

ONE POLICE PLAZA SECURITY PLAN

FINAL ENVIRONMENTAL IMPACT STATEMENT

CEQR# 04NYPD002M



LEAD AGENCY:

NEW YORK CITY POLICE DEPARTMENT

PREPARED BY:

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JULY 31, 2007

CEQR No. 04NYPD002M

Action Location: Manhattan, New York City

LEAD AGENCY:

New York City Police Department

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FOREWORD

This document is the Final Environmental Impact Statement (FEIS) for the One Police Plaza Security Plan. The Draft Environmental Impact Statement (DEIS) for the action was accepted as complete by the New York City Police Department as lead agency on July 28, 2006. Public notice of completion of the DEIS and a public hearing on the DEIS was published in the *City Record*, *Environmental Notice Bulletin*, *New York Post*, *Downtown Express*, *AM New York*, and *World Journal*. The New York City Police Department held two public hearings at the New York City Department of Health auditorium on September 14, 2006 and October 4, 2006. The period for public review remained open until October 24, 2006.

The FEIS reflects all substantive comments made on the DEIS during the public hearing and subsequent comment period. The comments are summarized and responded to in Chapter 16, "Response to Comments." Changes to the text and graphics of the FEIS were also made when appropriate to comments. The DEIS disclosed a significant adverse traffic impact at the intersection of Worth Street and Church Street, however, with revisions to the traffic analysis between the DEIS and FEIS, the With-Action condition has not resulted in a significant adverse traffic impact at this intersection. Additionally, the DEIS disclosed significant adverse air quality impacts at two locations, however, with revisions to the air quality analysis between the DEIS and FEIS based on revised standards for fine particulates, slight changes in the traffic network, and updated information on modeled pollutant concentrations, the With-Action condition has not result in significant adverse air quality impacts (see Chapter 9, "Air Quality," for a detailed discussion).

The FEIS also includes two new appendices, Appendices A-B. Appendix A provides the retail business survey final report and Appendix B provides all written comments received on the DEIS.

Except for this Foreword and Chapter 16 (which are new), all additions made to the text since publication of the DEIS are indicated by double-underlining the text.

One Police Plaza Security Plan EIS

EXECUTIVE SUMMARY

A. INTRODUCTION

Following the events of September 11, 2001, the New York City Police Department (NYPD) established security measures in order to protect government facilities in the “civic center” portion of lower Manhattan which were, at the time, and continue to be considered potential targets. These security measures included the installation of attended security checkpoint booths, planters, bollards and hydraulically-operated delta barriers to restrict the access of unauthorized vehicles for the roadways situated adjacent to the civic facilities located near One Police Plaza. Pedestrian access within the security perimeter established by the check points and the delta barriers is not restricted, with the exception of the area immediately adjacent to NYPD headquarters at One Police Plaza.

The NYPD, lead agency for the project, prepared an Environmental Assessment Statement (EAS) in January 2004 pursuant to an order issued on August 1, 2003 by New York State Supreme Court Justice Walter B. Tolub in *Chatham Green, Inc. et al. v. Bloomberg et al.* (Index No. 107569/03). NYPD then issued a negative declaration, which was subsequently challenged in a second lawsuit, *Chatham Towers, Inc. et al. v. Bloomberg et al.* (Index No. 107761/04). In an opinion dated October 15, 2004, Justice Tolub found that the EAS did not take a “hard look” as required by law, specifically for the technical areas of Community Facilities and Services, Socioeconomic Conditions, Neighborhood Character, Traffic and Parking, and Transit and Pedestrians. Justice Tolub directed the preparation of an Environmental Impact Statement (EIS).

Although the NYPD maintains that the EAS and negative declaration were adequate in all respects, in light of Justice Tolub’s determination, the NYPD is preparing an EIS in accordance with Article 8 of the New York State Environmental Conservation Law and the regulations promulgated pursuant thereto at 6 NYCRR Part 617 (State Environmental Quality Review Act or “SEQRA”), Executive Order 91 of 1977, as amended, and the Rules of Procedure for City Environmental Quality Review, found at Title 62, Chapter 5 of the Rules of the City of New York (“CEQR”).

The EIS includes review and analysis of certain impact categories identified in the *CEQR Technical Manual*. The EIS contains a description and analysis of the action and its environmental setting; the environmental impacts of the action, including its short and long term effects, and typical associated environmental effects; identification of any significant adverse environmental effects that can be avoided through incorporation of corrective measures into the action; a discussion of alternatives to the action; the identification of any irreversible and irretrievable commitments of resources that would be involved in the action upon

implementation; and a description of any necessary mitigation measures proposed to minimize significant adverse environmental impacts.

It bears noting that, in an unrelated action, certain streets proximate to One Police Plaza were closed in 1999, as indicated in an EAS, dated April 2, 1999, prepared by the New York City Department of Transportation at the request of the NYPD (CEQR No. 99DOT011M). Following the issuance of the EAS in 1999, a negative declaration was issued on May 13, 1999. These pre-September 11, 2001 street closures, listed below, are not part of the action but are considered as part of the No-Action condition in this EIS:

- Madison Street between Avenue of the Finest and Pearl Street (full closure)
- Avenue of the Finest between Madison Street and Park Row (full closure except for motor vehicles destined to the municipal garage)
- Pearl Street between Park Row and Madison Street (partial closure - southbound direction only)

As part of another unrelated action, in early 2001, an EAS was prepared for the Public Safety Answering Center II (CEQR No. 01NYP002M), to be located in an existing building at 109-113 Park Row. The EAS analyzed the closure of the 400-space municipal garage to the public, and a negative declaration was issued on June 12, 2001. The garage was then officially closed to the public on June 30, 2001. However, following the events of September 11, 2001, the NYPD decided not to go forward with the above-mentioned project and the building remained vacant. The municipal garage was rehabilitated and re-opened to NYPD authorized vehicles in April 2004. As the closure of the municipal garage occurred prior to the post-9/11 security plan, it is also included in this EIS as part of the No-Action condition.

B. PROJECT PURPOSE AND NEED

While the New York City Police Department headquarters at One Police Plaza had been considered a sensitive location at risk of attack and requiring implementation of certain security measures, following the events of September 11, 2001, the NYPD determined that there was a need for heightened security including the establishment of a “secure zone” around its headquarters.

In the wake of the September 11, 2001 terrorist attacks, NYPD’s Counter Terrorism Bureau conducted security assessments of numerous potential terrorist targets within New York City, including government and law enforcement facilities. Experience and research demonstrate that terrorists avoid “hardened” targets, which are targets that have been reinforced with barriers and other deterrents that make the target less vulnerable and accessible to attack. In assessing the security of One Police Plaza, the Counter Terrorism Bureau concluded that the “secure zone”

created around the building immediately following the terrorist attacks should be maintained to prevent the possibility of a vehicle bomb attack on NYPD Headquarters.

C. DESCRIPTION OF ACTION

As discussed above, following the events of September 11, 2001, a security plan was implemented that resulted in the installation of attended security checkpoint booths, planters, bollards, and hydraulically-operated delta barriers to restrict the access of unauthorized vehicles from the roadways adjacent to the civic facilities located near One Police Plaza, including NYPD Headquarters, the New York State Supreme Court, and the United States Courthouse. All but two sets of barriers were installed by the NYPD. Security barriers located at the intersection of Park Row and Foley Square and at Pearl Street on the west side of Park Row were installed by the United States Marshals Service (“USMS”) and are not part of the NYPD’s action. As shown in Figure S-1, security checkpoint locations for vehicular access have been installed at the following locations:

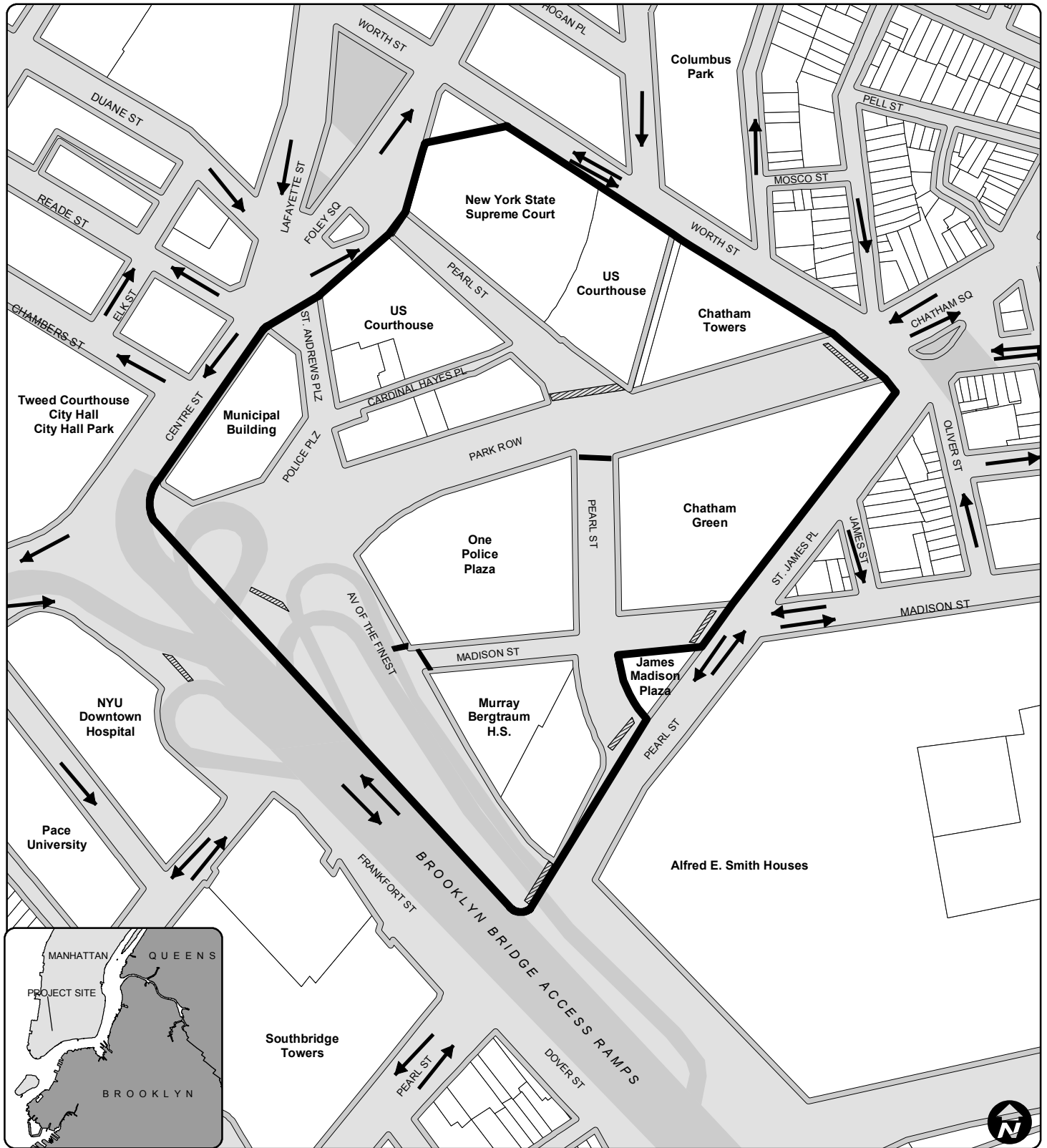
- Park Row, west of Worth Street
- Park Row, near the Brooklyn Bridge
- Pearl Street at Foley Square
- Pearl Street on the west side of Park Row
- Pearl Street at St. James Place
- Madison Street at St. James Place
- Avenue of the Finest at Pearl Street
- Rose Street at Frankfort Street
- Northbound Park Row Brooklyn Bridge off-ramp

Four of the above checkpoints also include sally ports - two delta barriers on the same roadway that allow a vehicle to be immobilized for inspection. Sally ports have been erected at the following checkpoints:




- Madison Street at St. James Place
- Pearl Street at St. James Place
- Avenue of the Finest at Pearl Street
- Park Row west of Worth Street

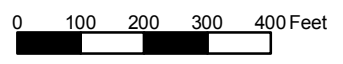
As a result of these security measures, the following streets within immediate proximity to One Police Plaza are open only to authorized vehicles:

- Park Row, between approximately Worth Street and the Brooklyn Bridge



Legend

-  Security Zone (Closed to Public Vehicular Traffic after 09/11/2001)
- Delta Barrier Locations**
-  Barriers installed in 1999
-  Barriers installed after 09/11/2001



- Pearl Street, between Foley Square and St. James Place
- Madison/Rose Streets, between Frankfort Street and St. James Place
- Avenue of the Finest
- Northbound Park Row Brooklyn Bridge off-ramp

As discussed above, the street closures resulted in restricted access for commercial and private vehicles on streets adjacent to NYPD headquarters and other nearby civic buildings. Authorized NYPD and government personnel and emergency vehicles are permitted through the checkpoints after undergoing appropriate scrutiny. Residents of the Chatham Green Houses seeking vehicular access to the Chatham Green parking lot along Park Row are permitted through the checkpoint at Park Row at Worth Street after displaying valid identification, but are not permitted into the security zone through any other checkpoint. Commercial vehicles, such as delivery trucks, are only permitted through the checkpoint at Park Row and Worth Street after displaying valid identification, passing through the barricade, and then pulling into a truck inspection area where they are inspected by USMS officers who utilize, among other security measures, bomb sniffing dogs.

With the exception of areas immediately adjacent to the NYPD headquarters at One Police Plaza, pedestrian access within the security perimeter is not restricted. Iron fencing and barriers are located around the perimeter of One Police Plaza to restrict pedestrian access. In addition, the stairway leading from Police Plaza to Madison Street is closed to pedestrians.

No-Action Condition

For analysis purposes, under the No-Action condition, it is assumed that the One Police Plaza security plan is not in place, that the roadways are open with the 1999 NYPD street closures and municipal garage closure in place, and that transportation services would continue as they were prior to September 11, 2001. For the purposes of this EIS, the analysis year is 2006 (Build Year).

With-Action Condition

Under the With-Action condition, the One Police Plaza security plan is in effect so that the roadways in the vicinity of One Police Plaza are closed to unauthorized vehicular traffic along with all the security plan features described above currently in place. Therefore, the EIS will analyze any potential impacts due to the security measures by comparing the No-Action condition to the With-Action condition.

Prior to September 11, 2001, six Metropolitan Transit Authority (“MTA”) New York City Transit bus routes used Park Row in one or both directions, including the M9, M15, M103, X25, X90,

and the B51. The BM1, BM2, BM3, and BM4 express bus routes were also rerouted around Park Row after September 11, 2001. These buses were rerouted around the security zone after the street closures were put in place. Recently three routes (M103, M15, and B51) have returned to Park Row. Although these MTA buses have returned to their original route down Park Row, for conservative analysis purposes, this will not be analyzed as part of the With-Action condition in the EIS. Instead, the rerouting of the M103, M15, and B51 buses to their original route will be analyzed as mitigation and discussed in detail in Chapter 11, “Mitigation.”

D. REQUIRED APPROVALS

Environmental Review (SEQRA and CEQR)

Pursuant to the State Environmental Quality Review Act (SEQRA) and its implementing regulations, New York City has established rules for its City Environmental Quality Review (CEQR). The environmental review provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify and, when practicable, mitigate significant adverse environmental effects.

New York City Local Law Number 24 of 2005

Local Law 24 of 2005, approved by the Mayor in March of 2005, amends the New York City Department of Transportation (“DOT”) regulations to state that “except as otherwise provided by law, it shall be unlawful for any person to close any street, or a portion thereof, within the jurisdiction of the [DOT] commissioner, to pedestrian or vehicular traffic without a permit from the commissioner.” In the event of closure of a publicly mapped street that is used for vehicular or vehicular and pedestrian access for more than 180 days, the commissioner shall issue or cause to be issued a community reassessment, impact and amelioration (CRIA) statement that has been approved by the commissioner or other government entity initiating the street closure. The CRIA statement shall be delivered to both the community board and the council member in whose district the street closure is located on or before the 210th day of the closure. However, the requirement for the issuance of the CRIA statement may be satisfied by delivery of an environmental assessment statement, environmental impact statement, or similar document required by law to be prepared for the street closure. The Local Law requires that a public forum be held. The law applies retroactively to street closures for security reasons that were commenced prior to enactment of the law. Therefore, in addition to satisfying the court order, this EIS is being prepared in satisfaction of the CRIA requirement pursuant to Local Law 24 of 2005. The CEQR process described above, which includes public review and hearings, will fully satisfy the CRIA requirements including the public forum requirement.

E. WITH-ACTION CONDITION

Land Use, Zoning and Public Policy

Overall, the With-Action condition has not resulted in any significant adverse effects on land use, zoning, or public policy. Land uses within the security zone and surrounding study area have not substantially changed from the 2001 baseline year to the With-Action condition. The action has not altered any zoning regulations and has not resulted in any structure that does not conform or comply with the existing underlying zoning. In addition, the action has not altered nor does it conflict with any public policy or plan that had been created previously to or after September 11, 2001. Consequently, the action has not resulted in any significant adverse impacts on land use, zoning, and public policy.

Community Facilities and Services

As the action has not and would not result in additional population in the area and would not directly alter a health care facility in the area, no significant impacts on health care facilities or other community facilities in the study area have occurred or would occur in the future. However, as discussed in Chapter 3, “Community Facilities,” as a direct response to a court order, an analysis of access to emergency facilities was prepared. Although there were differences in the opinions of NY Downtown emergency room and emergency medical service staff on whether access to the emergency room has been hindered by the street closures, response times indicate that responses to emergencies in the study area have not been affected by the street closures. Although response times within the study area have increased slightly between 2000 and 2005, the same is true for Manhattan as a whole as well as Citywide. Therefore, no significant adverse impacts to emergency facility access have occurred as a result of the street closures.

As discussed in detail in Chapter 3, “Community Facilities”, the street closures have not impacted police or fire service delivery within the study area. Both the NYPD and FDNY will continue to evaluate area operations on a regular basis and continued adjustments to resources will be made, if necessary. Therefore, no significant adverse impacts on FDNY and NYPD services have occurred or are expected as a result of the action.

Socioeconomic Conditions

Indirect Residential Displacement

According to the *CEQR Technical Manual*, indirect displacement of a residential population can occur when an action increases property values and thus rents throughout a study area, making it difficult for some current residents to continue to afford to live in the community. There is no evidence that the action has resulted in any secondary residential displacement. While rents and home values have, in general, increased throughout the study area, these increases appear to be a result of normal economic trends, are consistent with trends throughout Lower Manhattan, and are therefore not directly attributable to the security plan.

Indirect Business Displacement

Indirect business displacement is the involuntary displacement of businesses that results from a change in socioeconomic conditions created by a proposed action. The typical issue for indirect business displacement is when an action increases property values and rents, thereby making it difficult for some categories of business to remain at their current location. Although the action has limited accessibility to some parts of the study area, there is no evidence that the limit in accessibility has resulted in any secondary business displacement. While property values have, in general, increased throughout the study area, and commercial rents have slightly decreased, these changes are not unique to the study area and appear to be a result of normal economic trends. As these changes are consistent with trends throughout Lower Manhattan, they are therefore not directly attributable to the security plan. The results of the business survey are, at most, inconclusive. While registering individual beliefs, the survey results show that respondents in the study area are almost evenly split as to whether the barriers have had an effect on local businesses. While most respondents in Historic Chinatown attributed a decline in business as compared to neighboring areas to the barriers, businesses east of the Bowery, which also borders the barriers, largely indicated that the barriers have not had an impact. The survey results are also not supported by objective economic measures identified in the *CEQR Technical Manual* such as property values and vacancy rates. The security zone has also not adversely affected the viability of the Chinatown retail and restaurant sectors, which continue to be a major draw for both residents and tourists.

Adverse Effects on Specific Industries

According to the *CEQR Technical Manual*, it may be possible that a given action could affect the operation and viability of a specific industry, not necessarily tied to a specific location. The streets affected by the action provide approaches to the Historic Chinatown core for customers and clientele of the tourist-oriented shops and restaurants that are the mainstay of the economy of Chinatown. According to the guidelines of the *CEQR Technical Manual*, the action would not have an adverse impact on a specific industry because it would neither significantly impact the business conditions for any industry or category of businesses within or outside of the study

area, nor would it indirectly reduce employment or impair the economic viability of a specific industrial sector or business category. Although there are some complaints that Chinatown has suffered disproportionately in terms of tourist activity, that would appear to be an effect of the September 11 attacks, which has been felt throughout the tourism industry and not just in Chinatown, and the effect seems to have lessened with time. It should also be noted that the increase in international visitors to the City in the past two years (2005-2006) is a positive development for the City's tourism industry.

Urban Design/Visual Resources

The security plan has altered the urban design of the security zone area, yielding a significant adverse impact. According to the *CEQR Technical Manual*, in terms of streetscape elements, a significant adverse impact would result if an action would add to, eliminate, or alter a critical feature of a streetscape. According to the NYPD's Counter Terrorism Bureau, the security measures implemented around One Police Plaza and adjacent civic buildings are necessary to protect these buildings that are considered potential terrorist targets. The terrorist attacks on the World Trade Center on September 11, 2001 have resulted in greater security measures being implemented all over the City, particularly in Lower Manhattan due to the large number of government offices and financial institutions located there. Security devices such as jersey barriers, French barriers, delta barriers, bollards, and concrete planters, although typically not aesthetically pleasing, have become part of the landscape of the City after September 11, 2001. The area surrounding the New York Stock Exchange and Metro Tech in Brooklyn, for example, have implemented similar security plans where public streets have been closed to unauthorized traffic and security features have been installed. Although the action has affected streetscape elements within the security zone, these security features are considered necessary to protect potential terrorist targets and these features will remain in place as long as a potential terrorist threat exists.

However, although these security measures are necessary, the temporary and unaesthetic nature of the security features has resulted in a negative alteration of the streetscape within the security zone. Therefore, a significant adverse impact to urban design has resulted. Chapter 11, "Mitigation," provides a description of measures to be developed to mitigate the urban design impacts.

The security plan elements have not blocked public views to any visual resources, including view corridors, vistas, historic landmarks, historic districts, and open spaces within the study area. The installed streetscape elements that comprise the physical elements of the NYPD security plan do not preclude views of visual resources given the low heights of the bollards, jersey barriers, French barricades, and concrete planters and modest size of the security checkpoint booths. Consequently, the security plan has not adversely impacted visual resources within the study

area.

Neighborhood Character

The action has altered the neighborhood character within the security zone area. While there is still pedestrian traffic, vehicular traffic is lighter (within the security zone), and the security presence is an additional characteristic of the area. The area within the security zone has become isolated from the surrounding neighborhoods by the limiting of vehicular access. The streets within the security zone, before they were closed, particularly Park Row, were more active through streets connecting the Financial District to Chinatown and the Civic Center area. This reduction in vehicular traffic and activity within the security zone has created an abandoned quality, which is in contrast to the active and lively surrounding area. The closure of public streets and the addition of the security elements have introduced a forbidding and unaesthetic quality to the area. The action has created a disconnect between the security zone area and the surrounding neighborhood. Despite this negative alteration, these security features are considered necessary to protect potential terrorist targets and will remain in place as long as a potential terrorist threat exists.

There has been an increase in security, generally, within the study area around City Hall and other government and office buildings as a result of the September 11, 2001 terrorist attacks. These security measures include an increase of security officers outside these buildings as well as jersey barriers, bollards, delta barriers, and planters along sidewalks. These security measures have altered the character of the City, particularly in Lower Manhattan. Consequently, the One Police Plaza security plan is not a unique feature that has altered the character of the surrounding area. Although the action has resulted in increases in traffic and noise around the perimeter of the security zone, this has not altered the defining neighborhood characteristics of the study area, as this area has always been heavily trafficked. However, as discussed in Chapter 11, "Mitigation," traffic, transit and pedestrians, and urban design impacts would be fully or partially mitigated and, therefore, any impact on neighborhood character would also be mitigated.

Traffic and Parking

This chapter analyzes the effects of diverted traffic that has resulted from the implementation of the security plan on the Lower Manhattan street network during the weekday AM, midday, and PM peak hours. The results of the analyses show that diverted traffic has created significant traffic impacts (see Table S-1), with the AM, midday, and PM peak hours having three impacted intersections each. Chapter 11, "Mitigation," of this EIS provides a description of measures to be developed to mitigate the traffic impacts.

TABLE S-1
Summary of Impacted Intersections

Signalized Intersections		AM	MD	PM
Pearl Street @	Frankfort Street	X	X	X
	Robert F. Wagner Sr. Place	X	X	
Chatham Square @	Worth Street	X	X	X
	Mott Street			X

X impacts to one or more movements in the peak hour.

While parking conditions, both off-street and on-street, remain very competitive and the availability of curbside parking for shoppers and others is very limited, these conditions did not result from the With-Action condition. In addition, the security plan neither creates demand for public parking nor has it eliminated off-street public parking supply. As such, no significant adverse impacts on parking have occurred as a result of the implementation of the security plan.

Transit and Pedestrians

This chapter analyzes the effects of the security plan on bus services and pedestrian activity. The security plan has not generated additional demand for bus service or additional pedestrian activity. The local and express bus system has changed in conjunction with both the security plan as well as other Lower Manhattan street closures. Prior to implementing the security plan in 2001, Park Row hosted the M9, M15, M103, B51, X25, X90, BM1, BM2, BM3, and BM4 bus routes. After the security plan was implemented, these routes continued to operate, albeit with some modifications to route and stop locations due to the street closures. The detour at Park Row has added approximately 1 to 7 minutes to the travel times for these bus routes. There have been substantial increases in overall travel time for these bus routes, and these increases have resulted in significant adverse impacts on bus operations for the M15 and M103 routes, especially in the AM peak hour and in the southbound direction for all peak hours. Chapter 11, "Mitigation," of this EIS provides a description of measures to be developed to mitigate the bus transit impacts.

The security plan appears to have resulted in a significant adverse safety impact on pedestrian conditions at the Broadway/Worth Street intersection. Chapter 11, "Mitigation," of this EIS provides a description of measures that have been developed to mitigate the adverse pedestrian safety impact. The security plan has not generated any new pedestrian trips nor has it interrupted

existing pedestrian activity and no significant adverse impacts on pedestrian flow conditions have occurred or are anticipated as a result of the action.

Air Quality

Air quality analyses were undertaken to determine the potential for impacts under the action. These impacts can be either direct or indirect. Direct impacts come from stationary sources, such as emissions from heating systems. Indirect impacts are defined as the potential for emissions due to mobile sources/vehicles generated by the action. Pollutants that are examined for mobile sources are carbon monoxide (CO) and respirable particulate matter (PM10 and PM2.5).

The potential for mobile source impacts on CO concentrations was determined for the 2006 analysis year using the currently accepted methodologies. Modeling was based on the traffic analyses for three study area intersections. The results of these analyses showed that the maximum CO concentrations with the action did not exceed National Ambient Air Quality Standards (NAAQS) or impacts defined by the *City Environmental Quality Review (CEQR) Technical Manual*, as there were no exceedances of NAAQS or any increases in CO concentrations that are more than half the difference between the No-Action concentrations and the CO standard.

Analyses were performed to determine the potential for impacts from respirable particulate matter (PM10 and PM2.5). The results of these analyses disclosed that the future maximum predicted 24-hour and annual average particulate matter concentrations would not result in any violations of the PM10 and PM2.5 standards.

Noise

After performing a comprehensive screening of numerous potentially impacted intersections, a total of 2 intersections were monitored for potential noise impacts under the action. The analysis examined the potential for impacts from traffic diversions under the With-Action condition. The analysis showed that there are significant adverse impacts at the intersections of Worth Street and Baxter Street and Worth Street and Mulberry Street in the AM peak period. The projected noise level increases are 3.5 dBA and 4.1 dBA respectively, at the two intersections, and the *CEQR Technical Manual* describes a significant increase as an increase of 3.0 dBA. Therefore, these increases have resulted in a significant adverse impact on noise. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not be considered practical or cost effective at these locations. The rerouting of the M103, M15, and B51 bus routes back onto Park Row has been proposed as a mitigation measure. This would reduce the level of impact slightly, but would not eliminate it. Therefore, these impacts would

remain unmitigated.

F. MITIGATION

Urban Design

The With-Action condition has resulted in a significant adverse impact on urban design within the security zone area. The Lower Manhattan Development Corporation (LMDC) issued a report in 2004 entitled *Chinatown Access and Circulation Study* which included recommendations for improving Park Row. These recommendations are intended to address the closure of Park Row by making City-owned areas more pedestrian friendly and aesthetically pleasing.

Some of these recommendations relating to streetscape improvements include the following:

- Install a landscaped esplanade along Park Row, including attractive paving, trees, shrubs, planters, etc.
- Install improved street fixtures, including benches, lighting, and barriers. Attractive trash receptacles may be placed at appropriate locations away from security sensitive areas.
- Improve pedestrian wayfinding signage along Park Row and other routes through the area.

Coordination with NYPD and the U.S. Marshals Service regarding security measures for the Police Headquarters building and the federal court buildings would be required. The implementation of the above elements would significantly improve the streetscape of the security zone thereby enhancing the urban design and fully mitigating the security plan's urban design impact. In addition, although the action has not resulted in indirect socioeconomic impacts, these streetscape enhancements would improve pedestrian conditions which may increase the number of patrons to study area businesses. While it is expected that these mitigation measures would fully mitigate urban design impacts caused by the action they should be reassessed when the Chatham Square reconfiguration is complete and the Park Row improvements are in place.

Traffic

Traffic diversions that have occurred as a result of the With-Action condition have resulted in significant adverse traffic impacts at 4 signalized intersections in one or more peak periods. These impacted locations are listed in Table S-2. A traffic mitigation plan was therefore developed to address these impacts. This traffic mitigation plan would incorporate some of the recommendations from LMDC's *Chinatown Access and Circulation Study* for the reconfiguration for Chatham Square. Other mitigation measures associated with this plan include signal timing

changes and the implementation of exclusive left-turn and right-turn phases.

In summary, as shown in Table S-2, the proposed traffic mitigation plan would fully address all impacts at two intersections in the AM peak hour, two in the midday, and three in the PM peak hour. Three out of 4 intersections impacted by the action would no longer be impacted with the implementation of the proposed mitigation plan. However, two unmitigable impacts would remain at the intersection of Pearl Street and Robert F. Wagner Sr. Place in the AM and midday peak hours. Measures were therefore evaluated to address these impacts. However, signal timing adjustments to return this approach to its No-Action condition would be impractical as they would result in new or worsened impacts on other approaches and a reduction in pedestrian crossing times. Increasing capacity of roadways through changes to curbside regulations or modifications to lane striping was also found to be ineffective, as was widening the approach to achieve an additional lane. The action’s impact to westbound Robert F. Wagner Sr. Place left-turn movement and eastbound at Pearl Street in the AM and midday peak hours, respectively, would therefore remain unmitigated. The reconfiguration of Chatham Square as well as all other traffic mitigation plans would be implemented by the New York City Department of Transportation and/or the New York City Department of Design and Construction.

**TABLE S-2
Summary of Mitigated Intersections**

Signalized Intersections		AM	MD	PM
Pearl Street @	Frankfort Street	X	X	X
	Robert F. Wagner Sr. Place	U	U	
Chatham Square @	Worth Street	X	X	X
	Mott Street			X
X: All impacts fully mitigated. U: One or more unmitigated impacts in the peak period.				

Transit and Pedestrians

Bus Service

The results of the analysis of local bus conditions in the With-Action condition show that the street closures significantly impacted bus service. With the rerouting of the M103, M15, M9,

B51, X25, X90, BM1, BM2, BM3, and BM4 bus routes there have been substantial increases in overall travel time which has resulted in significant adverse impacts on bus operations, especially in the AM peak hour and in the southbound direction for all peak hours. In May 2005, the M103 bus returned to its original route via Park Row as a 90-day trial. The test was expanded in November 2005 when the M15 and B51 buses also returned to their original routes via Park Row to/from City Hall. The M9 remains on its current diverted route as the closure of Vesey Street after September 11, 2001 eliminated the important eastbound portion of this route, necessitating its formal relocation along Pearl Street. The reintroduction of the M15, M103, and B51 buses to Park Row would mitigate the increases in travel times these bus routes have experienced due to the action. The re-routing of the buses along Park Row has restored bus service within the area so that it is close to what it was in the baseline condition, prior to the streets being closed. The rerouting of the buses along Park Row has therefore mitigated bus service impacts.

Pedestrians

The security plan has neither generated any new pedestrian trips nor will it generate any pedestrian congestion on sidewalks. However, traffic diversions associated with the vehicular restrictions have resulted in an increase in the numbers of vehicle turning movements at some crosswalks, while decreasing or eliminating all such movements at other crosswalks within the security zone. As discussed in Chapter 8, "Transit and Pedestrians," the results of the analysis of high accident locations indicate that the action may have created a high pedestrian accident location at the intersection of Worth Street and Broadway.

In coordination with DOT, it was determined that a leading pedestrian interval will be implemented at the intersection of Worth Street and Broadway to improve pedestrian conditions at this intersection. The leading pedestrian interval would change the signal phasing at this intersection that would allow for the pedestrian phase to begin before the green phase for motor vehicle traffic traversing east-west on Worth Street. This signal timing modification will allow pedestrians a head start to cross in the crosswalk of the intersection.

Noise

Project-generated increases in noise exceed the impact criterion of 3.0 dBA between two intersections during the peak AM period: 1) Worth Street at Baxter Street and 2) Worth Street at Mulberry Street. The projected noise level increases are 3.5 dBA and 4.1 dBA respectively, at the two intersections under With-Action conditions. Rerouting the M103, M15, and B51 bus routes back onto Park Row has been proposed as a mitigation measure. This would reduce the level of impact by about 0.4 dBA, with resulting noise level increments of 3.1 dBA at Worth Street at Baxter Street and 3.7 dBA at Worth Street at Mulberry Street. While this mitigation

measure would reduce the impacts along Worth Street slightly, it would not eliminate them. No other method of mitigation is feasible. Due to the needs for pedestrian access and the distance between intersections, noise barriers would not be a feasible solution along these roadways. Project-diverted traffic in the midday and PM peak hours would not cause noise level impacts. Portions of Chatham Towers and other residential buildings at the intersections of Worth/Baxter Streets and Worth/Mulberry Streets, as well as Columbus Park, are affected by this increase in noise levels. The overall noise levels would decrease with distance from Worth Street. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not be considered practical or cost effective at these locations. Therefore, these impacts would remain unmitigated.

G. ALTERNATIVES

Four alternatives to the With-Action condition were considered in this EIS, to examine whether there are reasonable and practicable options that avoid or reduce action-related significant adverse impacts and still allow for the achievement of the stated goals and objectives of the With-Action condition.

No-Action Alternative

The No-Action Alternative assumes that the security plan would not be implemented and all streets that were closed to unauthorized traffic after September 11, 2001 would be open.

In the wake of the September 11, 2001 terrorist attacks, NYPD's Counter Terrorism Bureau conducted security assessments of numerous potential terrorist targets within New York City, including government and law enforcement facilities. Experience and research demonstrate that terrorists avoid "hardened" targets, which are targets that have been reinforced with barriers and other deterrents to make the target less vulnerable and accessible to attack. In assessing the security of One Police Plaza, the Counter Terrorism Bureau concluded that the "secure zone" created around the building immediately following the terrorist attacks should be maintained to prevent the possibility of a vehicle bomb attack on NYPD Headquarters. Securing these potential terrorist targets would not be possible under No-Action Alternative. For security reasons, the No-Action Alternative would therefore not be feasible.

No Unmitigable Traffic Impacts Alternative

As discussed in Chapter 11, "Mitigation," all significant adverse traffic impacts that have resulted from the action would be fully mitigated with the exception of the unmitigated impact at the

intersection of Pearl Street and Robert F. Wagner, Sr. Place. The No Unmitigable Traffic Impacts Alternative proposes to mitigate traffic impacts at the intersection of Pearl Street at Robert F. Wagner Sr. Place, by re-opening Avenue of the Finest between Pearl Street and Park Row. This would ease congestion focused at Pearl Street and Robert F. Wagner Sr. Place by allowing vehicles destined to the City Hall area to access it without having to detour around the security zone. Passenger vehicles traveling along this proposed right-of-way would only be able to travel westbound on Avenue of the Finest. Security checkpoints would be moved north on Park Row to allow vehicles to travel freely onto Park Row from Avenue of the Finest. The opening of Avenue of the Finest along with minor signal timing adjustments would mitigate this impact back to No-Action conditions.

The proposed opening of Avenue of the Finest to one-way westbound traffic was reviewed and evaluated by NYPD's Counter Terrorism Bureau. The result of this evaluation determined that the opening of Avenue of the Finest to passenger vehicles would not provide sufficient stand-off distance from NYPD headquarters. Therefore, this alternative is not feasible, as it would not meet the goals and objectives of the action.

Community-Suggested Alternative #1: Relocation of Police Headquarters

This alternative was developed in response to suggestions during the public scoping process to explore alternative locations for police headquarters. No specific site has been identified for this possible relocation, although Randalls Island or Governors Island have been suggested because their placement in the East River is thought to provide natural geographical security. The Relocation Alternative would fall far short of the objectives of the action. Moreover, given the concentration of other government facilities in the "civic center" portion of Lower Manhattan which continue to be considered potential terrorist targets and for which security measures would have to be maintained, the adverse impacts resulting from the action may not be entirely avoided should police headquarters be relocated from One Police Plaza. This alternative is therefore not feasible, as it would not meet the goals and objectives of the action.

Community-Suggested Alternative #2: Chatham Green Access Alternative

Under this alternative, the existing security checkpoint would be moved south on Park Row to establish a free-flowing vehicle entrance/exit to the Chatham Green parking lot. Currently, the security checkpoint is located just south of the corner of Park Row and Chatham Square. All vehicles wishing to access the Chatham Green parking lot must pass through this checkpoint, before entering the parking lot via Park Row. This procedure allows screening of vehicles before they enter the security zone, as control of these vehicles within the zone is not feasible. Vehicles can currently exit the parking lot via either the same location on Park Row, or Pearl Street

(northbound).

Under this alternative, the current checkpoint on Park Row would be moved approximately 125 feet to the south in an effort to establish a free-flowing entrance/exit to the Chatham Green parking lot. A 30-foot-wide two-lane access point to the parking lot, with a right-in/right-out, would be provided at the current location on Park Row. The current parking lot exit along Pearl Street would be sealed off and a turnaround would be established at the southeast corner of the parking lot, so that all vehicles would have to exit the parking lot via Park Row. This would result in the elimination of approximately 6 dedicated parking spaces along the Pearl Street side of the parking lot. However, those spaces could be replaced with some minor modifications to the parking lot's layout.

Like the action, this alternative would also result in significant adverse traffic, noise, and urban design impacts, and the mitigation measures for the action described in Chapter 11 would also be required for this Chatham Green Access Alternative.

This proposed alternative was reviewed and evaluated by NYPD's Counter Terrorism Bureau and it was determined that this alternative would not allow sufficient stand-off distance between NYPD headquarters and the Chatham Green Houses parking lot. As this stand-off distance would be substantially reduced to an unsafe level, this alternative would not achieve the objectives of NYPD's Counter Terrorism Bureau to protect government facilities in the "civic center" portion of Lower Manhattan that continue to be considered potential terrorist targets. This alternative is not feasible, as it would not meet the goals and objectives of the action.

H. UNAVOIDABLE ADVERSE IMPACTS

Unavoidable adverse impacts occur when a proposed action would result in significant adverse impacts for which there are no reasonably practicable mitigation measures, and for which there are no reasonable alternatives. For this project, these include unavoidable adverse effects on traffic and noise.

Traffic

At the intersection of Pearl Street and Robert F. Wagner Sr. Place, the action results in impacts to the westbound Robert F. Wagner Sr. Place left-turn movement in the AM Peak hour and the eastbound approach in the midday peak hour. Measures were therefore evaluated to address these impacts. However, signal timing adjustments to return this approach to its No-Action condition would be impractical as they would result in new or worsened impacts on other approaches and a reduction in pedestrian crossing times. Increasing capacity through changes to curbside regulations or modifications to lane striping was also found to be ineffective, as was

widening the approach to achieve an additional lane. The action's impact to westbound Robert F. Wagner Sr. Place left-turn movement and eastbound at Pearl Street in the AM and midday peak hours, respectively, would therefore remain unmitigated.

Noise

Project-generated increases in noise exceed the impact criterion of 3.0 dBA between two intersections during the peak AM period: 1) Worth Street at Baxter Street and 2) Worth Street at Mulberry Street. The projected noise level increases are 3.5 dBA and 4.1 dBA respectively, at the two intersections under With-Action conditions. Rerouting the M103, M15, and B51 bus routes back onto Park Row has been proposed as a mitigation measure. This would reduce the level of impact by about 0.4 dBA, with resulting noise level increments of 3.1 dBA at Worth Street at Baxter Street and 3.7 dBA at Worth Street at Mulberry Street. While this mitigation measures would reduce the impacts along Worth Street slightly, it would not eliminate them. No other method of mitigation is feasible. Due to the needs for pedestrian access and the distance between intersections, noise barriers would not be a feasible solution along these roadways. Project-diverted traffic in the midday and PM peak hours would not cause noise level impacts. Portions of Chatham Towers and other residential buildings at the intersections of Worth/Baxter Streets and Worth/Mulberry Streets, as well as Columbus Park, are affected by this increase in noise levels. However, the peak AM hour is not a peak period for park utilization. The overall noise levels would decrease with distance from Worth Street. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not be considered practical or cost effective at these locations. Therefore, these impacts would remain unmitigated.

I. GROWTH-INDUCING ASPECTS OF THE ACTION

As set forth in the *CEQR Technical Manual*, growth-inducing aspects of a proposed action generally refer to "secondary" impacts of an action that trigger further development. These include proposals that add substantial new land use, new residents, or new employment that could induce additional development of a similar kind or support uses (e.g., stores to serve new residential uses). Actions that introduce or greatly expand infrastructure capacity (e.g., sewers, central water supply) might also induce growth, although this could be an issue only in limited areas of Staten Island and perhaps Queens, since in most areas of New York City infrastructure is already in place and its improvement or expansion is usually proposed only to serve existing or expected users.

As the action has not added a new land use, new residents or new employment, there are no growth-inducing aspects associated with the action.

J. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Resources, both natural and man-made, have been expended in the construction and operation of the security plan elements. These resources include the building materials used during construction of checkpoint booths; energy in the form of gas and electricity consumed during the construction and operation of these security elements; and human effort to develop, construct and operate various elements of the security plan. These are considered irretrievably committed because their reuse for some other purpose would be highly unlikely.



POLICE DEPARTMENT

NOTICE OF COMPLETION OF A FINAL ENVIRONMENTAL IMPACT STATEMENT

**ONE POLICE PLAZA SECURITY PLAN
CEQR# 04NYPD002M**

Project Identification:
CEQR No. 04NYPD002M

Lead Agency:
New York City
Police Department

Date Issued: August 1, 2007

Contact Person:
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Pursuant to City Environmental Quality Review (CEQR), Mayoral Executive Order No. 91 of 1977, CEQR Rules of Procedure of 1991 and the regulations of Article 8 of the State Environmental Conservation Law, State Environmental Quality Review Act (SEQRA) as found in 6 NYCRR Part 617, a Final Environmental Impacts Statement (FEIS) has been prepared for the action described below. Copies of the FEIS are available for public inspection at the New York City Office of Environmental Coordination. The FEIS is also available online through a link from the homepage of the New York City Police Department at <http://www.nyc.gov/html/nypd> under the "Recent Press Releases/News" section of the website. A public hearing on the Draft Environmental Impact Statement (DEIS) was held on September 14, 2006 and October 4, 2006. Written comments on the DEIS were requested and were received and considered by the Lead Agency until October 24, 2006. The FEIS incorporates responses to the public comments received on the DEIS and additional analysis conducted subsequent to the completion of the DEIS.

A. INTRODUCTION

The New York City Police Department (NYPD) has prepared a Final Environmental Impact Statement (FEIS) for the security plan established following the events of September 11, 2001 in order to protect City, State, and Federal facilities in the “civic center” portion of lower Manhattan which were, and continue to be, considered potential targets. These security measures included the installation of attended security checkpoint booths, planters, bollards and hydraulically-operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near NYPD headquarters at One Police Plaza.

This FEIS has been prepared in conformance with applicable laws and regulations, including Executive Order No. 91 of 1977, as amended, and the New York City Environmental Quality Review (CEQR) regulations, and follows the guidance of the *CEQR Technical Manual*, October 2001.

The FEIS contains a description and analysis of the action and its environmental setting; the environmental impacts of the action, including its short and long term effects, and typical associated environmental effects; identification of any significant adverse environmental effects; a discussion of alternatives to the action; the identification of any irreversible and irretrievable commitments of resources that would be involved in the action; and a description of any necessary mitigation measures proposed to minimize significant adverse environmental impacts.

It bears noting that certain streets proximate to One Police Plaza were closed in 1999, as indicated in an EAS, dated April 2, 1999, prepared by the New York City Department of Transportation at the request of the NYPD (CEQR No. 99DOT011M). Following the issuance of the EAS in 1999, a negative declaration was issued on May 13, 1999. These pre-September 11, 2001 street closures, listed below, are not part of the action but are considered as part of the No-Action condition in this FEIS:

- § Madison Street between Avenue of the Finest and Pearl Street (full closure)
- § Avenue of the Finest between Madison Street and Park Row (full closure except for motor vehicles destined to the municipal garage)
- § Pearl Street between Park Row and Madison Street (partial closure - southbound direction only)

As part of another unrelated action, in early 2001, an EAS was prepared for the Public Safety Answering Center II (CEQR No. 01NYP002M), to be located in an existing building at 109-113 Park Row. The EAS analyzed the closure of the 400-space municipal garage to the public, and a negative declaration was issued on June 12, 2001. The garage was then officially closed to the public on June 30, 2001. However, following the events of September 11, 2001, the NYPD decided not to go forward with the above-mentioned project and the building remained vacant. The municipal garage was rehabilitated and re-opened to NYPD authorized vehicles in April

2004. As the closure of the municipal garage occurred prior to the post-9/11 security plan, it is also included in this FEIS as part of the No-Action condition.

As the action is currently in place, the analysis considers an Analysis year of 2006.

B. PROJECT PURPOSE AND NEED

While the New York City Police Department headquarters at One Police Plaza had been considered a sensitive location at risk of attack and requiring implementation of certain security measures, following the events of September 11, 2001, the NYPD determined that there was a need for heightened security, including the establishment of a “secure zone” around its headquarters.

In the wake of the September 11, 2001 terrorist attacks, NYPD’s Counter Terrorism Bureau conducted security assessments of numerous potential terrorist targets within New York City, including government and law enforcement facilities. Experience and research demonstrate that terrorists avoid “hardened” targets, which are targets that have been reinforced with barriers and other deterrents that make the target less vulnerable and accessible to attack. In assessing the security of One Police Plaza, the Counter Terrorism Bureau concluded that the “secure zone” created around the building immediately following the terrorist attacks should be maintained to prevent the possibility of a vehicle bomb attack on NYPD Headquarters.

C. PROJECT DESCRIPTION

As discussed above, following the events of September 11, 2001, a security plan was implemented that resulted in restricted use streets and the installation of attended security checkpoint booths, planters, bollards, and hydraulically-operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza, including NYPD Headquarters, the New York State Supreme Court, and the United States Courthouse. All but two sets of barriers were installed by the NYPD. Security barriers located at Park Row and Foley Square and at Pearl Street on the west side of Park Row, were installed by the United States Marshals Service (“USMS”) and are not part of the NYPD’s action. Security checkpoint locations for vehicular access have been installed at the following locations:

- § Park Row, west of Worth Street
- § Park Row, near the Brooklyn Bridge
- § Pearl Street at Foley Square
- § Pearl Street on the west side of Park Row
- § Pearl Street at St. James Place
- § Madison Street at St. James Place
- § Avenue of the Finest at Pearl Street

- § Rose Street at Frankfort Street
- § Northbound Park Row Brooklyn Bridge off-ramp

Four of the above checkpoints also include sally ports - two delta barriers on the same roadway that allow a vehicle to be immobilized for inspection. Sally ports have been erected at the following checkpoints:

- § Madison Street at St. James Place
- § Pearl Street at St. James Place
- § Avenue of the Finest at Pearl Street
- § Park Row west of Worth Street

As a result of these security measures, the following streets within immediate proximity to One Police Plaza are open only to authorized vehicles:

- § Park Row, between approximately Worth Street and the Brooklyn Bridge
- § Pearl Street, between Foley Square and St. James Place
- § Madison/Rose Streets, between Frankfort Street and St. James Place
- § Avenue of the Finest
- § Northbound Park Row Brooklyn Bridge off-ramp

As discussed above, the street closures resulted in restricted access for commercial and passenger vehicles on streets adjacent to NYPD headquarters and other nearby civic buildings. Authorized NYPD and government personnel and emergency vehicles are permitted through the checkpoints after displaying appropriate identification. Residents of Chatham Green seeking vehicular access to the Chatham Green parking lot along Park Row are permitted through the checkpoint at Park Row at Worth Street after displaying valid identification, but are not permitted into the security zone through any other checkpoint. Commercial vehicles, such as delivery trucks, are only permitted through the checkpoint at Park Row and Worth Street after displaying valid identification and after passing through the barricade must pull into a truck inspection staging area where they are inspected by USMS officers who utilize, among other security measures, bomb-sniffing dogs.

With the exception of areas immediately adjacent to the NYPD headquarters at One Police Plaza, pedestrian access within the security perimeter is not restricted. Iron fencing and barriers are located around the perimeter of One Police Plaza to restrict pedestrian access. In addition, the stairway leading from Police Plaza to Madison Street is closed to pedestrians.

No-Action Condition

For analysis purposes, under the No-Action condition, it is assumed that the One Police Plaza security plan is not in place, that the roadways are open with the 1999 NYPD street closures and municipal garage closure in place, and that transportation services would continue as they were prior to September 11, 2001. For the purposes of this EIS, the analysis year is 2006 (Build Year).

With-Action Condition

Under the With-Action condition, the One Police Plaza security plan is in effect so that the roadways in the vicinity of One Police Plaza are closed to unauthorized vehicular traffic along with all the security plan features described above currently in place. Therefore, the EIS has analyzed any potential impacts due to the security measures by comparing the No-Action condition to the With-Action condition.

Prior to September 11, 2001, six Metropolitan Transit Authority (“MTA”) New York City Transit bus routes used Park Row in one or both directions, including the M9, M15, M103, X25, X90, and the B51. The BM1, BM2, BM3, and BM4 express bus routes were also rerouted around Park Row after September 11, 2001. These buses were rerouted around the security zone after the street closures were put in place. Recently three routes (M103, M15, and B51) have returned to Park Row. Although these MTA buses have returned to their original route down Park Row, for conservative analysis purposes, this will not be analyzed as part of the With-Action condition in the EIS. Instead, the rerouting of the M103, M15, and B51 buses to their original route will be analyzed as mitigation and discussed in detail in Chapter 11, “Mitigation.”

D. REQUIRED APPROVALS

Environmental Review (SEQRA and CEQR)

Pursuant to the State Environmental Quality Review Act (SEQRA) and its implementing regulations, New York City has established rules for its City Environmental Quality Review (CEQR). The environmental review provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify and, when practicable, mitigate significant adverse environmental effects.

New York City Local Law Number 24 of 2005

Local Law 24 of 2005, approved by the Mayor in March of 2005, amends the New York City Department of Transportation (“DOT”) regulations to state that “except as otherwise provided by law, it shall be unlawful for any person to close any street, or a portion thereof, within the jurisdiction of the [DOT] commissioner, to pedestrian or vehicular traffic without a permit from the commissioner.” In the event of closure of a publicly mapped street that is used for vehicular or vehicular and pedestrian access for more than 180 days, the commissioner shall issue or cause to be issued a community reassessment, impact and amelioration (CRIA) statement that has been approved by the commissioner or other government entity initiating the street closure. The CRIA statement shall be delivered to both the community board and the council member in whose district the street closure is located on or before the 210th day of the closure. However, the requirement for the issuance of the CRIA statement may be satisfied by delivery of an environmental assessment statement, environmental impact statement, or similar document required by law to be prepared for the street closure. The Local Law requires that a public forum be held. The law applies retroactively to street closures for security reasons that were commenced prior to enactment of the law. Therefore, in addition to satisfying the court order, this EIS is being prepared in satisfaction of the CRIA requirement pursuant to Local Law 24 of 2005. The CEQR process described above, which includes public review and hearings, will fully satisfy the CRIA requirements including the public forum requirement.

E. WITH-ACTION CONDITION

Land Use, Zoning and Public Policy

Overall, the With-Action condition has not resulted in any significant adverse effects on land use, zoning, or public policy. Land uses within the security zone and surrounding study area have not substantially changed from the 2001 baseline year to the With-Action condition. The action has not altered any zoning regulations and has not resulted in any structure that does not conform or comply with the existing underlying zoning. In addition, the action has not altered nor does it conflict with any public policy or plan that had been created previously to or after September 11, 2001. Consequently, the action has not resulted in any significant adverse impacts on land use, zoning, and public policy.

Community Facilities and Services

As the action has not and would not result in additional population in the area and would not directly alter a health care facility in the area, no significant impacts on health care facilities or other community facilities in the study area have occurred or would occur in the future. However, as discussed in Chapter 3, “Community Facilities,” as a direct response to a court order, an analysis of access to emergency facilities was prepared. Although there were differences in the opinions of NY Downtown emergency room and emergency medical service

staff on whether access to the emergency room has been hindered by the street closures, response times indicate that responses to emergencies in the study area have not been affected by the street closures. Although response times within the study area have increased slightly between 2000 and 2005, the same is true for Manhattan as a whole as well as Citywide. Therefore, no significant adverse impacts to emergency facility access have occurred as a result of the street closures.

As discussed in detail in Chapter 3, “Community Facilities”, the street closures have not impacted police or fire service delivery within the study area. Both the NYPD and FDNY will continue to evaluate area operations on a regular basis and continued adjustments to resources will be made, if necessary. Therefore, no significant adverse impacts on FDNY and NYPD services have occurred or are expected as a result of the action.

Socioeconomic Conditions

Indirect Residential Displacement

According to the *CEQR Technical Manual*, indirect displacement of a residential population can occur when an action increases property values and thus rents throughout a study area, making it difficult for some current residents to continue to afford to live in the community. There is no evidence that the action has resulted in any secondary residential displacement. While rents and home values have, in general, increased throughout the study area, these increases appear to be a result of normal economic trends, are consistent with trends throughout Lower Manhattan, and are therefore not directly attributable to the security plan.

Indirect Business Displacement

Indirect business displacement is the involuntary displacement of businesses that results from a change in socioeconomic conditions created by a proposed action. The typical issue for indirect business displacement is when an action increases property values and rents, thereby making it difficult for some categories of business to remain at their current locations. Although the action has limited accessibility to some parts of the study area, there is no evidence that the limit in accessibility has resulted in any secondary business displacement. While property values have, in general, increased throughout the study area, and commercial rents have slightly decreased, these changes are not unique to the study area and appear to be a result of normal economic trends. As these changes are consistent with trends throughout Lower Manhattan, they are therefore not directly attributable to the security plan. The results of the business survey are, at most, inconclusive. While registering individual beliefs, the survey results show that respondents in the study area are almost evenly split as to whether the barriers have had an effect on local businesses. While most respondents in Historic Chinatown attributed a decline in business as compared to neighboring areas to the barriers, businesses east of the Bowery, which also borders the barriers, largely indicated that the barriers have not had an impact. The survey results are also not supported by objective economic measures identified in the *CEQR Technical Manual* such as property values and vacancy rates. The security zone has also not adversely affected the

viability of the Chinatown retail and restaurant sectors, which continue to be a major draw for both residents and tourists.

Adverse Effects on Specific Industries

According to the *CEQR Technical Manual*, it may be possible that a given action could affect the operation and viability of a specific industry, not necessarily tied to a specific location. The streets affected by the action provide approaches to the Historic Chinatown core for customers and clientele of the tourist-oriented shops and restaurants that are the mainstay of the economy of Chinatown. According to the guidelines of the *CEQR Technical Manual*, the action would not have an adverse impact on a specific industry because it would neither significantly impact the business conditions for any industry or category of businesses within or outside of the study area, nor would it indirectly reduce employment or impair the economic viability of a specific industrial sector or business category. Although there are some complaints that Chinatown has suffered disproportionately in terms of tourist activity, that would appear to be an effect of the September 11 attacks, which has been felt throughout the tourism industry and not just in Chinatown, and the effect seems to have lessened with time. It should also be noted that the increase in international visitors to the City in the past two years (2005-2006) is a positive development for the City's tourism industry.

Urban Design/Visual Resources

The security plan has altered the urban design of the security zone area, yielding a significant adverse impact. According to the *CEQR Technical Manual*, in terms of streetscape elements, a significant adverse impact would result if an action would add to, eliminate, or alter a critical feature of a streetscape. According to the NYPD's Counter Terrorism Bureau, the security measures implemented around One Police Plaza and adjacent civic buildings are necessary to protect these buildings that are considered potential terrorist targets. The terrorist attacks on the World Trade Center on September 11, 2001 have resulted in greater security measures being implemented all over the City, particularly in Lower Manhattan due to the large number of government offices and financial institutions located there. Security devices such as jersey barriers, French barriers, delta barriers, bollards, and concrete planters, although typically not aesthetically pleasing, have become part of the landscape of the City after September 11, 2001. The area surrounding the New York Stock Exchange and Metro Tech in Brooklyn, for example, have implemented similar security plans where public streets have been closed to unauthorized traffic and security features have been installed. Although the action has affected streetscape elements within the security zone, these security features are considered necessary to protect potential terrorist targets and these features will remain in place as long as a potential terrorist threat exists.

However, although these security measures are necessary, the temporary and unaesthetic nature of the security features has resulted in a negative alteration of the streetscape within the security zone. Therefore, a significant adverse impact to urban design has resulted. Chapter 11, "Mitigation," provides a description of measures to be developed to mitigate the urban design

impacts.

The security plan elements have not blocked public views to any visual resources, including view corridors, vistas, historic landmarks, historic districts, and open spaces within the study area. The installed streetscape elements that comprise the physical elements of the NYPD security plan do not preclude views of visual resources given the low heights of the bollards, jersey barriers, French barricades, and concrete planters and modest size of the security checkpoint booths. Consequently, the security plan has not adversely impacted visual resources within the study area.

Neighborhood Character

The action has altered the neighborhood character within the security zone area. While there is still pedestrian traffic, vehicular traffic is lighter (within the security zone), and the security presence is an additional characteristic of the area. The area within the security zone has become isolated from the surrounding neighborhoods by the limiting of vehicular access. The streets within the security zone, before they were closed, particularly Park Row, were more active through streets connecting the Financial District to Chinatown and the Civic Center area. This reduction in vehicular traffic and activity within the security zone has created an abandoned quality, which is in contrast to the active and lively surrounding area. The closure of public streets and the addition of the security elements have introduced a forbidding and unaesthetic quality to the area. The action has created a disconnect between the security zone area and the surrounding neighborhood. Despite this negative alteration, these security features are considered necessary to protect potential terrorist targets and will remain in place as long as a potential terrorist threat exists.

There has been an increase in security, generally, within the study area around City Hall and other government and office buildings as a result of the September 11, 2001 terrorist attacks. These security measures include an increase of security officers outside these buildings as well as jersey barriers, bollards, delta barriers, and planters along sidewalks. These security measures have altered the character of the City, particularly in Lower Manhattan. Consequently, the One Police Plaza security plan is not a unique feature that has altered the character of the surrounding area. Although the action has resulted in increases in traffic and noise around the perimeter of the security zone, this has not altered the defining neighborhood characteristics of the study area, as this area has always been heavily trafficked. However, as discussed in Chapter 11, "Mitigation," traffic, transit and pedestrians, and urban design impacts would be fully or partially mitigated and, therefore, any impact on neighborhood character would also be mitigated.

Traffic and Parking

This chapter analyzes the effects of diverted traffic that has resulted from the implementation of the security plan on the Lower Manhattan street network during the weekday AM, midday, and PM peak hours. The results of the analyses show that diverted traffic has created significant traffic impacts (see Table NOC-1), with three impacted intersections in the AM, midday, and PM peak periods. Chapter 11, "Mitigation," of this EIS provides a description of measures to be

developed to mitigate the traffic impacts.

While parking conditions, both off-street and on-street, remain very competitive and the availability of curbside parking for shoppers and others is very limited, these conditions did not result from the With-Action condition. In addition, the security plan neither creates demand for public parking nor has it eliminated off-street public parking supply. As such, no significant adverse impacts on parking have occurred as a result of the implementation of the security plan.

TABLE NOC-1 Summary of Impacted Intersections				
Signalized Intersections		AM	MD	PM
Pearl Street @	Frankfort Street	X	X	X
	Robert F. Wagner Sr. Place	X	X	
Chatham Square @	Worth Street	X	X	X
	Mott Street			X
X impacts to one or more movements in the peak hour.				

Transit and Pedestrians

This chapter analyzes the effects of the security plan on bus services and pedestrian activity. The security plan has not generated additional demand for bus service or additional pedestrian activity. The local and express bus system has changed in conjunction with both the security plan as well as other Lower Manhattan street closures. Prior to implementing the security plan in 2001, Park Row hosted the M9, M15, M103, B51, X25, X90, BM1, BM2, BM3, and BM4 bus routes. After the security plan was implemented, these routes continued to operate, albeit with some modifications to route and stop locations due to the street closures. The detour at Park Row has added approximately 1 to 7 minutes to the travel times for these bus routes. There have been substantial increases in overall travel time for these bus routes, and these increases have resulted in significant adverse impacts on bus operations for the M15 and M103 routes, especially in the AM peak hour and in the southbound direction for all peak hours. Chapter 11, “Mitigation,” of this EIS provides a description of measures to be developed to mitigate the bus transit impacts.

The security plan appears to have resulted in a significant adverse safety impact on pedestrian conditions at the Broadway/Worth Street intersection. Chapter 11, “Mitigation,” of this EIS provides a description of measures to be developed to mitigate the adverse pedestrian safety impacts. The security plan has not generated any new pedestrian trips nor has it interrupted existing pedestrian activity and no significant adverse impacts on pedestrian flow conditions

have occurred or are anticipated as a result of the action.

Air Quality

Air quality analyses were undertaken to determine the potential for impacts under the action. These impacts can be either direct or indirect. Direct impacts come from stationary sources, such as emissions from heating systems. Indirect impacts are defined as the potential for emissions due to mobile sources/vehicles generated by the action. Pollutants that are examined for mobile sources are carbon monoxide (CO) and respirable particulate matter (PM10 and PM2.5).

The potential for mobile source impacts on CO concentrations was determined for the 2006 analysis year using the currently accepted methodologies. Modeling was based on the traffic analyses for three study area intersections. The results of these analyses showed that the maximum CO concentrations with the action did not exceed National Ambient Air Quality Standards (NAAQS) or impacts defined by the *City Environmental Quality Review (CEQR) Technical Manual*, as there were no exceedances of NAAQS or any increases in CO concentrations that are more than half the difference between the No-Action concentrations and the CO standard.

Analyses were performed to determine the potential for impacts from respirable particulate matter (PM10 and PM2.5). The results of these analyses disclosed that the future maximum predicted 24-hour and annual average particulate matter concentrations would not result in any violations of the PM10 and PM2.5 standards.

Noise

After performing a comprehensive screening of numerous potentially impacted intersections, a total of 2 intersections were monitored for potential noise impacts under the action. The analysis examined the potential for impacts from traffic diversions under the With-Action condition. The analysis showed that there are significant adverse impacts at the intersections of Worth Street and Baxter Street and Worth Street and Mulberry Street in the AM peak period. The projected noise level increases are 3.5 dBA and 4.1 dBA respectively, at the two intersections, and the *CEQR Technical Manual* describes a significant increase as an increase of 3.0 dBA. Therefore, these increases have resulted in a significant adverse impact on noise. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not be considered practical or cost effective at these locations. The rerouting of the M103, M15, and B51 bus routes back onto Park Row has been proposed as a mitigation measure. This would reduce the level of impact slightly, but would not eliminate it. Therefore, these impacts would remain unmitigated.

F. MITIGATION

Urban Design

The With-Action condition has resulted in a significant adverse impact on urban design within the security zone area. The Lower Manhattan Development Corporation (LMDC) issued a report in 2004 entitled *Chinatown Access and Circulation Study* which included recommendations for improving Park Row. These recommendations are intended to address the closure of Park Row by making City-owned areas more pedestrian friendly and aesthetically pleasing.

Some of these recommendations relating to streetscape improvements include the following:

- Install a landscaped esplanade along Park Row, including attractive paving, trees, shrubs, planters, etc.
- Install improved street fixtures, including benches, lighting, and barriers. Attractive trash receptacles may be placed at appropriate locations away from security sensitive areas.
- Improve pedestrian wayfinding signage along Park Row and other routes through the area.

Coordination with NYPD and the U.S. Marshals Service regarding security measures for the Police Headquarters building and the federal court buildings would be required. The implementation of the above elements would significantly improve the streetscape of the security zone thereby enhancing the urban design and fully mitigating the security plan's urban design impact. In addition, although the action has not resulted in indirect socioeconomic impacts, these streetscape enhancements would improve pedestrian conditions which may increase the number of patrons to study area businesses. While it is expected that these mitigation measures would fully mitigate urban design impacts caused by the action they should be reassessed when the Chatham Square reconfiguration is complete and the Park Row improvements are in place.

Traffic

Traffic diversions that have occurred as a result of the With-Action condition have resulted in significant adverse traffic impacts at 4 signalized intersections in one or more peak periods. These impacted locations are listed in Table NOC-2. A traffic mitigation plan was therefore developed to address these impacts. This traffic mitigation plan would incorporate some of the recommendations from LMDC's *Chinatown Access and Circulation Study* for the reconfiguration for Chatham Square. Other mitigation measures associated with this plan include signal timing changes and the implementation of exclusive left-turn and right-turn phases.

In summary, as shown in Table NOC-2, the proposed traffic mitigation plan would fully address all impacts at two intersections in the AM peak hour, two in the midday, and three in the PM peak hour. Three out of 4 intersections impacted by the action would no longer be impacted with the implementation of the proposed mitigation plan. However, two unmitigable impacts would remain at the intersection of Pearl Street and Robert F. Wagner Sr. Place in the AM and midday

peak hours. Measures were therefore evaluated to address these impacts. However, signal timing adjustments to return this approach to its No-Action condition would be impractical as they would result in new or worsened impacts on other approaches and a reduction in pedestrian crossing times. Increasing capacity of roadways through changes to curbside regulations or modifications to lane striping was also found to be ineffective, as was widening the approach to achieve an additional lane. The action's impact to westbound Robert F. Wagner Sr. Place left-turn movement and eastbound at Pearl Street in the AM and midday peak hours, respectively, would therefore remain unmitigated. The reconfiguration of Chatham Square as well as all other traffic mitigation plans would be implemented by the New York City Department of Transportation and/or the New York City Department of Design and Construction.

TABLE NOC-2 Summary of Mitigated Intersections				
Signalized Intersections		AM	MD	PM
Pearl Street @	Frankfort Street	X	X	X
	Robert F. Wagner Sr. Place	U	U	
Chatham Square @	Worth Street	X	X	X
	Mott Street			X
X: All impacts fully mitigated. U: One or more unmitigated impacts in the peak period.				

Transit and Pedestrians

Bus Service

The results of the analysis of local bus conditions in the With-Action condition show that the street closures significantly impacted bus service. With the rerouting of the M103, M15, M9, B51, X25, X90, BM1, BM2, BM3, and BM4 bus routes, there have been substantial increases in overall travel time, which has resulted in significant adverse impacts on bus operations, especially in the AM peak hour and in the southbound direction for all peak hours. In May 2005, the M103 bus returned to its original route via Park Row as a 90-day trial. The test was expanded in November 2005 when the M15 and B51 buses also returned to their original routes via Park Row to/from City Hall. The M9 remains on its current diverted route as the closure of Vesey Street after September 11, 2001 eliminated the important eastbound portion of this route, necessitating its formal relocation along Pearl Street. The reintroduction of the M15, M103, and B51 buses to Park Row would mitigate the increases in travel times these bus routes have experienced due to the action. The re-routing of the buses along Park Row has restored bus service within the area so that it is close to what it was in the baseline condition, prior to the

streets being closed. The rerouting of the buses along Park Row has therefore mitigated bus service impacts.

Pedestrians

The security plan has neither generated any new pedestrian trips nor will it generate any pedestrian congestion on sidewalks. However, traffic diversions associated with the vehicular restrictions have resulted in an increase in the numbers of vehicle turning movements at some crosswalks, while decreasing or eliminating all such movements at other crosswalks within the security zone. As discussed in Chapter 8, “Transit and Pedestrians,” the results of the analysis of high accident locations indicate that the action may have created a high pedestrian accident location at the intersection of Worth Street and Broadway.

In coordination with DOT, it was determined that a leading pedestrian interval will be implemented at the intersection of Worth Street and Broadway to improve pedestrian conditions at this intersection. The leading pedestrian interval would change the signal phasing at this intersection that would allow for the pedestrian phase to begin before the green phase for motor vehicle traffic traversing east-west on Worth Street. This signal timing modification will allow pedestrians a head start to cross in the crosswalk of the intersection.

Noise

Project-generated increases in noise exceed the impact criterion of 3.0 dBA between two intersections during the peak AM period: 1) Worth Street at Baxter Street and 2) Worth Street at Mulberry Street. The projected noise level increases are 3.5 dBA and 4.1 dBA respectively, at the two intersections under With-Action conditions. Rerouting the M103, M15, and B51 bus routes back onto Park Row has been proposed as a mitigation measure. This would reduce the level of impact by about 0.4 dBA, with resulting noise level increments of 3.1 dBA at Worth Street at Baxter Street and 3.7 dBA at Worth Street at Mulberry Street. While this mitigation measure would reduce the impacts along Worth Street slightly, it would not eliminate them. No other method of mitigation is feasible. Due to the needs for pedestrian access and the distance between intersections, noise barriers would not be a feasible solution along these roadways. Project-diverted traffic in the midday and PM peak hours would not cause noise level impacts. Portions of Chatham Towers and other residential buildings at the intersections of Worth/Baxter Streets and Worth/Mulberry Streets, as well as Columbus Park, are affected by this increase in noise levels. The overall noise levels would decrease with distance from Worth Street. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not be considered practical or cost effective at these locations. Therefore, these impacts would remain unmitigated.

G. ALTERNATIVES

Four alternatives to the With-Action condition were considered in this EIS, to examine whether there are reasonable and practicable options that avoid or reduce action-related significant adverse impacts and still allow for the achievement of the stated goals and objectives of the With-Action condition.

No-Action Alternative

The No-Action Alternative assumes that the security plan would not be implemented and all streets that were closed to unauthorized traffic after September 11, 2001 would be open.

In the wake of the September 11, 2001 terrorist attacks, NYPD's Counter Terrorism Bureau conducted security assessments of numerous potential terrorist targets within New York City, including government and law enforcement facilities. Experience and research demonstrate that terrorists avoid "hardened" targets, which are targets that have been reinforced with barriers and other deterrents to make the target less vulnerable and accessible to attack. In assessing the security of One Police Plaza, the Counter Terrorism Bureau concluded that the "secure zone" created around the building immediately following the terrorist attacks should be maintained to prevent the possibility of a vehicle bomb attack on NYPD Headquarters. Securing these potential terrorist targets would not be possible under No-Action Alternative. For security reasons, the No-Action Alternative would therefore not be feasible.

No Unmitigable Traffic Impacts Alternative

As discussed in Chapter 11, "Mitigation," all significant adverse traffic impacts that have resulted from the action would be fully mitigated with the exception of the unmitigated impact at the intersection of Pearl Street and Robert F. Wagner, Sr. Place. The No Unmitigable Traffic Impacts Alternative proposes to mitigate traffic impacts at the intersection of Pearl Street at Robert F. Wagner Sr. Place, by re-opening Avenue of the Finest between Pearl Street and Park Row. This would ease congestion focused at Pearl Street and Robert F. Wagner Sr. Place by allowing vehicles destined to the City Hall area to access it without having to detour around the security zone. Passenger vehicles traveling along this proposed right-of-way would only be able to travel westbound on Avenue of the Finest. Security checkpoints would be moved north on Park Row to allow vehicles to travel freely onto Park Row from Avenue of the Finest. The opening of Avenue of the Finest along with minor signal timing adjustments would mitigate this impact back to No-Action conditions.

The proposed opening of Avenue of the Finest to one-way westbound traffic was reviewed and evaluated by NYPD's Counter Terrorism Bureau. The result of this evaluation determined that the opening of Avenue of the Finest to passenger vehicles would not provide sufficient stand-off distance from NYPD headquarters. Therefore, this alternative is not feasible, as it would not meet the goals and objectives of the action.

Community-Suggested Alternative #1: Relocation of Police Headquarters

This alternative was developed in response to suggestions during the public scoping process to explore alternative locations for police headquarters. No specific site has been identified for this possible relocation, although Randalls Island or Governors Island have been suggested because their placement in the East River is thought to provide natural geographical security. The Relocation Alternative would fall far short of the objectives of the action. Moreover, given the concentration of other government facilities in the “civic center” portion of Lower Manhattan which continue to be considered potential terrorist targets and for which security measures would have to be maintained, the adverse impacts resulting from the action may not be entirely avoided should police headquarters be relocated from One Police Plaza. This alternative is therefore not feasible, as it would not meet the goals and objectives of the action.

Community-Suggested Alternative #2: Chatham Green Access Alternative

Under this alternative, the existing security checkpoint would be moved south on Park Row to establish a free-flowing vehicle entrance/exit to the Chatham Green parking lot. Currently, the security checkpoint is located just south of the corner of Park Row and Chatham Square. All vehicles wishing to access the Chatham Green parking lot must pass through this checkpoint, before entering the parking lot via Park Row. This procedure allows screening of vehicles before they enter the security zone, as control of these vehicles within the zone is not feasible. Vehicles can currently exit the parking lot via either the same location on Park Row, or Pearl Street (northbound).

Under this alternative, the current checkpoint on Park Row would be moved approximately 125 feet to the south in an effort to establish a free-flowing entrance/exit to the Chatham Green parking lot. A 30-foot-wide two-lane access point to the parking lot, with a right-in/right-out, would be provided at the current location on Park Row. The current parking lot exit along Pearl Street would be sealed off and a turnaround would be established at the southeast corner of the parking lot, so that all vehicles would have to exit the parking lot via Park Row. This would result in the elimination of approximately 6 dedicated parking spaces along the Pearl Street side of the parking lot. However, those spaces could be replaced with some minor modifications to the parking lot’s layout.

Like the action, this alternative would also result in significant adverse traffic, air quality, noise, and urban design impacts, and the mitigation measures for the action described in Chapter 11 would also be required for this Chatham Green Access Alternative.

This proposed alternative was reviewed and evaluated by NYPD’s Counter Terrorism Bureau and it was determined that this alternative would not allow sufficient stand-off distance between NYPD headquarters and the Chatham Green Houses parking lot. As this stand-off distance would be substantially reduced to an unsafe level, this alternative would not achieve the objectives of NYPD’s Counter Terrorism Bureau to protect government facilities in the “civic

center” portion of Lower Manhattan that continue to be considered potential terrorist targets. This alternative is not feasible, as it would not meet the goals and objectives of the action.

H. UNAVOIDABLE ADVERSE IMPACTS

Unavoidable adverse impacts occur when a proposed action would result in significant adverse impacts for which there are no reasonably practicable mitigation measures, and for which there are no reasonable alternatives. For this project, these include unavoidable adverse effects on traffic and noise.

Traffic

At the intersection of Pearl Street and Robert F. Wagner Sr. Place, the action results in impacts to the westbound Robert F. Wagner Sr. Place left-turn movement in the AM Peak hour and the eastbound approach in the midday peak hour. Measures were therefore evaluated to address these impacts. However, signal timing adjustments to return this approach to its No-Action condition would be impractical as they would result in new or worsened impacts on other approaches and a reduction in pedestrian crossing times. Increasing capacity through changes to curbside regulations or modifications to lane striping was also found to be ineffective, as was widening the approach to achieve an additional lane. The action’s impact to westbound Robert F. Wagner Sr. Place left-turn movement and eastbound at Pearl Street in the AM and midday peak hours, respectively, would therefore remain unmitigated.

Noise

Project-generated increases in noise exceed the impact criterion of 3.0 dBA between two intersections during the peak AM period: 1) Worth Street at Baxter Street and 2) Worth Street at Mulberry Street. The projected noise level increases are 3.5 dBA and 4.1 dBA respectively, at the two intersections under With-Action conditions. Rerouting the M103, M15, and B51 bus routes back onto Park Row has been proposed as a mitigation measure. This would reduce the level of impact by about 0.4 dBA, with resulting noise level increments of 3.1 dBA at Worth Street at Baxter Street and 3.7 dBA at Worth Street at Mulberry Street. While this mitigation measures would reduce the impacts along Worth Street slightly, it would not eliminate them. No other method of mitigation is feasible. Due to the needs for pedestrian access and the distance between intersections, noise barriers would not be a feasible solution along these roadways. Project-diverted traffic in the midday and PM peak hours would not cause noise level impacts. Portions of Chatham Towers and other residential buildings at the intersections of Worth/Baxter Streets and Worth/Mulberry Streets, as well as Columbus Park, are affected by this increase in noise levels. However, the peak AM hour is not a peak period for park utilization. The overall noise levels would decrease with distance from Worth Street. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not

be considered practical or cost effective at these locations. Therefore, these impacts would remain unmitigated.

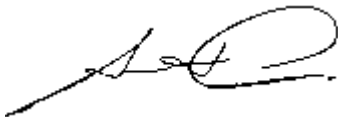
I. GROWTH-INDUCING ASPECTS OF THE ACTION

As set forth in the *CEQR Technical Manual*, growth-inducing aspects of a proposed action generally refer to “secondary” impacts of an action that trigger further development. These include proposals that add substantial new land use, new residents, or new employment that could induce additional development of a similar kind or support uses (e.g., stores to serve new residential uses). Actions that introduce or greatly expand infrastructure capacity (e.g., sewers, central water supply) might also induce growth, although this could be an issue only in limited areas of Staten Island and perhaps Queens, since in most areas of New York City infrastructure is already in place and its improvement or expansion is usually proposed only to serve existing or expected users.

As the action has not added a new land use, new residents or new employment, there are no growth-inducing aspects associated with the action.

J. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Resources, both natural and man-made, have been expended in the construction and operation of the security plan elements. These resources include the building materials used during construction of checkpoint booths; energy in the form of gas and electricity consumed during the construction and operation of these security elements; and human effort to develop, construct and operate various elements of the security plan. These are considered irretrievably committed because their reuse for some other purpose would be highly unlikely.



Inspector Anthony T. Tria
Capital Construction
New York City Police Department

August 1, 2007
Date

cc. Honorable Sheldon Silver, Speaker, New York State Assembly
Honorable Christine Quinn, Speaker, New York City Council
Honorable Scott M. Stringer, Manhattan Borough President
Honorable Alan J. Gerson, Council Member
Honorable John Liu, Council Member
Honorable Rosie Mendez, Council Member
Honorable Martin Connor, State Senator
Honorable Nydia Velasquez, Member of Congress
Noah Pfefferblit, District Manager, Community Board 1
Susan Stetzer, District Manager, Community Board 3
Robert Kulikowski, New York City Office of Environmental Coordination
Marjorie Bryant, New York City Department of Transportation
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Maria Osorio, New York City Office of Environmental Coordination
Christopher Reo, New York City Law Department
Heidi Rubinstein, New York City Law Department
Daniel Green, New York City Law Department
Joseph Guccione, United States Marshal Service
Irene Chang, Lower Manhattan Development Corporation
Gary Heath, New York City Department of Environmental Protection
Ted Orosz, Metropolitan Transportation Authority, New York City Transit
Norm Silverman, Metropolitan Transportation Authority, Bus Division Honorable



POLICE DEPARTMENT

STATEMENT OF FINDINGS

ONE POLICE PLAZA SECURITY PLAN

Project Identification:

CEQR No. 04NYPD002M

Lead Agency:

New York City
Police Department

Date Issued:

August 28, 2007

Contact Person:

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A. INTRODUCTION

This Statement of Findings has been prepared in accordance with the environmental review requirements of Article 8 of the New York State Environmental Conservation Law, the State Environmental Quality Review Act (SEQRA), the implementing regulations set forth in 6 NYCRR Part 617, and the New York City Rules of Procedure for City Environmental Quality Review (CEQR) and Executive Order 91 of 1977 as amended. The New York City Police Department (NYPD), acting as lead agency, issued a Notice Of Completion of the Final Environmental Impact Statement (FEIS) for the One Police Plaza Security Plan on August 1, 2007.

The Notice of Positive Declaration and Intent to Prepare a Draft EIS were issued on April 8, 2005 and the Draft Scoping Document for the Preparation of a Draft EIS was issued on April 21, 2005. The public, governmental agencies, community boards, and elected officials were invited to comment on the Draft Scoping Document either in writing or at the public scoping hearing held on May 24, 2005. The comment period on the Draft Scoping Document remained open until June 4, 2005. The comments received during the comment period were incorporated into the Final Scoping Document, which was issued in June 2006.

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The Draft Environmental Impact Statement (DEIS) was certified as complete on July 28, 2006 and was published and distributed for review. The issuance of the DEIS was followed by two public hearings that were held on September 14, 2006 and October 4, 2006. Written comments on the DEIS were requested and were received and considered by the Lead Agency until October 24, 2006. The NYPD prepared a Final Environmental Impact Statement (FEIS), which addressed all substantive comments made on the DEIS. The FEIS was certified as complete, and a Notice of Completion was issued on August 1, 2007.

After considering the FEIS for no less than 10 days after the issuance of the Notice of Completion, the NYPD has adopted this Statement of Findings.

B. DESCRIPTION OF THE ACTION

Introduction and Background

The NYPD, lead agency for the project, prepared an Environmental Assessment Statement (EAS) in January 2004 pursuant to an order issued on August 1, 2003 by New York State Supreme Court Justice Walter B. Tolub in *Chatham Green, Inc. et al. v. Bloomberg et al.* (Index No. 107569/03). NYPD then issued a negative declaration, which was subsequently challenged in a second lawsuit, *Chatham Towers, Inc. et al. v. Bloomberg et al.* (Index No. 107761/04). In an opinion dated October 15, 2004, Justice Tolub found that the EAS did not take a “hard look” as required by law, specifically for the technical areas of Community Facilities and Services, Socioeconomic Conditions, Neighborhood Character, Traffic and Parking, and Transit and Pedestrians. Justice Tolub directed the preparation of an Environmental Impact Statement (EIS).

Although the NYPD maintains that the EAS and negative declaration were adequate in all respects, in light of Justice Tolub’s determination, the NYPD prepared an EIS in accordance with SEQRA and the regulations promulgated pursuant thereto at 6 NYCRR Part 617 and CEQR.

The EIS includes review and analysis of certain impact categories identified in the *CEQR Technical Manual*. The EIS contains a description and analysis of the action and its environmental setting; the environmental impacts of the action; identification of any significant adverse environmental effects that cannot be avoided through incorporation of corrective measures into the action; a discussion of alternatives to the action; the identification of any irreversible and irretrievable commitments of resources that would be involved in the action upon implementation; and a description of any necessary mitigation measures proposed to minimize significant adverse environmental impacts.

It bears noting that, in an unrelated action, certain streets proximate to One Police Plaza were closed in 1999, as indicated in an EAS, dated April 2, 1999, prepared by the New York City Department of Transportation at the request of the NYPD (CEQR No. 99DOT011M). Following the issuance of the EAS in 1999, a negative declaration was issued on May 13, 1999. These pre-September 11, 2001 street closures, listed below, are not part of the action but are considered as part of the No-Action condition in this EIS:

- Madison Street between Avenue of the Finest and Pearl Street (full closure)
- Avenue of the Finest between Madison Street and Park Row (full closure except for motor vehicles destined to the municipal garage)
- Pearl Street between Park Row and Madison Street (partial closure - southbound direction only)

As part of another unrelated action, in early 2001, an EAS was prepared for the Public Safety Answering Center II (CEQR No. 01NYP002M), to be located in an existing building at 109-113 Park Row. The EAS analyzed the closure of the 400-space municipal garage to the public, and a negative declaration was issued on June 12, 2001. The garage was then officially closed to the public on June 30, 2001. However, following the events of September 11, 2001, the NYPD decided not to go forward with the above-mentioned project and the building remained vacant. The municipal garage was rehabilitated and re-opened to NYPD authorized vehicles in April 2004. As the closure of the municipal garage occurred prior to the post-9/11 security plan, it is also included in this EIS as part of the No-Action condition.

With-Action Condition

Following the events of September 11, 2001, a security plan was implemented that resulted in the installation of attended security checkpoint booths, planters, bollards, and hydraulically-operated delta barriers to restrict the access of unauthorized vehicles from the roadways adjacent to the civic facilities located near One Police Plaza, including NYPD Headquarters, the New York State Supreme Court, and the United States Courthouse. All but two sets of barriers were installed by the NYPD. Security barriers located at the intersection of Park Row and Foley Square and at Pearl Street on the west side of Park Row were installed by the United States Marshals Service (“USMS”) and are not part of the NYPD’s action. The security checkpoint locations for vehicular access have been installed by the NYPD at the following locations:

- Park Row, west of Worth Street
- Park Row, near the Brooklyn Bridge
- Pearl Street at Foley Square
- Pearl Street on the west side of Park Row
- Pearl Street at St. James Place
- Madison Street at St. James Place
- Avenue of the Finest at Pearl Street
- Rose Street at Frankfort Street
- Northbound Park Row Brooklyn Bridge off-ramp

Four of the above checkpoints also include sally ports - two delta barriers on the same roadway that allow a vehicle to be immobilized for inspection. Sally ports have been erected at the following checkpoints:

- Madison Street at St. James Place
- Pearl Street at St. James Place
- Avenue of the Finest at Pearl Street
- Park Row west of Worth Street

As a result of these security measures, the following streets within immediate proximity to One Police Plaza are open only to authorized vehicles:

- Park Row, between approximately Worth Street and the Brooklyn Bridge
- Pearl Street, between Foley Square and St. James Place
- Madison/Rose Streets, between Frankfort Street and St. James Place
- Avenue of the Finest
- Northbound Park Row Brooklyn Bridge off-ramp

As discussed above, the street closures resulted in restricted access for commercial and private vehicles on streets adjacent to NYPD headquarters and other nearby civic buildings. Authorized NYPD and government personnel and emergency vehicles are permitted through the checkpoints after undergoing appropriate scrutiny. Residents of the Chatham Green Houses seeking vehicular access to the Chatham Green parking lot along Park Row are permitted through the checkpoint at Park Row at Worth Street after displaying valid identification, but are not permitted into the security zone through any other checkpoint. Commercial vehicles, such as delivery trucks, are only permitted through the checkpoint at Park Row and Worth Street after displaying valid identification, passing through the barricade, and then pulling into a truck inspection area where they are inspected by USMS officers who utilize, among other security measures, bomb sniffing dogs.

With the exception of areas immediately adjacent to the NYPD headquarters at One Police Plaza, pedestrian access within the security perimeter is not restricted. Iron fencing and barriers are located around the perimeter of One Police Plaza to restrict pedestrian access. In addition, the stairway leading from Police Plaza to Madison Street is closed to pedestrians.

C. REQUIRED APPROVALS

Environmental Review (SEQRA and CEQR)

Pursuant to SEQRA and its implementing regulations, New York City has established rules for CEQR. The environmental review provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify and, when practicable, mitigate significant adverse environmental effects.

New York City Local Law Number 24 of 2005

Local Law 24 of 2005, approved by the Mayor in March of 2005, amends the New York City Department of Transportation (“DOT”) regulations to state that “except as otherwise provided by law, it shall be unlawful for any person to close any street, or a portion thereof, within the jurisdiction of the [DOT] commissioner, to pedestrian or vehicular traffic without a permit from the commissioner.” In the event of closure of a publicly mapped street that is used for vehicular or vehicular and pedestrian access for more than 180 days, the commissioner shall issue or cause to be issued a community reassessment, impact and amelioration (CRIA) statement that has been approved by the commissioner or other government entity initiating the street closure. The

CRIA statement shall be delivered to both the community board and the council member in whose district the street closure is located on or before the 210th day of the closure. However, the requirement for the issuance of the CRIA statement may be satisfied by delivery of an environmental assessment statement, environmental impact statement, or similar document required by law to be prepared for the street closure. The Local Law requires that a public forum be held. The law applies retroactively to street closures for security reasons that were commenced prior to enactment of the law. Therefore, in addition to satisfying the court order, this EIS was prepared in satisfaction of the CRIA requirement pursuant to Local Law 24 of 2005. The CEQR process described above, which includes public review and hearings, fully satisfies the CRIA requirements including the public forum requirement.

D. IMPACTS OF THE ACTION AND MITIGATION

Introduction

The FEIS includes descriptions of existing and past environmental conditions for the Action Area and surrounding study areas, plus assessments of the impacts of the Action. The assessment is based on a comparison of conditions with and without the Action. For analysis purposes, under the No-Action condition, it is assumed that the One Police Plaza security plan is not in place, that the roadways are open with the 1999 NYPD street closures and municipal garage closure in place, and that transportation services would continue as they were prior to September 11, 2001. For the purposes of the EIS, the analysis year is 2006 (Build Year). Under the With-Action condition, the One Police Plaza security plan is in effect so that the roadways in the vicinity of One Police Plaza are closed to unauthorized vehicular traffic along with all the security plan features described above currently in place. Therefore, the EIS analyzed any potential impacts due to the security measures by comparing the No-Action condition to the With-Action condition. The assessments were performed for a full range of impact categories: land use, zoning, and public policy, community facilities, socioeconomic conditions, urban design and visual resources, neighborhood character, traffic and parking, transit and pedestrians, air quality, and noise.

No significant adverse impacts were identified for land use, zoning and public policy; community facilities; socioeconomic conditions; visual resources; parking; and air quality. Significant adverse impacts were identified for urban design, neighborhood character, traffic, transit and pedestrians, and noise. For these latter six categories, the impacts and suggested mitigation measures are identified below.

Urban Design

The security plan has altered the urban design of the security zone area, yielding a significant adverse impact. According to the *CEQR Technical Manual*, in terms of streetscape elements, a significant adverse impact would result if an action would add to, eliminate, or alter a critical feature of a streetscape. According to the NYPD's Counter Terrorism Bureau, the security measures implemented around One Police Plaza and adjacent civic buildings are necessary to protect these buildings that are considered potential terrorist targets. The terrorist attacks on the World Trade Center on September 11, 2001 have resulted in greater security measures being implemented all over the City, particularly in Lower Manhattan due to the large number of government offices and financial institutions located there. Security devices such as jersey barriers, French barriers, delta barriers, bollards, and concrete planters, although typically not aesthetically pleasing, have become part of the landscape of the City after September 11, 2001. The area surrounding the New York Stock Exchange and Metro Tech in Brooklyn, for example, have implemented similar security plans where public streets have been closed to unauthorized traffic and security features have been installed. Although the action has affected streetscape elements within the security zone, these security features are considered necessary to protect potential terrorist targets and these features will remain in place as long as a potential terrorist threat exists.

However, although these security measures are necessary, the temporary and unaesthetic nature of the security features has resulted in a negative alteration of the streetscape within the security zone. Therefore, a significant adverse impact to urban design has resulted.

The security plan elements have not blocked public views to any visual resources, including view corridors, vistas, historic landmarks, historic districts, and open spaces within the study area. The installed streetscape elements that comprise the physical elements of the NYPD security plan do not preclude views of visual resources given the low heights of the bollards, jersey barriers, French barricades, and concrete planters and modest size of the security checkpoint booths. Consequently, the security plan has not adversely impacted visual resources within the study area.

Mitigation measures have been identified for these urban design impacts, which, if implemented would fully mitigate these impacts. The Lower Manhattan Development Corporation (LMDC) issued a report in 2004 entitled *Chinatown Access and Circulation Study* which included recommendations for improving Park Row. These recommendations were intended to address the closure of Park Row by making it more pedestrian friendly and aesthetically pleasing.

Some of these recommendations relating to streetscape improvements include the following:

- Install a landscaped esplanade along Park Row, including attractive paving, trees, shrubs, planters, etc.
- Install improved street fixtures, including benches, lighting, and barriers. Attractive trash receptacles may be placed at appropriate locations away from security sensitive areas.
- Improve pedestrian wayfinding signage along Park Row and other routes through the area.

Coordination with NYPD and the U.S. Marshals Service regarding security measures for the Police Headquarters building and the federal court buildings would be required. The implementation of the above elements would significantly improve the streetscape of the security zone thereby enhancing the urban design and fully mitigating the security plan's urban design impact. These measures will be implemented to the maximum extent practicable. While it is expected that these mitigation measures would fully mitigate urban design impacts caused by the action, they will be reassessed after the Chatham Square reconfiguration is complete and the Park Row improvements are in place.

Neighborhood Character

The action has altered the neighborhood character within the security zone area. While there is still pedestrian traffic, vehicular traffic is lighter (within the security zone), and the security presence is an additional characteristic of the area. The area within the security zone has become isolated from the surrounding neighborhoods by the limiting of vehicular access. The streets within the security zone, before they were closed, particularly Park Row, were more active through streets connecting the Financial District to Chinatown and the Civic Center area. This reduction in vehicular traffic and activity within the security zone has created an abandoned quality, which is in contrast to the active and lively surrounding area. The closure of public streets and the addition of the security elements have introduced a forbidding and unaesthetic quality to the area. The action has created a disconnect between the security zone area and the surrounding neighborhood. Despite this negative alteration, these security features are considered necessary to protect potential terrorist targets and will remain in place as long as a potential terrorist threat exists.

There has been an increase in security, generally, within the study area around City Hall and other government and office buildings as a result of the September 11, 2001 terrorist attacks. These security measures include an increase of security officers outside these buildings as well as jersey barriers, bollards, delta barriers, and planters along sidewalks. These security measures have altered the character of the City, particularly in Lower Manhattan. Consequently, the One Police Plaza security plan is not a unique feature that has altered the character of the surrounding area. Although the action has resulted in increases in traffic and noise around the perimeter of the security zone, this has not altered the defining neighborhood characteristics of the study area, as this area has always been heavily trafficked. However, mitigation measures for traffic, transit and pedestrians, and urban design impacts would be fully or partially mitigated and, therefore, any impact on neighborhood character would also be mitigated.

Traffic

The diverted traffic that has resulted from the implementation of the security plan has resulted in significant adverse impacts at certain intersections within the study area. The results of the analyses show that diverted traffic has created significant traffic impacts (see Table S-1), with three impacted intersections in the AM, midday, and PM peak periods.

**TABLE S-1
Summary of Impacted Intersections**

Signalized Intersections		AM	MD	PM
Pearl Street @	Frankfort Street	X	X	X
	Robert F. Wagner Sr. Place	X	X	
Chatham Square @	Worth Street	X	X	X
	Mott Street			X
X impacts to one or more movements in the peak hour.				

A traffic mitigation plan was therefore developed to address these impacts. This traffic mitigation plan, which will be implemented to the maximum extent practicable, incorporates some of the recommendations from LMDC’s *Chinatown Access and Circulation Study* for the reconfiguration for Chatham Square. Other mitigation measures associated with this plan include signal timing changes and the implementation of exclusive left-turn and right-turn phases.

In summary, the proposed traffic mitigation plan would fully address all impacts at three intersections in the AM peak hour, two in the midday, and three in the PM peak hour. Three out of 4 intersections impacted by the action would no longer be impacted with the implementation of the proposed mitigation plan. However, two unmitigable impacts would remain at the intersection of Pearl Street and Robert F. Wagner Sr. Place in the AM and midday peak hours. Measures were therefore evaluated to address these impacts. However, signal timing adjustments to return this approach to its No-Action condition would be impractical as they would result in new or worsened impacts on other approaches and a reduction in pedestrian crossing times. Increasing capacity of roadways through changes to curbside regulations or modifications to lane striping was also found to be ineffective, as was widening the approach to achieve an additional lane. The action’s impact to westbound Robert F. Wagner Sr. Place left-turn movement and eastbound at Pearl Street in the AM and midday peak hours, respectively, would therefore remain unmitigated. The reconfiguration of Chatham Square as well as all other traffic mitigation plans would be implemented by the New York City Department of Transportation and/or through the New York City Department of Design and Construction.

Transit and Pedestrians

Transit

The security plan has not generated additional demand for bus service. The local and express bus system has changed in conjunction with both the security plan as well as other Lower Manhattan street closures. Prior to implementing the security plan in 2001, Park Row hosted the M9, M15, M103, B51, X25, X90, BM1, BM2, BM3, and BM4 bus routes. After the security plan was implemented, these routes continued to operate, albeit with some modifications to route and stop locations due to the street closures. The detour at Park Row has added approximately 1

to 7 minutes to the travel times for these bus routes. There have been substantial increases in overall travel time for these bus routes, and these increases have resulted in significant adverse impacts on bus operations for the M15 and M103 routes, especially in the AM peak hour and in the southbound direction for all peak hours.

In May 2005, the M103 bus returned to its original route via Park Row as a 90-day trial. The test was expanded in November 2005 when the M15 and B51 buses also returned to their original routes via Park Row to/from City Hall. The M9 remains on its current diverted route as the closure of Vesey Street after September 11, 2001 eliminated the important eastbound portion of this route, necessitating its formal relocation along Pearl Street. The reintroduction of the M15, M103, and B51 buses to Park Row mitigated the increases in travel times these bus routes have experienced due to the action. The re-routing of the buses along Park Row has restored bus service within the area so that it is close to what it was in the baseline condition, prior to the streets being closed. The rerouting of the buses along Park Row has therefore mitigated bus service impacts.

Pedestrians

The security plan has neither generated any new pedestrian trips nor will it generate any pedestrian congestion on sidewalks. However, traffic diversions associated with the vehicular restrictions have resulted in an increase in the numbers of vehicle turning movements at some crosswalks, while decreasing or eliminating all such movements at other crosswalks within the security zone. The results of the pedestrian analysis in the EIS of high accident locations indicate that the action may have created a high pedestrian accident location at the intersection of Worth Street and Broadway.

In coordination with DOT, it was determined that a leading pedestrian interval will be implemented at the intersection of Worth Street and Broadway to improve pedestrian conditions at this intersection. The leading pedestrian interval would change the signal phasing at this intersection that would allow for the pedestrian phase to begin before the green phase for motor vehicle traffic traversing east-west on Worth Street. This signal timing modification will allow pedestrians a head start to cross in the crosswalk of the intersection.

Noise

Project-generated increases in noise exceed the impact criterion of 3.0 dBA between two intersections during the peak AM period: 1) Worth Street at Baxter Street and 2) Worth Street at Mulberry Street. The projected noise level increases are 3.5 dBA and 4.1 dBA respectively, at the two intersections under With-Action conditions. Rerouting the M103, M15, and B51 bus routes back onto Park Row was proposed as a mitigation measure. This reduced the level of impact by about 0.4 dBA, with resulting noise level increments of 3.1 dBA at Worth Street at Baxter Street and 3.7 dBA at Worth Street at Mulberry Street. While this mitigation measure reduced the impacts along Worth Street slightly, it has not eliminated them. No other method of mitigation is feasible. Due to the needs for pedestrian access and the distance between intersections, noise barriers would not be a feasible solution along these roadways. Portions of Chatham Towers and other residential buildings at the intersections of Worth/Baxter Streets and Worth/Mulberry Streets, as well as Columbus Park, are affected by this increase in noise levels.

The overall noise levels would decrease with distance from Worth Street. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not be considered practical or cost effective at these locations. Therefore, these impacts would remain unmitigated. Project-diverted traffic in the midday and PM peak hours has not caused noise level impacts.

E. UNAVOIDABLE ADVERSE IMPACTS

As described above in the sections on traffic and noise, some of the Action's significant adverse environmental impacts proved to be unmitigable, and are therefore considered as unavoidable adverse impacts.

F. ALTERNATIVES

Four alternatives to the With-Action condition were considered in this EIS, to examine whether there are reasonable and practicable options that avoid or reduce action-related significant adverse impacts and still allow for the achievement of the stated goals and objectives of the With-Action condition.

No-Action Alternative

The No-Action Alternative assumes that the security plan would not be implemented and all streets that were closed to unauthorized traffic after September 11, 2001 would be open.

In the wake of the September 11, 2001 terrorist attacks, NYPD's Counter Terrorism Bureau conducted security assessments of numerous potential terrorist targets within New York City, including government and law enforcement facilities. Experience and research demonstrate that terrorists avoid "hardened" targets, which are targets that have been reinforced with barriers and other deterrents to make the target less vulnerable and accessible to attack. In assessing the security of One Police Plaza, the Counter Terrorism Bureau concluded that the "secure zone" created around the building immediately following the terrorist attacks should be maintained to prevent the possibility of a vehicle bomb attack on NYPD Headquarters. Securing these potential terrorist targets would not be possible under No-Action Alternative. For security reasons, the No-Action Alternative would therefore not be feasible.

No Unmitigable Traffic Impacts Alternative

As discussed above, all significant adverse traffic impacts that have resulted from the action would be fully mitigated with the exception of the unmitigated impact at the intersection of Pearl Street and Robert F. Wagner, Sr. Place. The No Unmitigable Traffic Impacts Alternative proposes to mitigate traffic impacts at the intersection of Pearl Street at Robert F. Wagner Sr. Place, by re-opening Avenue of the Finest between Pearl Street and Park Row. This would ease congestion focused at Pearl Street and Robert F. Wagner Sr. Place by allowing vehicles destined to the City Hall area to access it without having to detour around the security zone. Passenger vehicles traveling along this proposed right-of-way would only be able to travel westbound on

Avenue of the Finest. Security checkpoints would be moved north on Park Row to allow vehicles to travel freely onto Park Row from Avenue of the Finest. The opening of Avenue of the Finest along with minor signal timing adjustments would mitigate this impact back to No-Action conditions.

The proposed opening of Avenue of the Finest to one-way westbound traffic was reviewed and evaluated by NYPD's Counter Terrorism Bureau. The result of this evaluation determined that the opening of Avenue of the Finest to passenger vehicles would not provide sufficient stand-off distance from NYPD headquarters. Therefore, this alternative is not feasible, as it would not meet the goals and objectives of the action.

Community-Suggested Alternative #1: Relocation of Police Headquarters

This alternative was developed in response to suggestions during the public scoping process to explore alternative locations for police headquarters. No specific site has been identified for this possible relocation, although Randalls Island or Governors Island have been suggested because their placement in the East River is thought to provide natural geographical security. The Relocation Alternative would fall far short of the objectives of the action. Moreover, given the concentration of other government facilities in the "civic center" portion of Lower Manhattan which continue to be considered potential terrorist targets and for which security measures would have to be maintained, the adverse impacts resulting from the action may not be entirely avoided should police headquarters be relocated from One Police Plaza. This alternative is therefore not feasible, as it would not meet the goals and objectives of the action.

Community-Suggested Alternative #2: Chatham Green Access Alternative

Under this alternative, the existing security checkpoint would be moved south on Park Row to establish a free-flowing vehicle entrance/exit to the Chatham Green parking lot. Currently, the security checkpoint is located just south of the corner of Park Row and Chatham Square. All vehicles wishing to access the Chatham Green parking lot must pass through this checkpoint, before entering the parking lot via Park Row. This procedure allows screening of vehicles before they enter the security zone, as control of these vehicles within the zone is not feasible. Vehicles can currently exit the parking lot via either the same location on Park Row, or Pearl Street (northbound).

Under this alternative, the current checkpoint on Park Row would be moved approximately 125 feet to the south in an effort to establish a free-flowing entrance/exit to the Chatham Green parking lot. A 30-foot-wide two-lane access point to the parking lot, with a right-in/right-out, would be provided at the current location on Park Row. The current parking lot exit along Pearl Street would be sealed off and a turnaround would be established at the southeast corner of the parking lot, so that all vehicles would have to exit the parking lot via Park Row. This would result in the elimination of approximately 6 dedicated parking spaces along the Pearl Street side of the parking lot. However, those spaces could be replaced with some minor modifications to the parking lot's layout.

Like the action, this alternative would also result in significant adverse traffic, noise, and urban design impacts, and the mitigation measures for the action would also be required for this Chatham Green Access Alternative.

This proposed alternative was reviewed and evaluated by NYPD's Counter Terrorism Bureau and it was determined that this alternative would not allow sufficient stand-off distance between NYPD headquarters and the Chatham Green Houses parking lot. As this stand-off distance would be substantially reduced to an unsafe level, this alternative would not achieve the objectives of NYPD's Counter Terrorism Bureau to protect government facilities in the "civic center" portion of Lower Manhattan that continue to be considered potential terrorist targets. This alternative is not feasible, as it would not meet the goals and objectives of the action.

G. CERTIFICATION OF FINDINGS

Having considered the relevant environmental impacts, facts, and conclusions disclosed in the FEIS and weighed and balanced relevant environmental impacts with social, environmental, public health, economic, and other essential considerations as required in 6 NYCRR 617.11, the New York City Police Department certifies that;

- The requirements of 6 NYCRR Part 617 have been met;
- Consistent with social, environmental, economic, and other essential considerations from among the reasonable alternatives thereto, the action to be approved is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable;
- Consistent with social, environmental, economic, and other essential considerations, the adverse environmental impacts revealed in the FEIS will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigative measures that were identified as practicable.

The FEIS and these Findings constitute the written statement of facts and the environmental, social, economic and other factors and standards that form the basis of this decision, pursuant to Section 617.11(d)(5) of the SEQRA regulations.



Inspector Anthony Tria
Capital Construction
New York City Police Department

August 28, 2007

Date

Distribution List:

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One Police Plaza Security Plan EIS

CHAPTER 1: PROJECT DESCRIPTION

A. INTRODUCTION

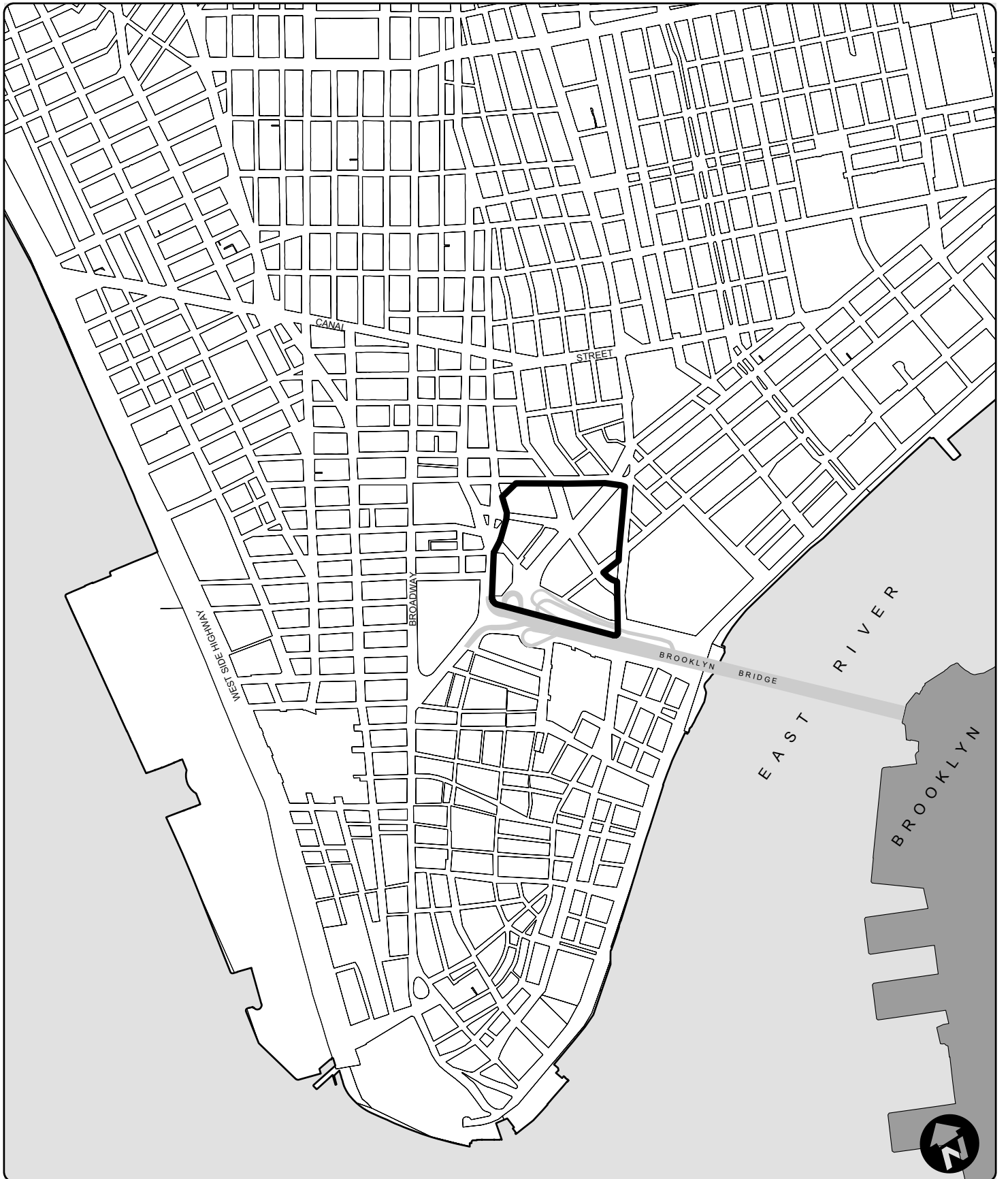
Following the events of September 11, 2001, the New York City Police Department (NYPD) established security measures in order to protect government facilities in the “civic center” portion of lower Manhattan which were at the time, and continue to be, considered potential targets (see Figure 1-1 for project location). These security measures included the installation of attended security checkpoint booths, planters, bollards and hydraulically-operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza (see Figure 1-2 for existing conditions). Pedestrian access within the security perimeter established by the check points and the delta barriers is not restricted, with the exception of the area immediately adjacent to NYPD headquarters at One Police Plaza.

The NYPD, lead agency for the referenced project, prepared an Environmental Assessment Statement (EAS) in January 2004 pursuant to an order issued on August 1, 2003 by New York State Supreme Court Justice Walter B. Tolub in the matter of *Chatham Green, Inc. et al. v. Bloomberg et al.* (Index No. 107569/03). NYPD then issued a negative declaration, which was subsequently challenged in a second lawsuit, *Chatham Towers, Inc. et al. v. Bloomberg et al.* (Index No. 107761/04). In an opinion dated October 15, 2004, Justice Tolub found that the EAS did not take a “hard look” as required by law, specifically for the technical areas of Community Facilities and Services, Socioeconomic Conditions, Neighborhood Character, Traffic and Parking, and Transit and Pedestrians. Justice Tolub directed that the preparation of an Environmental Impact Statement (EIS) was appropriate.


Although the NYPD maintains that the EAS and negative declaration were adequate in all respects, in light of Justice Tolub’s October 15, 2004 determination, the NYPD has prepared this draft EIS in accordance with Article 8 of the New York State Environmental Conservation Law and the regulations promulgated pursuant thereto at 6 NYCRR Part 617 (State Environmental Quality Review Act or “SEQRA”), Executive Order 91 of 1977, as amended, and the Rules of Procedure for City Environmental Quality Review, found at Title 62, Chapter 5 of the Rules of the City of New York (“CEQR”).

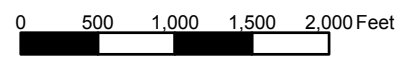
It bears noting that certain streets proximate to One Police Plaza were closed in 1999, as indicated in an EAS, dated April 2, 1999, prepared by the New York City Department of Transportation at the request of the NYPD (CEQR No. 99DOT011M). Following the issuance of the EAS in 1999, a negative declaration was issued on May 13, 1999. These pre-September 11, 2001 street closures, listed below (also see Figure 1-3), are not part of the action but are considered as part of the No-

Project Location



Legend

 Project Area





Park Row at Pearl Street looking north.



Park Row at Pearl Street looking south.



Chatham Square looking south towards Park Row.



St. James Place at Madison Street looking west.



Park Row at Worth Street looking south. M103 bus travelling north on Park Row.

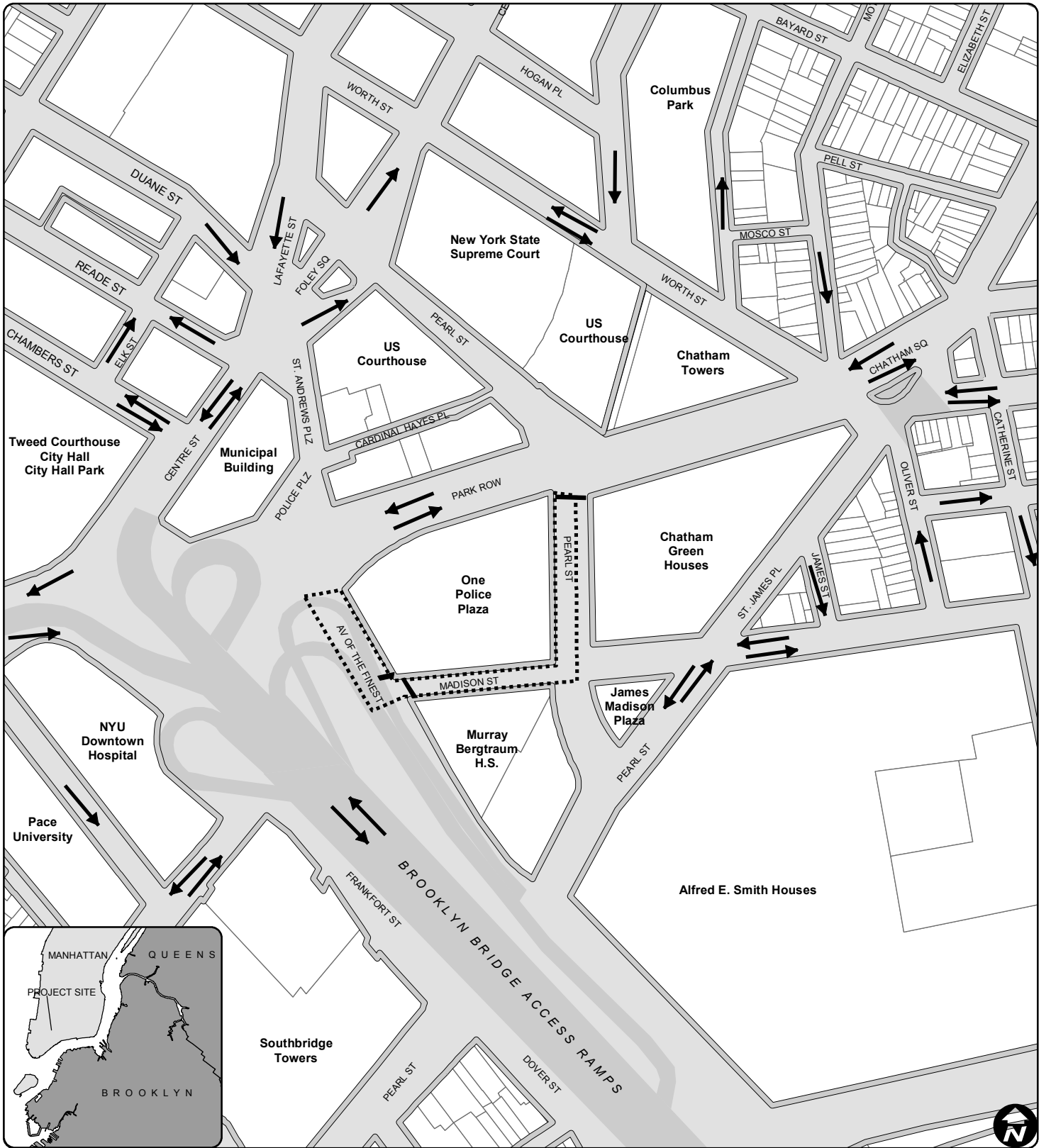


St. James Place at Pearl Street looking north.



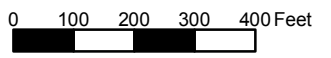
St. James Place at Madison Street looking south west.

1999 Street Closures



Legend

- 1999 Street Closures
- Delta Barrier Locations**
- Barriers installed in 1999



Action condition in this EIS:

- Madison Street between Avenue of the Finest and Pearl Street (full closure)
- Avenue of the Finest between Madison Street and Park Row (full closure except for motor vehicles destined to the municipal garage)
- Pearl Street between Park Row and Madison Street (partial closure - southbound direction only)

As part of another unrelated action, in early 2001, an EAS was prepared for the Public Safety Answering Center II (CEQR No. 01NYP002M), to be located in an existing building at 109-113 Park Row. The EAS analyzed the closure of the 400-space municipal garage to the public, and a negative declaration was issued on June 12, 2001. The garage was then officially closed to the public on June 30, 2001. However, following the events of September 11, 2001, the NYPD decided not to go forward with the above-mentioned project and the building remained vacant. The municipal garage was rehabilitated and re-opened to NYPD authorized vehicles in April 2004. As the closure of the municipal garage occurred prior to the post-9/11 security plan, it is also included in this EIS as part of the No-Action condition.

B. PROJECT PURPOSE AND NEED

While the New York City Police Department headquarters at One Police Plaza had been considered a sensitive location at risk of attack and requiring implementation of certain security measures, following the events of September 11, 2001, the NYPD determined that there was a need for heightened security, including the establishment of a “secure zone” around its headquarters.

In the wake of the September 11, 2001 terrorist attacks, NYPD’s Counter Terrorism Bureau conducted security assessments of numerous potential terrorist targets within New York City, including government and law enforcement facilities. Experience and research demonstrate that terrorists avoid “hardened” targets, which are targets that have been reinforced with barriers and other deterrents that make the target less vulnerable and accessible to attack. In assessing the security of One Police Plaza, the Counter Terrorism Bureau concluded that the “secure zone” created around the building immediately following the terrorist attacks should be maintained to prevent the possibility of a vehicle bomb attack on NYPD Headquarters.

C. DESCRIPTION OF ACTION

As discussed above, following the events of September 11, 2001, a security plan was implemented that resulted in restricted use streets and the installation of attended security checkpoint booths, planters, bollards, and hydraulically-operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza, including NYPD Headquarters, the New York State Supreme Court, and the United States Courthouse. All but two sets of barriers were installed by the NYPD. Security barriers located at Park Row and Foley Square and at Pearl Street on the west side of Park Row, were installed by the United States Marshals Service (“USMS”) and are not part of the NYPD’s action. As shown in Figure 1-4, security checkpoint locations for vehicular access have been installed at the following locations:

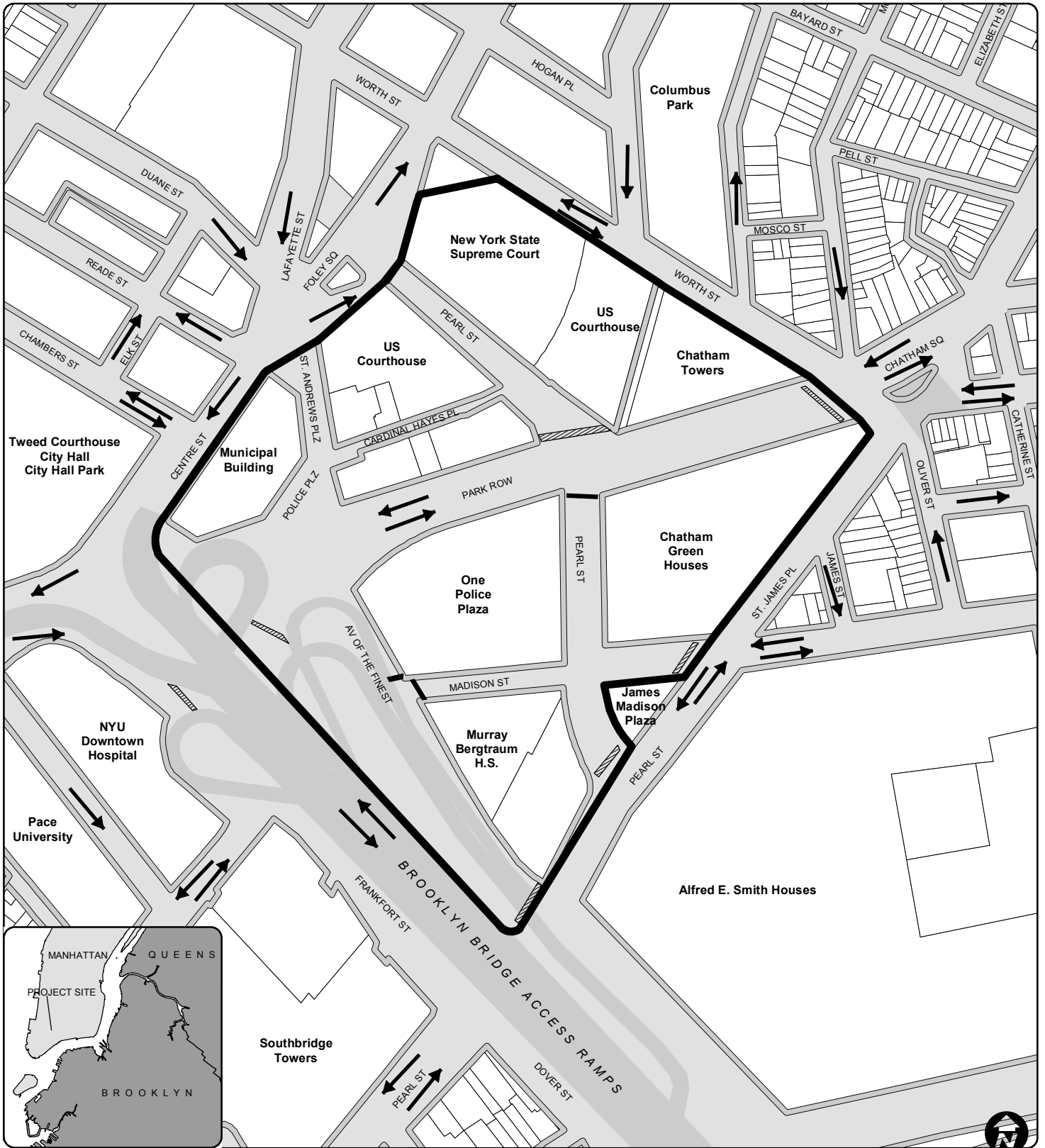
- Park Row, west of Worth Street
- Park Row, near the Brooklyn Bridge
- Pearl Street at Foley Square
- Pearl Street on the west side of Park Row
- Pearl Street at St. James Place
- Madison Street at St. James Place
- Avenue of the Finest at Pearl Street
- Rose Street at Frankfort Street
- Northbound Park Row Brooklyn Bridge off-ramp

Four of the above checkpoints also include sally ports - two delta barriers on the same roadway that allow a vehicle to be immobilized for inspection. Sally ports have been erected at the following checkpoints:




- Madison Street at St. James Place
- Pearl Street at St. James Place
- Avenue of the Finest at Pearl Street
- Park Row west of Worth Street

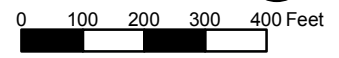
As a result of these security measures, the following streets within immediate proximity to One Police Plaza are open only to authorized vehicles:

- Park Row, between approximately Worth Street and the Brooklyn Bridge
- Pearl Street, between Foley Square and St. James Place
- Madison/Rose Streets, between Frankfort Street and St. James Place



Legend

-  Security Zone (Closed to Public Vehicular Traffic after 09/11/2001)
- Delta Barrier Locations**
-  Barriers installed in 1999
-  Barriers installed after 09/11/2001



- Avenue of the Finest
- Northbound Park Row Brooklyn Bridge off-ramp

As discussed above, the street closures resulted in restricted access for commercial and passenger vehicles on streets adjacent to NYPD headquarters and other nearby civic buildings. Authorized NYPD and government personnel and emergency vehicles are permitted through the checkpoints after displaying appropriate identification. Residents of Chatham Green seeking vehicular access to the Chatham Green parking lot along Park Row are permitted through the checkpoint at Park Row at Worth Street after displaying valid identification, but are not permitted into the security zone through any other checkpoint. Commercial vehicles, such as delivery trucks, are only permitted through the checkpoint at Park Row and Worth Street after displaying valid identification and after passing through the barricade must pull into a truck inspection staging area where they are inspected by USMS officers who utilize, among other security measures, bomb sniffing dogs.

With the exception of areas immediately adjacent to the NYPD headquarters at One Police Plaza, pedestrian access within the security perimeter is not restricted. Iron fencing and barriers are located around the perimeter of One Police Plaza to restrict pedestrian access. In addition, the stairway leading from Police Plaza to Madison Street is closed to pedestrians.

No-Action Condition

For analysis purposes, under the No-Action condition, it is assumed that the One Police Plaza security plan is not in place, that the roadways are open with the 1999 NYPD street closures and municipal garage closure in place, and that transportation services would continue as they were prior to September 11, 2001. For the purposes of this EIS, the analysis year is 2006 (Build Year).

With-Action Condition

Under the With-Action condition, the One Police Plaza security plan is in effect so that the roadways in the vicinity of One Police Plaza are closed to unauthorized vehicular traffic, along with all the security plan features described above currently in place. Therefore, the EIS will analyze any potential impacts due to the security measures by comparing the No-Action condition to the With-Action condition.

Prior to September 11, 2001, six Metropolitan Transit Authority (“MTA”) New York City Transit bus routes used Park Row in one or both directions, including the M9, M15, M103, X25, X90, and the B51. The BM1, BM2, BM3, and BM4 express bus routes were also rerouted around Park Row after September 11, 2001. These buses were rerouted around the security zone after the street

closures were put in place. Recently three routes (M103, M15, and B51) have returned to Park Row. Although these MTA buses have returned to their original route down Park Row, for conservative analysis purposes, this will not be analyzed as part of the With-Action condition in the EIS. Instead, the rerouting of the M103, M15, and B51 buses to their original route will be analyzed as mitigation and discussed in detail in Chapter 11, “Mitigation.”

Existing Conditions Within the Security Zone

Land uses within the security zone consist predominantly of institutional and residential uses. The existing Police Plaza complex includes an outdoor plaza, and the police headquarters at One Police Plaza. The outdoor plaza, part of the Police Plaza complex, is an open space walkway with trees and benches connecting police headquarters with the Municipal Building at One Centre Street. The 30-story Municipal Building occupies one square block between Centre Street, St. Andrews Plaza, Park Row, and Tryon Row. The Municipal Building has a street-level passageway to Chambers Street and an arcaded south wing that arches above a subway entrance. The United States Courthouse at 40 Foley Square, which houses the U.S. Court of Appeals and U.S. District Court, is a 31-story structure located to the northeast of the Municipal Building. St. Andrews Plaza separates the two buildings. The block bordered by Centre, Worth, Baxter, and Pearl Streets is occupied by the New York County Courthouse, home to the New York State Supreme Court and a second United States Courthouse, containing the U.S. District Court. The Metropolitan Correctional Center is located on the northwestern corner of Park Row and Pearl Street. Murray Bergtraum High School, a public school with student enrollment of approximately 2,790 students, is located on a block bounded by Pearl Street, Madison Street, and Avenue of the Finest. A Verizon telecommunications building is located on the same block as the high school.

Two large-scale housing developments, Chatham Towers and Chatham Green Houses, are also located within the security zone. Chatham Towers is the smaller of the two and is located between Worth Street, Park Row, and Pearl Street. Chatham Towers consists of two 25-story towers containing approximately 250 residential units with underground parking for residents and the public. The Chatham Green Houses is a 21-story cooperative apartment building located on the irregularly shaped block bordered by Park Row, St. James Place, Chatham Square, and Pearl and Madison Streets. The S-shaped structure contains 420 residential units. There is also an at-grade parking lot located in the front of the building on Park Row and along the back of the building on St. James Place. As Chatham Green Houses is located within the security zone, residents in vehicles that wish to access the parking lot along Park Row must present identification before being permitted through the barrier. Access to the parking lot along St. James Place is not restricted. Access to the Chatham Towers parking garage is not restricted as the entrance is located along Worth Street, which is not located within the security zone.

D. REQUIRED APPROVALS

Environmental Review (SEQRA and CEQR)

Pursuant to the State Environmental Quality Review Act (SEQRA) and its implementing regulations, New York City has established rules for its City Environmental Quality Review (CEQR). The environmental review provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify and, when practicable, mitigate significant adverse environmental effects. CEQR rules guide environmental review through the following steps:

Establishing a Lead Agency: Under CEQR, the “lead agency” is the public entity responsible for conducting environmental review. Usually, the lead agency is also the entity principally responsible for carrying out, funding, or approving the proposed action. In accordance with CEQR rules (62 RCNY §5-03), the New York City Police Department is the lead agency for this action.

Determination of Significance: The lead agency’s first charge is to determine whether the proposed action may have a significant adverse impact on the environment. To do so, it must prepare or have prepared an Environmental Assessment Statement (EAS). As discussed above, the NYPD prepared an EAS in January 2004 pursuant to an order issued on August 1, 2003 by New York State Supreme Court Justice Walter B. Tolub in the matter of *Chatham Green, Inc. et al. v. Bloomberg et al.* (Index No. 107569/03). NYPD issued a negative declaration, which was subsequently challenged in a second lawsuit, *Chatham Towers, Inc. et al. v. Bloomberg et al.* (Index No. 107761/04). In an opinion dated October 15, 2004, Justice Tolub found that the EAS did not take a “hard look” as required by law. The NYPD then agreed to prepare an EIS for the street closures surrounding NYPD headquarters. The NYPD issued a positive declaration on April 21, 2005, requiring that an Environmental Impact Statement (EIS) be prepared.

Scoping: Once the lead agency issues a positive declaration, it must then issue a draft scope of work for the EIS. A draft scope of work for this action was issued on April 6, 2005. “Scoping” or creating the scope of work, is the process of focusing the environmental impact analyses on the key issues that are to be studied. CEQR requires a public scoping meeting as part of the process. A public scoping session was held on May 24, 2005 and public comments, both oral and written, were accepted and considered in conformance with the regulations. A final scope of work was issued on June 26, 2006.

Draft Environmental Impact Statement (DEIS): In accordance with the final scope of work, a DEIS

is prepared. The lead agency reviews all aspects of the document, calling on other City agencies for review and comment, as it deems appropriate. Once the lead agency is satisfied that the DEIS is complete, it issues a Notice of Completion and circulates the DEIS for public review. The Notice of Completion for the DEIS was issued on July 28, 2006.

Public Review: Publication of the DEIS and issuance of the Notice of Completion signal the start of the public review period. During this time, which must extend for a minimum of 30 days, the public may review and comment on the DEIS either in writing or at the public hearing convened for the purpose of receiving such comments. The lead agency must publish a notice of the hearing at least 14 days before it takes place, and must accept written comments for at least 10 days following the close of the hearing. All substantive comments received at the hearing and all written comments received within 10 days after the hearing become part of the CEQR record and must be summarized and responded to in the FEIS. Two public hearings on the DEIS were held on September 14, 2006 and October 4, 2006 at the New York City Department of Health auditorium, to afford all interested parties the opportunity to submit oral and/or written comments. The record remained open through October 24, 2006, to allow submission of additional written comments on the DEIS.

Final Environmental Impact Statement (FEIS): After the close of the public comment period for the DEIS, the lead agency prepares an FEIS. This FEIS has incorporated relevant comments made on the DEIS either in a separate attachment (Chapter 16, “Response to Comments”) or in changes to the body of the text, graphics, and tables. In response to those comments, revisions, including further studies, may be incorporated. Once the lead agency determines the FEIS is complete, it issues a Notice of Completion and circulates the FEIS. As previously noted, the FEIS must be issued (with the notice of completion) at least 10 days before the decision-maker (NYPD) can act to approve the action.

New York City Local Law Number 24 of 2005

Local Law 24 of 2005, approved by the Mayor in March of 2005, amends the New York City Department of Transportation (“DOT”) regulations to state that “except as otherwise provided by law, it shall be unlawful for any person to close any street, or a portion thereof, within the jurisdiction of the [DOT] commissioner, to pedestrian or vehicular traffic without a permit from the commissioner.” In the event of closure of a publicly mapped street that is used for vehicular or vehicular and pedestrian access for more than 180 days, the commissioner shall issue or cause to be issued a community reassessment, impact and amelioration (CRIA) statement that has been approved by the commissioner or other government entity initiating the street closure. The CRIA statement shall be delivered to both the community board and the council member in whose district the street closure is located on or before the 210th day of the closure. However, the requirement for

the issuance of the CRIA statement may be satisfied by delivery of an environmental assessment statement, environmental impact statement, or similar document required by law to be prepared for the street closure. The Local Law requires that a public forum be held. The law applies retroactively to street closures for security reasons that were commenced prior to enactment of the law. Therefore, in addition to satisfying the court order, this EIS is being prepared in satisfaction of CRIA pursuant to Local Law 24 of 2005. The CEQR process described above, which includes public review and hearings, will fully satisfy the CRIA requirements including the public forum requirement.

One Police Plaza Security Plan EIS

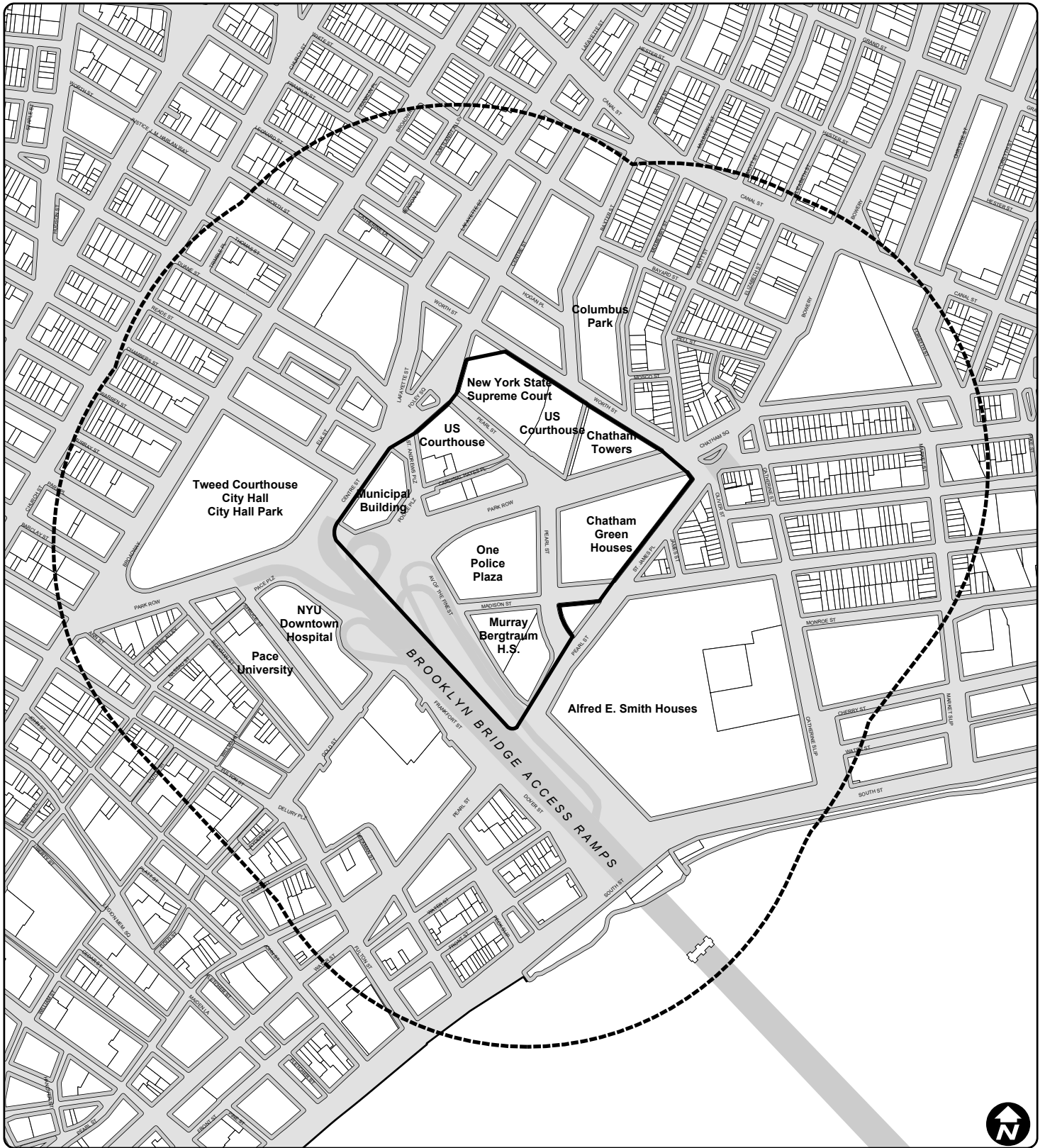
CHAPTER 2: LAND USE, ZONING, AND PUBLIC POLICY

A. INTRODUCTION



A detailed assessment of land use, zoning, and public policy is appropriate if the proposed action would result in a significant change in land use or would substantially affect regulations or policies governing land use or if analyses requiring land use information are being performed in any other technical area. Examples of technical analyses requiring land use information include socioeconomic conditions, neighborhood character, traffic and transportation, air quality, and noise. Under *CEQR Technical Manual* guidelines, an assessment of zoning is typically performed in conjunction with a land use analysis when the action would change the zoning on the site or result in the loss of a particular use. Similar to zoning, some assessment of public policy typically accompanies an assessment of land use. Under CEQR, a land use analysis characterizes the uses and development trends in the study area, and assesses whether a proposed action is compatible with or may affect those conditions.

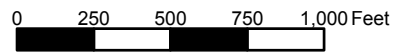
As discussed in Chapter 1, “Project Description,” the security plan consists of the installation of attended security checkpoint booths, planters, bollards and hydraulically operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated [adjacent to the civic facilities] near One Police Plaza following the events of September 11, 2001 (see Figure 2-1 for project area boundary). As the security plan has the potential to indirectly affect land use within the study area, a detailed assessment of its effects on land use, zoning, and public policy is warranted.

According to the *CEQR Technical Manual*, unless the action covers a substantial physical area or is a generic action, the study area should generally include at least the project site and the area within 400 feet of the site’s boundaries. When other, more indirect, effects may also occur, a larger study area should be used. Typically, such secondary impacts can occur within a radius of a quarter-mile from the site of the action. For the purposes of this analysis, the land use study area conservatively extends approximately a quarter-mile from the security zone boundary (see Figure 2-1). The study area is bounded generally by the East River/Market Street to the east, Canal Street to the north, Church Street to the west, and Fulton Street to the south.



Legend

-  Security Zone (Closed to Public Vehicular Traffic after 09/11/2001)
-  Land Use Study Area (Quarter-Mile Radius)



B. BASELINE CONDITIONS

As set forth in the project description, the One Police Plaza security plan includes the closure of streets adjacent to the civic facilities located near One Police Plaza (see Figure 2-1 for security zone area). Prior to September 11, 2001, the streets were open to all vehicles, with the exception of several streets that have been closed since 1999 for security purposes (see Chapter 1, Figure 1-3) and that were subject to a separate environmental review. In addition, the security features associated with the action such as delta barriers, security booths, sally ports, jersey barriers, and bollards were not in place prior to September 11, 2001. As the creation of the security zone was the result of the September 11, 2001 attacks and subsequent security needs, an understanding of the conditions that existed in the surrounding area prior to the attacks will help provide context for the analysis which follows. Those baseline land use, zoning, and public policy conditions are discussed in this section. To the extent that certain baseline conditions did not exist in 2001, they are also identified herein (e.g. adoption of certain amendments to the Waterfront Revitalization Program in 2002).

Land Use

Security Zone

In 2001 (and today), land uses within the security zone consist mostly of institutional and residential uses. The Police Plaza complex, developed between 1968 and 1972, includes an outdoor plaza, and the police headquarters at One Police Plaza. The 400-space municipal parking garage located under One Police Plaza was closed to the public a few months prior to September 11, 2001. The outdoor plaza, part of the Police Plaza complex, is a landscaped open space with trees and benches connecting police headquarters with the Municipal Building at One Centre Street. The 30-story Municipal Building occupies one square block between Centre Street, St. Andrews Plaza, Park Row, and Tryon Row. The Municipal Building has a street-level passageway to Chambers Street and an arcaded south wing that arches above a subway entrance. The United States Courthouse, containing the U.S. Court of Appeals, is a 31-story structure located to the northeast of the Municipal Building. St. Andrews Plaza separates the two buildings. The block bordered by Centre, Worth, Baxter, and Pearl Streets is occupied by the New York County Courthouse, home to the New York State Supreme Court, and a second U.S. Courthouse containing the U.S. District Court. The Metropolitan Correctional Center is located on the northwestern corner of Park Row and Pearl Street. Murray Bergtraum High School is located on the a block bounded by Pearl Street, Madison Street, and Avenue of the Finest, along with a Verizon telecommunications building.

Two large-scale housing developments, Chatham Towers and Chatham Green Houses, are also located within the security zone. Chatham Towers is the smaller of the two and is located

between Worth Street, Park Row, and Pearl Street. Chatham Towers consists of two 25-story towers with 250 residential units and underground parking for residents and the public. The Chatham Green Houses is a 21-story cooperative apartment building located on the irregularly shaped block bordered by Park Row, St. James Place, Chatham Square, and Pearl and Madison Streets. The S-shaped structure contains 420 residential units. There is an at-grade parking lot located in the front of the building along Park Row and along the back of the building on St. James Place. A two-story office building occupies the portion of the block on Park Row and St. James Place near Worth Street. Offices for doctors, dentists, accountants, real estate brokers, and investment firms are contained in this building. A playground associated with the Chatham Green Houses is located on St. James Place.

Study Area

In 2001, the study area was generally characterized by the same mixed land use pattern that prevails today. Chinatown below Canal Street included mainly commercial and residential uses in small, older buildings, and large residential towers. High concentrations of commercial and mixed-use buildings exist throughout the sub-area, concentrated along Canal Street, between Broadway and Pearl Street, along the north-south streets throughout the area. Restaurants, fresh food markets, tea and rice shops, tourist markets and garment factories are the main businesses in Chinatown, and the area's distinct character, rich history, and mix of businesses make it a popular tourist destination.

The eastern section of the study area includes large-scale residential developments such as the Governor Alfred E. Smith Houses along the East River, Knickerbocker Village, and Confucius Plaza, a large, middle-income residential building on Bowery at Division Street.

Additional uses in the study area include institutional, transportation, office, and open space. Three elementary schools and numerous religious institutions are scattered throughout the area. Cultural institutions include the Museum of Chinese in the Americas at Mulberry and Bayard Streets, and the Eldridge Street Project between Canal and Division Streets, which undertook a massive restoration of the Eldridge Street Synagogue, a National Historic and New York City Landmark. There are several open space areas located in the study area. Columbus Park is a well-used recreation area with a baseball field, playgrounds, swings, basketball courts, benches, and tables for chess games. Located on a block that stretches from Bayard Street to Worth Street, Columbus Park separates the monumental institutions of lower Manhattan's civic center from the smaller-scale businesses and residential uses in Chinatown. Kimlau Square is a small triangle with benches and a statue located at the intersection of Worth Street, Mott Street, Bowery, Park Row, St. James Place, and Oliver Street. Located on St. James Place, the St. James Plaza is a small community plaza. James Madison Plaza is also an open space area with trees and benches bordered by St. James Place and Pearl and Madison Streets.

The western portion of the study area, known as the Civic Center, is characterized by a high concentration of government and government-related uses, including several courthouses, and City and state government office buildings. The City Hall complex, which includes City Hall Park, City Hall, and the former Tweed Courthouse (now municipal offices), occupies a triangular block between Park Row, Broadway, and Chambers Street with the park filling most of the triangle's southern point. The Surrogate's Court/Hall of Records building is located north of the City Hall complex and west of the Municipal Building. There are several additional government office buildings in the northwest portion of the study area, including the Jacob Javits Federal Building and the U.S. Court of International Trade on Lafayette Street at Duane Street. Several small parks are located near the courthouse as well as the African burial ground, located along Duane Street east of Broadway. Historic courthouse buildings line Centre Street, the area's main thoroughfare, which passes through Foley Square.

Several land uses define the southern portion of the study area. The superblock between Frankfort, Gold, Fulton, and Pearl Streets contain the Southbridge Towers residential complex. Southbridge Towers contains seven residential buildings, ground floor retail establishments, underground parking lots, parks, plazas, and restaurants. In addition, the 100 Gold Street office building and St. Margaret's House share the Southbridge Towers superblock. The area surrounding these towers contain small concentrations of residential buildings, most with ground-floor commercial uses. Major institutional uses in this area include Pace University, with an enrollment of approximately 13,498 students, and NY Downtown Hospital, located just south of the Brooklyn Bridge. Also located in the southeastern portion of the study area is the South Street Seaport. The South Street Seaport is a dominant use along the East River Waterfront, attracting large numbers of visitors to shops, restaurants, boat rides and boardwalk entertainment. Also located in this area was the Fulton Fish Market, a wholesale fish market.

One important land use element in the southern portion of the study area is the entry and exit ramp system for the Brooklyn Bridge. These ramps form a network of segregated roadways that divide the Governor Alfred E. Smith Houses, Verizon, and Murray Bergtraum High School corridor from the land uses to the east. A small park at the corner of Frankfort Street and Park Row marks the end of the Brooklyn Bridge pedestrian path. The ramps to the Brooklyn Bridge also creates a physical and visual barrier to the neighborhoods to the south.

Zoning

Security Zone

In the baseline condition, the security zone area was zoned C6-1, C6-4, and R7-2 (see Figure 2-2). C6 districts are General Commercial districts and are zoned for a wide range of high bulk commercial uses requiring a central location. Most C6 districts are in Manhattan and provide for corporate headquarters, large hotels, entertainment facilities, retail stores, and some residential development in mixed buildings. R7 is a medium density apartment house district. Table 2-1 summarizes the zoning and permitted uses and bulk in the security zone area in the baseline condition.

Study Area

The remainder of the study area included C2, C5, C6, and C8 commercial districts, M1 manufacturing districts, and R7 and R8 residential zoning districts. Portions of the Special Lower Manhattan District and Special Tribeca Mixed-Use District are located in the southern and western portions of the study area, respectively. The Special Transit Land Use District is also located in the study area in the vicinity of Chatham Square. Table 2-1 summarizes the zoning in the study area in the baseline condition.

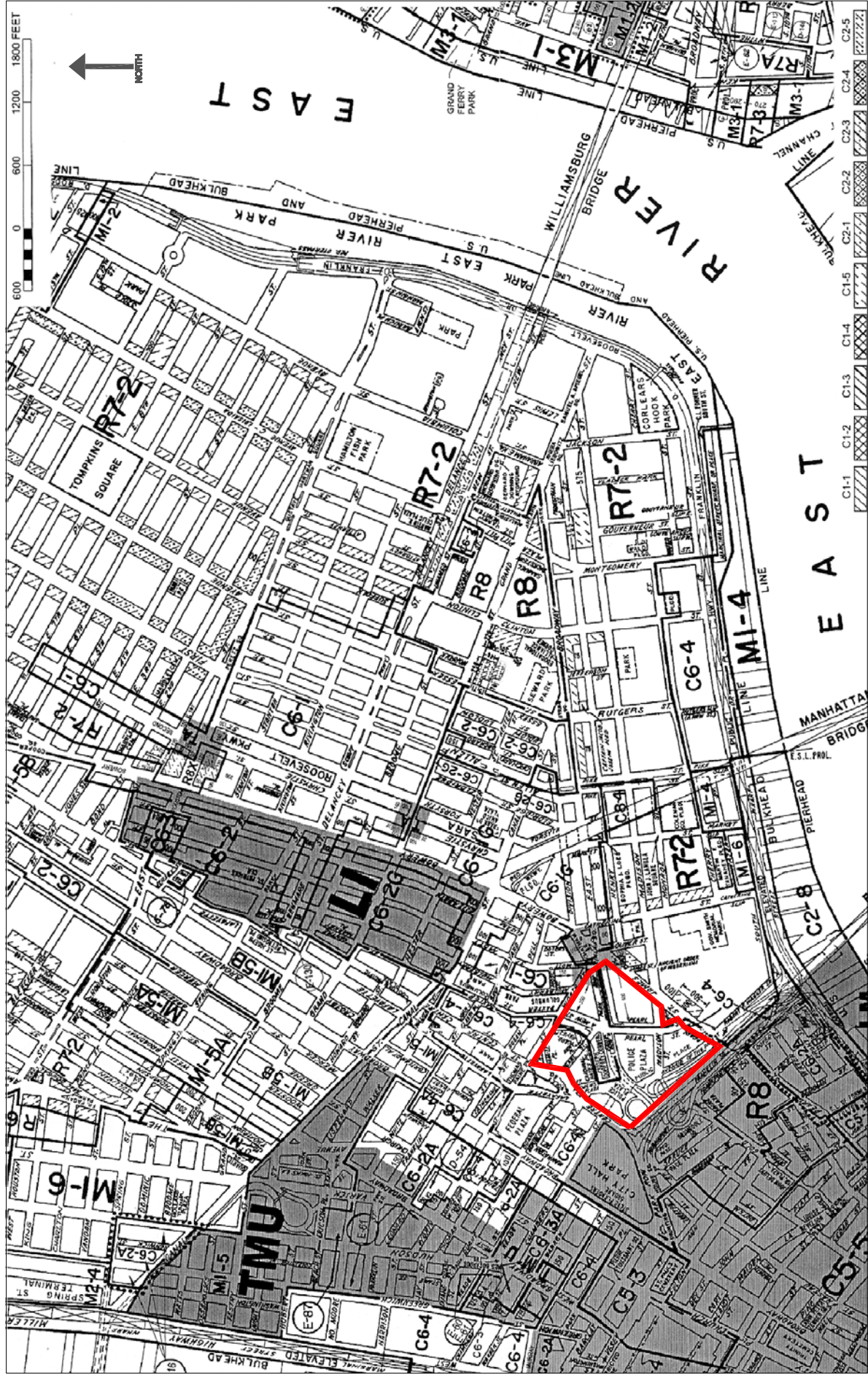
Public Policy

Federal, state, and city agencies as well as community organizations often develop locally specific or neighborhood plans for various areas of New York City. A discussion of specific pre-September 11, 2001 plans addressing the study area is presented below.

Security Zone

There were no specific policies or plans that addressed the security zone area alone. The Lower Manhattan Economic Revitalization Plan (discussed below) applied to areas south of Chambers Street in Lower Manhattan. The southern portion of the security zone is located within that boundary.

The Lower Manhattan Economic Revitalization Plan. The Lower Manhattan Economic Revitalization Plan was enacted into law in 1995 and was recently extended until June 30, 2007. This plan includes benefits for both commercial tenants and residential conversions, as well as other cost-savings programs.



Security Zone

One Police Plaza Security Plan EIS

Figure 2-2

Zoning Map

**Table 2-1
Study Area Zoning**

Zoning District	Permitted Uses/Bulk
Commercial Districts	
C2-8	Low-density neighborhood shopping/services. High density residential and community facility use.
C4-6	Medium-density general commercial. High-density residential, community facility.
C5-3, C5-5	High-density restricted central commercial district intended for retail and large offices. High-density residential, community facility.
C6-1, C6-2, C6-3	Medium-density general commercial outside CBD (Central Business District). Low- to medium-density residential and community facility.
C6-1G	Medium-density general central commercial district. Allows residential conversion of non-residential floor area only by special permit.
C6-2A, C63-A	Contextual* medium-density general central commercial district outside of CBD. Low- to medium-density residential and community facility.
C6-4, C6-9	High-density general central commercial intended for CBD, allowing medium- to high-bulk offices. High-density residential, community facility.
C6-4A	Contextual high-density general central commercial intended for CBD, allowing medium - to high-bulk offices. High-density residential, community facility.
C8-4	General services district intended to provide for necessary service establishments often involving objectionable influences (noise from operations or truck traffic). Incompatible with residential and retail uses.
Residential Districts	
R7-2	Medium-density residential, community facility.
R8	General residence district. High-density residential, community facility.
Manufacturing Districts	
M1-4	Low-density light industrial uses (high performance) and certain community facilities.
M1-5, M1-6	Medium-density light industrial uses (high performance) and certain community facilities (for loft areas).
Special Purpose Districts	
LM	Special Lower Manhattan District
TMU	Special Tribeca Mixed-Use District
TA	Special Transit Land Use District
Note: * Contextual districts mandate street wall heights, lot coverage and density requirements, which produce lower, bulkier buildings that maintain the scale and street space of existing neighborhoods.	

Study Area

The following is a description of pre-September 11, 2001 public policies or plans that applies to some portion of the study area.

The Alliance for Downtown New York. The Downtown Alliance, the city's largest business improvement district (BID), was established in 1995. The Downtown Alliance's mission is to transform Lower Manhattan into a 24-hour neighborhood and to create a safe, clean, live-work, wired community for the 21st century. The BID covers the area from City Hall to the Battery, and from the East River to Route 9A, and includes approximately 100 million square feet of office space and over 100 city blocks.

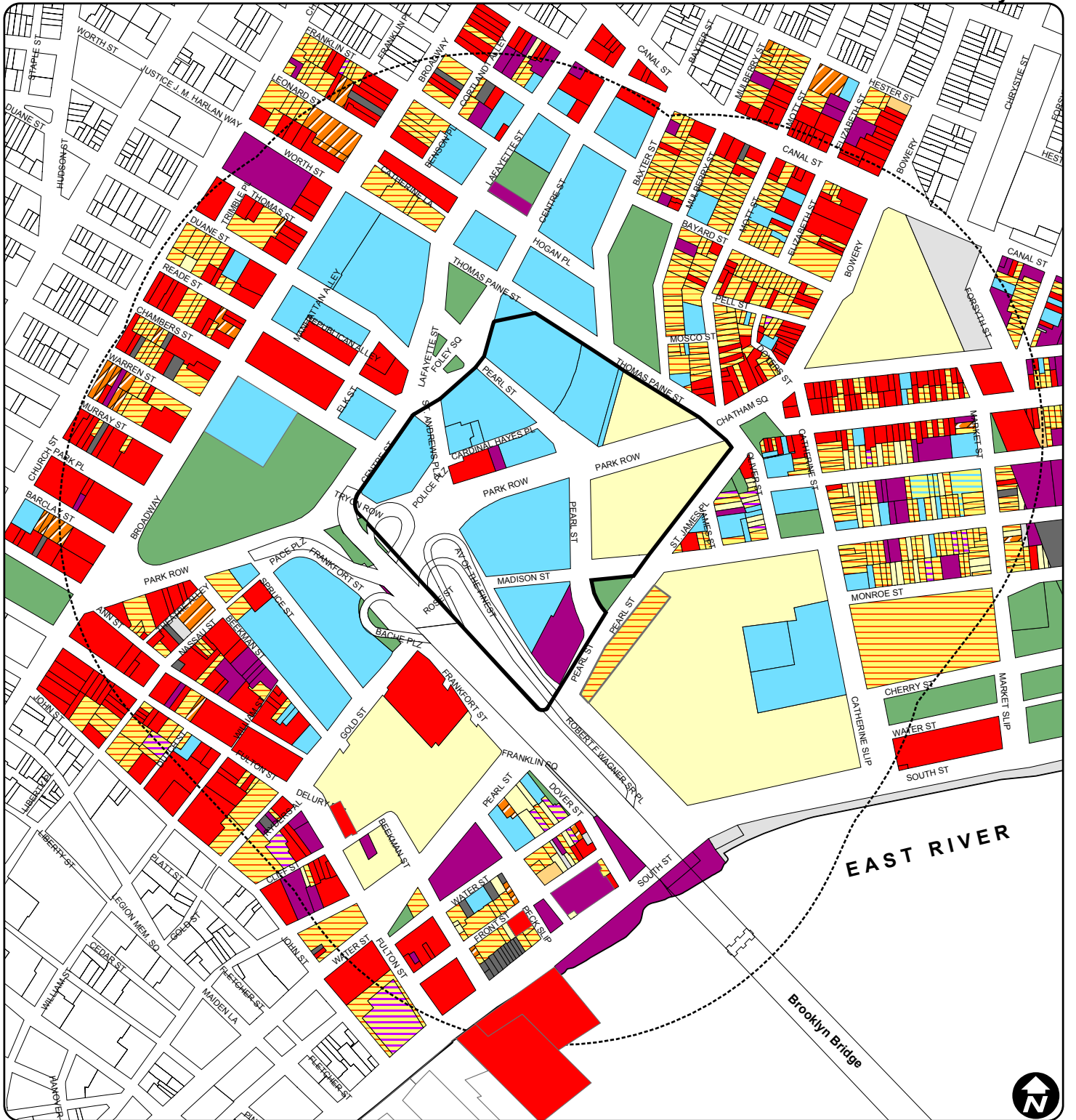
421-g Program. The 421-g program provides a real estate tax exemption and abatement incentive for developers to convert commercial buildings, generally south of Murray and Frankfort Streets, into residential dwellings. Since 1998, more than 50 buildings in the Lower Manhattan area have been converted from office to residential use under the 421-g program.

Local Waterfront Revitalization Program. Although the security zone is not located within the boundaries of the coastal zone, some of the eastern and southern portions of the study area are located within this boundary. Pursuant to federal law, in 1999 and 2002, New York City and State, respectively, adopted policies aimed at protecting resources in the coastal zone. New York City's Waterfront Revitalization Program (WRP) contains 10 major policies, each with several objectives focused on improving public access to the waterfront; reducing damage from flooding and other water-related disasters; abandoned waterfront structures; and promoting development with appropriate land uses. The principles of the WRP formed the basis for a New York City Department of City Planning study and the subsequent adoption of new waterfront zoning.

C. CHANGES IN THE AREA SUBSEQUENT TO SEPTEMBER 11, 2001

This section provides a description of land uses in the study area which have changed since September 11, 2001 when the security plan and resulting street closures were put into place. The land uses that characterize the study area today form the basis for future land use projections as well as the basis for the impact analysis that follows. Figure 2-3 shows a land use map for the study area as it exists today.

Land Use Study Area



Legend

Land Use	Open Space	Quarter Mile Study Area
Outside Study Area	Vacant Parcel	Security Zone
Residential	Residential with Office	(Closed to Public Vehicular Traffic after 9/11/01)
Residential with Ground Floor Retail	Residential with Cultural	
Commercial	Hotel	
Industrial, Utilities, Transportation, Parking	Vacant Building	
Institutional	Under Construction	



Land Use

Security Zone

No significant changes to land use have occurred in the security zone since the 2001 baseline year. The 400-space municipal garage located under Police Plaza was closed to the public on June 30, 2001. The plan to demolish the garage was abandoned and, in April 2004, it was reopened to NYPD authorized vehicles.

Study Area

Since 2001, several new residential and commercial buildings have been constructed, and several other existing buildings have been converted for residential use in the southern and western portions of the study area (see Table 2-2). Figure 2-4 shows those parcels with changes to land use since the 2001 baseline year. As a result, approximately 1,578 residential units have been added within the study area since 2001. Since that time however, there has been little to no new development within Chinatown, besides two new commercial buildings located on East Broadway. Most recently, the historic Fulton Fish Market, a wholesale fish market that existed on South Street for over 120 years, has moved to a new facility in the Hunts Point section of the Bronx. There is no known final plan concerning the reuse or redevelopment of the fish market site. Besides the projects mentioned herein, land uses within the study area have generally remained the same since 2001.

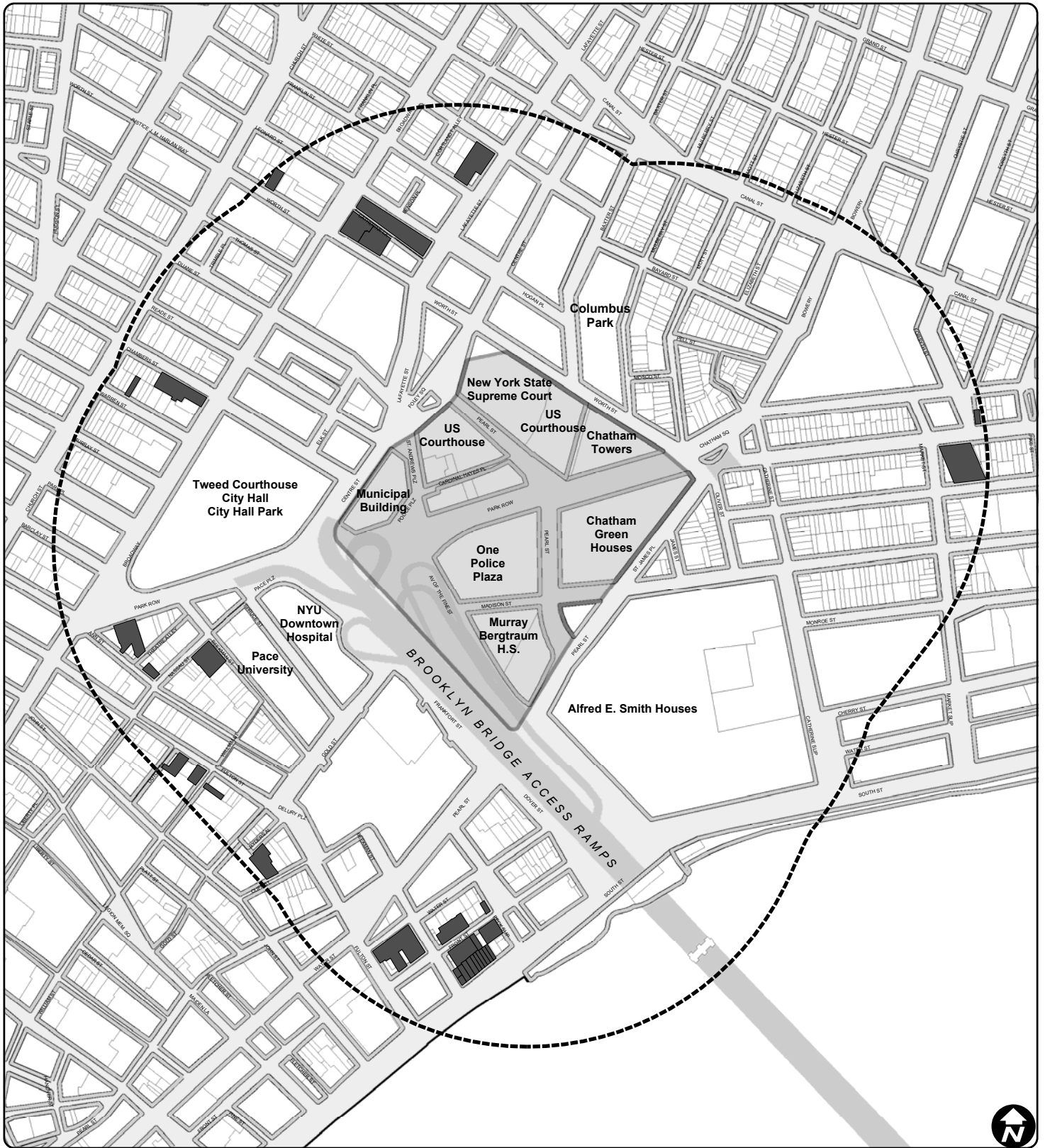
Zoning

Security Zone

No changes in zoning regulations have occurred within the security zone since the 2001 baseline year.

Study Area

No changes in zoning regulations have occurred within the study area since the 2001 baseline year.



Legend

- Security Zone (Closed to Public Vehicular Traffic after 09/11/2001)
- Land Use Study Area (Quarter-Mile Radius)
- Parcel with a Change in Land Use Since 2001

Source: NYC Department of City Planning

0 250 500 750 1,000 Feet

Table 2-2
Changes in Land Use since the 2001 Baseline Year

Address	Type of Use	# of Units	Status
New Construction			
336-344 Broadway	Residential	147	Occupied
15 Cliff Street	Residential	156	Occupied
Front Street/Peck Slip	Residential /Commercial	96	Under Construction
90 East Broadway	Commercial	0	Temporary Certificate of Occupancy
75 East Broadway	Commercial	0	Temporary Certificate of Occupancy
Conversions			
200 Water Street	Residential	575	Occupied
136 William Street	Residential	10	Occupied
150 Nassau Street	Residential	124	Occupied
25 Ann Street	Residential	9	Occupied
106 Fulton Street	Residential	84	Occupied
102 Fulton Street	Residential	14	Occupied
135 William Street	Residential/Dorm	35	Occupied
15 Park Row	Residential	210	Completed
270 Broadway	Residential	87	Occupied
79 Worth Street	Residential	35	Occupied
22 Warren Street	Residential	5	Occupied
Vacant			
Fulton Fish Market - 104-115 South Street	Vacant	0	Recently vacated

Source: New York City Department of City Planning

Public Policy

Since September 11, 2001, a number of public policy initiatives have been implemented to assist in the recovery efforts and continued revitalization of Lower Manhattan. These are in addition to policies that continue to be in effect since before the terrorist attacks. The major policies and plans addressing the study area are discussed below.

Security Zone

The public policies and plans discussed below do not apply to the security zone separately. However, the security zone area is located within the geographic boundary of these policies and plans.

Lower Manhattan Development Corporation (LMDC). LMDC was created (by the State) in November 2001 as a subsidiary of the Empire State Development Corporation (ESDC) to help plan and coordinate the rebuilding and revitalization of Lower Manhattan south of Houston Street so that it will re-emerge as a stronger and more vibrant community. LMDC is charged with assisting New York City in its efforts to recover from the terrorist attacks on the Twin Towers. LMDC has sponsored several initiatives and studies relating to short-term and long-term solutions to the challenges facing Lower Manhattan neighborhoods in the wake of September 11, 2001. Among these efforts are open space and streetscape improvements and studies of affordable housing, Chinatown traffic and transportation, the Fulton Street corridor, and Greenwich Street south of the WTC site.

New York City's Vision for a 21st Century Lower Manhattan. In December 2002, Mayor Michael Bloomberg unveiled "A Vision for a 21st Century Lower Manhattan," which includes a series of proposals to connect Lower Manhattan to the world around it, build new neighborhoods, and create public places that make Lower Manhattan an appealing place. Goals include improvements to streetscapes, the expansion and creation of public plazas and parks, and the continued revitalization of the waterfront.

New York Liberty Bond Program. As part of the efforts to rebuild and revitalize New York City in the wake of the September 11, 2001 attack on New York City, the New York Liberty Bond Program was introduced as a cooperative program between New York Liberty Development Corporation, New York City Industrial Development Agency (IDA), New York State Housing Finance Agency (HFA), and New York City Housing Development Corporation (HDC). These agencies offer tax-exempt financing for the construction and renovation of commercial and residential properties that lie primarily within the Liberty Zone, which is the area of Manhattan south of Canal Street, East Broadway, and Grand Street.

Chinatown/Lower East Side Empire Zone. The Empire Zone (EZ) was created in 2002 to address the economic needs of the Chinatown and Lower East Side communities, including high unemployment and poverty rates among local residents and high vacancy rates for commercial office, retail, and industrial spaces. In addition, this area has substantial economic needs which have been exacerbated by the effects of September 11, 2001. The EZ program is a certification program by which businesses that create jobs or make investments in a geographically designated area are made eligible for a variety of New York State tax credits and benefits. The Chinatown/Lower East Side EZ is generally bounded by East Houston Street to the north, Ridge Street, Pitt Street, Essex Street, and Montgomery Street on the east, South Street, Madison Street, Park Row, and Chambers Street to the south, and Broadway to the west.

Study Area

All of the public policies and plans discussed above that apply to the security zone area also apply to the study area, in addition to the public policy initiative described below.

Chinatown Partnership Local Development Corporation. The Chinatown Partnership Local Development Corporation (CPLDC), formed in 2004, is a non-profit, community-based, economic development organization. The CPLDC's goal is to improve business conditions by making Chinatown a cleaner, safer, more attractive place to conduct business; strengthening connections between commerce and culture; enhancing Chinatown's role in New York City; and forming new partnerships with governments and other entities to increase public and private investment in Chinatown.

In addition to the policies discussed above, Lower Manhattan has been the subject of numerous studies and proposed development and revitalization plans since September 11, including disaster relief, discretionary grants, residential grant programs, and storefront improvement programs.

D. 2006 NO-ACTION CONDITION

For analysis purposes, under the No-Action condition, it is assumed that the One Police Plaza security plan implemented by the NYPD after September 11, 2001 is not in place. The roadways would be open with the 1999 street closures and municipal garage closure in place and transportation services would continue as they were prior to September 11, 2001. Under this scenario, all private and commercial vehicles would have access throughout the security zone, with the exception of the streets that were closed in 1999.

Land Use

Security Zone

Land uses within the security zone that presently exist have not changed since the 2001 baseline year. Due to the institutional and residential character of the security zone area, it is expected that the land uses within the security zone will remain the same under the No-Action condition.

Study Area

Land uses and general land use patterns throughout the study area are expected to remain the same under the No-Action condition. Land uses in the study area generally have not changed since the security plan and resulting street closures were implemented. This area of Lower Manhattan is fully developed with little opportunity for new development. As shown in Table 2-2, most land use changes that have occurred since the 2001 baseline year have been in the form of residential conversions of office buildings. It is unlikely that land uses and land use patterns in the study area would be much different than they are in the With-Action condition if the street closures were not in place.

Zoning

Security Zone

Zoning regulations in the security zone have not changed since the 2001 baseline year when the security plan was put into place. It is unlikely that zoning regulations in the security zone would change if the streets that were closed as a result of the security plan were open to all private and commercial vehicles.

Study Area

Zoning regulations in the study area have not changed since the 2001 baseline year when security plan was put into place. It is unlikely that zoning regulations in the study area would be different in 2006 if the streets that were closed under the security plan were open to all private and commercial vehicles.

Public Policy

Security Zone

Public policies and plans that include the security zone area would not be affected under the No-Action condition. Existing public policies and plans discussed above, including policies and plans that were created as a response to the events of September 11, 2001, would still exist under the No-Action condition.

Study Area

Likewise, public policies and plans that include the study area would not be affected under the No-Action condition. Existing public policies and plans discussed above, including policies and plans that were created as a response to the events of September 11, 2001, would exist in the No-Action condition.

E. 2006 WITH-ACTION CONDITION

As discussed above, the action consists of the installation of security booths, rising-plate hydraulic delta barriers, bollards, sally ports, and planters on various streets and intersections within the study area for the purpose of creating a secure perimeter around One Police Plaza and adjacent civic facilities.

Land Use

According to the *CEQR Technical Manual*, the approach to determining whether land use changes are significant and adverse is as follows:

- If the action would directly displace a land use and such a loss would adversely affect surrounding land uses, this displacement may be considered a significant adverse impact;
- In general, if an action would generate a land use that would be incompatible with surrounding uses, such a change may be considered significant and adverse;
- In general, if an action is expected to alter land uses in the surrounding area and the anticipated change is substantial, that change is usually considered significant, but not necessarily adverse.

Security Zone

The With-Action condition has not resulted in a direct displacement of any land use or a land use that would be incompatible with surrounding uses, and has not altered land uses within the security zone.

Study Area

As discussed above, with the exception of some minor residential conversions, the study area has not experienced significant change in land use since September 11, 2001, when the security plan was put in place. The action has not resulted in a change of land use of any parcel located within

the study area. In addition, the proposed action has not adversely impacted the general land use character or trends evident in the study area.

Zoning

According to the *CEQR Technical Manual*, a significant adverse land use impact in terms of zoning would occur if an action would create land uses or structures that substantially do not conform or comply with underlying zoning.

Security Zone

The With-Action condition has not created land uses or structures in the security zone area that do not conform to or comply with underlying zoning.

Study Area

The With-Action condition has not created land uses or structures in the study area that do not conform to or comply with underlying zoning.

Public Policy

According to the *CEQR Technical Manual*, a significant adverse public policy impact would occur when an action would create a land use that conflicts with, or would itself conflict with public policies and plans for the site or surrounding areas or if the action would result in significant material changes to existing regulations or policy.

Security Zone

The action has not resulted in a land use that has or would conflict with public policies for the security zone area. In addition, the action has not resulted in changes to existing regulations or policy for the security zone area. As such, the With-Action condition has not resulted in any significant adverse impacts on public policy.

Study Area

The action has not resulted in a land use that has or would conflict with public policies for the study area. In addition, the action has not resulted in changes to existing regulations or policy

for the study area. As such, the With-Action condition has not resulted in any significant adverse impacts on public policy.

F. CONCLUSION

Overall, the With-Action condition has not resulted in any significant adverse effects on land use, zoning, or public policy. Land uses within the security zone and surrounding study area have not substantially changed from the baseline condition to the With-Action condition. The action has not altered any zoning regulations and has not resulted in any structure that does not conform or comply with the existing underlying zoning. In addition, the action has not altered or conflicted with any public policy or plan that was created prior to or after September 11, 2001. Accordingly, the action has not resulted in any significant adverse impacts on land use, zoning, and public policy.

One Police Plaza Security Plan EIS

CHAPTER 3: COMMUNITY FACILITIES

A. INTRODUCTION

According to the *CEQR Technical Manual*, a community facilities analysis examines a proposed action's potential effect on the provision of services by those community facilities. For CEQR purposes, community facilities typically include schools, libraries, day care facilities, health care facilities, and police and fire protection services. Direct effects occur when a particular action physically alters or displaces a community facility. Indirect effects result from increases in population that create additional demand on service delivery. Although the security plan's street closures would not have a direct or indirect impact on health care facilities under the analytical methods set forth in the *CEQR Technical Manual*, as a direct response to the court's order, a discussion of the street closures and their potential effect on access to emergency medical facilities is included in this chapter. As the action would not physically alter or displace any community facility or add population to the area, the remaining community facilities outlined in the *CEQR Technical Manual* (schools, libraries, and day care facilities) have been screened out and have not been assessed within this chapter.

For police and fire protection services, the *CEQR Technical Manual* suggests that a detailed assessment of service delivery be conducted if a proposed action would affect the physical operations of, or access to and from, a fire station or police precinct house. While the With-Action condition would not result in such direct effects, as a result of the court order, this chapter addresses police and fire protection services as well.

B. BASELINE CONDITIONS

Health Care Facilities

Health care facilities include public, proprietary and non-profit facilities that accept public funds (usually in the form of Medicare and Medicaid reimbursements) and that are available to any member of the community. The types of facilities include hospitals, nursing homes, clinics and other facilities providing outpatient health services. According to the *CEQR Technical Manual*, the CEQR assessment of health care focuses on emergency and outpatient ambulatory services that could be affected by the introduction of a large low-income residential population which may rely heavily on nearby hospital emergency rooms and other public outpatient ambulatory services. As discussed above, the With-Action condition would not physically alter or displace any health care

facility or add population to the area. However, as a direct response to the court’s order, a discussion of the street closures and their potential effect on access to emergency medical facilities is provided below. Hospital emergency room services and outpatient ambulatory care facilities (regulated by the NYS Department of Health and Office of Mental Health) within approximately a quarter mile of the security zone boundary have been identified and are shown in Figure 3-1.

Hospitals and Emergency Rooms

As shown in Figure 3-1, within approximately a quarter mile of the security zone area, there is one hospital with emergency rooms available to residents and workers in the general study area. The closest and only hospital in the study area is New York Downtown Hospital located at 170 William Street. New York Downtown Hospital is the sole full-service hospital in Lower Manhattan serving approximately 600,000 people who work and live in Lower Manhattan.

As shown in Table 3-1 below, the hospital serving the study area had approximately 72,016 outpatient ambulatory visits and approximately 29,235 emergency room visits in 2001¹. The Emergency Department and Ambulance Entrances are located along Gold Street between Spruce and Beekman Streets.

**TABLE 3-1
Hospitals and Emergency Rooms within a Quarter-Mile of With-Action Area**

Map No.	Hospital	Address	Outpatient Dept. Visits	Emergency Room Visits
1	New York Downtown Hospital	170 William Street	72,016	29,235

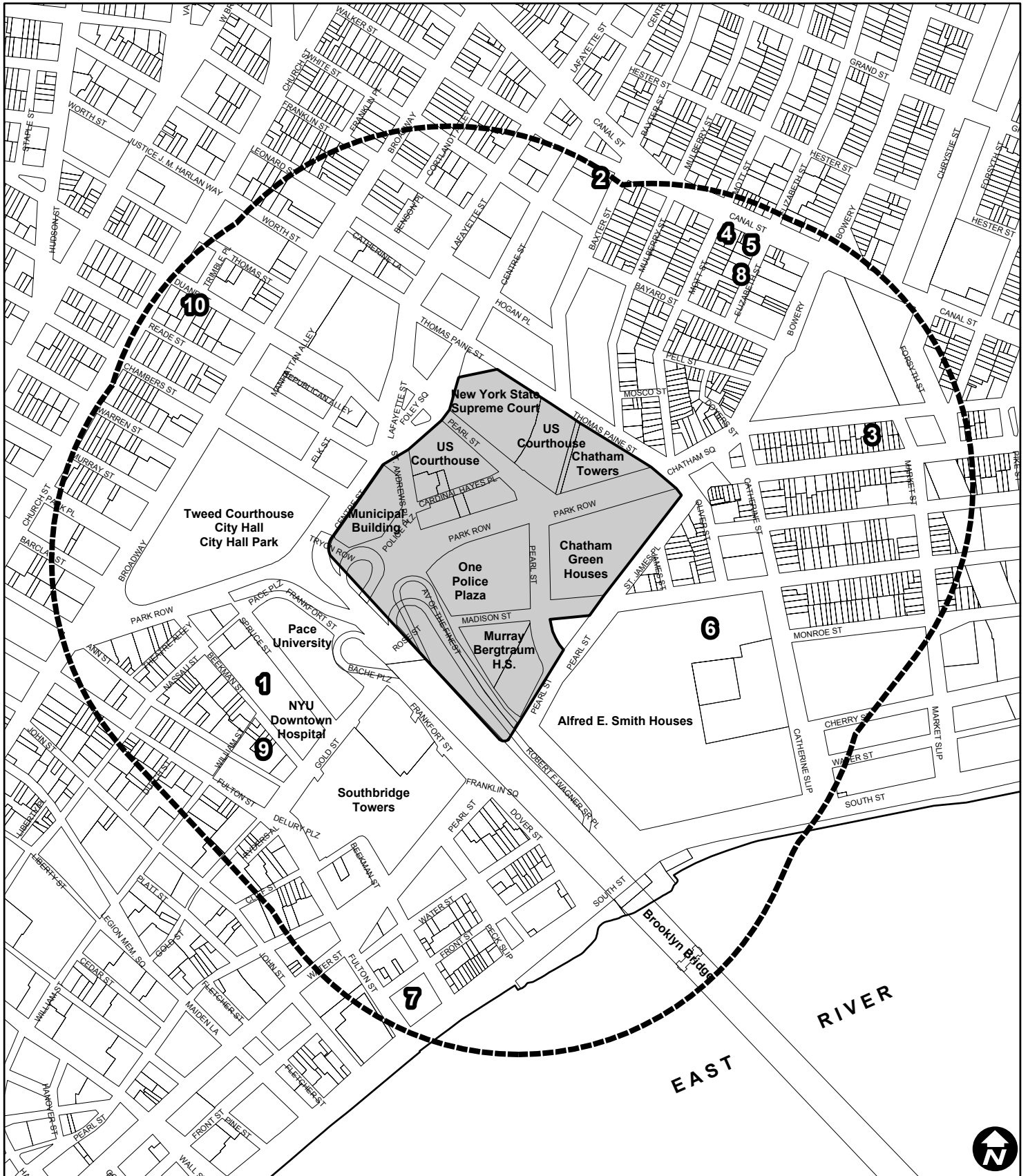
Source: United Hospital Fund: *Health Care Annual Update: 2004 Update*

Other Outpatient Services




As shown in Figure 3-1, within approximately a quarter mile of the With-Action area, there are 6 outpatient locations (as inventoried in the DCP *Selected Facilities and Program Sites in New York City, 2003 Edition*). They cover the entire area with a full range of ambulatory care facilities and are listed in Table 3-2.

¹ Data are from June 2000 to July 2001

Community Facilities Study Area



Legend

-  Security Zone (Closed to Public Vehicular Traffic after 09-11-2001)
-  Community Facilities Study Area (Quarter-Mile Radius)
-  Community Facility Location

200 0 200 400 600 800 Feet

TABLE 3-2
Other Outpatient Services within a Quarter-Mile of With-Action Area

Map No.	Hospital	Address	Facility Type
2	Charles B. Wang Community Health Center	125 Walker Street	Free Standing Health Center
3	Lower East Side Service Center	46 East Broadway	Free Standing Health Center
4	Chinatown Clinic	168 Canal Street	Free Standing Health Center
5	Chinatown Health Services	25 Elizabeth Street	Free Standing Health Center
6	Governor Smith Health Center	60 Madison Street	HHC Communicare
7	The Medical Practice of St. Margaret's House	49 Fulton Street	Free Standing Health Center

Source: *Selected Facilities and Program Sites in New York City, 2003 Edition.*

Police Services

Although the *CEQR Technical Manual* suggests that a detailed analysis of police services is generally conducted only in the case of direct impacts on facilities, as a result of the court order discussed above, this EIS will present an examination of potential impacts on service delivery. The study area is served by the NYPD's 5th Precinct, which is located at 19 Elizabeth Street in the Chinatown neighborhood of Manhattan (Map No. 8 on Figure 3-1). In total, the precinct serves an area of approximately 1.2 square miles and is generally bounded by Canal Street to the north, Allen Street to the east, South Street to the south, and Broadway to the west.

Crime within the 5th Precinct service area has declined between 2001 and 2004 (see Table 3-3 below). Total crime within the 5th Precinct service area decreased by 45% between 2001 and 2004 with major changes in robbery and felony assault. In addition, although outside of the community facility study area, the NYPD's 7th Precinct, located at 19 ½ Pitt Street, serves the southern portion of Community Board 3 (portions of which are located within the study area). The 7th Precinct's average response time to a critical crime in progress has decreased by 15% from 4.6 minutes in 2001 to 4 minutes in 2005.²

² www.nyc.gov, *My Neighborhood Statistics, Community Board 3*, Accessed September 2005.

TABLE 3-3
Crime Statistics for the 5th Precinct: 2001 to 2004

Crime	2001	2004	% Change
Murder	4	1	-75%
Rape	6	5	-17%
Robbery	352	130	-63%
Felony Assault	227	92	-59%
Burglary	394	174	-56%
Grand Larceny	965	697	-28%
Grand Larceny Auto	159	70	-56%
TOTAL	2,107	1,169	-45%

Source: NYPD, CompStat Unit, *CompStat; Volume 12, No. 33*

According to the NYPD's Office of Management Analysis and Planning, overall response times to crimes in progress within the study area have dropped substantially between 2000 and 2005. As shown in Table 3-4 below, response times to crimes in progress also dropped within the 5th Precinct, Manhattan Community Board 1, and Citywide.

Table 3-4: Average Response Times to Crimes in Progress 2000 & 2005
(in minutes)

	2000	2005	% CHANGE
CITYWIDE	11.1	7.2	-35%
CB 1	9.7	6.8	-30%
5th PRECINCT	7.5	5.8	-23%
STUDY AREA	8.4	5.6	-34%

Source: NYPD Office of Management Analysis and Planning

Fire Protection

Although the *CEQR Technical Manual* suggests that a detailed analysis of fire protection services is generally conducted only in the case of direct impacts on facilities, as a result of the court order discussed above, this EIS will present an examination of potential impacts on service delivery.

In New York City, FDNY engine companies carry hoses, ladder companies provide search, rescue, and building ventilation functions, and rescue companies specifically respond to fires or emergencies in high-rise buildings. In addition, the FDNY operates the City's EMS system. As shown in Table 3-5 and Figure 3-1, there are two fire stations that serve the study area. Normally, a total of three engine companies and two ladder companies respond to each call, although initial responses to

alarms from any given call box location are sometimes determined by the specific needs of the geographic location or use at that location. FDNY can also call on units in other parts of the City as needed.

TABLE 3-5
Fire Protection Services

Map No.	Facility Name	Address	Facility type
9	Engine 6	49 Beekman Street	NYC Fire House
10	Engine 7 Ladder 1	100 Duane Street	NYC Fire House

Response times are generally the same in the study area when compared to response times in Manhattan and Citywide. As shown in Table 3-6, average emergency response times in the study area decreased from 2000 to 2001, then increased in 2002. Between 2002 to 2004, average response times in the study area decreased, but increased between 2004 to 2005. In Manhattan as well as Citywide, response times decreased between 2000 and 2001, then increased from 2001 to 2002. Citywide, response times increased from 2002 to 2003, remained the same from 2003 to 2004, and increased again between 2004 and 2005. In Manhattan, response times decreased slightly from 2003 to 2004, then increased from 2004 to 2005.

Table 3-6
Average Emergency Response Times: 2000-2005

PERIOD	CITYWIDE*	MANHATTAN*	STUDY AREA**
2000	4:46	4:48	4:49
2001	4:43	4:46	4:37
2002	4:46	4:50	4:49
2003	4:53	4:54	4:36
2004	4:53	4:52	4:29
2005	5:07	5:08	5:02

Source: New York City Fire Department

* Averages based on response times to structural fires, non-structural fires, non-fire emergencies, and medical emergencies.

** Averages based on response time to major categories from selected alarm boxes within the study area.

C. 2006 NO-ACTION CONDITION

For analysis purposes, under the No-Action condition, it is assumed that the security plan would not be in place. The roadways would be open with the 1999 street closures and municipal garage closure in place and transportation services would continue as they were prior to September 11, 2001.

Health Care Facilities

In the No-Action condition, health care facilities in the study area would continue to have access through the streets that are currently closed as a result of the security zone as police vehicles are authorized to enter the security zone.

Police Services

In the No-Action condition, police vehicles would continue to have access through the streets that are currently closed as a result of the security zone as police vehicles are authorized to enter the security zone.

Fire Services

As with police services, in the No-Action condition, FDNY vehicles would continue to have access through the streets that are currently closed as a result of the security zone as FDNY vehicles are currently authorized to enter the security zone.

D. 2006 WITH-ACTION CONDITION

Under the With-Action condition, the roadways in the vicinity of One Police Plaza that have been closed to unauthorized vehicular traffic since soon after September 11, 2001 would remain closed, along with all pedestrian restrictions currently in place.

As discussed above, according to the *CEQR Technical Manual*, a community facilities analysis examines a proposed action's potential effect on the provision of services by those community facilities. Direct effects occur when a particular action physically alters or displaces a community facility. Indirect effects result from increases in population that create additional demand on service delivery. Although the action does not have any direct effects or indirect effects on community facilities by CEQR standards, as a result of the court's order, a discussion of the street closures and access to emergency medical facilities in addition to fire and police services is included below.

Health Care Facilities

As the action has not and would not result in an increase in population, healthcare facilities within the study area would not experience changes in utilization or capacity as a result of the action.

In the With-Action condition, emergency service vehicles dispatched from and destined to New York Downtown hospital are granted access through the security zone at the barrier locations after displaying proper identification. Emergency vehicles may traverse the security zone to travel to and from the Chatham Green Houses and Chatham Towers. However, access to these buildings is also possible from St. James Place and Worth Street, respectively, which are not restricted access streets.

Several phone interviews were conducted with New York Downtown hospital staff to gain a better perspective on if, and how, the street closures have affected emergency service delivery at the hospital³. Dr. Antonio Dajer, Intern Director of the Emergency Department at New York Downtown indicated that emergency service and ambulance access have not been impacted by the street closures and he has not noticed an increase in emergency response times for ambulances. Mr. Peter Fromm, Director of EMS at New York Downtown indicated that at times, at the discretion of the EMS operator, an ambulance may re-route around the security zone if the operator believes it will be faster than going through the barricades; however response times and EMS operations at the hospital have not been significantly impacted by the street closures. Mr. Fromm also added that there is a low impact on operations from the street closures between 8:00 AM and Midnight because the hospital's EMS units are positioned on each side of the barricades during that time. After midnight, there is only one EMS unit at the barricade and it must circumvent the barricade to respond. Mr. Fromm also added that overall response times are not above standard, but that crews have reported that it takes longer to get to certain locations. However, the record of ambulance response times are not kept by the hospital, but rather the New York City Fire Department (see Table 3-6 for emergency response times).

Dr. David Goldschmitt, Director of Emergency Medicine at New York Downtown hospital, also in a phone interview, indicated that there has been an increase in emergency response times for ambulances traveling to the hospital due to the re-routing of traffic and because ambulances must show identification at the barricades before being allowed to go through the security zone.

³ Phone interviews were conducted between August 31 - September 7, 2005

Police Services

The action has not resulted in the construction of any new permanent structures or land uses that would increase the population or number of employees in the study area. As discussed above, police vehicles have access through the restricted streets as police vehicles are authorized to enter the security zone. Any emergency requiring police attention that would require police units or personnel to enter the restricted security perimeter would result in advance communication with NYPD personnel stationed at the barrier locations, resulting in the lowering of delta barriers. In addition, police access to the Chatham Green Houses and Chatham Towers, which are located within the security zone, is not restricted by the street closures since access can be obtained from St. James Place and Worth Street, respectively, which are not restricted streets.

As discussed above, the average response time to a crime in progress has decreased substantially within the study area as well as within the 5th Precinct, Manhattan Community Board 1, and Citywide. In addition, these security measures reduce the likelihood of a terrorist attack in the security zone. As such, the With-Action condition does not and would not adversely impact the policing capabilities in the study area.

Fire Protection

As the action has not resulted in an increase in residential or worker population, the demand for fire protection services remains unchanged. As with police services, FDNY vehicles have authorized access through the streets that are currently restricted as a result of the action. The FDNY has reviewed the action and has determined that it does not have a negative impact on fire operations. The FDNY stated that they are able to respond and operate within the security zone and in the surrounding area. The delta barriers that are installed at various locations are staffed 24 hours a day, seven days a week, and are quickly lowered to permit emergency access. In addition, the jersey barriers through the site do not affect FDNY emergency operations.⁴

As shown in Table 3-6, fire and EMS response times have not increased substantially within the study area since the security plan has been implemented and are consistent to response times in Manhattan and the City as a whole. Therefore, no significant adverse impacts on FDNY fire and EMS service response times have occurred or are anticipated as a result of action.

⁴Letter dated July 25, 2005 from Salvatore J. Cassano, Chief of Operations, Bureau of Operations, FDNY

E. CONCLUSION

According to the *CEQR Technical Manual*, impacts on health care facilities are identified if an action would result in an increase of 5 percent or more in the demand for services over the No-Action condition, that would result in a facility exceeding its capacity. As the action has not resulted in additional population in the area and would not directly alter a health care facility in the area, no significant impacts on health care facilities have occurred or would occur in the future. However, as discussed above, as a direct response to a court order, an analysis of access to emergency facilities was presented. Although there were differences in the opinions of New York Downtown Hospital emergency room and emergency medical service staff on whether access to the hospital's emergency room has been affected by the street closures, FDNY response times indicate that response to emergencies in the study area have not been affected by the street closures. Although response times within the study area have increased slightly between 2000 and 2005, the same is true for Manhattan as a whole as well as Citywide. As such, no impacts to emergency facility access have occurred as a result of the street closures.

As discussed above, the street closures have not impacted police or fire service delivery within the study area. Both the NYPD and FDNY would continue to evaluate area operations on a regular basis and continued adjustment of resources would be made, if necessary. Therefore, no significant adverse impacts on FDNY and NYPD services have occurred as a result of the action.

One Police Plaza Security Plan EIS

CHAPTER 4: SOCIOECONOMIC CONDITIONS

A. INTRODUCTION

This chapter examines the potential effects of the action on socioeconomic conditions in the study area, including population and housing characteristics, economic activity, and the real estate market. As described in Chapter 1, 'Project Description', the action is the maintenance of the security plan implemented at One Police Plaza and surrounding roadways following the events of September 11, 2001. The security plan resulted in the installation of attended security checkpoint booths, planters, bollards and hydraulically operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza. The barriers were installed by the NYPD, with the exception of the barriers located at Park Row at Foley Square and at Pearl Street on the west side of Park Row, which were installed by the USMS.

In accordance with the guidelines presented in the *City Environmental Quality Review (CEQR) Technical Manual*, this chapter evaluates five specific factors that could create significant socioeconomic impacts in an area, including: (1) direct displacement of residential population; (2) direct displacement of existing businesses; (3) indirect displacement of residential population; (4) indirect displacement of businesses; and (5) adverse effects on specific industries not necessarily tied to a project site or area.

This analysis begins with a preliminary assessment for each specific issue of concern. According to the *CEQR Technical Manual*, the goal of a preliminary assessment is to discern the effects of a proposed project or action for the purposes of either eliminating the potential for significant impacts or determining that a more detailed analysis is necessary to answer the question regarding potential impacts. For those factors that could not be eliminated through the preliminary assessment, a more detailed analysis is presented. Based on screening thresholds, the preliminary assessment conducted below shows that a detailed analysis is warranted for the action's potential to have adverse effects on indirect residential and business displacement. This chapter, therefore, consists of:

A section that defines the analysis methodology, study area boundaries and the data sources used for the preliminary assessment. A preliminary assessment for direct residential, direct business, indirect residential, and indirect business displacement, as well as an examination of effects on specific industries. A detailed analysis for the action's effects on any of the five technical areas where a socioeconomic impact could not be ruled out by the preliminary assessment.

B. METHODOLOGY, STUDY AREA DEFINITION, AND DATA SOURCES

Methodology

The purpose of a socioeconomic assessment is to disclose changes that would be created by an action and identify whether they rise to a level of significance. The nature of the action, which consists of a security plan comprising various elements to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza, presents unique challenges in developing a proper analytical framework for socioeconomic conditions. The action, being a security plan that does not entail any new development, does not present the same socioeconomic issues, which are typically associated with development projects.

Another key challenge in developing a proper analytical framework is collecting data and providing information that adequately reflects conditions with and without the action. This can be difficult, as the action is essentially already in place, and relevant data that depicts conditions prior to implementation of the security plan may not be fully available from direct sources. Finally, a key challenge faced in analyzing the effects of the security plan is isolating the specific effects of the security plan from the area-wide overall effects of the September 11, 2001 attacks, which are beyond the scope of analysis for the action.

In an attempt to surmount those challenges, and adhere to the CEQR guidelines to the greatest extent possible, while providing a relevant and meaningful analysis, a comparative methodological approach has been developed for the action. In order to isolate the effects of the action, i.e., the security plan, from the overall effects of the 9/11 attacks, the study area patterns will be compared to those of all of Lower Manhattan as well as another geographic area to the west of Broadway (Tribeca), all of which were affected by the events of September 11, 2001. As the security plan's effects were felt predominantly in the area to the east of Broadway (refer to traffic analysis in Chapter 7), the comparative analysis will identify whether there are any trends that are applicable to the study area that are not evident in Lower Manhattan as a whole and/or in the sampled area to the west of the study area. If the study area shares similar trends with those other geographic areas, all of which were affected by 9/11, then those trends are likely attributable to the events of 9/11. However, if the study area is found to exhibit certain trends that are not shared by the other nearby geographic areas, then it may be concluded that those trends are, in part, attributable to the security plan.

For example, if comparisons of vacancy rates pre- and post-9/11 show that the vacancy rate in the study area has increased since 2000, whereas vacancy rates in Lower Manhattan as a whole or in other areas of Lower Manhattan have decreased, it could be argued that the increase in vacancy rates is not necessarily attributable to the effects of 9/11, and may therefore be, in part, a result of the security plan.

Study Area and Historic Chinatown Sub-Area

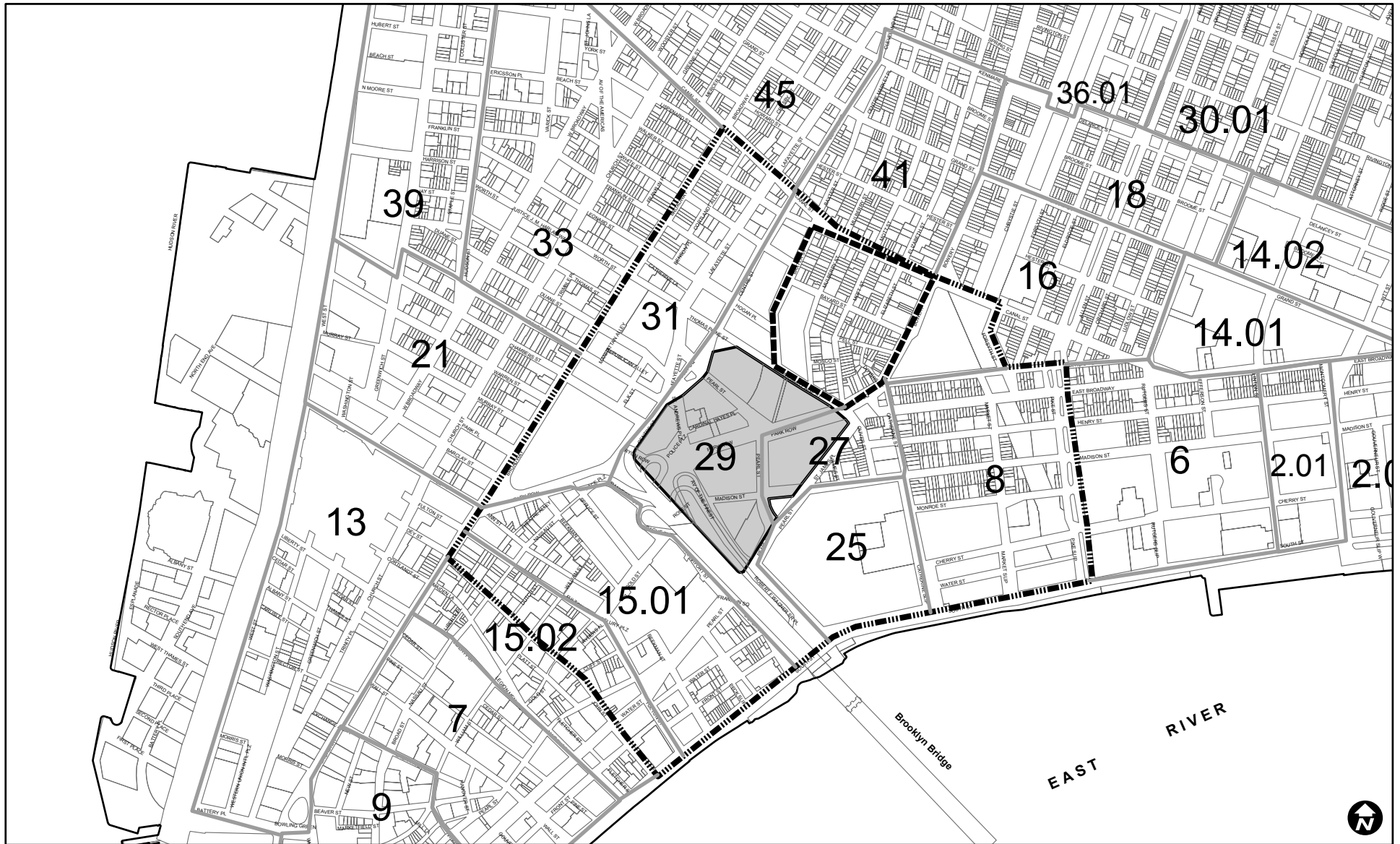
The study area is drawn to provide basic information on the greater neighborhood as a way of providing a point of comparison with the area affected by the action and its immediate surroundings. Based on review of the action and the characteristics of the surrounding area, an approximate quarter-mile radius from the action area (the security zone) was selected as the basis for identifying the study area for both residential and business displacement. The study area was adjusted to include census tracts with 50 percent or greater of their area located within the quarter-mile radius, and to exclude those with less than 50 percent of their area in the quarter-mile radius. The resultant study area is generally bounded by Canal Street to the north, Fulton Street to the south, Pike Street to the east, and Broadway to the west (see Figure 4-1). As shown in the figure, census tracts 8, 15.01, 25, 27, 29, and 31 make up the study area, in addition to a small portion of Census Tract 16 (only census block 4004 is included in the study area). The study area is located in Manhattan Community Districts 1 and 3, and comprises the Civic Center and parts of the Chinatown and South Street Seaport neighborhoods of Manhattan.

In addition, in order to address concerns that have been voiced by the community regarding the action's specific effects on Chinatown, socioeconomic conditions within the Historic Chinatown Sub-area are also analyzed in this chapter. As shown in Figure 4-1, this sub-area is generally bounded by Canal Street to the north, the Bowery to the East, Worth Street to the south, and Baxter Street to the west, and comprises the traditional heart of the area referred to as Historic Chinatown. The boundaries of the Historic Chinatown sub-area coincide with the boundaries of part of census tract 29 (Blocks 1000, 1001, 1002, 1003, 1004, 2000, 2001, 2002, 2003, 3000, 3001, 3002), or, alternately, tax blocks 199, 200, 201, 202, 162, 163, 164 and 165.



In addition to the study area and the Historic Chinatown sub-area, this chapter also provides, where applicable, a comparative analysis of Lower Manhattan and a geographic area to the west of Broadway, as discussed above. For the purposes of this analysis, Lower Manhattan is defined as the area generally south of Canal Street, the Bowery, Division and Pike Streets, and includes all of Manhattan Community District 1 (CD1) plus census tracts 8, 25, 27, and a portion of 29 within CD3, as shown in Figure 4-1. Lastly, Census Tracts 21 and 33, which are located to the west of Broadway and south of Canal Street, were selected for the comparative analysis in this chapter (refer to Figure 4-1). These two census tracts comprise the majority of Tribeca, which is generally defined as the area between Broome and Barclay Streets west of Broadway. Tribeca was selected for the comparative analysis because, although it was affected by the events of 9/11, it is not directly affected by the security plan.



Baseline Condition

As discussed in Chapter 1, 'Project Description', as the security plan has already been implemented, the With-Action condition is the security plan currently in place in 2006. As such, the action is analyzed compared to the baseline condition. The baseline condition summarizes population, housing, employment, and commercial real estate characteristics as they existed in 2000, and reflects conditions prior to the attacks of September 11, 2001 and implementation of

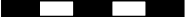


Legend

-  Security Zone (Closed to Public Vehicular Traffic after 09/11/2001)
-  Approximate Quarter Mile Study Area Boundary

-  Historic Chinatown Subarea
- 31** Census Tract Number
-  Census Tract Boundary

200 0 200 400 600 800 Feet




the security plan. Following the baseline description is a discussion of changes that have occurred between 2000 and 2006, and an assessment of the No-Action condition (no security plan) and the With-Action condition (the security plan in place) compared to the baseline pre-September 11, 2001 and No-Action conditions.

Data Sources

Effects on socioeconomic conditions can occur due to the direct or indirect displacement of residents or businesses and employees. Direct displacement is the involuntary displacement of residents or businesses from the site(s) of a proposed action. Indirect displacement is the involuntary displacement of residents, businesses or employees that results from a change in socioeconomic conditions created by the action.

According to the *CEQR Technical Manual*, the socioeconomic character of an area is defined in terms of its population, housing stock, and economic activities. Socioeconomic impacts may occur when an action would directly or indirectly result in a change in population, housing stock, or economic activities in an area. In some cases, these changes can be substantial, but not adverse. In other cases, these changes may be beneficial to some groups and adverse to others. The purpose of a socioeconomic assessment is to disclose changes that would be created by an action and identify whether they rise to a level of significance.

In order to assess potential direct and indirect effects of the action, information was gathered regarding the surrounding area's demographic characteristics, housing inventory, housing market, and commercial and retail activity. The analysis begins by conducting an initial screening for socioeconomic analysis generally and preliminary assessments for each specific issue of concern to determine if detailed analysis is warranted.

Population and Housing

The analysis of population and housing is based primarily on data from the 1990 and 2000 U.S. Census. These data have been grouped by the following Census characteristics:

- Total population;
- Household and income characteristics, including total households, average household size, and median household income; and
- Housing characteristics, including housing vacancy and tenure (owner versus renter occupied), median contract rent, and median home value.

The pre-September 11, 2001 baseline condition is based primarily on 2000 US Census data. Because the Census is dicennial, it is impossible to obtain an accurate current demographic and housing profile of the study area based solely on Census data. Thus, the depiction of the current condition is based largely on 2000 Census data updated with information and survey data compiled from various agencies and organizations involved in the redevelopment of Lower Manhattan. Much of the current housing and population data is based on an assessment of units

built in the study area between 2000 and 2005 and corresponding population estimates based on the 2000 average household sizes by sub-area. The list of recent housing developments was compiled based on information provided by the New York City Department of City Planning (DCP).

Businesses, Institutions, and Employment

The assessment of business and institutional displacement begins with an analysis of employment trends in the study area and Lower Manhattan. The analysis is based on private employment data for third quarter 2000 and 2002 (ES-202 data set), collected by the New York State Department of Labor (NYSDOL) and organized by DCP. The employment data identify the major industries that dominate or characterize the study area. The employment data were also supplemented by field surveys, conducted in July 2005, and data from the New York City Department of Finance's Real Property Assessment Division (RPAD).

In addition, field surveys were conducted within the Historic Chinatown sub-area and other portions of Chinatown north of Canal Street and east of the Bowery/Catherine Street to determine whether proximity to the street closures has a direct correlation to business patterns. The business surveys included questions regarding business category, number of employees, and duration of time each business has been at the current location. For business surveys in the Chinatown area, bi-lingual interviewers (Mandarin and Cantonese) were utilized.

Commercial Real Estate

The employment analysis is followed by a discussion of commercial real estate trends in the study area. The analysis of real estate is based on information from real estate brokerages, market research firms, RPAD, and field surveys. A variety of data sources were consulted, including interviews with real estate professionals. Office real estate data for the quarter-mile study area were compiled by Signature Partners LLC. Furthermore, several planning studies and publications were consulted, including but not limited to: October 2005 Market View, Downtown Manhattan by CB Richard Ellis; Summer 2005 Retail Report, New York City by Colliers ABR; The Real Estate Board of New York's Retail Reports for 2000 through 2005; and numerous articles from other real estate and business/professional publications.

Specific Industries (Tourism and Garment Sector)

The economy of Chinatown depends heavily on the tourism and garment industries. The garment industry has been suffering for over 10 years, as cheaper imports from other NAFTA (North American Free Trade Agreement) regions and Asia flooded the market, and technology start-up companies forced up the cost of rents and squeezed the factories from their traditional manufacturing neighborhoods.¹ As such, the issues affecting the garment industry are closely

¹ Source: *Chinatown One Year After September 11th: An Economic Impact Study*, Asian American Federation of New York, November 2002 (p.19); and "Closed for Repairs" by Mark McCord, *Asian Business*, January 1, 2002 (<http://www.cargonewsasia.com/timesnet/data/ab/docs/ab3114.html>).

linked to global market forces, and are therefore well beyond the scope of analysis for the security plan. It should also be noted that the garment industry is mostly concentrated in the area to the north of Canal Street, which falls outside the study area primarily affected by the security plan.²

Chinatown, with its concentration of dining and shopping establishments, is one of the City's major tourist attractions. Given Chinatown's importance to New York City's tourism industry, this chapter examines the potential for the action to significantly affect business conditions in this important industry. For the purpose of analysis the tourism industry is summarized in terms of its overall economic profile, current employment, and historic trends in the industry, followed by an assessment of how the action could alter conditions for this industry. The analysis utilizes information gathered as part of the socioeconomic data collection and tourism data provided on NYC & Company's website.

C. PRELIMINARY ASSESSMENT

The first step in the analysis of potential socioeconomic impacts is a preliminary assessment to determine the potential significance of socioeconomic change generated by a proposed action. This chapter follows the guidance set forth in the *CEQR Technical Manual* for both the preliminary and, where warranted, detailed assessments.

Direct Residential Displacement

Direct residential displacement is the involuntary displacement of residents from the site of (or a site directly affected by) a proposed action. As set forth in the *CEQR Technical Manual*, direct residential displacement is not in and of itself an impact under CEQR. Where a public agency is undertaking the action or where tenants are protected by rent control or rent stabilization and where relocation benefits are available, no significant adverse impacts are considered to occur. Impacts of residential displacement could occur if the change would be large enough to alter neighborhood character or perhaps lead to the indirect displacement of remaining residents.

The preliminary assessment is based on the potential of the action to exceed three interrelated threshold indicators:

- *The profile of the displaced residents is similar or markedly different from that of the overall study area.*
- *The displaced population represents a substantial or significant portion of the population within the study area.*

² Source: *Chinatown One Year After September 11th: An Economic Impact Study- Interim Report*, Asian American Federation of New York, April 2002, p. A8 and Figure A.8.

- *The action would result in a loss of this population group within the neighborhood.*

The action is a security plan incorporating the installation of attended security checkpoint booths, planters, bollards and hydraulically operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza. The action, which is limited to streets and sidewalks, does not entail any new development, and does not involve any involuntary displacement of residents. Although there are two residential buildings within the security zone (Chatham Towers and Chatham Green Houses), none of the residents would be directly displaced by the security plan. As no direct residential displacement would occur as a result of the action, no significant adverse impacts are expected and further detailed analysis is not necessary.

Direct Business and Institutional Displacement

Under CEQR guidelines, direct business displacement is the involuntary displacement of businesses from the site of (or a site directly affected by) a proposed action. The preliminary assessment of business and institutional displacement directly resulting from a proposed action examines the employment and business value characteristics of the affected businesses to determine the significance of the potential impact. As part of the preliminary assessment, the following circumstances were considered:

- *If the business or institution in question has substantial economic value to the City or region, and it can only be relocated with great difficulty or not at all. As set forth in the CEQR Technical Manual, the consideration of a business' economic value is based on: 1) its products and services; 2) its locational needs, particularly whether those needs can be satisfied at other locations; and 3) its potential effects, on business or consumers, of losing the displaced business as a product or service.*
- *If a category of businesses or institutions is the subject of other regulations or publicly adopted plans to preserve, enhance, or otherwise protect it.*
- *If the business or institution defines or contributes substantially to a defining element of neighborhood character.*
- *If a substantial number of businesses or employees would be displaced that collectively define the character of the neighborhood.*

The action is a security plan incorporating the installation of attended security checkpoint booths, planters, bollards and hydraulically operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza. Land uses within the security zone consist of institutional and residential uses. In addition to the two residential buildings discussed above, uses within the security zone include One Police Plaza; the Municipal Building at One Centre Street; the United States Courthouse (containing the U.S. Court of Appeals); the New York County Courthouse (home to the New York State Supreme Court); facilities containing the U.S. District Court, Southern District; the Metropolitan Correctional Center; Murray Bergrau High School, and a Verizon office building. The action, which is limited to streets and sidewalks, does not entail any new development, and does not involve any involuntary displacement of businesses or institutions within the security zone. As

no direct business or institutional displacement would occur as a result of the action, no significant adverse impacts are expected and further detailed analysis is not necessary.

Indirect Residential Displacement

Indirect residential displacement is the involuntary displacement of residents as a result of a change in socioeconomic conditions created by a proposed action. The potential for indirect residential displacement is based on whether an action could result in rising property values, and thus rents, making it difficult for some existing residents to afford their homes. In examining the direct effects of an action that may generate indirect changes, the preliminary assessment evaluates the potential for indirect impacts, including whether the action would:

- *Add a substantial new population with different socioeconomic characteristics compared to the size and character of the existing population.*
- *Directly displace uses or properties that have had a “blighting” effect on property values in the area.*
- *Directly displace enough of one or more components of the population to alter the socioeconomic composition of the study area.*
- *Introduce a substantial amount of a more costly type of housing, compared to existing housing and housing expected to be built in the study area by the time the action is implemented.*
- *Introduce a “critical mass” of non-residential uses such that the surrounding area becomes more attractive as a residential neighborhood.*
- *Introduce a land use that could have a similar indirect effect if it is large enough or prominent enough or combines with other like uses to create a critical mass large enough to offset positive trends in the study area, to impede efforts to attract investment to the area, or to create a climate for disinvestment.*

The action, which is a security plan, would not add any new population, would not directly displace any uses, properties, or populations, and would not introduce any new housing or new uses to the study area. However, as the street closures implemented as part of the action affect accessibility to some residential developments, they may possibly affect property values in the study area. It was determined that a socioeconomic impact cannot be ruled out and a detailed analysis of indirect residential displacement was undertaken. This analysis is provided in Section D of this chapter.

Indirect Business and Institutional Displacement

Indirect business displacement is the involuntary displacement of businesses as a result of a change in socioeconomic conditions created by a proposed action. Like the analysis of indirect residential displacement, the preliminary assessment for indirect business and institutional displacement focuses on the issue of whether an action would increase property values, and thus rents, throughout the study area, making it difficult for some categories of businesses to remain in the area. An action can lead to such indirect changes if:

- *It introduces enough of a new economic activity to alter existing economic patterns.*
- *It adds to the concentration of a particular sector of the local economy enough to alter or accelerate an ongoing trend to alter existing economic patterns.*
- *It directly displaces uses or properties that have had a “blighting” effect on commercial property values in the area, leading to rises in commercial rents.*
- *It directly displaces uses of any type that directly support businesses in the area or bring people to the area that form a customer base for local businesses.*
- *It directly or indirectly displaces residents, workers, or visitors who form the customer base of existing businesses in the area.*
- *It introduces a land use that could have a similar indirect effect, through the lowering of property values, if it is large enough or prominent enough or combines with other like uses to create a critical mass large enough to offset positive trends in the study area, to impede efforts to attract investment to the area, or to create a climate for disinvestment.*

The action, which is a security plan, would not add any new economic activities, would not directly displace any uses, properties, or populations, and would not introduce any new businesses or new uses to the study area. However, as the street closures implemented as part of the action affect accessibility to some commercial uses south and north of the security zone, particularly in the Historic Chinatown sub-area, they may possibly affect business conditions and property values in the study area. It was determined that a socioeconomic impact cannot be ruled out and a detailed analysis of indirect business displacement was undertaken. This analysis is provided in Section E of this chapter.

Adverse Effects on Specific Industries

As set forth in CEQR guidelines, the preliminary assessment of the action’s potential to affect the operation and viability of a specific industry (and not necessarily tied to the specific action area) is not based on set criteria or the identification of specific economic variables. The *CEQR Technical Manual* indicates that a more detailed examination is appropriate if the following considerations cannot be answered with a clear “no”:

- Would the action significantly affect business conditions in any industry or any category of businesses within or outside the study area?
- Would the action indirectly substantially reduce employment or impact the economic viability in the industry or category of businesses?

The streets affected by the action provide approaches to Chinatown for customers and clientele of the tourist-oriented shops and restaurants that are the mainstay of the economy of Chinatown. It was determined that a socioeconomic impact on the City’s tourism industry cannot be ruled out and a detailed analysis was undertaken. This analysis is provided in Section F.

D. DETAILED ANALYSIS OF INDIRECT RESIDENTIAL DISPLACEMENT

This section describes the population and housing characteristics of the study area and the Historic Chinatown sub-area. This section presents 2000 Census data and, where applicable, 2005 data, in order to compare the study area and Historic Chinatown sub-area characteristics to Lower Manhattan as a whole and census tracts 21 and 33.

Baseline Condition

Population Profile

According to 2000 Census Bureau data, the census tracts/blocks which comprise the study area (see Figure 4-1) had a population base of approximately 33,128 residents, and the Historic Chinatown sub-area supported a population of about 5,091 residents, which represents approximately 15.4% of the study area population. As also shown in Table 4-1, Lower Manhattan had a population of approximately 59,485 residents in 2000, whereas census tracts 21 and 33 combined had 6,103 residents. Almost a third of the study area's population is located in Census Tract 8, which forms the eastern edge of the study area boundary, and has the largest average household size in the study area (as discussed below).

Households, Income and Poverty Status

In 2000, the study area contained approximately 11,779 total households with a weighted average household size of 2.50 (see Table 4-2). Average household size varied throughout the census tracts comprising the study area, ranging from 1.75 persons per household in census tract 15.01 to 2.99 in census tract 8. The Historic Chinatown sub-area had approximately 1,935 total households, representing approximately 16.4% of the study area households, and an average household size of 2.51, which is similar to that of the overall study area. As shown in Table 4-2, Lower Manhattan had approximately 24,265 households in 2000, whereas census tracts 21 and 33 combined had approximately 2,943 total households. In general, households in the study area and the Historic Chinatown sub-area were larger than those in Lower Manhattan and census tracts 21 and 33, which had an average household size of 2.19 and 2.02, respectively.

Table 4-1: Study Area Population

Census Tract / Area*	2000 Population	Estimated Absolute Change 2000 to 2005	Estimated 2005 Population	Percentage Change 2000 to 2005
8	10,917	264	11,181	2.4%
15.01	4,562	601	5,163	13.2%
25	5,209	-	5,209	0.0%
27	1,517	-	1,517	0.0%
29	7,422	-	7,422	0.0%
31	1,726	1,516	3,242	87.8%
16 (<i>partial</i>)	1,775	-	1,775	0.0%
STUDY AREA TOTAL	33,128	2,381	35,509	7.2%
<i>Historic Chinatown Sub-area</i>	<i>5,091</i>	-	<i>5,091</i>	<i>0</i>
LOWER MANHATTAN	59,485	16,548	76,033	27.8%
<i>Census Tracts 21 and 33</i>	<i>6,103</i>	<i>2,132</i>	<i>8,235</i>	<i>34.9%</i>

Source: 2000 Population from U.S. Department of Commerce, Bureau of the Census, 2000 Census, Summary File 1. Estimated 2005 absolute change based on information from New York City Department of City Planning regarding new construction or conversion in CD1. Information for Lower Manhattan from NYCDPC Census data for CD1 (SF 1) and 2000 Census Summary File 1 for other census tracts.

* The study area consists of Census Tracts 8, 15.01, 25, 27, 29 and 31 in their entirety, plus Census Tract 16, Block 4004. The Historic Chinatown Sub-area consists of part of Census Tract 29 (Blocks 1000, 1001, 1002, 1003, 1004, 2000, 2001, 2002, 2003, 3000, 3001, 3002), or, alternately, Tax Blocks 199, 200, 201, 202, 162, 163, 164 and 165. Lower Manhattan encompasses the area south of Canal Street, the Bowery, Division and Pike Streets, and includes all of CD1 plus Census Tracts 8, 25, 27, and 29 within CD3.

Income characteristics for the study area households are described below, using the median household income (see Table 4-2). The median household income represents the mid-point of all household incomes in a particular study area. Household income data for the study area indicate that the census tracts comprising the study area exhibit a range of median incomes, from as low as \$13,611 (tract 25) to a high of \$67,361 (tract 31). The study area as a whole has a weighted average median household income of approximately \$26,510. As shown in Table 4-2, the Historic Chinatown sub-area has a median household income of approximately \$22,800, which is less than the weighted average median for the study area by approximately 14%.

Although tracts 31 and 15.01 within the study area have higher median household incomes, the weighted average median income for the study area is less than the \$59,767 median household income for Lower Manhattan, and significantly less than the weighted average median household income of \$119,077 for census tracts 21 and 33. The median household income for Manhattan was \$47,030 in 2000, higher than the study area and the Historic Chinatown sub-area, but lower than the median income in Lower Manhattan and in census tracts 21 and 33.

Table 4-2 also shows the percent of the population below poverty level according to the 2000 Census. The census tracts comprising the study area range from a low of 9.1% (tract 15.01) to 48.4% (tract 25) of the population below poverty level. For the study area as a whole, approximately 29.9% of the population falls below the poverty level, whereas the Historic Chinatown sub-area exhibits higher poverty levels, with approximately 36.6% of the population

falling below the poverty level. As shown in Table 4-2, approximately 19.5% of the population in Lower Manhattan fell below poverty level in 2000, whereas only 2.8% of the population of census tracts 21 and 33 fell below poverty level. In Manhattan as a whole, approximately 20% of the population fell below the poverty level in 2000.

Table 4-2: 2000 Census Household Characteristics

Census Tract / Area*	Housing Characteristics		Income Profile	
	Total Households	Average Household Size	Median Household Income (2)	Percent Below Poverty Level
8	3,644	2.99	\$ 25,148	26.7%
15.01	2,303	1.75	\$ 40,158	9.1%
25	1,882	2.74	\$ 13,611	48.4%
27	663	2.23	\$ 28,438	26.8%
29	2,246	2.48	\$ 20,344	36.5%
31	296	1.96	\$ 67,361	14.0%
16 (partial)	745	2.38	N.A.	N.A.
STUDY AREA TOTAL	11,779	2.50	\$ 26,510	29.9%
<i>Historic Chinatown Sub-area (1)</i>	<i>1,935</i>	<i>2.51</i>	<i>\$ 22,800</i>	<i>36.6%</i>
LOWER MANHATTAN	24,265	2.19	\$ 59,767	19.5%
<i>Census Tracts 21 and 33</i>	<i>2,943</i>	<i>2.02</i>	<i>\$ 119,077</i>	<i>2.8%</i>

Source: Total households and average household size from U.S. Department of Commerce, Bureau of the Census, 2000 Census, Summary File 1, median household income and percent below poverty level from Summary File 3. Values for each study area or sub-area were calculated by taking the weighted average of average household size, median household income, and percent below poverty level for all of the census tracts or block groups in a given study area. Because this data is available only at the block group level and block group boundaries do not always align with sub-area boundaries, the medians are not exact. Block groups were included or excluded depending on how much of the block group lay within the sub-area.

* The study area consists of Census Tracts 8, 15.01, 25, 27, 29 and 31 in their entirety, plus Census Tract 16, Block 4004. The Historic Chinatown Sub-area consists of part of Census Tract 29 (Blocks 1000, 1001, 1002, 1003, 1004, 2000, 2001, 2002, 2003, 3000, 3001, 3002), or, alternately, Tax Blocks 199, 200, 201, 202, 162, 163, 164 and 165. Lower Manhattan encompasses the area south of Canal Street, the Bowery, Division and Pike Streets, and includes all of CD1 plus Census Tracts 8, 25, 27, and 29 within CD3.

(1) The historic Chinatown sub-area is comprised of two entire Block Groups (1 and 3) and a majority of a third Block Group (2). However, as the Census SF3 data are not provided at the block level, the information for median household income and percent below poverty level is provided for the block group level. Although this may not be an entirely accurate representation of conditions in the Historic Chinatown sub-area, as the remainder of Block Group 2 includes Chatham Towers (which may skew some of the data), it nonetheless provides a general idea of conditions.

(2) Median incomes are shown in constant 1999 dollars. The median income represents a weighted average of the median incomes of all the census tracts or block groups in study area or sub-area.

Housing Characteristics

Housing patterns in the study area generally reflect the population and household patterns. As shown in Table 4-3, the study area had an estimated 12,417 housing units in 2000, of which approximately 16.8% (2,091 units) were located within the Historic Chinatown sub-area. Lower Manhattan had approximately 26,759 units in 2000, and census tracts 21 and 33 had a combined total of 3,174 housing units.

Most of the housing units in the study area are located in a few large residential developments. Two of those developments are located within the security zone: Chatham Green Houses, a 21-

Table 4-3: Study Area Housing Units

Census Tract / Area*	2000 Total Housing Units	Estimated Absolute Change 2000 to 2005	Estimated 2005 Housing Units	Percentage Change 2000 to 2005
8	3,712	88	3,800	2.4%
15.01	2,432	343	2,775	14.1%
25	1,935	-	1,935	0.0%
27	696	-	696	0.0%
29	2,418	-	2,418	0.0%
31	461	758	1,219	164.4%
16 (partial)	763	-	763	0.0%
STUDY AREA TOTAL	12,417	1,189	13,606	9.6%
Historic Chinatown Sub-area	2,091	-	2,091	0
LOWER MANHATTAN	26,759	9,120	35,879	34.1%
Census Tracts 21 and 33	3,174	1,133	4,307	35.7%
<p><i>Source: 2000 total housing units from U.S. Department of Commerce, Bureau of the Census, 2000 Census, Summary File 1. Estimated 2005 absolute change based on information from New York City Department of City Planning regarding new construction or conversion in CD1. Information for Lower Manhattan from NYCDCP Census data for CD1 (SF 1) and 2000 Census Summary File 1 for other census tracts.</i></p> <p>* The study area consists of Census Tracts 8, 15.01, 25, 27, 29 and 31 in their entirety, plus Census Tract 16, Block 4004. The Historic Chinatown Sub-area consists of part of Census Tract 29 (Blocks 1000, 1001, 1002, 1003, 1004, 2000, 2001, 2002, 2003, 3000, 3001, 3002), or, alternately, Tax Blocks 199, 200, 201, 202, 162, 163, 164 and 165. Lower Manhattan encompasses the area south of Canal Street, the Bowery, Division and Pike Streets, and includes all of CD1 plus Census Tracts 8, 25, 27, and 29 within CD3.</p>				

story, 420-unit co-op development; and Chatham Towers, a 240-unit co-op development consisting of two 20-story towers. Four other large residential developments are located within the study area but outside the security zone. Alfred E. Smith Houses, which is located to the east of the security zone and occupies census tract 25 in its entirety, is a public housing development operated by the NYC Housing Authority, consisting of 12 buildings ranging from 15 to 17 stories in height, with a total of 1,931 units. Further to the east of the security zone is Knickerbocker Village, a 1,589-unit State-sponsored Mitchell-Lama rental development for families. To the northeast of the security zone is Confucius Plaza, a 44-story, 760-unit City-sponsored Mitchell-Lama co-op development. Finally, to the south of the security zone is Southbridge Towers, a 1,651-unit Mitchell-Lama co-op development. Combined, the six residential developments described above account for approximately 53% of the total housing units located in the study area.

Table 4-4 shows selected housing characteristics from the 2000 Census data, including vacancy rates, tenure, median contract rent and median home value. As shown in Table 4-4, of the census tracts comprising the study area, tract 31 had the highest vacancy rate in 2000, at 35.8%, whereas tract 8 had the lowest vacancy rate, at 1.8%. Overall, the study area had a housing vacancy rate of 5.1%. The Historic Chinatown sub-area exhibited a slightly higher housing vacancy rate, at 7.5%, which was comparable to the vacancy rate for tracts 21 and 33 (7.3%). Lower Manhattan had the highest housing vacancy rate, at 9.3%.

The proportion of rental units (versus owner-occupied units) varies in the census tracts

comprising the study area, ranging from 43.3% (tract 27) to 99.0% (tract 25). In the study area, 81.8% of the occupied housing stock was renter-occupied in 2000, as compared to 79.6% in Lower Manhattan and 55.1% in census tracts 21 and 33. The Historic Chinatown sub-area had an even higher proportion of rental units, at approximately 94.1%.

Table 4-4: Housing Characteristics

Census Tract / Area*	Total Housing Units	Housing Vacancy (Percent)	Housing Tenure (Percent)		Median Contract Rent	Median House Value
			Owner	Renter		
Census Tract 8	3,712	1.8%	3.5%	96.5%	\$ 510	\$ 175,000
Census Tract 15.01	2,432	5.3%	44.5%	55.5%	\$ 468	\$ 106,500
Census Tract 25	1,935	2.7%	1.0%	99.0%	\$ 264	\$ 416,700
Census Tract 27	696	4.7%	56.7%	43.3%	\$ 508	\$ 186,300
Census Tract 29	2,418	7.1%	14.3%	85.7%	\$ 434	\$ 150,800
Census Tract 31	461	35.8%	45.6%	54.4%	\$ 1,599	\$ 366,100
16 (partial)	763	2.4%	18.5%	81.5%	N.A.	N.A.
STUDY AREA TOTAL	12,417	5.1%	18.2%	81.8%	\$ 454	\$ 156,449
Historic Chinatown Sub-area (1)	2,091	7.5%	5.9%	94.1%	\$ 438	\$ 148,667
LOWER MANHATTAN	26,759	9.3%	20.4%	79.6%	\$ 2,066	\$ 459,444
Census Tracts 21 and 33	3,174	7.3%	44.9%	55.1%	\$ 1,906	\$ 708,350

Source: Total households, housing vacancy and tenure from U.S. Department of Commerce, Bureau of the Census, 2000 Census, Summary File 1, median contract rent and median house value from Summary File 3. Values for each study area or sub-area were calculated by taking the weighted average of average household size, median household income, and percent below poverty level for all of the census tracts or block groups in a given study area. Because this data is available only at the block group level and block group boundaries do not always align with sub-area boundaries, the medians are not exact. Block groups were included or excluded depending on how much of the block group lay within the sub-area.

* The study area consists of Census Tracts 8, 15.01, 25, 27, 29 and 31 in their entirety, plus Census Tract 16, Block 4004. The Historic Chinatown Sub-area consists of part of Census Tract 29 (Blocks 1000, 1001, 1002, 1003, 1004, 2000, 2001, 2002, 2003, 3000, 3001, 3002), or, alternately, Tax Blocks 199, 200, 201, 202, 162, 163, 164 and 165. Lower Manhattan encompasses the area south of Canal Street, the Bowery, Division and Pike Streets, and includes all of CD1 plus Census Tracts 8, 25, 27, and 29 within CD3.

(1) The historic Chinatown sub-area is comprised of two entire Block Groups (1 and 3) and a majority of a third Block Group (2). However, as the Census SF3 data are not provided at the block level, the information for median household income and percent below poverty level is provided for the block group level. Although this may not be an entirely accurate representation of conditions in the Historic Chinatown sub-area, as the remainder of Block Group 2 includes Chatham Towers (which may skew some of the data), it nonetheless provides a general idea of conditions.

Residential Real Estate Market Conditions

In 2000, the median contract rent (excluding such expenses as electricity, gas, and telephone service) in the study area was about \$445 per month. As shown in Table 4-4, the median contract rent in the census tracts comprising the study area varied widely, ranging from a low of \$264 in tract 25 to a high of \$1,599 in tract 31. The median contract rent in the Historic Chinatown sub-area was comparable to that of the overall study area, at \$438. The median contract rents in the study area and the Historic Chinatown sub-area were significantly less than those found in Lower Manhattan and census tracts 21 and 33, representing less than one-quarter of the median contract rents in those two other geographic areas.

In 2000, the median house value for owner-occupied units in the study area was about \$156,449. As shown in Table 4-4, the median house value in the census tracts comprising the study area

varied widely, ranging from a low of \$106,500 in tract 15.01 to a high of \$416,700 in tract 25. The median house value in the Historic Chinatown sub-area was slightly lower, though comparable to that of the overall study area, at \$148,667. As shown in Table 4-4, the median house values in the study area and the Historic Chinatown sub-area were significantly less than those found in Lower Manhattan and census tracts 21 and 33, which were \$469,444 and \$708,350, respectively.

Population and Housing Trends Between 2000 and 2005

Although there was a temporary decline in population immediately following the events of September 11, 2001, the area has since experienced an increase in residential developments and conversions. After the 2000 U.S. Census, population levels in the study area and Lower Manhattan as a whole increased as a result of the completion of new developments as well as conversions. As shown in Table 4-3 above, new residential developments and conversions since 2000 have added more than 1,189 new housing units to the study area. This represents a 9.6% increase in the housing inventory of the study area. As also indicated in Table 4-1 above, these new housing units are estimated to have increased the study area population by approximately 2,381 residents, resulting in an increase of 7.2% compared to 2000 conditions. As shown in Tables 4-1 and 4-3, none of the new residential units added in the study area (and hence, none of the new residents) are located in the Historic Chinatown sub-area. This could be due to the fact that the Historic Chinatown sub-area is predominantly a vibrant commercial core, and many of the lots in the sub-area are generally small. This combination of factors does not make the sub-area conducive to residential redevelopment or residential conversion.

The increase in the number of housing units and population has been more dramatic in Lower Manhattan as a whole, including in census tracts 21 and 33. As shown in Table 4-3 above, new residential developments and conversions since 2000 have added an estimated 9,120 new housing units to Lower Manhattan, of which approximately 1,133 units are located in census tracts 21 and 33. This represents a 34.1% increase in the housing inventory of Lower Manhattan and a 35.7% increase in census tracts 21 and 33, compared to 2000 conditions. As indicated in Table 4-1 above, these new housing units are estimated to have increased the population in Lower Manhattan by approximately 16,548 residents, an increase of 27.8% compared to 2000 conditions. The population of census tracts 21 and 33 increased by approximately 2,132 residents, a 34.9% increase compared to 2000 conditions.

Current information on household size and income characteristics is not available.

Residential Real Estate Market Conditions

Given the study area's geographical location, no real estate data are available for its specific boundaries. The majority of the study area is roughly located within the Lower East Side/Chinatown residential neighborhood of Manhattan, which generally extends between Houston Street on the north and the Brooklyn Bridge to the south, east of Broadway. The southern portions of the study area however fall within the Financial District/Seaport area. Real estate data for those markets have been used as applicable.

In terms of current real estate market conditions, the study area, like the rest of Manhattan, is generally experiencing lower vacancy rates, rising rents and sales prices as a result of increased demand. Although residential vacancy rates skyrocketed to more than 30% in the immediate aftermath of September 11, 2001, the vacancy rate had declined to under 10% by September 2002.³ In 2002, rental vacancy rates in the Lower East Side/Chinatown area were 2.1%, while vacancy rates in Greenwich Village/Financial District were 4.1%.⁴ Most recently, Citi Habitats' Black and White Report for Manhattan for January through June 2005 indicates that rental vacancy rates were 1.97% in the Battery Park City/Financial District area, 2.38% in the East Village, and 2.39% in Soho/Tribeca. Therefore, vacancy rates in the overall study area as well as in Lower Manhattan as a whole appear to be generally lower now compared with 2000 Census data.

Rental Market

No post-2000 residential real estate data were available for the specific quarter-mile study area. Therefore, residential rental real estate data were compiled for the area of Lower Manhattan below Canal Street, and compared to three other areas: Canal Street to West 29th Street (which includes the Soho, West Village and Chelsea neighborhoods), Canal Street to East 29th Street (which includes the Bowery, Lower East Side, East Village and Gramercy Park neighborhoods), and the Manhattan rental market as a whole.⁵

As shown in Table 4-5 below, the average rent for all unit sizes in Lower Manhattan, which was comparable to that in the area from Canal Street to West 29th Street in 2000, has declined steadily since, before increasing slightly in the first quarter of 2004 (latest data available). By the first quarter of 2004, the average rents in Lower Manhattan were approximately 20% lower than average rents in the area between Canal Street and West 29th Street, 2% lower than average rents in the area between Canal Street and East 29th Street, and 6% lower than average rents in Manhattan as a whole. As shown in Table 4-5, average rents in Lower Manhattan have decreased by approximately 10.7% between the end of 2000 and the first quarter of 2004, which is a much greater decrease than that experienced in the other two markets (rents in the area between Canal Street and West 29th Street actually increased in that same period), but is lower than the decrease of 13.6% in the overall Manhattan rental market in the same period.

³ "Downtown Still Struggles A Year After the Attacks" by Janet Morrissey, September 9, 2002; realestatejournal.com

⁴ Source: *State of New York City's Housing and Neighborhoods 2004*, Furman Center for Real Estate and Urban Policy, New York University.

⁵ *Halstead/Feathered Nest Rental Report – October 1, 2003 to March 31, 2004* broke out real estate data for these specific areas.

Table 4-5: Residential Rental Market - Lower Manhattan Vs. Other Manhattan Sub-Markets and Whole Manhattan Market (2000-2004)

Period	Average Rents for All Unit Sizes (\$)			
	Lower Manhattan*	Canal Street to West 29th Street*	Canal Street to East 29th Street*	Whole Manhattan Market
2000 (year end)	\$2,712	\$2,725	\$2,634	\$2,971
2001 (mid year)	\$2,539	\$2,763	\$2,766	\$2,899
2002 (year end)	\$2,353	\$2,690	\$2,515	\$2,523
2003 (third quarter)	\$2,370	\$2,855	\$2,435	\$2,528
2004 (first quarter)	\$2,421	\$2,914	\$2,466	\$2,568
% Change 2000-2004	-10.7%	6.9%	-6.4%	-13.6%

Source: Halstead/Feathered Nest Rental Report - October 1, 2003 to March 31, 2004

* Lower Manhattan data are for area south of Canal Street. Area between Canal Street and West 29th Street includes Soho, West Village, and Chelsea neighborhoods. Area between Canal Street and East 29th Street includes Bowery, Lower East Side, East Village, and Gramercy Park neighborhoods.

Sales Market

According to Halstead Property LLC's Monthly Market Report for September 2005, the inventory of new listings for condominium and cooperative units as well as lofts in Downtown Manhattan (defined as the area south of 14th Street) increased well above the same period a year ago. Compared to September 2004, the inventory of available studios increased by 8% in September 2005, one bedrooms increased by 79%, two-bedrooms by 95%, three-bedrooms by 48%, and the inventory of lofts increased by 333% compared to a year ago. At the same time, median sale prices increased in the Downtown area compared to one year ago. The median sale price for studios increased by 19%, the median price of one-bedroom units increased by 27%, and the median sale price of two-bedroom units increased by 1% compared to one year ago. For lofts, the average price per square foot increased by 37% compared to one year ago.

No post-2000 residential real estate data were available for the specific quarter-mile study area. Therefore, residential sales real estate data were compiled for the Financial District, and compared to Tribeca/Soho. The Financial District is defined as the area between Battery Park and Vesey Street/Broadway/Brooklyn Bridge, and encompasses the southern portion of the study area. Tribeca/Soho is defined as the area bounded by Vesey Street to the south and Houston Street to the north between Broadway and the Hudson River, and encompasses the area defined by census tracts 21 and 33. Table 4-6 below provides comparative sales data for those two areas for the period between 2000 and 2005. It should be noted that because condo data were not available for the Financial District, only co-op data are provided in order to allow for a meaningful/compatible comparison.

As shown in the table, both the average and median sales prices for co-op apartments in the Financial District increased substantially between 2000 and 2005, by approximately 188% and 235%, respectively. In the third quarter of 2005, the average sales price for co-op apartments in

the Financial District was \$750,000, and the median sales price was \$570,000. In comparison, the average and the median sales prices in Tribeca/Soho have fluctuated widely between 2000 and 2005. The average sales price in Tribeca/Soho reached a high of \$1,619,371 in 2004, before dropping to \$1,134,196 (an increase of 157% compared to 2000), while the median sales price reached a high of \$1,585,000 in 2004, before dropping to \$635,000 in 2005, an increase of only

Table 4-6: Residential Sales Market (Co-ops Only) - Financial District Vs. Tribeca/Soho (2000-2005)

Period	Financial District*				Tribeca/Soho*			
	# of sales	Average Sale Price (\$)	Median Sale Price (\$)	Average Price per s.f.	# of sales	Average Sale Price (\$)	Median Sale Price (\$)	Average Price per s.f.
3rd Quarter 2000	8	\$261,000	\$170,000	\$297	12	\$442,062	\$625,000	\$395
3rd Quarter 2001	2	\$167,500	\$167,500	\$323	11	\$955,909	\$780,000	\$612
3rd Quarter 2002	12	\$560,167	\$547,500	\$472	17	\$1,237,647	\$1,250,000	\$638
3rd Quarter 2003	11	\$570,818	\$495,000	\$508	29	\$918,517	\$949,000	\$651
3rd Quarter 2004	6	\$657,500	\$685,000	\$524	27	\$1,619,371	\$1,585,000	\$800
3rd Quarter 2005	8	\$750,500	\$570,000	\$759	23	\$1,134,196	\$635,000	\$1,035
% Change 2000 to 2005	0.0%	187.5%	235.3%	155.6%	91.7%	156.6%	1.6%	162.0%

Source: Miller Samuel Inc. data, www.millersamuel.com/data/report.php

* Financial District is defined as the area between Battery Park and Vesey Street/Broadway/Brooklyn Bridge, from the East River to West Street (does not include Battery Park City). Tribeca/Soho is defined as the area bounded by Houston Street to the north, Vesey Street to the south, Broadway to the east and the Hudson River to the west.

1.6% compared to the 2000 median sales price. Average price per square foot is perhaps a more appropriate indicator, as it is directly related to the size of the co-op, whereas average sales prices are for all unit sizes, so may be skewed if more larger units are sold. As shown in Table 4-6, the average price per square foot in the Financial District has consistently been lower than in Tribeca/Soho. Whereas the average price per sf has fluctuated in the Financial District, it has steadily increased in Tribeca/Soho. In the third quarter of 2005, the average price per sf in the Financial District was \$759, an increase of 156% over 2000 figures, and the average price per sf in Tribeca/Soho was \$1,035, an increase of 162% over 2000 figures.

Although specific data on average and median sales prices for Chatham Green co-ops, which is located within the security zone, are not available, recent real estate listing in the *New York Times* and on real estate firms' websites indicate that asking prices for Chatham Green co-op apartments are comparable to the average and median sale price in the Financial District for the 3rd Quarter 2005. Based on the real estate listings, asking sales prices for Chatham Green apartments range from \$422,000 for a studio, \$625,000 for a 1-bedroom, \$799,000 for a 2-bedroom, and \$975,000 for a 3-bedroom. Based on the listings, the average asking sales price for a Chatham Green co-op apartment is \$688,417 and the median asking sales price is \$615,000. Historical data on average and median sales and listing prices for Chatham Green are not available. No recent or historic data or sales listing were available for co-ops in Chatham Towers, which are also partially located within the security zone.

No-Action Condition

For analysis purposes, under the No-Action condition, it is assumed that the security plan implemented by the NYPD after September 11, 2001 that resulted in the above mentioned street closures would not be in place. The roadways would be open with the 1999 street closures and municipal garage closure in place, and transportation services would continue as they were prior to September 11, 2001.

As the security plan is currently in place, no data are available for 2006 conditions in the absence of the action. Certain assumptions can be made however, based on 2000 data and current data. In the absence of the action, access to the study area, particularly access from areas to the east and south, would be unhindered, and hence, more direct. However, better accessibility would not necessarily have resulted in measurably different population or housing characteristics. No direct correlation between accessibility and housing characteristics has been found. As discussed above, residential vacancy rates in the area have actually decreased between 2000 (prior to the security plan), and 2005 (with the security plan), and the decrease has been experienced throughout the study area and Lower Manhattan as a whole. Both median and average rents as well as sales prices have fluctuated somewhat in the period since 2000, although the general trend has been toward higher rents and sales prices.

It would therefore appear that the security plan has not affected housing characteristics, as it has not resulted in trends that are unique to the study area. Therefore, analysis of the available data indicates that, in the absence of the security plan, socioeconomic conditions (particularly those associated with the residential population) would not be expected to be measurably different than conditions with the security plan in place.

With-Action Condition

The action has resulted in the installation of temporary security booths, rising-plate hydraulic delta barriers, bollards, and planters on various streets and intersections within the study area for the purpose of closing streets to create a secure perimeter around One Police Plaza and adjacent civic facilities. As discussed above, according to the *CEQR Technical Manual*, in most cases, the potential for indirect residential displacement is based on whether an action could result in rising property values, and thus rents, making it difficult for some existing residents to afford their homes (increased value of owner-occupied units would not result in involuntary displacement). Another factor in determining the potential for indirect displacement is whether the action would introduce a land use that could have a similar indirect effect if it is large enough or prominent enough or combines with other like uses to create a critical mass large enough to offset positive trends in the study area, to impede efforts to attract investment to the area, or to create a climate for disinvestment.

Although the action has limited accessibility to some parts of the study area, there is no evidence that the limit in accessibility has resulted in any secondary residential displacement. While rents

and home values have, in general, increased throughout the study area, these increases appear to be a result of normal economic trends, are consistent with trends throughout Lower Manhattan, and are therefore not directly attributable to the security plan.

According to the *CEQR Technical Manual*, a population at risk of indirect displacement consists of people living in privately held units unprotected by rent control, rent stabilization, or other forms of rent control, whose incomes or poverty status indicate that they could not support substantial rent increases that would occur as a result of the action. As noted above, the action, a security plan, has not directly resulted in substantial rent increases in the study area. Although rents in the area have increased compared to the baseline condition, such increases are similar to those experienced throughout Lower Manhattan and Manhattan as a whole, and are a product of the City's economic activities rather than a result of the security plan. It should also be noted that at least 53% of the housing units in the study area are protected (either Mitchell Lama developments or public housing). In particular, census tract 25, which had the lowest median household income and the highest percent of population below the poverty level in 2000, is comprised entirely of the Alfred E. Smith Houses, a public housing development which is not affected by increases in rent.

Another issue of concern to the community is the potential effect of the security zone on property values in the study area, particularly in the immediate vicinity of the security zone as Chatham Green and Chatham Towers are susceptible to changes in property values. As discussed above, median sales values in Lower Manhattan, including the study area, have generally increased compared to the 2000 baseline condition. Recent sales listings for apartments indicate that average and median sales prices for co-ops in Chatham Green (located within the security zone) are comparable to the median and average sales prices for co-ops within the Financial District area. Data and listing for sales prices for Chatham Towers were not available. A more detailed discussion of property values along Mott Street in the study area is provided in the discussion of commercial real estate below.

Therefore, the action has not offset positive trends in the study area, has not impeded efforts to attract residential investment to the area, and has not created a climate for disinvestment. In fact, based on current real estate market conditions, the action has neither reduced property values in the study area, nor has it independently increased residential values to such an extent that secondary residential displacement would be observed.

E. DETAILED ANALYSIS OF INDIRECT BUSINESS DISPLACEMENT

This section evaluates indirect business displacement, providing an assessment of the employment and business characteristics of the study area and the Historic Chinatown sub-area, as well as the real estate market trends in the study area. Where appropriate, this section provides a special focus on the Historic Chinatown sub-area, and compares the characteristics of the study area to those of Lower Manhattan as a whole and Tribeca in particular (census tracts 21 and 33

where applicable). It should be noted that, because retail real estate data were not available for the specific defined study area, data are provided for Downtown/Lower Manhattan in general, and the comparative sub-market assessment is provided for the Broadway retail corridor, which falls partially within the defined study area, and the Tribeca sub-market, which is defined as Hudson Street from Chambers Street to Canal Street, to the west of the study area.

Baseline Condition

Over the past three decades, the economy of New York City has remained strong, despite three significant downturns, triggered by the global oil crisis of the mid-1970s, the stock market crash of October 1987, and the precipitous slide of the technology sector that began in early 2000, followed by the September 11, 2001 terrorist attack. Despite these cycles, total employment in New York City over the past 30 years has remained relatively stable, with two peaks in 1989 and 1999.

While total employment in the City has been steady, the mix of employment has changed significantly since 1969. The manufacturing sector, traditionally the leading employer in the City in the first half of the twentieth century, has given way to more service-oriented industries, such as financial and business services, tourism, and entertainment. The most recent economic boom in the late 1990s was driven largely by the financial services sector, along with other key industries, such as advertising, motion pictures, publishing, media, tourism, and business and computer services. That boom was also heavily influenced by high-tech or technology start-up industries, which include telecommunications, business and computer services sectors. Meanwhile, manufacturing employment continues to decline, following a decades-long trend in which manufacturing has moved to other parts of the U.S. and overseas in search of lower operating costs, including labor, utilities and rent. Between 1969 and 1999, New York City lost more than two-thirds of its manufacturing jobs.

The late 1990s boom enjoyed by New York City, driven by a strong national economy and growth in the city's financial sector and other key industries, subsided toward the end of 2000. In January 2001, just two months before the national recession began, the City entered a protracted downturn, which was made even more evident by the events of September 11. In the late 1990s, the city experienced its strongest economic boom of the past half century, both in absolute terms and relative to the United States. Between 1996 and 2000, private-sector employment grew at a 2.6% average annual pace. According to the Federal Reserve Bank of New York, as 2000 drew to a close however, the boom ended and NYC's economy slipped into a recession in January 2001, just two months before the national economy also began a downturn.⁶

⁶ Source for information in this paragraph: *Current Issues in Economics and Finance – Second District Highlights*; Volume 9, Number 2, February 2003; Federal Reserve Bank of New York.

Employment and Business Profiles

The business displacement analysis uses similar study areas to the residential displacement assessment previously shown in Figure 4-1. It should be noted however that, for the assessment of commercial real estate, the quarter-mile radius was not adjusted to match census tract boundaries, as census data were not used for this analysis. Table 4-5 provides summary data for 2000 (baseline condition) and 2002 on private sector employment for each of the study areas. The 2002 data, the latest available, includes the effects of the 9/11 attacks on the area's economy. As shown in Tables 4-7 and 4-8, the study area contained approximately 11,512 private sector jobs in 2000, of which approximately 3,327 jobs (28.9%) were located in the Historic Chinatown sub-area. A total of 1,529 private firms were located in the study area in 2000, of which approximately 574 firms (37.5%) were located in the Historic Chinatown sub-area. Lower Manhattan had approximately 331,674 private sector jobs in 2000⁷, of which approximately 19,242 jobs (5.8%) were located in census tracts 21 and 33 (Tribeca).

Table 4-7: 2000 and 2002 Private Sector Employment

Census Tract / Area*	Employment (jobs)			Number of Firms		
	2000	2002	Percent Change 2000 to 2002	2000	2002	Percent Change 2000 to 2002
8	2,159	1,882	-12.8%	376	337	-10.4%
15.01	3,110	2,079	-33.2%	278	212	-23.7%
25	218	262	20.2%	13	11	-15.4%
27	368	351	-4.6%	77	80	3.9%
29	3,647	3,233	-11.4%	602	583	-3.2%
31	1,999	1,904	-4.8%	182	165	-9.3%
16 (partial)	11	-	-100.0%	1	1	0.0%
STUDY AREA TOTAL	11,512	9,711	-15.6%	1,529	1,389	-9.2%
Historic Chinatown Sub-area (1)	3,327	2,929	-12.0%	574	557	-3.0%
LOWER MANHATTAN						
Census Tracts 21 and 33	19,242	16,608	-13.7%	2,173	1,875	-13.7%

Source: NYS DOL data compiled by DCP (ES-202Data from 2000 and 2002).

* The study area consists of Census Tracts 8, 15.01, 25, 27, 29 and 31 in their entirety, plus Census Tract 16, Block 4004 (tax block 289). The Historic Chinatown Sub-area consists of part of Census Tract 29 (Blocks 1000, 1001, 1002, 1003, 1004, 2000, 2001, 2002, 2003, 3000, 3001, 3002), or, alternately, Tax Blocks 199, 200, 201, 202, 162, 163, 164 and 165. Lower Manhattan encompasses the area south of Canal Street, the Bowery, Division and Pike Streets, and includes all of CD1 plus Census Tracts 8, 25, 27, and 29 within CD3.

Table 4-8 and Figure 4-2 show the absolute number of jobs and percentage by industry sector in each of the study areas in 2000. As indicated, the services industries sector⁸ constituted the

⁷ Source for Lower Manhattan employment data is *Permanent PATH Terminal FEIS*, May 2005.

⁸ Services Industries Sector includes: Business, Legal and Professional Services; Entertainment Services; Health and Social Services; Educational Services; and Other Services.

Table 4-8: Private Sector Employment By Industry Sector - 2000 and 2002

SECTOR	STUDY AREA TOTAL*				HISTORIC CHINATOWN SUB-AREA*				LOWER MANHATTAN**				CENSUS TRACTS 21 AND 33			
	2000 Employment		2002 Employment		2000 Employment		2002 Employment		2000 Employment		2002 Employment		2000 Employment		2002 Employment	
	Jobs	Percent of Total	Jobs	Percent of Total	Jobs	Percent of Total	Jobs	Percent of Total	Jobs	Percent of Total	Jobs	Percent of Total	Jobs	Percent of Total	Jobs	Percent of Total
Construction	293	2.5%	100	1.0%	17	0.5%	7	0.2%	4,486	1.4%	3,478	1.3%	489	2.5%	223	1.3%
Manufacturing	784	6.8%	500	5.1%	200	6.0%	110	3.8%	16,826	5.1%	12,012	4.3%	1,166	6.1%	609	3.7%
TCPU (1)	436	3.8%	412	4.2%	131	3.9%	103	3.5%	13,385	4.0%	10,627	3.8%	1,342	7.0%	2,992	18.0%
Wholesale	492	4.3%	444	4.6%	115	3.5%	116	4.0%	9,633	2.9%	7,658	2.8%	1,037	5.4%	683	4.1%
Other Industrial	-	0.0%	9	0.1%	-	0.0%	9	0.3%	-	0.0%	-	0.0%	38	0.2%	21	0.1%
Total Industrial	2,005	17.4%	1,465	15.1%	463	13.9%	345	11.8%	44,330	13.4%	33,775	12.2%	4,072	21.2%	4,528	27.3%
Retail	2,915	25.3%	2,262	23.3%	1,609	48.4%	1,334	45.5%	34,990	10.5%	29,520	10.7%	3,190	16.6%	2,506	15.1%
FIRE (2)	1,389	12.1%	1,584	16.3%	544	16.4%	477	16.3%	130,370	39.3%	96,004	34.8%	2,021	10.5%	1,128	6.8%
Services Industries (3)	5,066	44.0%	3,943	40.6%	663	19.9%	595	20.3%	120,887	36.4%	107,444	38.9%	9,811	51.0%	7,994	48.1%
Total Non-Industrial	9,370	81.4%	7,789	80.2%	2,816	84.6%	2,406	82.1%	286,247	86.3%	232,968	84.4%	15,022	78.1%	11,628	70.0%
Unclassified	137	1.2%	457	4.7%	48	1.4%	178	6.1%	1,097	0.3%	9,395	3.4%	148	0.8%	452	2.7%
TOTAL	11,512	100.0%	9,711	100.0%	3,327	100.0%	2,929	100.0%	331,674	100.0%	276,138	100.0%	19,242	100.0%	16,608	100.0%

Source: NYS DOL data compiled by DCP (ES-202Data from 2000 and 2002).

(1) TCPU: Transportation, Communication, and Public Utilities

(2) FIRE: Financial, Insurance Real Estate

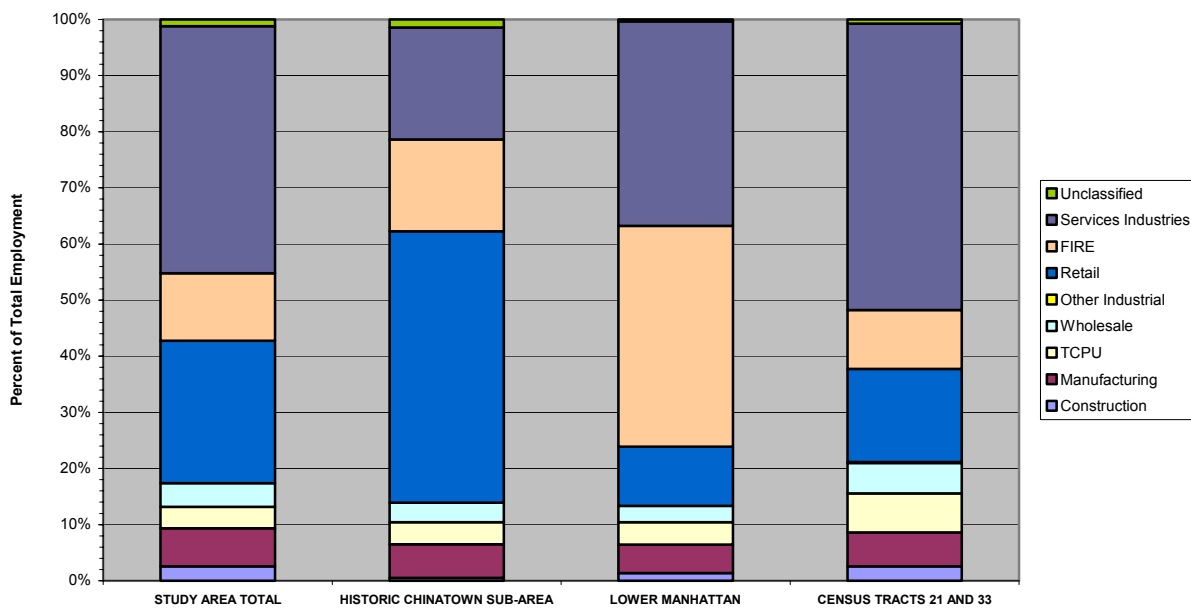
(3) Services Industries include: Business, Legal and Professional Services; Entertainment Services, Health & Social Services; Educational Services; and Other Services.

* The study area consists of Census Tracts 8, 15.01, 25, 27, 29 and 31 in their entirety, plus Census Tract 16, Block 4004 (tax block 289). The Historic Chinatown Sub-area consists of part of Census Tract 29 (Blocks 1000, 1001, 1002, 1003, 1004, 2000, 2001, 2002, 2003, 3000, 3001, 3002), or, alternately, Tax Blocks 199, 200, 201, 202, 162, 163, 164 and 165. Lower Manhattan encompasses the area south of Canal Street, the Bowery, Division and Pike Streets, and includes all of CD1 plus Census Tracts 8, 25, 27, and 29 within CD3.

** Lower Manhattan data is from the Permanent WTC PATH Terminal FEIS, May 2005.

largest percentage of jobs in both the study area and Tribeca (census tracts 21 and 33) in 2000, with 44.0% and 51.0%, respectively, of total employment in 2000. In the Historic Chinatown sub-area, however, the largest percentage of jobs were in the retail sector, which had 48.4% of total employment in 2000. In Lower Manhattan as a whole, the financial, insurance and real estate (FIRE) sector had the largest percentage of jobs, with 39.3% of total jobs in 2000, closely followed by the services industries sector, with 36.4% of total jobs. As shown in Table 4-8, census tracts 21 and 33 (Tribeca) had the highest percentage of total industrial jobs in 2000, at 21.2%, higher than the percentage in the study area (17.4%), the Historic Chinatown sub-area (13.9%), or Lower Manhattan (13.4%).

Figure 4-2: Composition of 2000 Private Sector Employment



The Retail Sector

As indicated by the data in Table 4-8, the Historic Chinatown sub-area comprises the major retail concentration of the study area. Retail in the Historic Chinatown sub-area is mainly concentrated on the ground floors of small, older buildings. High concentrations of commercial and mixed-use buildings exist throughout the sub-area, clustered along Canal Street, and along the north-south streets throughout the sub-area. Restaurants, fish and vegetable markets, souvenir and gift shops and tea and rice shops are the main businesses in Chinatown, but the area contains other retail establishments as well, such as traditional Chinese herbal medicine shops, acupuncturists, and jewelry and silk robe shops. The area’s distinct character and mix of businesses make it a popular tourist destination.

Other major retail areas in the study area include Fulton Street, the Historic Seaport district, and the Pier 17 Pavilion, as well as the Broadway corridor. The Fulton Street corridor includes a wide diversity of businesses, with many small stores selling jewelry, discount clothing and accessories, and gifts and souvenirs, along with eating and drinking places. The Historic Seaport district is characterized by upscale national/regional tenants (e.g. Coach, Brookstone, J. Crew, and Ann Taylor) and a variety of restaurants, many of which are located in historic buildings on cobblestone streets like Front Street and Schermerhorn Row. The Pier 17 Pavilion is a three-story mall consisting primarily of small storefronts for specialty tenants of apparel and accessory retail. The mall also includes several restaurants and bars and some nationally recognized tenants, such as Sharper Image, Express, and Victoria's Secret. The Broadway Corridor includes a large number of eating and drinking establishments that serve the area's workforce, along with a number of convenience goods stores and neighborhood services stores, such as salons and film developers. The Civic Center area contains very little retail, with street vendors selling food and drink items comprising almost all of the retail activity in that area.

In Lower Manhattan overall, the mall at the World Trade Center contained a significant retail concentration under the baseline condition, with approximately 325,000 square feet of retail space, mostly occupied by national or regional chains. The shops at the World Financial Center contain approximately 160,000 square feet, including Ann Taylor, Banana Republic, and a number of restaurants. Other major destination retail establishments in Lower Manhattan include the Century 21 department store and J&R Music and Computer World. In many areas of Lower Manhattan, retail is supported largely by the workforce population.

Commercial Real Estate Conditions

Office Market

Office demand is cyclical, based on economic conditions. In the overall Downtown Manhattan office market area, which extends mostly south of the Brooklyn Bridge and Chambers Street, vacancy rates were approximately 4.2% at the end of the third quarter in 2000, with an average asking rent of approximately \$43.10 per square foot (\$/sf).⁹ Office market real estate data were also compiled for an approximate quarter-mile radius from the security zone (the study area). For the quarter-mile study area, the total office vacancy rate was 4.4% in the third quarter of 2000. Overall, it is estimated that the study area had 579,446 square feet of total vacant office space in the third quarter of 2000, with total average rents of \$39.74 per square foot.¹⁰ Therefore, under the baseline condition, the study area exhibited comparable characteristics to the overall Downtown Manhattan office market in terms of vacancy rates, although it had lower average rents.

As Tribeca does not comprise a discrete office market or submarket, no comparative data were

⁹ Source: CB Richard Ellis, *Downtown Manhattan Office Market View*, October 2005.

¹⁰ Source for quarter-mile study area: Signature Partners LLC, 11/8/2005.

available for that area. Therefore, in order to provide a meaningful comparative assessment of the office real estate market, the Downtown Manhattan office market is compared to the Midtown South office market. Midtown South extends approximately from 34th Street to Canal Street, and includes the area west of the Bowery south of 23rd Street. This market includes the Chelsea, Flatiron, Hudson Square/Tribeca, Noho/Soho, Park Avenue South/Madison Square, Penn Plaza, and Union Square submarkets. At the end of the third quarter of 2000, vacancy rates in the Midtown South office market area were approximately 5.1%, with an average asking rent of approximately \$47.21 per square foot.¹¹ Therefore, under the baseline condition, the Midtown South office market exhibited higher rents and vacancy rates than both Downtown Manhattan as a whole and the study area.

Retail Market

No real estate data for the retail market were available for the specific quarter-mile study area. Therefore, real estate data were compiled for the Downtown Manhattan retail market as a whole, as well as for two sub-areas within that market, namely the Broadway corridor and the Tribeca sub-market. The Broadway corridor extends from Battery Park to Chambers Street, and falls partially within the study area, whereas the Tribeca sub-market is defined as the portion of Hudson Street from Chambers Street to Canal Street.

In Fall 2000, the Downtown Manhattan retail market had approximately 1.75 million square feet of total available retail space, including ground floor, lower level, upper level, and mezzanine spaces. The average asking rent for these spaces was \$67/sf. No 2000 data were available for the Broadway corridor and Tribeca, however, in Spring 2001, the Broadway corridor had average asking rents of \$85/sf for available ground floor spaces, whereas average asking rents for ground floor spaces in Tribeca were higher, at \$94/sf.

Employment, Business and Commercial Real Estate Trends Between 2000 and 2005

According to the 2005 *World Trade Center Memorial and Redevelopment Plan GEIS*, the September 11 attacks on the World Trade Center (WTC) complex destroyed seven buildings containing approximately 13.4 million square feet of Class A office space. In addition to those buildings destroyed, at least 23 properties containing approximately 21.1 million square feet of office space were damaged by the attacks. In total, approximately 34.5 million square feet of office space in Lower Manhattan were destroyed or damaged by the September 11 attacks. The approximately 27.8 million square feet of Class A office space destroyed or damaged represented roughly 60 percent of the Class A office space south of Chambers Street. In addition to office space, approximately 0.5 million square feet of retail space were destroyed, a majority of which was in the underground mall of the WTC complex.

As shown in Table 4-7 above, the study area and the Historic Chinatown sub-area, as well as Lower Manhattan as a whole experienced a decline in total jobs and number of firms between 2000 and 2002 (the latest data available). This decline in jobs and businesses, which was

¹¹ Source: CB Richard Ellis, *Downtown Manhattan Office Market View*, October 2005.

experienced throughout Lower Manhattan, can be mainly attributed to the effects of the September 11, 2001 attacks. It is estimated that approximately 51,000 private sector jobs were lost in the month of October 2001 alone, with an additional 41,000 jobs lost between October 2001 and March 2002.¹² According to the Federal Reserve Bank of New York's November 2002 Economic Policy Review, these employment disruptions varied across the City's boroughs and neighborhoods, and across industries. The most pronounced impact was concentrated in the blocks surrounding the World Trade Center, where numerous businesses, offices, and retail shops were either destroyed or badly damaged. Substantial employment effects were felt in the whole of Lower Manhattan (south of Canal Street), where transportation access was curtailed for security purposes and due to the cleanup of the WTC site and the volume of customer traffic fell precipitously. However, because of the drop-off in tourism as well as possible multiplier effects from the loss of finance jobs and businesses throughout the city suffered because of the attacks.¹³

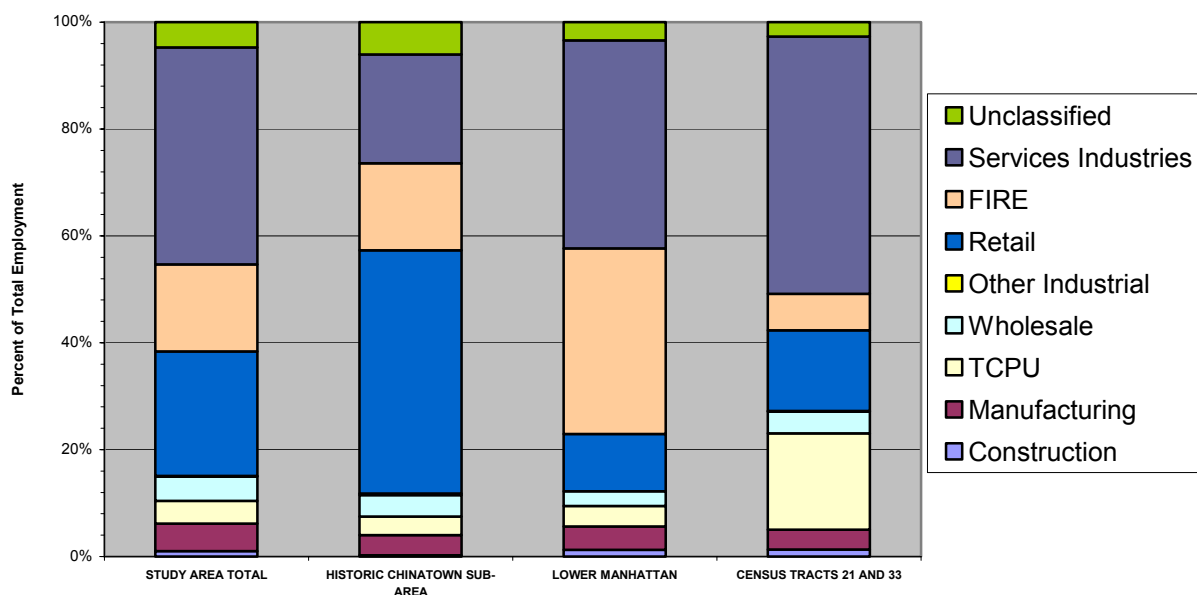
As shown in Table 4-7, the total number of private sector jobs in the study area declined by approximately 15.6% in 2002, to approximately 9,711, whereas the number of jobs in the Historic Chinatown sub-area declined by 12.0%, to 2,929 jobs. Likewise, the number of private firms declined by 9.2% in the study area, and by 3.0% in the Historic Chinatown sub-area. In census tracts 21 and 33 (Tribeca), both the number of jobs and number of firms declined by approximately 13.7% in 2002.

Figure 4-3 shows the percentage of private sector jobs by industry sector in each of the study areas in 2002, whereas Table 4-6 above shows the absolute number of jobs and percentage by industry sector in each of the study areas. As shown in Table 4-8, whereas total industrial employment decreased from 2000 to 2002 in the study area, the Historic Chinatown sub-area and Lower Manhattan as a whole, total industrial employment actually increased in Tribeca (census tracts 21 and 33), from 21.2% of total employment in 2000, to 27.3% in 2002, with the largest increase (11%) in the TCPU (transportation, communication and public utilities) sector. The overall services industries sector declined in the overall study area and census tracts 21 and 33 between 2000 and 2002, by 3.4% and 2.9%, respectively, but experienced modest increases in the Historic Chinatown sub-area and Lower Manhattan, of 0.4% and 2.5%, respectively. As shown in Table 4-8 and Figure 4-3, the retail sector continued to have the highest percentage of jobs in the Historic Chinatown sub-area, with 45.5% of total private sector employment in 2002, whereas the services industries sector accounted for the highest percentage of jobs in the study area, Tribeca, and Lower Manhattan.

¹² Source: "Measuring the Effects of the September 11 Attack on New York City" by Jason Bram, James Orr, and Carol Rapaport; Federal Reserve Bank of New York *Economic Policy Review*; November 2002.

¹³ Ibid.

Figure 4-3: Composition of 2002 Private Sector Employment



Commercial Real Estate Conditions

Office Market

As shown in Table 4-9, in the overall Downtown Manhattan office market area, office vacancy rates increased sharply from 7.4% in October 2001 (third quarter) to 14.6% in October 2002. This sharp increase clearly indicates the effects of the September 11 attacks on the Downtown office market. The vacancy rate has fluctuated in the following three years, but exhibits a general trend toward higher vacancies. The vacancy rate experienced a temporary decrease to 11.4% in October 2004, but has since increased to 15.0% in October 2005. The asking rents for office space in the Downtown market decreased steadily since 2000, reaching a low of approximately \$30.49 in October 2004, before increasing again to \$35.56 in October 2005.¹⁴

Office market real estate data for the approximate quarter-mile study area indicate that the study area’s vacancy rates have experienced a quicker recovery compared to the overall Downtown market. As shown in Table 4-9, the total office vacancy rate in the study area increased sharply from 4.4% in the third quarter of 2000 to 17.1% in the third quarter of 2001, and reached a peak of 17.3% in the third quarter of 2002, before declining again, to approximately 8.1% in the third quarter of 2005. Overall, it is estimated that the study area had approximately 1.03 million square feet of total vacant office space in the third quarter of 2005. Total average rents in the study area have fluctuated since 2000, reaching a high of \$41.20/sf in the third quarter of 2001, before

¹⁴ Source: CB Richard Ellis data as presented in the Local Economy Statistical Abstract (1990 to 2002).

declining steadily, with a total average rent of \$29.19 in the third quarter of 2005.¹⁵ Although the study area’s average rents continue to be lower than those found in the overall Downtown Manhattan office market, its office vacancy rates have improved substantially compared to vacancy rates for Downtown Manhattan.

Table 4-9: Comparison of Office Markets: Downtown Manhattan, Study Area, and Midtown South

	Downtown Manhattan (1)		Study Area (2)		Midtown South (1)	
	Asking Rent (\$/s.f.)	Availability Rates (%)	Asking Rent (\$/s.f.)	Availability Rates (%)	Asking Rent (\$/s.f.)	Availability Rates (%)
Oct./3rd Quarter 2000	\$ 43.10	4.2%	\$ 39.74	4.4%	\$ 47.21	5.1%
Oct./3rd Quarter 2001	\$ 40.54	7.4%	\$ 41.20	17.1%	\$ 41.76	10.8%
Oct./3rd Quarter 2002	\$ 36.66	14.6%	\$ 33.01	17.3%	\$ 35.31	12.8%
Oct./3rd Quarter 2003	\$ 33.31	15.3%	\$ 30.40	15.5%	\$ 31.38	13.0%
Oct./3rd Quarter 2004	\$ 30.49	11.4%	\$ 30.18	7.4%	\$ 32.48	12.2%
Oct./3rd Quarter 2005	\$ 35.56	15.0%	\$ 29.19	8.1%	\$ 34.11	10.0%

(1) Source: CB Richard Ellis data as presented in the Local Economy Statistical Abstract (1990 to 2004)
 (2) Source: Signature Partners LLC data compiled for 1/4 mile study area

Table 4-9 also provides similar data for the Midtown South office market, for comparison purposes. As described above, the Midtown South market extends approximately from 34th Street to Canal Street, and includes the area west of the Bowery south of 23rd Street. As shown in the table, office vacancy rates in Midtown South increased from 5.1% in October 2000 (third quarter) to 10.8% in October 2001. The vacancy rate has fluctuated in the following years, reaching a peak of 13.0% in October 2003, before declining to approximately 10.0% in October 2005. Total average rents in the Midtown South office market have fluctuated between 2000 and 2005, from a high of \$47.21 in October 2000, to a low of \$31.38 in October 2003, before recovering to \$34.11 in October 2005.¹⁶

Therefore, the study area exhibits similar trends to both the overall Downtown and the Midtown South office markets. While the vacancy rates in the study area have exhibited similar trends to those of the Midtown South market, they have recovered to near pre-9/11 levels more quickly than the Downtown market.

Retail Market

Lower Manhattan’s merchants and restaurant owners have struggled to recover from the effects of 9/11. Area merchants saw a precipitous drop in business after the attacks, and have since continued to struggle. For several months after the attacks, Lower Manhattan was isolated and barren, as streets were cordoned off for recovery work and subway service was suspended. Because independent streetfront retailers do not report to one landlord however, overall Lower

¹⁵ Source for quarter-mile study area data: Signature Partners LLC, 11/8/2005.

¹⁶ Source: CB Richard Ellis data as presented in the Local Economy Statistical Abstract (1990 to 2004).

Manhattan sales figures are hard to ascertain. The Alliance for Downtown New York, however, estimates that half of the retail stores in the Downtown area saw a 20-50% decline in fourth quarter sales volume in 2001 compared to 2000 fourth quarter sales, and 27% experienced a decrease of 51-80% in sales volume.¹⁷

Table 4-10 below provides data for the retail market in Downtown Manhattan, and compares it to Midtown South. As shown in Table 4-10, the estimated vacancy rate for all available retail space in the Downtown retail market has fluctuated widely over recent years, from a high of 33.65% in Fall 2002 to a low of 17.41% in Spring 2005. By Fall 2005, the estimated vacancy rate was 23.33%. The average asking rents for all retail space in Downtown decreased steadily from \$67/sf in Fall 2000 to a low of \$58/sf in 2003, before increasing significantly, to a high of \$85/sf in Fall 2005. As shown in Table 4-8, whereas the retail vacancy rate for Downtown has consistently been much higher than that in Midtown South, the average asking rent in Downtown exceeded that in Midtown South for the first time in Spring 2005, and continued to be higher in Fall 2005.

As shown in Table 4-10, ground floor retail actually accounts for a relatively small percentage of all available retail space in the Downtown market, ranging from 4.2% to 11.9% of all retail space. Ground floor retail represents an even smaller percentage of available space in Midtown South, ranging from 2.3% to 5.8% of all available retail space. In terms of median and average asking rents for ground floor retail, the Downtown market commands much lower rent than Midtown South, and rents in Downtown have generally increased at a slower rate. For example, average asking rent in Downtown increased by approximately 55% between Fall 2001 and Fall 2005, to \$121/sf, whereas average asking rent in Midtown South increased by approximately 132% in the same period, to a high of \$271/sf in Fall 2005. Median asking rents also show similar disparities, with an increase of 31% in Downtown between Fall 2001 and Fall 2005 (to \$85/sf), compared to an increase of 73% in Midtown South in the same period (to \$260/sf).

Table 4-11 below provides a comparison of asking rents for ground floor retail space in Downtown and two submarkets within the Downtown retail market. As noted above, the Broadway corridor extends from Battery Park to Chambers Street, and falls partially within the study area, whereas Tribeca data are provided for the portion of Hudson Street from Chambers Street to Canal Street. As shown in the table, average asking rents for ground floor space in the Broadway corridor are typically comparable to or higher than those in the overall Downtown retail market, whereas average asking rents in Tribeca are typically much lower. Whereas average asking rents for ground floor retail space in the Broadway corridor have ranged from \$85/sf to \$130/sf, average asking rents for ground floor retail space in Tribeca have ranged from \$41/sf to \$94/sf. In Fall 2005, the average asking rent in the Broadway corridor was \$125/sf, which was slightly higher than in Downtown (\$121/sf) and much higher than in Tribeca (\$68/sf).

¹⁷ Source: *Downtown Alliance Survey of Lower Manhattan Retail Establishments*; January 2002. A survey conducted by the Downtown Alliance of 861 retail stores and restaurants located in Lower Manhattan south of Chambers Street and in Tribeca.

Table 4-10: Downtown Retail Market Compared to Midtown South Retail Market: 2000-2005

Period	OVERALL DOWNTOWN *							MIDTOWN SOUTH *						
	All Available Retail Space (1)			Available Ground Floor Retail Space				All Available Retail Space (1)			Available Ground Floor Retail Space			
	All Available Space (s.f.)	Estimated Available %	Average Asking Rent (\$/s.f.)	Available Ground Floor Space (s.f.)	% of All Available Space	Average Asking Rent (\$/s.f.)	Median Asking Rent (\$/s.f.)	All Available Space (s.f.)	Estimated Available %	Average Asking Rent (\$/s.f.)	Available Ground Floor Space (s.f.)	% of All Available Space	Average Asking Rent (\$/s.f.)	Median Asking Rent (\$/s.f.)
Fall 2000	1,751,368	N.A.	\$ 67	N.A.	N.A.	N.A.	N.A.	3,997,295	N.A.	\$ 79	N.A.	N.A.	N.A.	N.A.
Spring 2001	1,330,401	N.A.	\$ 60	N.A.	N.A.	N.A.	N.A.	3,594,616	N.A.	\$ 78	N.A.	N.A.	N.A.	N.A.
Fall 2001	1,628,602	24.68%	\$ 60	161,759	9.9%	\$ 78	\$ 65	3,921,165	8.89%	\$ 70	115,374	2.9%	\$ 117	\$ 150
Spring 2002	1,712,603	25.95%	\$ 58	202,599	11.8%	\$ 101	\$ 100	4,281,769	9.71%	\$ 74	173,650	4.1%	\$ 137	\$ 135
Fall 2002	2,389,302	33.65%	\$ 59	283,507	11.9%	\$ 101	\$ 80	5,172,809	11.65%	\$ 71	131,322	2.5%	\$ 169	\$ 150
Spring 2003	2,288,655	32.23%	\$ 58	254,908	11.1%	\$ 98	\$ 75	5,091,709	11.47%	\$ 70	186,589	3.7%	\$ 161	\$ 155
Fall 2003	2,319,714	31.78%	\$ 58	246,183	10.6%	\$ 100	\$ 100	5,185,830	11.63%	\$ 74	221,298	4.3%	\$ 161	\$ 160
Spring 2004	1,486,299	20.36%	\$ 59	140,346	9.4%	\$ 76	\$ 75	4,300,418	9.64%	\$ 75	249,381	5.8%	\$ 150	\$ 150
Fall 2004*	5,051,457	23.72%	\$ 73	214,597	4.2%	\$ 117	\$ 100	3,292,503	9.27%	\$ 78	95,928	2.9%	\$ 187	\$ 186
Spring 2005*	3,708,566	17.41%	\$ 82	281,648	7.6%	\$ 128	\$ 95	3,016,221	8.50%	\$ 73	73,746	2.4%	\$ 215	\$ 211
Fall 2005*	4,968,517	23.33%	\$ 85	293,581	5.9%	\$ 121	\$ 85	2,296,607	6.47%	\$ 82	51,825	2.3%	\$ 271	\$ 260

Source: Real Estate Board of New York (REBNY) Retail Reports

* In the Fall 2004 and 2005 and Spring 2005 Retail Reports, Downtown boundaries were changed from south of Canal St. to South of 14th St., and the boundaries of Midtown South were changed from Canal to 30th Streets to 15th to 34th Streets.

(1) All retail space, including ground floor, lower level, upper level, and mezzanine

Table 4-11: Downtown Ground Floor Retail Market For Overall Downtown and Two Sub-Markets: 2000-2005

Period	OVERALL DOWNTOWN* - Ground Floor Only (1)		BROADWAY CORRIDOR - Ground Floor Only (2)		TRIBECA - Ground Floor Only (3)	
	Median Asking Rent (\$/s.f.)	Average Asking Rent (\$/s.f.)	Median Asking Rent (\$/s.f.)	Average Asking Rent (\$/s.f.)	Median Asking Rent (\$/s.f.)	Average Asking Rent (\$/s.f.)
Fall 2000	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
Spring 2001	N.A.	N.A.	\$ 79	\$ 85	\$ 95	\$ 94
Fall 2001	\$ 65	\$ 78	\$ 73	\$ 88	\$ 40	\$ 45
Spring 2002	\$ 100	\$ 101	\$ 118	\$ 130	\$ 35	\$ 41
Fall 2002	\$ 80	\$ 101	\$ 103	\$ 121	\$ 60	\$ 61
Spring 2003	\$ 75	\$ 98	\$ 81	\$ 112	\$ 48	\$ 60
Fall 2003	\$ 100	\$ 100	\$ 100	\$ 109	\$ 60	\$ 57
Spring 2004	\$ 75	\$ 76	\$ 75	\$ 87	\$ 40	\$ 54
Fall 2004*	\$ 100	\$ 117	\$ 100	\$ 111	\$ 55	\$ 56
Spring 2005*	\$ 95	\$ 128	\$ 100	\$ 126	\$ 71	\$ 69
Fall 2005*	\$ 85	\$ 121	\$ 75	\$ 125	\$ 66	\$ 68

Source: Real Estate Board of New York (REBNY) Retail Reports

* In the Fall 2004 and 2005 and Spring 2005 Retail Reports, Downtown boundaries were changed from south of Canal St. to South of 14th St.

- (1) All retail space, including ground floor, lower level, upper level, and mezzanine
- (2) Broadway corridor is defined as extending from Battery Park to Chambers Street
- (3) Tribeca data provided for Hudson Street from Chambers Street to Canal Street

Median asking rents have shown similar trends. As shown in Table 4-9, median asking rents for ground floor retail space in the Broadway corridor have generally been higher than or equal to those in the overall Downtown retail market (except in Fall 2005 when they were lower), whereas median asking rents in Tribeca have always been lower. In Fall 2005, the median asking rent for ground floor retail space in the Downtown retail market was \$85/sf, which was higher than both the Broadway corridor (\$75/sf) and Tribeca (\$66/sf) submarkets.

Current Physical and Economic Conditions

According to the *CEQR Technical Manual*, it is advisable to observe the study area first-hand during peak business times, as the level of activity, condition of buildings, and presence or absence of vacant properties can all be indicators of economic conditions. As discussed in Chapter 2, “Land Use and Zoning,” commercial properties are scattered throughout the study area, with office and institutional uses concentrated in the civic core, and other commercial and retail uses concentrated along (and to the west of) Broadway and south of Beekman Street. Ground floor retail uses are especially predominant in the Historic Chinatown sub-area as well as the eastern segment of the study area (east of Catherine Street).

As shown in Table 4-12 below, there are currently approximately 486 active retail establishments in the study area, predominantly ground floor goods and service businesses. The majority of those commercial establishments, approximately 62%, are located within the Historic Chinatown sub-area. As also shown in Table 4-12, for the overall study area, almost 30% of the businesses provide neighborhood services such as personal care, travel services, shoe repair, and

cleaning/tailoring, and another 28.8% sell shopping goods such as apparel and furniture. For the Historic Chinatown sub-area, more than a third (37%) of the businesses provide neighborhood services, and another 25.7% sell shopping goods, whereas nearly a quarter (24.7%) of the business are eating and drinking establishments (compared to 19.1% for the overall study area).

As illustrated by the data in Table 4-12, the Historic Chinatown sub-area represents the retail heart of the study area. As shown in the table, approximately 80% of the study area's eating and drinking establishments, 78% of its neighborhood services, and 68% of its food stores, are located within the Historic Chinatown sub-area.

Table 4-12: Commercial Establishments in the Study Area, 2005

Retail Category	Historic Chinatown Subarea		Study Area	
	Number	Percent	Number	Percent
Shopping Goods	77	25.7%	140	28.8%
General Merchandise	5	1.7%	19	3.9%
Apparel & Accessory	16	5.3%	31	6.4%
Furniture, Home Furnishings	7	2.3%	7	1.4%
Misc. Shopping Goods	49	16.3%	83	17.1%
Wholesale	0	0.0%	17	3.5%
Building Materials, Hardware	1	0.3%	4	0.8%
Auto- Related Trade	0	0.0%	3	0.6%
Food Stores	32	10.7%	47	9.7%
Eating & Drinking Places	74	24.7%	93	19.1%
Neighborhood Services	111	37.0%	143	29.4%
Vacant (storefronts, buildings, space available)	5	1.7%	39	8.0%
TOTAL	300	100.0%	486	100.0%

Source: PHA Ground Survey, July 2005

Most of the retail corridors are very active, although there are some vacant storefronts. As shown in Table 4-7 above, the Historic Chinatown sub-area has a very active business environment, with an observed vacancy of only 1.7%. In comparison, the overall study area has an observed vacancy of approximately 8%. The vacancy rate for the overall study area appears to be lower than the vacancy rate in the Downtown area below Canal Street (23.33% as discussed above), while the vacancy rate in the Historic Chinatown sub-area is significantly lower.

Results of Business Surveys

In order to assess whether proximity to the security zone has a direct correlation to business patterns, field surveys were conducted within the Historic Chinatown sub-area and other portions of Chinatown north of Canal Street and east of the Bowery/Catherine Street, and within the security zone. A random sample of approximately 75-130 businesses in each of those three geographic areas was selected, and an attempt was made to divide the surveys equally between

restaurants and retail businesses (gifts, jewelry, clothing, supermarket, etc.) in each area. Appendix A contains the survey methodology, results of the survey, and the survey questionnaire.

The business surveys included questions regarding business conditions in 2006 compared to the previous year (2005), whether the security zone has affected the business, and if so, in what way. Other questions related to business category, number of employees, and duration of time each business has been at the current location. Comments and suggestions for improving business conditions were also noted. A total of 306 surveys were completed, with 74 businesses surveyed in the Historic Chinatown sub-area, 128 in the area north of Canal Street, and 100 in the area East of the Bowery, and 4 within the security zone. Figure 4-4 shows the geographic area of the businesses surveyed.

Table 4-13 suggests the view that the security plan’s affect on businesses in the Chinatown area is almost evenly split between those interviewed.

Table 4-13: Has the Security Zone Affected Your Business?

	COUNT	PERCENTAGE
Yes	147	48.0 %
No	159	52.0 %
Total	306	100.0 %

Source: SIS International Research surveys conducted January-February 2007

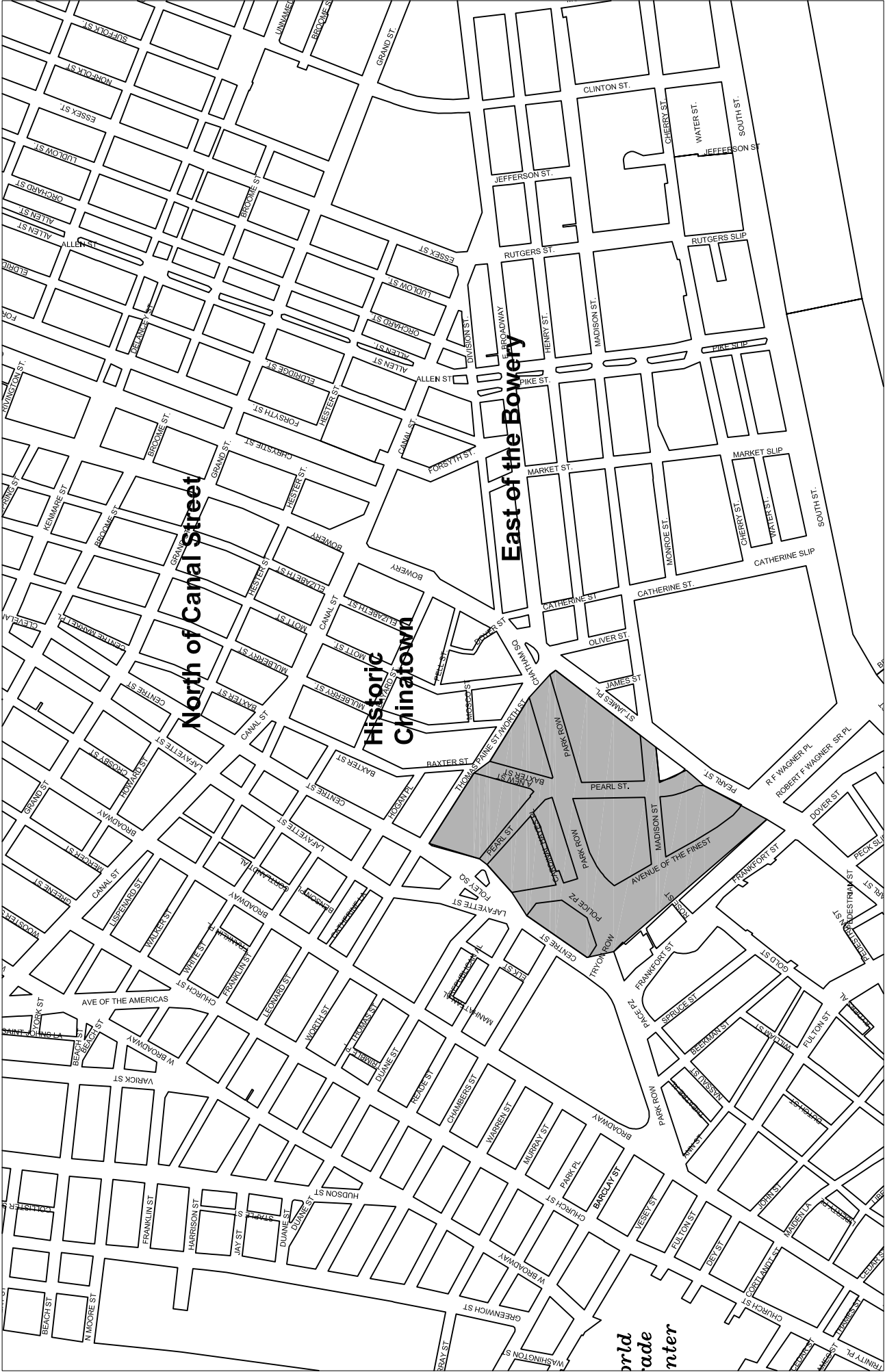
Additionally, Table 4-14 suggests that respondents were also equally split as to whether business had gone down in the past year or stayed the same.

Table 14-4 - Business Since Last Year

	COUNT	PERCENTAGE
No change	129	42.2 %
Minimal change	18	5.9 %
Declined by more than 10%	111	36.3 %
Declined by less than 10%	37	12.1 %
Improved by more than 10%	9	2.9 %
Improved by less than 10%	2	0.7 %
Total	306	100.0 %

Source: SIS International Research surveys conducted January-February 2007

These “even rifts” in business outlook necessitate cross-tabulation of our results to identify any existing factors that affect the type of response given by those interviewed. A cross-tabulation to verify whether those respondents who felt the security zone has had an affect also felt that businesses had declined in the past year, resulted in Table 4-15 and the corresponding graph below.



Legend: ■ Security Zone

One Police Plaza Security Plan EIS

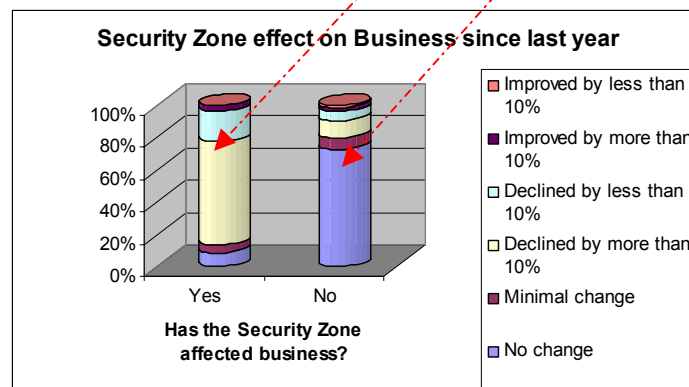
Figure 4-4

Geographic Areas of Businesses Surveyed

Table 4-15 - Business Since Last Year

	Security Zone Affect	
	Yes	No
No change	13	116
Minimal change	7	11
Declined by more than 10%	94	17
Declined by less than 10%	28	9
Improved by more than 10%	5	4
Improved by less than 10%	0	2
Total	147	159

Source: SIS International Research surveys conducted January-February 2007



One possibility was that these responses depended on which geographical district businesses were located in. Table 4-16 and 4-17 below suggest that businesses in the North of Canal Street district were split regarding their views on the affect of the security zone and the change in business prospects since last year. Respondents in the Historic Chinatown area tended to think that the security plan affected their business and those in the East of Bowery district reported that they were not as affected by the security zone.

Table 4-16 - Business Since Last Year

	Business Districts			
	North of Canal Street	Historic Chinatown	East of Bowery	Security Zone
No change	45	22	61	1
Minimal change	12	5	1	0
Declined by more than 10%	47	32	30	2
Declined by less than 10%	17	12	8	0
Improved by more than 10%	5	3	0	1
Improved by less than 10%	2	0	0	0
Total	128	74	100	4

Source: SIS International Research survey January-February 2007

Table 4-17 - Security Zone Effect

	Business Districts			
	<u>North of Canal Street</u>	<u>Historic Chinatown</u>	<u>East of Bowery</u>	<u>Security Zone</u>
<u>Yes</u>	<u>67</u>	<u>45</u>	<u>32</u>	<u>3</u>
<u>No</u>	<u>61</u>	<u>29</u>	<u>68</u>	<u>1</u>
<u>Total</u>	<u>128</u>	<u>74</u>	<u>100</u>	<u>4</u>

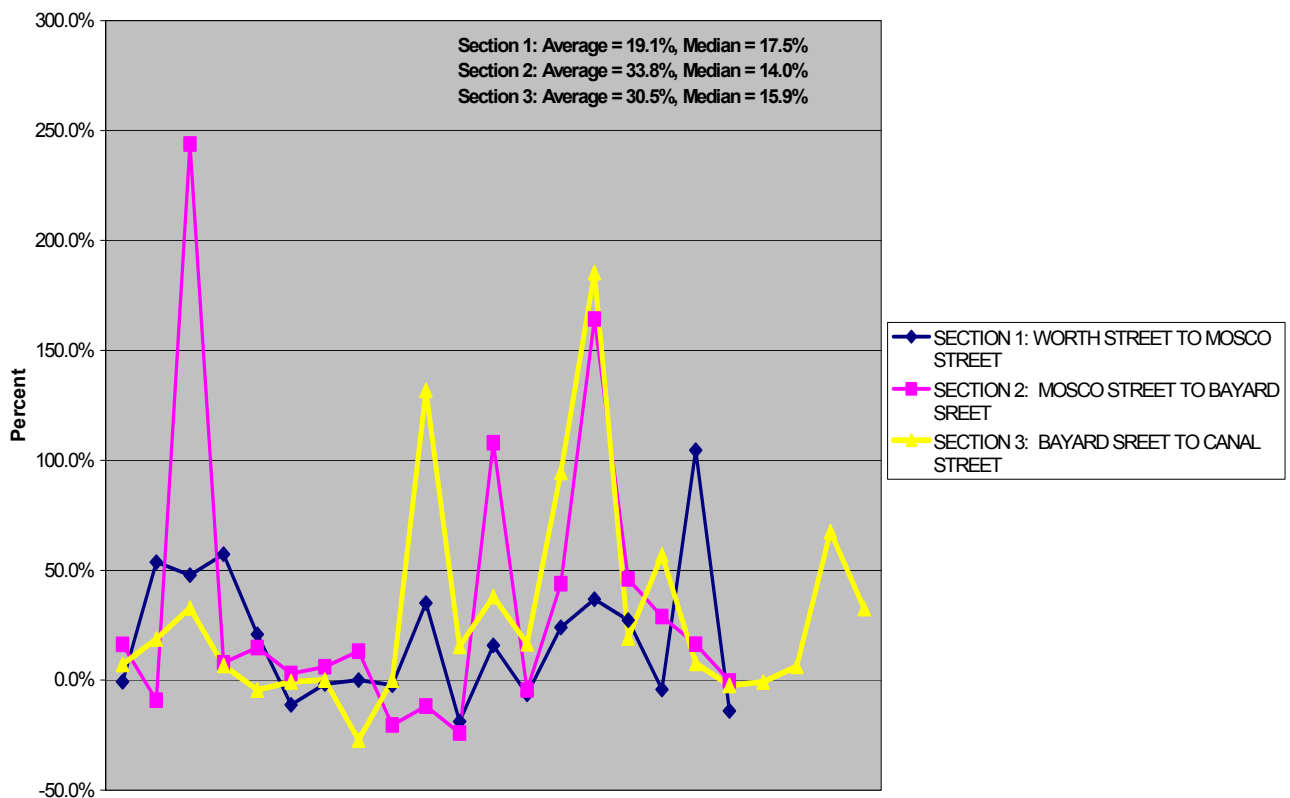
Source: SIS International Research survey January-February 2007

Across business types, the main complaint from respondents was against the new traffic regulations that had been imposed since the establishment of the security zone. There was general consensus [even among those who did not feel that business had been strongly affected] that less parking space and more traffic congestion made it difficult and less attractive to enter the Chinatown area (see Appendix A for examples of feedback). As shown in Appendix A, while the re-opening of Park Row to vehicular traffic was suggested by some of the surveyed businesses in all geographic areas, the suggestions that more parking, removing traffic congestion, and reducing the number of parking tickets handed out would improve business conditions were also prevalent. Parking suggestions included requests for more metered parking, more municipal parking, and more parking lots in general, with one respondent indicating that police cars block parking spaces and there was a need to create more parking for customers. Another suggestion that was made quite often was to bring more tourists to the area.

Property Values

In order to evaluate whether the security plan has had an adverse impact on property values in the area, a similar approach to that cited in the June 3, 2004 Petitioners’ Memorandum of Law by Kenneth Kimerling was used. According to the Memorandum of Law, a study conducted by the office of petitioner Council member Alan J. Gerson divided up Mott Street into three sections, and compared the rate of property appreciation for each section between July 1, 2001 and January 1, 2004. The three sections identified, all of which fall within the Historic Chinatown sub-area illustrated in Figure 4-1, were: Section 1, between Chatham Square and Mosco Street, the area closest to the security zone; Section 2, between Mosco Street and Bayard Street, approximately one block away from the security zone; and Section 3, between Bayard Street and Canal Street, the section farthest (approximately two blocks away) from the security zone.

Figure 4-5: Rate of Property Value Increase Along Mott Street (2001/02 to 2005/06)



A similar assessment was conducted for those three segments, using the NYC Department of Finance’s 5-year Market Value History Reports for Tax Years 2001/02 through 2005/06 for each tax lot fronting on Mott Street. The assessment found that in Section 1, property values for all properties (i.e., residential commercial, retail, etc.) increased by an average of 19.1%, whereas the increase in Section 2 was 33.8%, and Section 3 experienced an increase of 30.5%. As the rate of increase in the segment farthest away from the security zone was less than that experienced in the middle segment, the correlation between proximity and rate of property value increase does

not appear to be strong. Moreover, as shown in Figure 4-5, Sections 2 and 3 have significant outliers, which skew the data. For example, one property in Section 2 experienced a 243.8% increase in value, which is more than an order of magnitude higher than other values in the Section.

Therefore, in order to provide a more accurate basis for assessment, the median rate of property value increase was calculated for each Section. The median is more appropriate as a measure of central tendency in this case because, unlike the average, it is not sensitive to abnormally high or low values (outliers). As shown in Figure 4-5, the median rate of increase for all properties was 17.5% in Section 1, 14.0% in Section 2, and 15.9% in Section 3. Thus, the median rates of all property value increases from 2001/02 to 2005/06 are comparable in all three Sections, with the median rate of increase actually highest in the Section closest to the security zone.

No-Action Condition

For analysis purposes, under the No-Action condition, it is assumed that the security plan implemented by the NYPD after September 11, 2001 that resulted in the above mentioned street closures would not be in place. The roadways would be open with the 1999 street closures and municipal garage closure in place and transportation services would continue as they were prior to September 11, 2001.

As the security plan is currently in place, no data is available for 2005 conditions in the absence of the action. Certain assumptions can be made, however, based on 2000 data and current 2005 data. First, in the absence of the action, access to the study area, particularly access to the Historic Chinatown sub-area from areas to the east and south, would be unhindered, and hence more direct. However, better accessibility would not necessarily have resulted in measurably different business or employment characteristics. For example, no direct correlation between accessibility and property values or vacancy rates has been found. As discussed above, commercial vacancy rates have actually decreased between 2000 (prior to the security plan and 9/11) and 2005 (with the security plan), and the decrease has been experienced throughout the study area and Lower Manhattan as a whole. In fact, the decrease in office vacancy rates has been more noticeable in the study area. Likewise, retail vacancy rates in the study area appear to be lower than in the overall Lower Manhattan area, and the storefront vacancy rate was observed to be particularly low in the Historic Chinatown sub-area.

Finally, property values along Mott Street, which is perhaps most affected by accessibility issues, have generally increased, and the rate of increase has not been found to be dependent on proximity to the security zone. As such, it would appear that the security plan has not affected business or employment characteristics, as it has not resulted in trends that are unique to the study area. Therefore, it is expected that, in the absence of the security plan, socioeconomic conditions (particularly those associated with the business environment) would not be measurably different than conditions with the security plan in place.

With-Action Condition

The action has resulted in the installation of temporary security booths, rising-plate hydraulic delta barriers, bollards, and planters on various streets and intersections within the study area for the purpose of closing streets to create a secure perimeter around One Police Plaza and adjacent civic facilities.

Although the action has limited accessibility to some parts of the study area, there is no evidence that the limit in accessibility has resulted in any secondary business displacement. While property values have, in general, increased throughout the study area, and commercial rents have slightly decreased, these changes are not unique to the study area and appear to be a result of normal economic trends. As these changes are consistent with trends throughout Lower Manhattan, they are therefore not directly attributable to the security plan.

Moreover, as discussed above, median property values in Lower Manhattan, including the study area, have generally increased compared to the 2000 baseline condition. As shown in the detailed discussion of property values along Mott Street in the study area, property values have generally increased, and the rate of increase has not been found to be dependent on proximity to the security zone. Therefore, the action has neither offset positive trends in the study area, impeded efforts to attract investment to the area, nor created a climate for disinvestment. In fact, based on current real estate market conditions, the action has not reduced property values in the study area, and has not increased commercial rents to such an extent that secondary business displacement would be observed. Moreover, the security zone has not adversely affected the viability of the Chinatown retail and restaurant sectors, which continue to be a major draw for both residents and tourists.

Therefore, the action, a security plan, would not alter existing economic patterns or add to the concentration of a particular sector enough to alter trends. It would not directly displace “blighted” uses or properties such that commercial rents would increase. It would not directly or indirectly displace uses or people that support businesses in the area or form the customer bases for existing businesses. Additionally, the action would not introduce a land use that would offset positive trends in the study area or impede efforts to attract investment.

F. ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

According to the *CEQR Technical Manual*, it may be possible that a given action could affect the operation and viability of a specific industry, not necessarily tied to a specific location. As noted above, the streets affected by the action provide approaches to the Historic Chinatown core for customers and clientele of the tourist-oriented shops and restaurants that are the mainstay of the economy of Chinatown. This section provides an assessment of the action’s potential effects on the City’s tourism industry.

New York City's Tourism Industry

As a tourist destination, New York City offers incomparable museums, attractions, world-renowned restaurants, hotels, theaters, entertainment, and shopping. The tourism industry plays an important role in driving New York City's economy, by generating new jobs, economic activity and essential tax revenues that benefit all five boroughs. While the tourism industry is critical to the local economy, its overall impact, and the number of jobs tourism creates, is relatively small compared to other sectors. For example, even with all of the growth in recent years, tourism-related jobs only still represent about 5% of the City's total jobs. By contrast, the health care industry employs 14% of the City's workforce.¹⁸ The biggest employers in the City are still finance, insurance, real estate and health care.

Employment in Tourism-Related Industries

Jobs created by the tourist industry include restaurant workers, retail workers, museum and gallery employees, and hotel workers, among others. New York City's tourism-related industries saw a marked decline in employment following 9/11. Prior to September 2001, seven key New York City industries impacted by visitor spending showed a net gain of almost 5,000 jobs over the same period in 2000. In October 2001, however, these industries lost almost 20,000 jobs from the previous year. The following months showed an average month-to-month lag of 20-25,000 jobs compared with the same period the year before, while July 2002 reflected a 16,000 decrease in jobs compared to July 2001.¹⁹ In the immediate aftermath of the attacks, it is estimated that approximately 30,000 people who worked in tourism lost their jobs.²⁰ According to NYC & Company data, a total of approximately 226,100 New York City jobs were supported by visitor spending in 2002.

Visitors to New York City

The tourism industry had peaked in 2000, then crashed in the months after the attacks of 9/11. Although tourism declined following the events of 9/11, by April of 2004, it had reached pre-September 11, 2001 levels for the first time. Hotels filled up, tourist destinations such as the Empire State Building drew record numbers, and even foreign visitors, who dropped off most drastically in recent years, returned.

As shown in Figure 4-6 below, after a small decline in the total number of visitors in 2001 (a 2.8% decrease from 2000 numbers), the total number of visitors has since been increasing, reaching a record high of 39.9 million total visitors in 2004. As shown in the figure, domestic

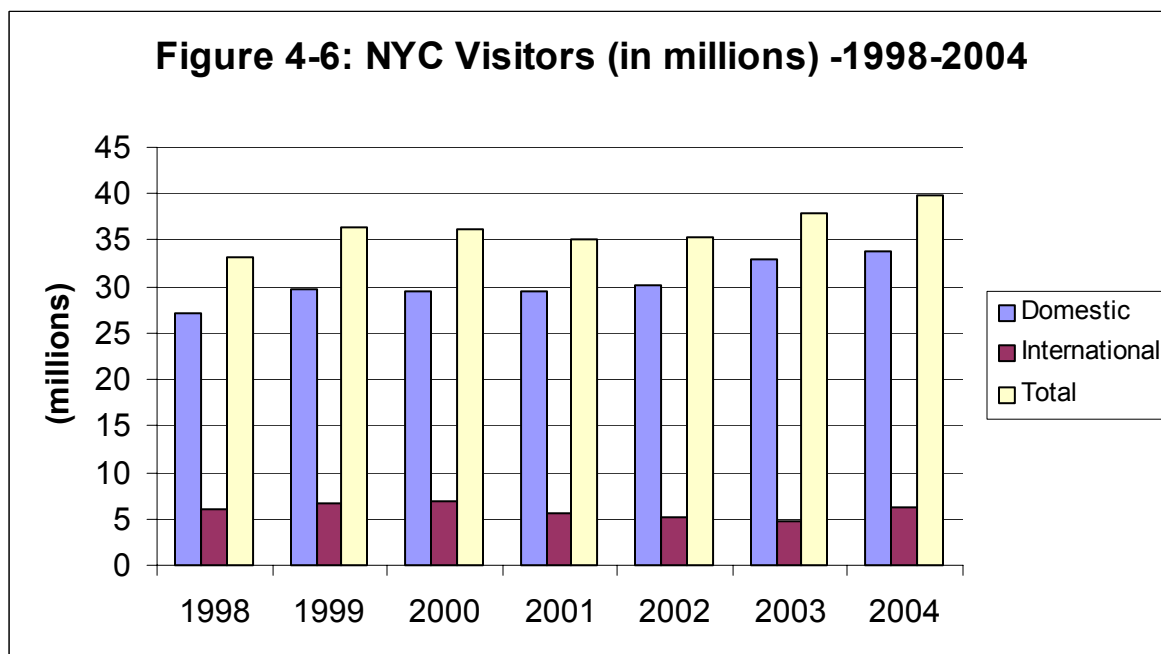
¹⁸ Source: "Tourism and Jobs" by Mark Berkey-Gerard; *Gotham Gazette*, 31 May 2004.

¹⁹ Source: *New York City's Tourism Industry: One Year After September 11*, NYC & Company, September 4, 2002. The employment figures cited are an aggregate of Department & Apparel Stores, Eating & Drinking Places, Hotels & Other Lodging, Amusement/Recreation Services, Museums/Arboreta/Zoos, and Air Transportation. They include all job losses in those industries, including jobs lost due to declines in revenues from residents and commuters as well as those lost due to declines in revenues from visitors.

²⁰ Source: "Tourism and Jobs" by Mark Berkey-Gerard; *Gotham Gazette*, 31 May 2004.

visitors, which account for the majority of visitors, have increased steadily since 2001, reaching 33.8 million in 2004. This increase in domestic visitors, particularly in the months immediately following 9/11, appears to be due to, in part, an influx of people coming to New York to visit friends and relatives following September 11. In contrast, the number of international visitors declined steadily between 2001 and 2003, reaching a low of 4.8 million in 2003, before rebounding sharply to 6.2 million visitors in 2004 (a 28.9% increase from 2003). This sharp increase in international visitors is partly due to the weak dollar. According to NYC & Company data, the top five countries producing international visitors to the City were the United Kingdom, Canada, Japan, Germany, and France, which had a combined total of 2.3 million visitors in 2004.

Although international visitors account for a small percentage of total visitors (15.5% of total visitors in 2004), they actually spend four times more than domestic travelers, accounting for 40% of all visitor spending. Total visitor spending in NYC (both international and domestic) from 1998 to 2004 has shown a similar trend to the number of visitors. After reaching \$17.0 billion in 2000, visitor spending declined to \$15.1 billion in 2001, and declined further to \$14.1 billion in 2002. However, visitor spending has since increased to \$18.49 billion in 2003, and reached a high of \$21.07 billion in 2004.



According to NYC & Company data, the total economic impact of New York City tourism in 2002 (latest year for which data is available) was \$21 billion, and the total taxes generated by visitor spending in that year were \$2.8 billion.

Hotel Occupancy

Hotel occupancy in the City reached as high as 84.6% in 2000, before dropping significantly to

73.4% in 2001. Hotel occupancy has since exhibited a modest recovery, increasing to 75.6% in 2002 and 76% in 2003. In 2004, the hotel occupancy in New York City rose to 83%, comparable to pre-9/11 levels. The average daily rate has increased from a five-year low of \$193 in 2003 to \$212 in 2004. The hotel room inventory as of July 14, 2004 was 70,545 rooms. According to a NYC & Company November 17, 2005 press release, New York City is expected to add nearly 5,000 new hotel rooms to its current inventory by the end of 2007. This increase is fueled by record visitor volume and a thriving economy.

Chinatown's Tourism Industry

Manhattan's Chinatown is the biggest in the United States, with the largest concentration of ethnic Chinese in the Western Hemisphere. Chinatown is located mostly south of Canal Street, but has over the years expanded into the Lower East Side and Little Italy. The largest Asian community in North America can be found among the narrow streets between Worth and Hester and East Broadway and West Broadway; with Canal Street serving as Chinatown's main street. Within these boundaries, visitors find traditional Chinese herbal-medicine shops, acupuncturists, food markets filled with amazing varieties of fish and exotic vegetables, pagoda-style buildings, stores selling all manner of items from beautiful jewelry and silk robes to hair accessories and plumbing parts, and hundreds of restaurants serving every imaginable type of Chinese cuisine, from dim sum to fried noodles to extravagant Cantonese, Hunan, Mandarin, or Szechuan banquets, as well as Vietnamese, Malaysian, Thai, and other Asian cuisines.

The tourist and restaurant industries are two of the main pillars of Chinatown's economy. The Chinese Chamber of Commerce estimates that about a third of the economy of Chinatown depends directly on tourists.²¹ According to the Asian American Federation of New York's (AAFNY) *Chinatown After September 11th: An Economic Impact Study*, more than 250 restaurants and 500 specialty stores (jewelry, gift and apparel shops) are located in Chinatown. [It should be noted that the study evaluated the larger Chinatown neighborhood, not just the Historic Chinatown core that has been assessed throughout this chapter.] The study estimated that these dining and shopping establishments are the primary draw for more than 2,000 visitors daily, brought in by group tour buses and commuter vans. With typically higher spending power than local residents, tourists patronize Chinatown's restaurants and shops, contributing to Chinatown's economy. According to the study, as part of typical travel packages, tour bus companies often have special arrangements with Chinatown restaurants.²²

Chinatown is easily accessible by mass transit, with three subway stations (with a total of 11 subway lines) serving the area, namely, the 6, J, M, N, Q, R, W, Z trains at the Canal Street station; the B and D trains at the Grand Street station; and the F train at the East Broadway station. In addition, Chinatown is also accessible by the M15, M102, M101, and M6 bus routes, and is within walking distance from several other destinations in Lower Manhattan.

²¹ Source: "Closed for Repairs" by Mark McCord; www.cargonewasia.com/timesnet/data/ab/docs/ab3114.html; *Asian News*, January 1, 2002.

²² Source: *Chinatown After September 11th: An Economic Impact Study*, Asian American Federation of New York, Interim Report, April 4, 2002; pp. 1, 23.

In the wake of the tragic events of September 11, 2001, Chinatown experienced a decline in the number of tourists. According to the AAFNY study, in the first two months after 9/11, the Chinese American Restaurant Association reported a 40% drop in business among its members. Over 60% of the restaurants experienced business downturns of 30% to 70% after 9/11, and a significant decrease in tourist business was reported. Retail businesses were also affected, with the retail industry experiencing a 55% drop in monthly revenues, and jewelers experiencing a reduction of 50% in sales volume during the three months after 9/11. Chinatown's economy also suffered as a result of fears over the SARS virus in early 2003.

In early 2004, the City launched an aggressive campaign to promote Chinatown and lure tourists back to the district. "Explore Chinatown," which was set up in February 2004 and formally launched in May 2004, is a new marketing campaign intended to increase the number of tourists visiting Chinatown as well as to rebuild and improve the neighborhood's economy. The two year campaign is being coordinated by NYC & Company (the City's official tourism marketing organization) and the effort is being funded by the Lower Manhattan Development Corporation (LMDC) and the September 11th Fund. Marketing strategies for the campaign have included the creation of a new website, www.explorechinatown.com, which offers information about the historic neighborhood, suggested itineraries, a calendar of events, and cultural activities. In addition, a new visitor information kiosk was also built in Chinatown in December 2004 (located at the triangle where Canal, Walker, and Baxter Streets meet).

Initial indications suggest that this new aggressive marketing has paid off. For example, Chinatown's traditional annual Lunar New Year Parade, which took place in February 2005, was the first to be organized and coordinated by Explore Chinatown. According to campaign officials, the parade and festival drew about 350,000 visitors, and many business owners indicated that business in 2005 was better than the previous year. One restaurant owner estimated that his restaurant made around 25% more this Chinese New Year (2005) than last year.²³ No comparable information is available for the 2006 Chinese New Year.

The level of visitor activity in Chinatown on average days, as opposed to the major annual Chinese New Year's celebrations, is difficult to quantify, as no specific data are available for the number of visitors to Chinatown. However, subway ridership data can be used as a general indicator of pedestrian activity in Chinatown, as the vast majority of tourists and a substantial portion of other visitors use the subways. New York City Transit (NYCT) provides annual subway ridership data for every subway station in the City, as well as average weekday, average Saturday and average Sunday ridership data.²⁴ This facilitates comparison of ridership at any given station over a period of several years, and it also allows for a comparative assessment of ridership trends between two or more stations. For the purposes of this assessment, the Canal Street station (serving the J, M, N, Q, R, W, Z and 6 lines) was selected as being the closest station serving the Historic Chinatown area. Although the B, D and F subway lines also serve

²³ Source: "Business Report More Prosperity at This Year's Parade" by Divya Watal; *Downtown Express*, Volume 17, Number 39, February 17-23, 2005.

²⁴ Ridership for each station includes all passengers (other than NYCT employees) who enter the subway system at that station, including passengers transferring from buses. Not included are passengers exiting the subway system and passengers transferring from other subway lines.

Chinatown, their stations (at Grand Street and East Broadway, respectively), are not in immediate proximity to the Historic Chinatown core. Table 4-18 provides ridership data (annual, average weekday, average Saturday and average Sunday) for the Canal Street station for 2000 through 2004 (latest year for which data are available).

Consistent with the comparative methodology utilized throughout this chapter, Table 4-18 also provides similar data for other stations serving Tribeca and Lower Manhattan. As explained above, the comparative analysis would identify whether there are any trends that are applicable to the study area that are not evident in Lower Manhattan as a whole and/or in a sampled area to the west of the study area (Tribeca). For this comparative assessment, the Fulton Street/Broadway-Nassau station (serving the A, C, J, M, Z, 2, 3, 4 and 5 lines) was selected in Lower Manhattan, and the Canal Street and Franklin Street stations on the 1 line, and the Canal Street station on the A, C, E lines were selected in Tribeca.

As shown in Table 4-18, 2004 annual ridership at the Canal Street station serving the study area/Historic Chinatown core has increased by 15% compared to the 2001 pre-9/11 baseline condition. Average weekday ridership increased by 18%, whereas average Saturday and Sunday ridership increased by 20% and 14%, respectively, during the same period. Thus, as the number of subway riders entering this station has increased significantly compared to pre-9/11 conditions, it can be argued that the volume of people passing near and through the Historic Chinatown area has also increased, particularly on weekends, when tourist activity tends to peak.

In comparison, the selected stations in both Tribeca and Lower Manhattan experienced a decrease in annual and average weekday ridership over the same period, while average weekend ridership increased. For example, 2004 annual ridership in Lower Manhattan decreased by 5% compared to the baseline condition, and average weekday ridership decreased by 6%, while both average Saturday and Sunday ridership increased by 6%. In Tribeca, overall, 2004 annual ridership decreased by 4% and average weekday ridership declined by 6%, while both Saturday and Sunday ridership increased (by 8% and 1%, respectively), compared to 2001 pre-9/11 conditions.

It should be noted that the ridership data for the Canal Street station (J, M, N, Q, R, W, Z, 6), particularly annual and average weekday numbers, reflect service changes caused by the final phase of the Manhattan Bridge reconstruction, which began in July 2001 and ended in late February 2004. During this final phase of the rehabilitation, only the two tracks that connected Brooklyn to the Broadway line (N, Q) were in service, while the two tracks that connected Brooklyn to the 6th Avenue line (B, D) were not operational. This resulted in a shift in ridership between stations, causing an increase at several stations, including this Canal Street station, and a decrease at a number of other stations in the area, such as the Grand Street station (B, D).

Table 4-18: Subway Ridership Data for Subway Stations Serving the Study Area, Tribeca and Lower Manhattan (2001 to 2004)

	2001	2002	2003	2004	% Change 2001-2004
Study Area/Historic Chinatown – Canal Street Station (J, M, N, Q, R, W, Z, 6)					
Annual Ridership	13,578,273	17,699,470	16,858,187	15,561,802	15%
Average weekday Ridership	39,561	51,663	49,688	44,795	13%
Average Saturday Ridership	35,884	47,019	43,440	42,899	20%
Average Sunday Ridership	28,599	37,110	34,504	32,593	14%
Tribeca					
Franklin Street Station (I)					
Annual Ridership	1,997,511	2,119,136	1,765,348	1,736,731	-13%
Average weekday Ridership	7,001	7,467	6,159	6,049	-14%
Average Saturday Ridership	2,267	2,303	2,109	2,080	-8%
Average Sunday Ridership	1,736	1,774	1,590	1,549	-11%
Canal Street Station (I)					
Annual Ridership	1,895,864	1,845,972	1,735,003	1,810,452	-5%
Average weekday Ridership	6,337	6,152	5,754	5,947	-6%
Average Saturday Ridership	3,063	3,093	3,009	3,343	9%
Average Sunday Ridership	2,178	2,150	2,055	2,146	-1%
Canal Street Station (A, C, E)					
Annual Ridership	5,152,150	5,309,669	4,942,512	5,104,588	-1%
Average weekday Ridership	17,392	17,822	16,564	16,900	-3%
Average Saturday Ridership	7,831	8,343	8,001	8,789	12%
Average Sunday Ridership	5,643	6,097	5,607	5,999	6%
Tribeca Total (all three stations)					
Annual Ridership	9,045,525	9,274,777	8,442,863	8,651,771	-4%
Average weekday Ridership	30,730	31,441	28,477	28,896	-6%
Average Saturday Ridership	13,161	13,739	13,119	14,212	8%
Average Sunday Ridership	9,557	10,021	9,252	9,694	1%
Lower Manhattan – Fulton Street (J, M, Z, 2, 3, 4, 5) / Broadway Nassau (A, C)					
Annual Ridership	17,517,708	17,265,262	15,580,428	16,629,417	-5%
Average weekday Ridership	62,192	60,067	54,874	58,168	-6%
Average Saturday Ridership	18,782	22,243	18,131	19,919	6%
Average Sunday Ridership	12,347	14,531	11,982	13,122	6%
Source: New York City Transit 2002 and 2004 Subway & Bus Ridership Reports. Data for lines using the Manhattan Bridge reflect service changes caused by the final phase of its rehabilitation.					

This shift is particularly noticeable in the sharp rise in ridership at the Canal Street station in 2002, compared to 2001 (a 30% increase), which corresponds to a decline of approximately 67% in annual ridership at the Grand Street Station during the same period.

With the completion of the reconstruction in early 2004, there was a shift in ridership from stations on the Broadway line to stations on the 6th Avenue line. According to NYC Transit, by the end of 2004, ridership at the Grand Street station had almost quadrupled from its 2003 level.

As illustrated in Table 4-18, all three geographic areas considered experienced increases in average weekend subway ridership between 2001 and 2004. While the percentage increase at the

Canal Street station nearest the study area is significantly higher than increases experienced in the two other areas considered, this is likely attributable in large part to the shift in ridership patterns resulting from the Manhattan Bridge reconstruction, as discussed above.

Similarly, the Manhattan Bridge reconstruction is most likely the cause for the increases in annual and average weekday ridership experienced at this station, compared to decreases experienced in the two other geographic areas.

Based on the above subway ridership data, and accounting for the effects of Manhattan Bridge-related service changes, the study area generally shows similar trends to Lower Manhattan and Tribeca, with all three geographic areas experiencing increases in weekend subway ridership. Although subway ridership data represent an aggregate of all types of subway users (tourists, workers, and others), given that tourist activity typically peaks on weekends, this increase in weekend subway ridership could be an indication that the study area, including the Historic Chinatown core, has experienced an increase in the volume of visitors compared to the baseline condition.

Assessment

The above data indicate that the tourism industry in New York City, including in Chinatown, is on its way to recovering from the effects of the 9/11 attacks. As these improvements have occurred in the presence of the current security plan, the street closures resulting from the One Police Plaza security plan have therefore not had a significant adverse impact on the operation or viability of the City's tourist industry. Therefore, the Action does not have the potential to affect the operation and viability of the City's tourism industry.

Although there are some complaints that Chinatown has suffered disproportionately in terms of tourist activity, that would appear to be an effect of the September 11 attacks which has been felt throughout the tourism industry and not just in Chinatown, and these negative effects seem to have lessened with time. Moreover, the number of subway riders using the Canal Street station closest to Historic Chinatown has increased significantly compared to pre-9/11 conditions, an indication that the volume of people passing near and through the Historic Chinatown area has also increased, particularly on weekends. It should also be noted that the increase in international visitors to the City in the past two years is a positive development for the City's tourism industry.

G. CONCLUSION

The action has not resulted in significant adverse impacts for all areas considered in the socioeconomic analysis.

Indirect Residential Displacement: Although the action has limited accessibility to some parts of the study area, there is no evidence that the limit in accessibility has resulted in any secondary residential displacement. While rents and home values have, in general, increased throughout the study area, these increases appear to be a result of normal economic trends, are consistent with

trends throughout Lower Manhattan, and are therefore not directly attributable to the security plan.

Indirect Business Displacement: Although the action has limited accessibility to some parts of the study area, there is no evidence that the limit in accessibility has resulted in any secondary business displacement. While property values have, in general, increased throughout the study area, and commercial rents have slightly decreased, these changes are not unique to the study area and appear to be a result of normal economic trends. As these changes are consistent with trends throughout Lower Manhattan, they are therefore not directly attributable to the security plan.

As discussed above, most of the retail corridors in the study area are very active. The Historic Chinatown sub-area has an observed vacancy rate of only 1.7% while the entire study area has an observed vacancy rate of 8%. The vacancy rate for the overall study area appears to be lower than the vacancy rate of 23.33% in the Downtown area below Canal Street. In addition, the main businesses in the Historic Chinatown sub-area (neighborhood services, shopping goods, and eating and drinking establishments) that were dominant in the baseline condition, continue to be dominant businesses in the With-Action condition. The results of the business survey are, at most, inconclusive. While registering individual beliefs, the survey results show that respondents in the study area are almost evenly split regarding that the barriers have had on local businesses. While most respondents in Historic Chinatown attributed the barriers to a decline in business than in other neighboring areas, businesses east of the Bowery, which also borders the barriers, largely indicated that the barriers have not had an impact. The survey results are also not supported by objective economic measures identified in the *CEQR Technical Manual* such as property values and vacancy rates. Therefore, it appears that the security zone has also not adversely affected the viability of the Chinatown retail and restaurant sectors, which continue to be a major draw for both residents and tourists.

Moreover, as discussed above, median property values in Lower Manhattan, including the study area, have generally increased compared to the 2000 baseline condition. As shown in the detailed discussion of property values along Mott Street in the study area, property values have generally increased, and the rate of increase has not been found to be dependent on proximity to the security zone. Therefore, the action has neither offset positive trends in the study area, impeded efforts to attract investment to the area, nor created a climate for disinvestment. In fact, based on current real estate market conditions, the action has neither reduced property values in the study area, nor has it increased commercial rents to such an extent that secondary business displacement would be observed.

In addition, according to the *CEQR Technical Manual*, and as discussed above, an action can lead to indirect business displacement if:

- It introduces enough of a new economic activity to alter existing economic patterns.
- It adds to the concentration of a particular sector of the local economy enough to alter or accelerate an ongoing trend to alter existing economic patterns.
- It directly displaces uses or properties that have had a “blighting” effect on commercial

- property values in the area, leading to rises in commercial rents.
- It directly displaces uses of any type that directly support businesses in the area or bring people to the area that form a customer base for local businesses.
 - It directly or indirectly displaces residents, workers, or visitors who form the customer base of existing businesses in the area.
 - It introduces a land use that could have a similar indirect effect, through the lowering of property values, if it is large enough or prominent enough or combines with other like uses to create a critical mass large enough to offset positive trends in the study area, to impede efforts to attract investment to the area, or to create a climate for disinvestment.

As the action has not resulted in any of the above, no significant adverse indirect business displacement impacts have occurred.

Adverse Effects on Specific Industries: According to the *CEQR Technical Manual*, it may be possible that a given action could affect the operation and viability of a specific industry, not necessarily tied to a specific location. As noted above, the streets affected by the action provide approaches to the Historic Chinatown core for customers and clientele of the tourist-oriented shops and restaurants that are the mainstay of the economy of Chinatown. According to the guidelines of the *CEQR Technical Manual*, the action would not have an adverse impact on a specific industry because it would neither significantly impact the business conditions for any industry or category of businesses within or outside of the study area, nor would it indirectly reduce employment or impair the economic viability of a specific industrial sector or business category. Although there are some complaints that Chinatown has suffered disproportionately in terms of tourist activity, that would appear to be an effect of the September 11 attacks which has been felt throughout the tourism industry and not just in Chinatown, and these negative effects seem to have lessened with time. It should also be noted that the increase in international visitors to the City in the past two years is a positive development for the City's tourism industry.

One Police Plaza Security Plan EIS

CHAPTER 5: URBAN DESIGN AND VISUAL RESOURCES

A. INTRODUCTION

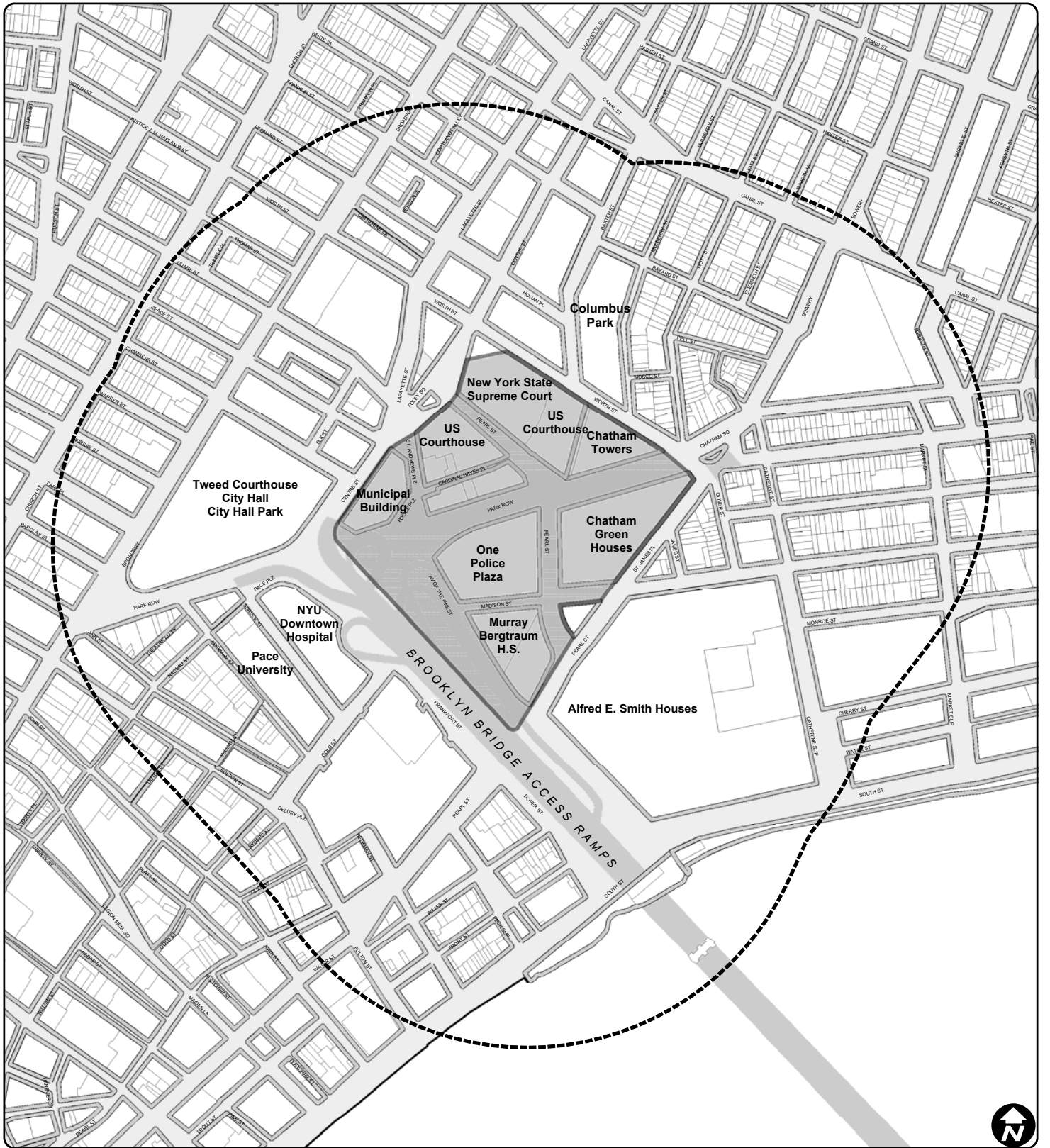
This chapter provides an assessment of the potential effects on urban design and visual resources that could result from the action. Together, the urban design components and visual resources of an area define the distinctive physical identity of a neighborhood. As described in Chapter 1, “Project Description,” the action being analyzed is a security plan currently in place at One Police Plaza and surrounding roadways. The security plan was implemented by the NYC Police Department (NYPD) through the installation of attended security checkpoint booths, planters, bollards and hydraulically-operated delta barriers to restrict vehicular access to roadways adjacent to One Police Plaza and adjacent civic buildings.

Given the above conditions and the guidelines set forth in the *CEQR Technical Manual*, an analysis of urban design and visual resources is warranted. The analysis of urban design, as stipulated by CEQR, will assess the effects of the action on those attributes that constitute the physical appearance of buildings and streets in the study area. These attributes include building bulk, use, and type; building arrangement; block form and street pattern; streetscape elements; street hierarchy; and natural features. Bulk is created by the size of a building and its massing on a site. Height, length, and width define a building’s size, while volume, shape, setbacks, lot coverage, and density define its mass.



As the security plan being analyzed in the With-Action scenario includes streetscape elements that restrict pedestrian and vehicular access to certain blocks and streets, the analysis of visual resources provided in this chapter will focus on the security plan’s effects on the ability of the public to view and enjoy significant view corridors and vistas, natural resources, historic resources, and the waterfront from publicly accessible locations. Given the small physical scale and confined setting of the security plan, a general overview of visual resources, such as local waterfront views, public parks, and landmarked structures and districts in the study area will be provided along with an assessment of the effects of the security plan on those resources within its vicinity.

For analysis purposes, the urban design and visual resources study area is coterminous with the study area used for analysis in Chapter 2, “Land Use, Zoning and Public Policy,” and is defined by a quarter-mile radius around the security zone (see Figure 5-1). The analysis year for baseline conditions is 2001, which is prior to the establishment of the post-September 11th, 2001 security plan. The analysis year for the security plan itself (also referred to as the With-Action scenario) is 2006.

Urban Design and Visual Resources Study Area



Legend

-  Security Zone (Closed to Public Vehicular Traffic after 09/11/2001)
-  Urban Design and Visual Resources Study Area (Quarter-Mile Radius)

B. BASELINE CONDITIONS

The September 11, 2001 attacks on the World Trade Center resulted in a security plan which included the closure of streets situated adjacent to the civic facilities located near One Police Plaza (see Figure 5-1 for security zone area). Prior to the attacks, the streets that had been closed were open to all vehicles, with the exception of the streets that closed in 1999 for security purposes (see Chapter 1, Figure 1-3). In addition, the security features associated with the post- September 11, 2001 street closures such as delta barriers, security booths, jersey barriers, and bollards were not in place. A description of the conditions that existed in the surrounding area prior to September 11, 2001 will provide context for the analysis which follows. These baseline urban design and visual resources conditions are discussed in this section.

Urban Design

Security Zone

The security zone is comprised of an approximately 7-block area in Manhattan and its surrounding streets, bounded roughly by Pearl Street to the east, Centre Street to the west, Pearl Street and Park Row to the north, and the Brooklyn Bridge to the south (see Figure 5-1). This area is unique in that it lies at the border between predominantly residential and retail uses to the north and City and Federal institutional uses to the south.

Almost all of the buildings in the security zone are tall, high-rise institutional, commercial, and residential structures, generally above 15 stories in height. Specifically, these buildings are the 16-story One Police Plaza building, the 39-story Municipal Building, a 31-story United States Courthouse, and accompanying buildings ranging from 2 to 13 stories, a 25-story United States District Courthouse, the 25-story Chatham Towers residential building, the 21-story Chatham Green Houses, the 7-story Murray Bergrbaum High School, and the 32-story Verizon tower to the south of the school.

The approximately 7-block security zone area contains a varied stock of building forms and two major uses- institutional and residential. Directly to the east of the northern terminus of Park Row stands the Chatham Green Houses, a 21-story complex of three brick residential buildings aligned into a singular building footprint resembling the letter “S”. Chatham Green was built in the 1960s and features low lot coverage and distinctive balconied facades on both sides of the building. Directly to the west of the northern terminus of Park Row is Chatham Towers, a residential complex comprised of two 25-story residential buildings of mid-1960s concrete construction. The towers are staggered at the center of their lot and are surrounded by trees and a landscaped plaza.

Institutional uses, namely City, State, and Federal Courthouses and City law enforcement facilities,

are centered to the west and southwest portions of the security zone area. To the west of Chatham Towers stand two institutional buildings used by the United States District and New York State Supreme Courts, respectively: 500 Pearl Street and 60 Centre Street. 500 Pearl Street is a 1920s granite building with a prominent 25-story tower resting on an approximately 7-story building base. 60 Centre Street, also completed in the 1920s, is an approximately 7-story courthouse featuring a Roman classical exterior and a radial building plan. Sixty Centre Street was landmarked in 1966 by the NYC Landmarks Preservation Commission (NYC LPC). To the south of 60 Centre Street stands the United States Courthouse at 40 Centre Street, an approximately 31-story Classical Revival skyscraper, also landmarked by NYC LPC in 1975. Forty Centre Street features above-ground connections to two ancillary buildings that stand 10 and 13 stories tall between it and Park Row. Directly adjacent to the south side of 40 Centre Street is St. Andrew's Roman Catholic Church, a complex comprised of a 2-story brick church and 4-story associated brick building, both built in 1937. Further southwest is Police Plaza, a landscaped plaza with benches, tables, and trees at the center of the surrounding government and law enforcement buildings.

At 1 Centre Street, to the west of Police Plaza, stands the Municipal Building, a prominent 39-story building designed in the early 1900s by McKim, Mead, & White. The building exhibits high lot coverage and bulk, with its tall Corinthian columns extending from its archway over Chambers Street up to the golden statue at its peak. One Centre Street was landmarked by NYCLPC in 1966 and houses several City Agencies. To the east of Police Plaza stands the headquarters for the NYC Police Department, One Police Plaza, which is an approximately 16-story brick and glass building constructed in the 1970s. One Police Plaza exhibits fairly high bulk, extending to its full height from the ground without setbacks.

In the southeast corner of the security zone stands the 7-story Murray Bergtraum High School at the intersection of Rose Street and Avenue of the Finest, and the 32-story tower operated by Verizon Telecommunications. Murray Bergtraum High School is a NYC public high school within a bulky, brick and concrete building rising 7 stories from a triangular footprint that is anchored by corner cylindrical structures. The Verizon building, formerly the NYNEX Building, is a white concrete building featuring distinctive dark striations along its facades created by columns of glass windows. This high-bulk building features low lot coverage and high bulk and is used by Verizon for telecommunication purposes.

Building arrangement varies throughout the security zone area. The combination of large buildings and large blocks allows for blocks with low to moderate lot coverage. The buildings in the security zone area are generally centered on their blocks and are surrounded by features such as landscaped open space, parking, or perimeters comprised of open plazas.

No singular form governs the blocks found in the security zone study area. The blocks that comprise this area are non-rectilinear superblocks that are the sites of large buildings and/or spaces, inclusive of institutional buildings such as the Municipal Building and One Police Plaza, as well as Chatham

Towers and Chatham Green, which are large residential apartment buildings.

The street pattern in the security zone area is irregular and non-rectilinear, as the streets in this area border irregularly-shaped superblocks and weave into and around the prominent elevated access roadways that connect the Brooklyn Bridge to the rest of Manhattan. Taken as a whole, the security zone area resembles a square that has been sliced diagonally one way by Park Row and the other way by Pearl Street. As such, uniform east-west and north-south corridors for travel and views are uncommon. As described in Chapter 1, “Project Description,” several streets in the vicinity of One Police Plaza were closed in 1999, creating discontinuities of street access and function but not of physical form. As shown in Chapter 1, Figure 1-3, there was a full closure of Madison Street between Avenue of the Finest and Pearl Street, the restriction of Avenue of the Finest between Madison Street and Park Row except for vehicles headed for the municipal parking garage, and a prohibition of southbound traffic on Pearl Street between Park Row and Madison Street.

Within the security zone area, sidewalks are well populated with street trees while the private open spaces and landscaped areas surrounding the Chatham Green and Chatham Towers residential developments provide dense greenery along both sides of the northern portion of Park Row. The public open space on Police Plaza provides open plaza space with simple, minimal tables and benches, and distinctive plaza paving. The streetwalls in the area are semi-continuous, as each of the blocks within this area features one to two large buildings.

Study Area

The study area extends a quarter-mile radius from the security zone and contains all or part of approximately 80 blocks in Manhattan, encompassing portions of four distinct neighborhoods: the southeastern portion of Chinatown, the northeastern portion of the Fulton Market area, the northern portion of the Civic Center area, and the northeastern portion of Tribeca. These areas are also illustrated in Figure 5-1. The urban form of the study area varies widely, exhibiting several types of building stock ranging from low-rise residential buildings with street level retail to tall high-density commercial and residential towers.

The study area is comprised of a mixture of institutional, residential, commercial, and retail uses. Just outside the security zone area, a core of predominantly institutional buildings, with some commercial office uses, stands roughly bounded by Broadway, Worth Street, Pearl Street, and the Brooklyn Bridge, with tall, high-bulk buildings ranging from 5 to 45 stories in height. Courthouse and City law enforcement buildings extend between Centre and Baxter Streets to White Street, while NY Downtown Hospital and Pace University stand to the south of the Brooklyn Bridge access ramps between Gold, Beekman, and Nassau Streets. To the northwest and northeast of this institutional zone is Chinatown, which contains low-to mid-rise buildings, (generally 5 to 7 stories in height), with moderate to high lot coverage. Street-level retail use is generally mixed in with residential buildings throughout Chinatown, which predominantly exhibits the early 1900s brick tenement

building form.

Along the southeast border of the study area's institutional core are two large housing developments - the Alfred E. Smith Houses public housing development and the Southbridge Towers complex, which consist of tall, 12- to 27-story residential towers situated within playgrounds, plazas, courtyards, and small commercial establishments.

Punctuating each block of Broadway from Worth Street southward are several commercial office towers from the early 1900s, generally ranging from 14 to 60 stories in height, but with moderate bulks given the characteristic setbacks designed into these towers for light and air. The tallest of these towers is the landmarked Woolworth Building between Park Place and Barclay Street. To the west of Broadway are buildings typical of Tribeca, industrial loft-style buildings from the late 1800s and early 1900s, ranging from 5 to 6 stories in height with cast-iron facades and full lot coverage.

The Fulton Market District comprises the southern portion of the secondary study area, with buildings that generally exhibit high bulk on small lots and widely varied heights. Slender, tall buildings at 12 to 30 stories anchor the corners and midblocks of many of the blocks along Fulton Street, interspersed among mid-rise buildings 4 to 6 stories in height. To the east of Pearl Street extending out onto the piers comprising the South Street Seaport, the predominant building stock is made up of low-rise 3- and 4-story buildings, of late-1800s brick-and-mortar construction.

Within the study area, the majority of buildings are coterminous with lots that are aligned perpendicularly to the surrounding street grid. With the exception of the larger superblock housing developments, buildings generally have their edges aligned with their lot boundaries, leaving little room for variation in the placement of buildings upon lots. The larger housing developments in the area generally feature high-rise apartment buildings that are spaced apart, often divided by common amenities such as open space or recreational facilities.

Because the study area is a patchwork of several neighborhoods, smaller localized grids intersected, creating irregular blocks at their edges. These convergences are anchored down by public squares, as was the case with Chatham Square and Foley Square. Additional superblocks in the area included the Southbridge Towers and the Alfred E. Smith Towers.

There are several distinct regions of blocks that exhibit similar form within the study area. These patches are generally divided by large superblocks, parks, or regions whose forms responded to the presence of the many elevated and at-grade access roadways to the Brooklyn and Manhattan Bridge. The South Street Seaport District, generally to the east of Pearl Street and to the north of Fulton Street, has many areas closed to vehicles to allow pedestrian use. To the west of Broadway and to the north of Canal Street exist rectangular blocks, 200 by 400 feet in size, that are roughly in alignment with the Manhattan street grid. Located between Catherine Street and the on-ramps to the Manhattan Bridge are several predominantly residential blocks that are approximately 200 by

800 feet in size. In addition, the blocks nearest to the South Street Seaport are approximately 200 by 300 feet in size and align with the East River edge.

In the study area, the street pattern is generally rectilinear, loosely aligned with the Manhattan grid to the west of the Bowery. To the east of the Bowery and Water Street, streets are oriented perpendicularly to the East River. In the narrow streets of the historic district around the South Street Seaport, it is common to find streets that meander in direction and create angular street junctures; streets that dead-end and created alleyways, and streets that exist only for several blocks.

Many street trees are found within the study area. Streetwall continuity, with few empty lots and alleyways along block fronts, are prevalent throughout the majority of the study area, with the exception of the standalone civic buildings. Curb cuts regularly punctuated the sidewalks for vehicle entry into properties containing light manufacturing uses, for instance, along Chrystie Street where produce and seafood distribution establishments operated. Cobbled streets are maintained to the east of Pearl Street and to the north of Fulton Street, in the mainly pedestrian corridors that comprised the Fulton Fish Market and South Street Seaport District. Remnants of industrial use in the Tribeca loft buildings between Broadway and Church Street were seen in the elevated metal platforms that stand at the building facades and were once used for loading. Metal cellar doors, in line with the sidewalks, were commonly found in the secondary study area in conjunction with street-level retail businesses, restaurants, and buildings that once housed industrial use.

The street hierarchy in the entire study area, as illustrated in Figure 5-1, is composed of several major arterials running east-west and north-south, which cater to the heaviest pedestrian and vehicular traffic and served as truck and crosstown bus routes for NYC Transit (NYCT) buses. The major east-west arterials are Canal Street, which runs between the Holland Tunnel to New Jersey to the west and the Manhattan Bridge to the east; Chambers Street, which runs between the West Side Highway (Route 9A) to the west and the Brooklyn Bridge to the east; and Worth Street (also known as Thomas Paine Street), which runs between Hudson Street and the Bowery. The major north-south arterials are Broadway, the Bowery, Park Row, Pearl Street, Water Street, and South Street, which runs underneath the Franklin Delano Roosevelt (FDR) Drive, an expressway that traces the eastern edge of Manhattan. The narrower east-west and north-south streets throughout the remainder of the study area are considered local routes.

The Brooklyn Bridge on- and off-ramps are an important element in the urban design context of the study area. Built in the last part of the 19th Century, the Brooklyn Bridge spans the East River from Park Row in Manhattan to Adams Street in Brooklyn. There is a raised boardwalk in the middle of the bridge for pedestrians and bicycles. Benches and flowers at Park Row mark the end of the Manhattan side of Brooklyn Bridge. The ramps associated with the bridge run throughout the western portion of the study area and the elevated ramps create unusual spaces at street level. In some cases, the street level space is used for parked cars, while other areas have been covered with greenery to create “green streets.” The Brooklyn Bridge and its network of ramps divide the civic

center from the offices and other land uses in lower Manhattan.

The principal natural feature of the urban design study area is the East River, situated to the east of the island of Manhattan to form an aquatic border between Manhattan and the boroughs of Brooklyn and Queens. Esplanades along the East River provide passive recreational areas for residents and visitors, a contextual backdrop for eastward views from points further inland, as well as a visual feature for waterfront properties. The topography of the entire study area is generally flat, with gentle downward slopes near the edge of Manhattan at the East River. No further natural features are found in the study area.

Visual Resources

Security Zone

The security zone area is a densely developed urban area with few opportunities for expansive view corridors. Views of the Brooklyn Bridge are an important visual resource, as are views of the civic center's ornate cornices. The Municipal Building and the U.S. Courthouse, have decorative crowns distinguishable from the other tall buildings in the area. Street-level views of the Brooklyn Bridge from Police Plaza and from other points in the eastern portion of the security zone area are blocked by the Verizon Building (formerly the New York Telephone Company switching center). View corridors to the East River are not available along the full length of the east-west streets due to the irregularity of the street grid in the study area. Elevated roadways associated with the FDR Drive and the Brooklyn Bridge, fencing, and above-ground development commonly obstruct public views of the river.

Study Area

Views to the visual resources within the study area are generally short and are often limited to the immediate surroundings of each resource. Views of larger structures, such as the Municipal Building, the Woolworth Building, and the Brooklyn Bridge generally do not extend across the study area due to visual barriers created by buildings. These structures are periodically visible from open spaces throughout the study area, where views are possible due to the variation of building heights, and from vantage points along the Manhattan and Brooklyn waterfronts.

C. 2006 NO-ACTION CONDITION

Under the 2006 No-Action condition, it is assumed that the security plan implemented by the NYPD after September 11, 2001 that resulted in the street closures would not be in place. The roadways would be open with the 1999 street closures and municipal garage closure in place and

transportation services would continue as they were prior to September 11, 2001. Under this scenario, all private and commercial vehicles would have access throughout the security zone, with the exception of the streets that were closed in 1999. In addition, all security-related streetscape elements would not be present in the security zone.

Urban Design

Security Zone

Since the baseline year, no changes have occurred in building bulk, use, or type; building arrangement; block form and street pattern; street hierarchy; or natural features within the security zone area. Changes in streetscape elements have occurred within the security zone area since the baseline 2001 year with the implementation of the security plan. The features of the security plan included the installation of attended security checkpoint booths, planters, bollards and hydraulic-operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza, which are considered potential terrorist targets. Following the 2001 street closures, private police vehicles were permitted to park at an angle along Park Row; however, all vehicles are now prohibited from parking along Park Row. Private police vehicles were also permitted and continue to park along the closed northbound Brooklyn Bridge off-ramp. How the security plan has affected urban design in the study area is discussed below in detail under Section D, “With-Action Condition.”

Under the No-Action condition, there would be no change from baseline conditions in the urban design features (inclusive of building bulk, use, and type; building arrangement; block form; street pattern; streetscape elements; street hierarchy; and natural features) within the security zone area.

Study Area

As discussed in Chapter 2, “Land Use, Zoning, and Public Policy,” besides a few residential conversions and new residential construction, little development has occurred in the study area. As such, the urban design characteristics of the area have not changed significantly in the study area since the baseline conditions. Brooklyn Bridge Plaza, the open space area located at street level under the Brooklyn Bridge, has recently undergone an upgrade to become a more attractive area that includes new sitting areas, trees and plantings, and sports courts. In addition, police vehicles that were permitted to park on James Madison Plaza, located at Pearl Street and Madison Streets, before and after baseline conditions, are currently not permitted to park there as a result of a court order. In addition, Duane Street between Broadway and Centre Street, along the south facade of a complex of two Federal buildings, was closed for security purposes after the baseline year. Access to this segment of Duane Street is provided to authorized government vehicles.

Visual Resources

Security Zone

As discussed above, the security zone area continues to be a densely developed urban area with few opportunities for expansive view corridors. Street-level views of the Brooklyn Bridge from Police Plaza and from other points in the eastern portion of the security zone area are blocked by the Verizon Building. View corridors to the East River are not available along the full length of the east-west streets due to the irregularity of the street grid in the study area. Elevated roadways associated with the FDR Drive and the Brooklyn Bridge, fencing, and above-ground development continue to obstruct public views of the river. As discussed above, changes in streetscape elements have occurred within the security zone area from baseline conditions with the implementation of the security plan that was put into place following the events of September 11, 2001. How the security plan has affected visual resources within the security zone is discussed below in detail under Section D, “With-Action Condition.”

Under the 2006 No-Action condition, there would be no change from baseline conditions in the ability of the public to view visual resources within the security zone area.

Study Area

As with the security zone area, the study area continues to be a densely developed urban area. As discussed above, besides a few residential conversions and new residential construction, little development has occurred in the study area that would have affected visual resources. How the security plan has affected visual resources within the study area is discussed below in detail under Section D, “With-Action Condition.”

Under the 2006 No-Action condition, there would be no change from baseline conditions in the ability of the public to view visual resources within the study area.

Urban design characteristics and visual resources throughout the study area would be expected to remain the same under the No-Action condition. As discussed above, besides a few residential conversions and new residential construction, little development has occurred in the study area since the baseline year. This area of Lower Manhattan is fully developed with little opportunity for new development. As shown in Chapter 2, Table 2-2, most land use changes that have occurred since the baseline year have been in the form of residential conversions of office buildings. It would therefore be unlikely that urban design characteristics, urban design patterns, and visual resources in the study area would be much different than they are in the study area in the With-Action condition if the street closures were not in place.

D. 2006 WITH-ACTION CONDITION

As discussed above, the action has resulted in the installation of temporary security booths, rising-plate hydraulic delta barriers, bollards, and planters on various streets and intersections within the security zone for the purpose of closing streets to unauthorized vehicular traffic to create a secure perimeter around One Police Plaza and adjacent civic facilities. As discussed in Chapter 1, “Project Description,” and shown in Figure 1-4, security checkpoint locations for vehicular access have been installed at the following locations:

- Park Row, just west of Worth Street
- Park Row, near the Brooklyn Bridge
- Pearl Street at Foley Square
- Pearl Street on the west side of Park Row
- Pearl Street at St. James Place
- Madison Street at St. James Place
- Avenue of the Finest at Pearl Street
- Rose Street at Frankfort Street
- Northbound Park Row Brooklyn Bridge off-ramp

In addition, the action resulted in the creation of sally ports - two delta barriers on the same roadway that allow a vehicle to be immobilized for inspection - at the following checkpoints:

- Madison Street at St. James Place
- Pearl Street at St. James Place
- Avenue of the Finest at Pearl Street
- Park Row west of Worth Street

As a result, the following streets within close proximity to One Police Plaza that are open only to authorized vehicles include:

- Park Row, between approximately Worth Street and the Brooklyn Bridge
- Pearl Street, between Foley Square and St. James Place
- Madison/Rose Streets, between Frankfort Street and St. James Place
- Avenue of the Finest
- Northbound Park Row Brooklyn Bridge off-ramp

This section describes urban design and visual resource conditions that have been affected under the current security plan within the security zone area and within the quarter-mile radius study area. This assessment considers the effects of the With-Action condition from where it is visible: from within the security zone area and from locations outside of, though within view of, the security plan

features.

Urban Design

Security Zone

The addition of these security elements has resulted in the modification of the local street pattern, through the restriction of access to portions of Park Row, Pearl Street, and Madison Street and the alteration of the streetscape within the security zone. The security plan has not affected building bulk, use, and type; or natural features. Figure 5-2 depicts the photograph reference number and view direction of the photos shown in Figure 5-3.




The main access point into the security zone for Chatham Green residents arriving in vehicles and other authorized vehicles is located at Park Row and Worth Street (see Photo 1 of Figure 5-3). Park Row is the widest street in the security zone, formerly carrying two-way traffic in four lanes. There are two security booths located at this checkpoint with two delta barriers located in both northbound and southbound lanes. Planters border the south side of the sidewalk along Worth Street at Park Row. A temporary electronic sign is located at this checkpoint to alert drivers that Park Row is open to authorized vehicles only.

Commercial vehicles, such as delivery trucks, are only permitted through the checkpoint at Park Row and Worth Street after displaying valid identification. After passing through the barricade, commercial trucks must pull into a truck inspection staging area on the westside side of Park Row where they are inspected by the USMS officers as well as bomb sniffing dogs (Photo 2 of Figure 5-3). There is a temporary USMS security booth positioned at the truck inspection area as well as a temporary chain link fence cage for the bomb sniffing dogs. Concrete jersey barriers topped with two feet of black wrought iron fencing line the center, west side, and east side of Park Row. Jersey barriers with black fencing border the east side of Park Row along side of police headquarters. There are two temporary trailers located along this portion of the sidewalk as well. There are also temporary security booths and delta barriers located along the southern portion of Park Row; one in the southbound lane, just south of Police Plaza, and in the northbound lane, just north of Frankfort Street (Photos 3 and 4 of Figure 5-3).

There are temporary USMS security booths and delta barriers located at Foley Square at Pearl Street and on the west side of Park Row at Pearl Street restricting vehicular access on this portion of Pearl Street (Photos 5 and 7 of Figure 5-3). There are temporary security booths and delta barriers on the east side of Park Row at Pearl Street and on the west side of St. James Place and Pearl Street (Photos 6 and 8 of Figure 5-3). The security checkpoint at St. James Place and Pearl Street also contains planters and French barriers (movable metal pedestrian barricades) (Photo 8 of Figure 5-3). While this portion of Pearl Street formerly carried traffic in both north and southbound directions,



Legend

-  Security Zone (Closed to Public Vehicular Traffic after 09/11/2001)
-  Urban Design and Visual Resources Study Area (Quarter-Mile Radius)
-  Photo Reference Number and View Direction





1. View south on Park Row at Worth Street



2. View north on Park Row at Pearl Street



3. View north on Park Row at Police Plaza



4. View north on Park Row at Frankfort Street



5. View east on Pearl Street at Foley Square



6. View east on Pearl Street at Park Row



7. View west on Pearl Street at Park Row



8. View north on Pearl Street at St. James Place



9. View south on Madison Street at St. James Place



10. View east on Madison Street at Avenue of the Finest



11. View south on Rose Street at Avenue of the Finest



12. View north on Avenue of the Finest at Madison Street



13. View north on Avenue of the Finest at Pearl Street



14. View east on closed Brooklyn Bridge ramp

it is now only open to northbound authorized traffic since the street closures in 1999. A permanent black wrought iron fence and concrete planters located down the center of Pearl Street between Park Row and St. James Place were installed after the 2001 security plan was put into place (Photo 6 of Figure 5-3).

As discussed in Chapter 1, “Project Description,” the closure of Madison Street between Pearl Street and Avenue of the Finest was part of the 1999 street closures and temporary security booths and delta barriers were situated at Madison Street and Avenue of the Finest and Pearl Street and Madison Street as part of that security plan. After the 2001 security plan was put into place, temporary security booths and delta barriers were installed on the west side of St. James Place at Madison Street and at Rose Street and Frankfort Street (Photos 8 and 10 of Figure 5-3). There are also planters and jersey barriers located at the checkpoints at Rose Street and Frankfort Street and Madison Street at St. James Place.

As discussed in Chapter 1, “Project Description,” Avenue of the Finest between Madison Street and Park Row was a part of the 1999 street closure and a temporary security booth and delta barrier was located on west side of Avenue of the Finest at Madison Street (Photo 9 of Figure 5-3). As a result of the 2001 security plan, Avenue of the Finest was closed to unauthorized vehicles from Pearl Street to Park Row with the addition of a temporary security booth, delta barrier, and planters (Photo 12 of Figure 5-3).

In addition, as discussed above, an off-ramp from the Brooklyn Bridge was closed as part of the With-Action condition. Vehicles that previously exited the Brooklyn Bridge via this off-ramp were able to travel north on Park Row or east along Avenue of the Finest. A temporary barricade is located at the entrance of the off-ramp and authorized vehicles currently park on the ramp (Photo 13 of Figure 5-3).

According to the NYPD’s Counter Terrorism Division, these security measures are necessary to create a “secure zone” around NYPD headquarters and other civic buildings that are considered potential terrorist targets. The terrorist attacks on the World Trade Center on September 11, 2001 resulted in greater security measures being implemented all over the City, particularly in Lower Manhattan due to the large number of government offices and financial institutions located there. Security devices, although typically not aesthetically pleasing, have become part of the landscape of the City after September 11, 2001. The area surrounding the New York Stock Exchange and Metro Tech in Brooklyn, for example, have implemented similar security plans where public streets have been closed to unauthorized traffic and features such as delta barriers, jersey barriers, concrete planters, and bollards have been installed. The security plan features discussed above have altered the urban design characteristics of the security zone area, creating a makeshift and nonhomogeneous setting. However, these security features are considered necessary to protect potential terrorist targets and these features will remain in place as long as a potential terrorist threat exists.

Although these security measures are necessary, their temporary and unaesthetic nature has resulted in a negative alteration of the streetscape within the security zone. The closure of public streets and the addition of the security elements have introduced a forbidding and unaesthetic quality to the area. The action has created a disconnect between the security zone area and the surrounding neighborhood. According to the *CEQR Technical Manual*, in terms of streetscape elements, a significant adverse impact would result if an action would add to, eliminate, or alter a critical feature of a streetscape. The streets within the security zone, before they were closed, particularly Park Row, were active through streets connecting the Financial District to Chinatown and the Civic Center area. The absence of vehicular traffic and activity within the security area has created an abandoned quality, which is in stark contrast to the active and lively surrounding area. The temporary quality of the security elements has created a haphazard, inconsistent look that does not fit with the surrounding urban design context. The absence of vehicles and addition of the security elements have altered the streetscape within the security zone and a significant adverse impact to urban design has resulted. Chapter 11, “Mitigation,” of this EIS provides a description of measures to be developed to mitigate the urban design impacts identified in this chapter.

Study Area

The action has not altered the urban design characteristics that give the study area its defining appearance. The features of the security plan discussed above have altered streetscape elements limited to the area within the security zone. The built form of the area, consisting of a mixture of historic and visual landmarks built on irregularly shaped blocks, has remained unchanged.

Visual Resources

Security Zone

Street level views in the security zone area have been altered by the current temporary security measures. All of the temporary barricades have a makeshift quality resulting from their mobility and inconsistency of design and materials. Visual resources in the security zone area consist of the streetscapes unique to the area and the Civic Center’s historic landmarks, including the Brooklyn Bridge, the Municipal Building, the United States Courthouse, and the New York County Courthouse. In general, view corridors to significant visual resources are not available from points within the security zone, and those of major landmarks in the area, such as the Brooklyn Bridge and the Municipal Building, are available as upward views from public spaces, unobstructed by structures under one story in height. The barricades also figure prominently into views at street level since the majority of the security zone has no traffic and little pedestrian traffic. Otherwise, views to these resources have not been dramatically changed and significant visual resources have remained prominently visible. These security elements are minimally intrusive to viewsheds and have not adversely impacted visual resources located in the area.

Study Area

The security plan elements have not blocked public views to any visual resources, including view corridors, vistas, historic landmarks, historic districts, and open spaces within the study area. The installed streetscape elements that comprise the physical elements of the NYPD security plan do not preclude views of visual resources given the low heights of the bollards, jersey barriers, French barricades, and concrete planters and modest size of the security checkpoint booths. As such, the security plan has not adversely impacted visual resources within the study area.

One Police Plaza Security Plan EIS

CHAPTER 6: NEIGHBORHOOD CHARACTER

A. INTRODUCTION

As defined in the *CEQR Technical Manual*, neighborhood character is considered to be an amalgam of the various elements that give a neighborhood its distinct personality. These elements can include land use, urban design, visual resources, historic resources, socioeconomics, transportation and noise, as well as any other physical or social characteristics that help to distinguish the community in question from another.

According to the *CEQR Technical Manual*, an assessment of neighborhood character is generally needed when the action would exceed preliminary thresholds in any one of the following areas of technical analysis: land use, urban design and visual resources, historic resources, socioeconomic conditions, transportation, or noise. An assessment is also appropriate when the action would have moderate effects on several of the aforementioned areas. Although the *CEQR Technical Manual* lists historic resources as a neighborhood character element, as the action has not and would not result in a substantial direct change to a historic resource or substantial changes to public views of a resource, a discussion of historic resources in this chapter is not included. Potential effects on neighborhood character may include:

- *Land Use.* Development resulting from a proposed action could alter neighborhood character if it introduces new land uses, conflicts with land use policy or other public plans for the area, changes land use character, or generates significant land use impacts.
- *Socioeconomic Conditions.* Changes in socioeconomic conditions have the potential to affect neighborhood character when they result in substantial direct or indirect displacement or addition of population, employment, or businesses; or substantial differences in population or employment density.
- *Urban Design and Visual Resources.* In developed areas, urban design changes have the potential to affect neighborhood character by introducing substantially different building bulk, form, size, scale, or arrangement. Urban design changes may also affect block forms, street patterns, or street hierarchies, as well as streetscape elements such as streewalls, landscaping, curbcuts, and loading docks. Visual resource changes could affect neighborhood character if they directly alter key visual features such as unique and important public view corridors and vistas, or block public visual access to such features.

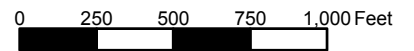
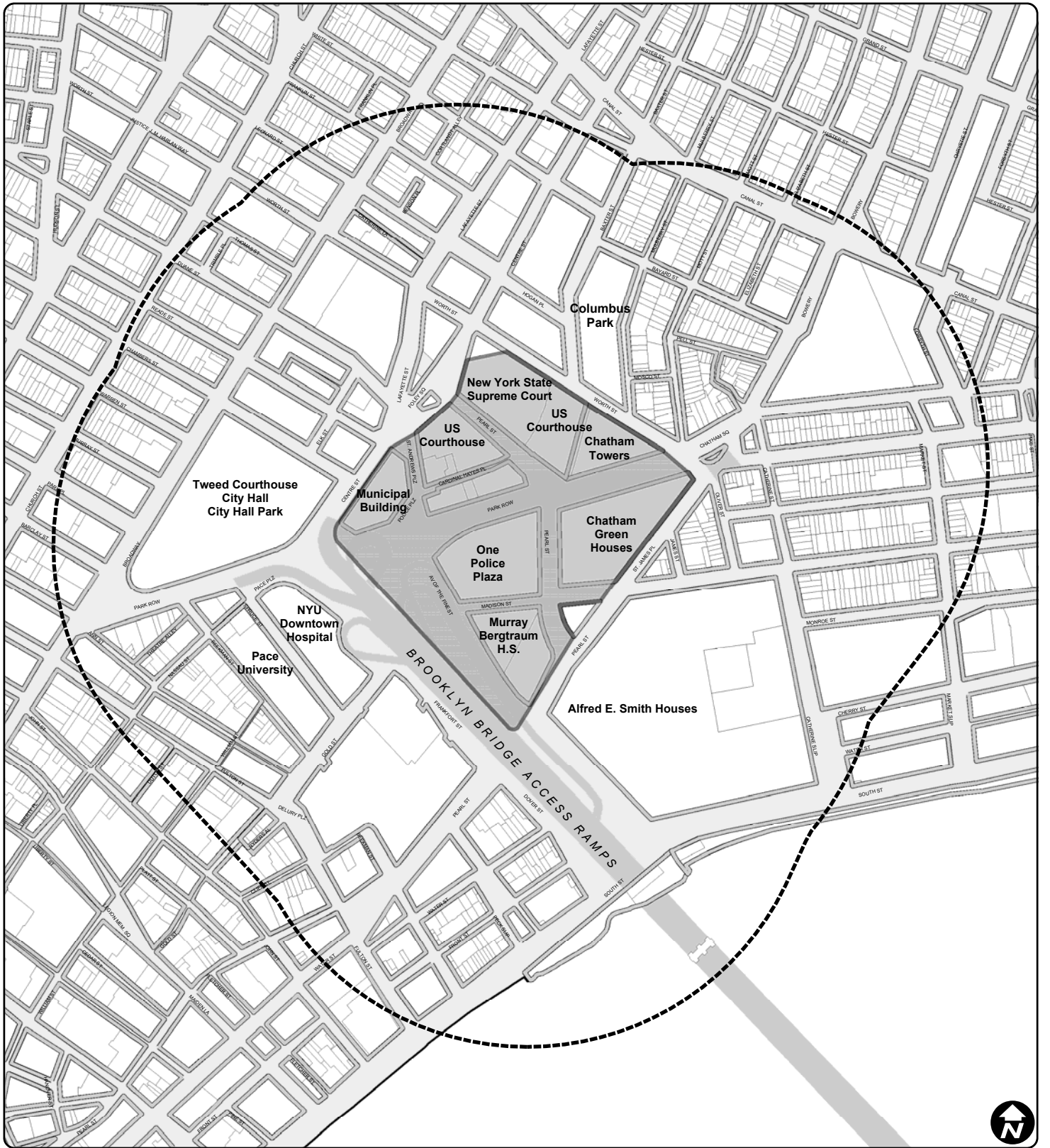
- *Transportation.* Changes in traffic and pedestrian conditions can affect neighborhood character in a number of ways. For traffic to have an effect on neighborhood character, it must be a contributing element to the character of the neighborhood (either by its absence or its presence), and it must change substantially as a result of the action. According to the *CEQR Technical Manual*, such substantial traffic changes can include: changes in level of service (LOS) to C or below; change in traffic patterns; change in roadway classifications; change in vehicle mixes, substantial increase in traffic volumes on residential streets; or significant traffic impacts, as identified in the technical traffic analysis. Regarding pedestrians, when a proposed action would result in substantially different pedestrian activity and circulation, it has the potential to affect neighborhood character.
- *Noise.* According to the *CEQR Technical Manual*, for an action to affect neighborhood character with respect to noise, it would need to result in a significant adverse noise impact and a change in acceptability categories.

This chapter of the EIS examines neighborhood character within the security zone area and its surrounding blocks, and the action's effects on that character (see Figure 6-1 for study area location). The chapter's impact analysis focuses on changes to neighborhood character resulting from changes in the technical areas discussed above, since changes to these technical areas are most relevant to potential changes in neighborhood character.



B. BASELINE CONDITIONS

As discussed in Chapter 1, "Project Description," the September 11, 2001 attacks on the World Trade Center resulted in a security plan that included the closure of streets adjacent to the civic facilities located near One Police Plaza (see Figure 6-1 for security zone area). Prior to the attacks, these streets were open to all vehicles, with the exception of several streets that closed in 1999 for security purposes (see Chapter 1, Figure 1-3). As the creation of the security zone was a result of the September 11, 2001 attacks, a description of the neighborhood character that existed in the surrounding area prior to the attacks will help to provide the context for the analysis which follows. Those 2001 baseline neighborhood conditions are discussed in this section.

Neighborhood Character Study Area



Legend

-  Security Zone (Closed to Public Vehicular Traffic after 09/11/2001)
-  Neighborhood Character Study Area (Quarter-Mile Radius)

Security Zone

The With-Action area (the security zone) for neighborhood character analysis is defined as the streetscapes in the area bounded by Worth Street, St. James Street, Pearl Street, Frankfort Street, and Centre Street. The street pattern in this area is irregular and does not follow the formal 1811 grid plan imposed on the majority of the City. As mentioned above, in the baseline condition, streets were open to all commercial and private vehicles and none of the features associated with the action were in place.

The area within the security zone is composed of mainly institutional and residential uses. The courthouses and office buildings draw large volumes of employees and visitors to the area throughout the day and most of the streets surrounding these buildings are congested with government and private vehicles. The existing Police Plaza complex includes an outdoor plaza, and the police headquarters at One Police Plaza. The outdoor plaza, part of the Police Plaza complex, is an open space walkway with trees and benches connecting police headquarters with the Municipal Building at One Centre Street. The 30-story Municipal Building occupies one square block between Centre Street, St. Andrews Plaza, Park Row, and Tryon Row. The Municipal Building has a street-level passageway to Chambers Street and an arcaded south wing that arches above a subway entrance. The United States Courthouse at 40 Foley Square, which houses the U.S. Court of Appeals and U.S. District Court, is a 31-story structure located to the northeast of the Municipal Building. St. Andrews Plaza separates the two buildings. The block bordered by Centre, Worth, Baxter, and Pearl Streets is occupied by the New York County Courthouse, home to the New York State Supreme Court and a second United States Courthouse, containing the U.S. District Court. The Metropolitan Correctional Center is located on the northwestern corner of Park Row and Pearl Street. Murray Bergtraum High School, a public school with student enrollment of approximately 2,790 students, is located on a block bounded by Pearl Street, Madison Street, and Avenue of the Finest. A Verizon telecommunications building is located on the same block as the high school.

Marked and unmarked police vehicles are parked throughout the blocks south of One Police Plaza. Madison Street was used for police parking, as was James Madison Plaza and the covered area under the Brooklyn Bridge. The large number of law enforcement vehicles creates a strong police presence in the area. The Verizon Building and Murray Bergtraum High School also attract large numbers of pedestrians to the area. On weekday mornings, many students and employees arrive at the subway station located under the Municipal Building and then walk across Police Plaza and down the stairs to Madison Street. The streets within the security zone, particularly Park Row, were active through streets connecting the Financial District to Chinatown and the Civic Center area.

Two large-scale housing developments, Chatham Towers and Chatham Green Houses, are also located within the security zone. Chatham Towers is the smaller of the two and is located

between Worth Street, Park Row, and Pearl Street. Chatham Towers consists of two 25-story towers containing 250 residential units with underground parking for residents and the public. Chatham Towers is a sculpted concrete building and was constructed in 1965 by architects Kelly & Gruzen. The Chatham Green Houses cooperative apartment building is a 21-story structure located on the irregularly shaped block bordered by Park Row, St. James Place, Chatham Square, and Pearl and Madison Streets. The S-shaped structure contains 420 residential units. The Chatham Green Houses is set back from the street by landscaping and a parking lot located in the front of the building along Park Row. Access/egress points to and from the parking lot are located along Park Row and Pearl Street. Like Chatham Towers, Chatham Green was designed by architects Kelly & Gruzen and constructed in 1961.

Study Area

Located directly east of the Civic Center area is the Governor Alfred E. Smith Houses which consists of several mid-size residential buildings built around open space. The Smith Houses and Chatham Green form a distinct residential unit along St. James Place. Confucius Plaza, a 44-story subsidized housing building, was built in 1976 and is located on the corner of the Bowery and Division Streets. The statue of Confucius in front of Confucius Plaza is a common meeting place for members of the community.

North and east of these large-scale residential developments is the Chinatown neighborhood. Since the 1840's New York's Chinatown has traditionally been centered in the eight blocks bounded by Canal, Worth, Baxter Streets and the Bowery/Chatham Square. Manhattan's Chinatown owes its dynamic character to its unique mix of physical and cultural characteristics and the myriad activities that take place on the area's principal public places - its streets and sidewalks. Among these activities are the assembly and movement of people, goods, and vehicles on the area's public rights of way - including bus staging, freight deliveries, waste pickups, and the many other activities and services that are essential for the area's daily life.¹ These activities in Chinatown are familiar and contribute greatly to the area's essential character and cultural significance. They are particularly intense in the oldest and most traditional areas of the community where the public rights-of-way are the most heavily utilized and congestion is the greatest.²

Restaurants, fresh food markets, tea and rice shops, gift and souvenir shops, and garment factories are the main businesses in Chinatown, and the area's distinct character and mix of businesses make it a popular tourist destination. The largest Asian community in North America

¹*Chinatown Access and Circulation Study*, prepared by LMDC, 2004.

²Ibid

can be found among the narrow streets of Chinatown, a neighborhood which extends north of Canal Street beyond the study area.

In the early 1970's Chinatown began to push out the enclave's historic boundaries, although Mott Street continued to be Chinatown's unofficial "Main Street". Like many streets that predated Manhattan's grid pattern, Mott Street meanders around natural features of landscape rather than running through or over them. Mott Street between Canal Street and Chatham Square is considered the historic heart of Chinatown and is the primary destination for tourists. This stretch of Mott Street is lined with souvenir shops, tea houses and restaurants that cater mostly to tourists. Mott Street and the surrounding sidestreet's sidewalks are crowded with tourists and shoppers, particularly on the weekends. The housing stock within the traditional heart of Chinatown is mostly composed of decrepit and cramped tenement buildings, some of which are over 100 years old.

High concentrations of commercial and mixed-use buildings exist throughout the area, concentrated along Canal Street, between Broadway and Pearl Street, along the north-south streets throughout the area. Canal Street is a bustling commercial district, crowded with open storefronts and street vendors. Tourists as well as local residents pack the Canal Street sidewalks every day to frequent the open-air food stalls and small stores selling items such as perfume, purses, hardware, and industrial plastics at low prices. Some of these goods are grey market imports and notoriously counterfeit, with fake trademarked brand names on electronics, clothing and personal accessories. Pirated CDs and DVDs are also common, offered for sale on the Canal Street sidewalks in makeshift stands and suitcases or laid out bedsheets. Canal Street is a heavily trafficked east-west thoroughfare with vehicles headed west to the Holland Tunnel and east to the Manhattan Bridge.

The Brooklyn Bridge divides the Civic Center/Chinatown neighborhoods from the South Street Seaport and Financial District to the south. The ramps to the Brooklyn Bridge also create a physical and visual barrier to the neighborhoods to the south. The on- and off-ramp system for the Brooklyn Bridge forms a network of segregated roadways that divide the Governor Alfred E. Smith Houses, Verizon, and Murray Bergtraum High School corridor from the area to the east. The South Street Seaport contains many national retail stores and restaurants that attracts tourists and shoppers to the area. The Seaport itself, on Pier 17, operates primarily as a mall and tourism center. Tourists are offered shops and a food court and decks outside allow for spectacular views of the Brooklyn Bridge and Brooklyn Heights. This area was also home to the Fulton Fish Market, a bustling wholesale fish market that operated in the early morning hours along South Street between Peck Slip and Fulton Street. Dover and Water Streets, as well as Peck Slip are characterized by cobblestone streets and their relatively low building height and small-scale historic residential/maritime functions.

North of the South Street Seaport area, the Southbridge Towers residential complex creates its own insular neighborhood with commercial establishments, parking garages, open spaces, and housing towers. The Southbridge Towers complex is distinct from both the South Street Seaport neighborhood to the south and west and from the office buildings to the north. The office buildings located along William, Beekman, Nassau, and Ann Streets are all part of the northern section of the Lower Manhattan business center. Located outside of Manhattan's uniform street grid, these streets are narrow and irregular. They are filled with ground floor retail establishments including restaurants and support services for office workers and businesses above. Pace University and NY Downtown Hospital are located north of the Lower Manhattan business district and form their own neighborhood across Park Row from City Hall across Gold Street from Southbridge Towers. This area attracts many pedestrians during the weekdays.

C. 2006 NO-ACTION CONDITION

For analysis purposes, under the No-Action condition, it is assumed that the security plan implemented by the NYPD after September 11, 2001 that resulted in the above mentioned street closures would not be in place. The roadways would be open with the 1999 street closures and municipal garage closure in place and transportation services would continue as they were prior to September 11, 2001. Under this scenario, all private and commercial vehicles would have access throughout the security zone, with the exception of the streets that were closed in 1999.

Security Zone

In the No-Action condition, without the street closures in place, no significant changes in neighborhood character would have occurred within the security zone from the baseline 2001 year. Land uses within the security zone would remain the same in the No-Action condition as would urban design and socioeconomic conditions. Transportation characteristics of the security zone would also remain unchanged from the baseline 2001 year. As mentioned above, all private and commercial vehicles would have access throughout the security zone, with exception of the streets that were closed in 1999. Prior to September 11, 2001, and the resulting street closures, six MTA New York City Transit bus routes used Park Row in one or both directions, including the M9, M15, M103, X25, X90, and the B51. In addition, the BM1, BM2, BM3, and B4 bus routes also utilized Park Row prior to September 11, 2001. In the 2006 No-Action, with the exception of the M9 route, these buses would remain on their routes along Park Row. One pedestrian corridor along police headquarters was closed as a result of the security plan. In the 2006 No-Action condition, this corridor would be open.

Study Area

In the No-Action condition, the security zone around NYPD headquarters would not be in place, however, security measures implemented throughout the study area at City Hall and various

government and office buildings after September 11, 2001 would continue to be in place. The presence of these other security measures is an additional characteristic of the area compared to the baseline condition. Besides the additional security measures installed within the study area, neighborhood character within the study area would remain the same in the 2006 No-Action condition.

D. 2006 WITH-ACTION CONDITION

Following the events of September 11, 2001, a security plan was implemented that resulted in the installation of attended security checkpoint booths, planters, bollards, and hydraulic delta barriers to restrict the access of unauthorized vehicles from the roadways adjacent to the civic facilities located near One Police Plaza including NYPD Headquarters, the New York State Supreme Court, and the United States Courthouse. The security measures consist of delta barriers, bollards and planters to control vehicle access to police headquarters and other civic facilities in the area. The delta barriers that have been installed at various intersections can be raised and lowered to provide authorized vehicles access to streets within the secure perimeter. With the exception of areas immediately adjacent to the NYPD headquarters at One Police Plaza, pedestrian access within the security perimeter is not restricted. The stairway from Police Plaza to Madison Street that was used by employees and students headed toward Murray Bergtraum High School and Verizon from the subway station at the Municipal Building is now closed. They now must use the stairway from Police Plaza that leads down to Avenue of the Finest to access the school, Verizon, and Pearl Street.

Residents of Chatham Green in vehicles are required to show identification to enter the checkpoint at Park Row and Worth Street before they are able to access their parking lot. Commercial vehicles, such as delivery trucks, are permitted through the barrier with proper identification and after an inspection of the truck. Prior to September 11, 2001, six MTA New York City Transit bus routes used Park Row in one or both directions, including the M9, M15, M103, X25, X90, and the B51. In addition, the BM1, BM2, BM3, and BM4 bus routes used Park Row prior to September 11, 2001. In the With-Action condition, these buses were rerouted around the security zone increasing travel distances and travel times for passengers and adding congestion to the already crowded detour routes.

Private police vehicles were permitted to park along restricted portions of Park Row and the Brooklyn Bridge off ramp leading to Park Row after those roadways were closed. However, police vehicles are currently not permitted to park along this portion of Park Row. They are still permitted to park on the closed Brooklyn Bridge off ramp. In addition, police vehicles that were permitted to park on James Madison Plaza before and after the 2001 baseline year, are not currently permitted to park there.

This section focuses on changes to neighborhood character resulting from changes in the technical areas of Land Use, Socioeconomic Conditions, Urban Design and Visual Resources, Transportation, and Noise. Changes in these technical areas are most likely to result in changes to neighborhood character as follows:

- *Land Use.* The Land Use, Zoning, and Public Policy analysis (see Chapter 2) indicates that the action has not impacted or changed or would not change the scale and density or type of land use within the study area. As such, the action has not affected neighborhood character in terms of land use.
- *Socioeconomic Conditions.* The Socioeconomic analysis (see Chapter 4) concluded that although the action has limited accessibility to some parts of the study area, there is no evidence that the limit in accessibility has resulted in any secondary residential displacement. While rents and home values have, in general, increased throughout the study area, these increases appear to be a result of normal economic trends, are consistent with trends throughout Lower Manhattan, and are therefore not directly attributable to the security plan. In addition, while property values have, in general, increased throughout the study area, and commercial rents have slightly decreased, these changes are not unique to the study area and appear to be a result of normal economic trends. As these changes are consistent with trends throughout Lower Manhattan, they are therefore not directly attributable to the security plan. The action, which is limited to streets and sidewalks, does not entail any new development, and does not involve any involuntary displacement of businesses or institutions within the security zone. As no direct, indirect business or institutional displacement would occur as a result of the action, no significant adverse impacts have occurred or are expected on socioeconomic conditions.
- *Urban Design and Visual Resources.* The Urban Design and Visual Resources analysis (see Chapter 5) indicates that the action has resulted in some changes to the urban design and visual quality of the area, specifically within the security zone. The addition of the security zone features has resulted in a negative modification of the streetscape elements within the security zone boundaries. As such, significant adverse impacts on urban design have resulted from implementation of the security plan. The urban design analysis notes that the urban design impacts would be addressed with operational mitigation measures (see Chapter 11, “Mitigation”). The security plan has not blocked public views to any visual resources, including view corridors, vistas, historic landmarks, historic districts, and open spaces. The installed streetscape elements that comprise the physical elements of the NYPD security plan do not preclude views of visual resources given the low heights of the bollards and modest size of the security checkpoint booths. As such no impacts on visual resources have occurred.

- *Transportation.* The Traffic and Parking analysis (see Chapter 7) indicates that the action has resulted in traffic impacts in a number of locations in the study area. The analysis also notes that most of the identified traffic impacts would be fully addressed with proposed mitigation measures (see Chapter 11). No significant adverse impacts to study area parking conditions have resulted from the With-Action condition. The Transit and Pedestrian analysis (see Chapter 8) indicates that there have been substantial increases in overall travel time for the diverted bus routes, and these increases have resulted in significant adverse impacts on bus operations for the M15 and M103 routes, especially in the AM peak hour and in the southbound direction for all peak hours. In addition, the security plan appears to have resulted in a significant adverse safety impact on pedestrian conditions at the Broadway/Worth Street intersection where increases in pedestrian accidents have occurred. Chapter 11, “Mitigation,” provides mitigation measures to address the bus transit and pedestrian safety impacts identified.
- *Noise.* As discussed in Chapter 10, noise levels within the study area have increased as a result of the diverted traffic. As discussed in the chapter, the action has resulted in noise impacts at two locations along Worth Street.

Security Zone

The terrorist attacks on the World Trade Center on September 11, 2001 resulted in greater security measures being implemented all over the City, particularly in Lower Manhattan due to the large number of government offices and financial institutions located there. Security devices such as jersey barriers, French barriers, delta barriers, bollards, and concrete planters, although typically not aesthetically pleasing, have become part of the landscape of the City after September 11, 2001. The area surrounding the New York Stock Exchange and Metro Tech in Brooklyn, for example, have implemented similar security plans where public streets have been closed to unauthorized traffic and features such as delta barriers, jersey barriers, concrete planters, and bollards have been installed. This increase in security presence has altered the character of the City, especially in Lower Manhattan.

As the increased security presence has altered the character of Lower Manhattan, the action has resulted in an alteration of neighborhood character within the security zone area. While there is still pedestrian traffic, vehicular traffic is lighter (within the security zone), and the security presence is an additional characteristic of the area. The area within the security zone has become isolated from the surrounding neighborhoods by the limiting of vehicular access. The streets within the security zone, before they were closed, particularly Park Row, were more active through streets connecting the Financial District to Chinatown and the Civic Center area. This absence of vehicular traffic and activity within the security zone has created an abandoned quality, which is starkly contrasted to the active and lively surrounding area. The closure of

public streets and the addition of the security elements has introduced a forbidding and unaesthetic quality to the area. The action has created a disconnect between the security zone area and the surrounding neighborhood. Despite this negative alteration, these security features are considered necessary to protect potential terrorist targets and these features will remain in place as long as a potential terrorist threat exists.

Study Area

As discussed above, there has been an increase in security within the study area around City Hall and other government and office buildings as a result of the September 11, 2001 terrorist attacks. These security measures include an increase in security officers outside these buildings as well as jersey barriers, bollards, delta barriers, and planters along sidewalks. These security measures have altered the character of the City, particularly in Lower Manhattan. Consequently, the One Police Plaza security plan is not a unique feature that has altered the character of the surrounding area. Although the action has resulted in increases in traffic and noise around the perimeter of the security zone, this has not altered the defining neighborhood characteristics of the study area, as this area has always been heavily trafficked.

E. CONCLUSION

The action has resulted in a change of character within the security zone. As discussed above, the action has resulted in an overall change in the character of the security zone area with respect to urban design and street-level activity. The cumulative effects of the impacts discussed above have negatively impacted neighborhood character within the security zone. While a number of significant adverse traffic impacts were identified, these impacts occur in locations that would already be congested in the No-Action condition. These transportation impacts have not significantly altered neighborhood character within the study area. However, as discussed in Chapter 11, "Mitigation," traffic, transit and pedestrians, and urban design impacts would be fully or partially mitigated and therefore, any impact on neighborhood character would also be mitigated.

One Police Plaza Security Plan EIS

CHAPTER 7: TRAFFIC AND PARKING

A. INTRODUCTION

This section of the EIS discusses the transportation characteristics and any potential impacts associated with the security plan implemented shortly after September 11, 2001 by the New York City Police Department (NYPD) in order to protect City, State, and Federal facilities in the “civic center” portion of lower Manhattan which were at the time, and continue to be considered potential terrorist targets. As discussed in Chapter 1, “Project Description,” the security measures include attended security checkpoint booths, planters, bollards and hydraulically-operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza. The traffic and parking analysis focuses on the vehicle diversions related to the street closures that are part of the security plan. In addition, on-street and off-street parking conditions are included in the analysis.

The traffic study area and analysis locations focus on the perimeter of the security zone and on other key intersections which are considered principal diversion paths. The study area for the transportation analyses is shown in Figure 7-1. The study area was selected to encompass those roadways most likely to be used by the majority of vehicles traveling through the area near One Police Plaza, as well as those roadways most affected by the traffic diversions due to the security plan. As shown in Figure 7-1, the study area is bounded by Kenmare and Broome Streets to the north, Greene Street and Church Street to the west, John Street to the south, and Pearl Street, Madison Street, Pike Street, and Allen Street to the east. Forty intersections (38 signalized and 2 unsignalized) were analyzed in detail for vehicular traffic during the 8-9 AM, 12-1 midday, and 5-6 PM peak hours. These peak hours were chosen for analysis based on a review of the peak travel time for the area surrounding One Police Plaza and are the periods most likely to be impacted by the security plan. Potential impacts from trips diverted as a result of the security plan are identified based on criteria defined in the *CEQR Technical Manual*.

As also noted in Chapter 1, “Project Description,” some portions of the security zone were implemented in 1999 and are not part of the action, but considered under No-Action conditions. The security zone has been operational for over four years and therefore the transportation effects of the action (the With-Action condition) are readily evident and are documented in the field under 2006 conditions.

As portions of Pearl Street (southbound) and Madison Street were already closed in 1999, the principal circulation effect of the action has been the closure of Park Row which, prior to its closure, carried up to 900 two-way vehicles per hour (vph) including several NYC Transit bus



Legend

- Analyzed Intersections (Unsignalized)
- Analyzed Intersections (Signalized)
- ⊥ ATR Location

- Study Area Boundary
- Security Zone
- ➔ Traffic Direction

routes. Prior to the closure of Pearl Street, which traversed westbound through the zone, this roadway carried up to 500 vph. Traffic flow on Park Row, prior to closure, originated from two main components: (a) through traffic between Chinatown and Lower Manhattan via the Bowery and (b) traffic exiting from the inbound Brooklyn Bridge destined to Chinatown and points north/northeast (the reverse movement of this flow did not use Park Row). Therefore, prior to its closure, traffic flow on Park Row was split approximately 60-65% northbound and 35-40% southbound.

The closure of westbound Pearl Street reduced the limited number of east-to-west street connections for travel northbound east of Church Street. Westbound Pearl Street was also the main connector for traffic exiting the southbound FDR Drive and headed to the Centre Street corridor within the Court District as well as to Chinatown.

Before its closure, Park Row, as well as other streets in the security zone, provided curbside parking over much of their lengths. This parking has since been displaced. Also displaced were local bus operations and bus stops in the vicinity of the security zone.

As with other technical areas, the traffic and parking studies consider a No-Action condition and compare it to a With-Action condition in order to assess any potential traffic and parking impacts resulting from the security plan, using impact criteria described in the *CEQR Technical Manual*. The analysis year is 2006. The 2006 No-Action traffic and parking conditions were documented considering various secondary source data collected prior to the 2001 closures as well as data collected in 2005 and 2006. These “baseline” conditions, such as traffic volumes, curbside parking and other data are also included in this section for informational purposes.

Following the baseline discussion is an assessment of No-Action conditions (no security plan in 2006) and With-Action conditions (the security plan in place in 2006) compared to the baseline pre-September 11, 2001 baseline condition.

B. BASELINE CONDITIONS

Vehicular Traffic

As discussed above, for the purpose of this analysis, the existing conditions are defined as the transportation network existing prior to September 11, 2001 and after the closure of the selected streets in the area of One Police Plaza in 1999 (see Chapter 1, Figure 1-3 for 1999 street closure locations). Various sources were used to compile a 2000 base network. The 1993 *Foley Square FEIS*, 2004 *Chinatown Access and Circulation Study*, 2004 *World Trade Center Memorial and Redevelopment Plan EIS*, 2000 *48-52 Franklin Street EAS*, 2004 *One Police Plaza Security Plan*

EAS, the 2000 Woolworth Building Parking Garage EAS, and additional source material provided by NYCDOT served as sources for the construction of a 2000 base traffic network for the study area.

Study Area Street Network

The study area utilized for the traffic analysis, as shown on Figure 7-1, is bordered on the north by Kenmare and Broome Streets, Green Street and Church Street to the west, John Street to the south, and Pearl Street, Madison Street, Pike Street, and Allen Street to the east. Forty intersections are analyzed in detail for the AM, midday and PM peak hours. The street configuration in the study area south of Worth Street is very irregular and becomes more typical of the Manhattan grid north of Worth Street. The street system includes a combination of north-south arterials as well as principal east-west streets. In addition, both the Brooklyn and Manhattan Bridges have their Manhattan termini in the study area.

The main north-south arterials in the western portion of the study area are Church Street and Broadway, which form a northbound/southbound one-way couplet serving much of Lower Manhattan north of Liberty Street. Church Street typically has four northbound travel lanes plus parking/loading lanes on each side of the street, while Broadway has three southbound travel lanes plus a parking/loading lane on both sides of the street. The curb lanes on both Church Street and Broadway typically have peak periods regulations. Towards the center of the study area, the Centre Street/Lafayette Street corridors carry most of the north-south traffic. Centre Street is two-way with four travel lanes between the Brooklyn Bridge and Reade Street, and then one-way northbound with typically two-to-three travel lanes plus parking/loading. Lafayette Street also has two-to-three southbound travel lanes north of Reade Street. In the easterly portion of the study area lies Water Street/Pearl Street/St. James Place and the Bowery corridor. This corridor is two-way and varies in width from two travel lanes (St. James Place) to four travel lanes (remaining portions of much of the corridor), plus curbside parking/loading on both sides along most segments. Prior to its closure, the diagonal corridor of the Park Row/Bowery corridor was also a key north-south corridor with four travel lanes plus curbside parking/loading throughout most of its length.

The principal east-west corridors in the study area are Canal Street, Worth Street and Chambers Street. Each of the facilities are two-way and provide a different function. Canal Street is the principal arterial in this area and connects to the Manhattan Bridge, the Holland Tunnel and Route 9A. Canal Street typically has four to six lanes plus curbside parking/loading with peak hour regulations. Worth Street and Chambers Street are smaller and similarly configured two-way streets, typically with two travel lanes plus curbside parking/loading on most blocks. Worth Street traverses between the Bowery and Hudson Street (mainly as a circulator facility) while Chambers Street connects the Brooklyn Bridge/City Hall area to Route 9A and Battery Park City and provides both through and circulator functions.

The local street pattern in the study area is extensive, but not continuous with major interruptions in the network due to City Hall, the complex of federal, state and city courts along Centre Street, the Manhattan and Brooklyn Bridges and numerous squares, large development block consolidations, and other features in this early New York street system. In addition, interruptions in the system have occurred due to security zones, Duane Street east of Broadway due to 26 Federal Plaza and, to the south, an extensive network surrounding the New York Stock Exchange.

Subsequent to 9/11, some key streets were taken out of service and remain temporarily closed in the vicinity of the World Trade Center (WTC) site. Of particular note is Vesey Street between Route 9A and Church Street. Vesey Street was a principal eastbound traffic corridor connecting Route 9A/Battery Park City to Park Row and points north. Vesey Street is likely to remain closed for several additional years while the WTC site is being reconstructed. Further, given the security issues associated with the Freedom Tower (to be built on Vesey Street), there is a significant potential that Vesey Street may not return to its prior traffic distribution function. In addition, Foley Square itself has been reconstructed into a consolidated open space, severing any direct connection between Pearl Street and Lafayette Street.

Chatham Square is a major confluence of roadways and a principal traffic element in the study area. Worth Street, Park Row, St. James Place, East Broadway, Bowery and Mott Street all converge in Chatham Square with inbound volumes. Only Mott Street, among these six roadways, is one-way and it is one-way into the square. Over 10 lanes of inbound traffic flow (not including Park Row) compete with pedestrians for available capacity at Chatham Square. The square was reconfigured in 2000, prior to the closure of Park Row, to add a consolidated space and better organize the fragmented traffic islands.

Surface Transit Network

In conjunction with the street network, the local bus system has also changed in response to both the security plan and other Lower Manhattan street closures. Figure 7-2 shows the Lower Manhattan area bus route maps for 2000, 2003 and 2005. As shown in the figure, prior to implementing the security plan in 2001, Park Row hosted the M9, M15, M103 and B51 bus routes. The M9 route operated between Union Square and South End Avenue in Battery Park City, while the M15 (the segment thru Park Row) traversed from East 126th Street to City Hall via 1st and 2nd Avenues. The M103 operated between East 125th Street and City Hall via Lexington and 3rd Avenues, while the B51 route traversed from the Fulton Mall in Brooklyn to City Hall (Manhattan) via the Manhattan Bridge. Together these four bus routes provided 25 to 30 buses per hour in each direction during the peak commuter periods. It should be noted that prior to May 2005, all four routes detoured around the security zone, with most using Worth Street and St. James Place for travel to/from City Hall (see Figure 7-2, 2003 map). Due to the closure of Vesey Street, the M9 route no longer crosses through the City Hall area, but reaches



Bus Routes
January 2000



Bus Routes
April 2003



Bus Routes
July 2005

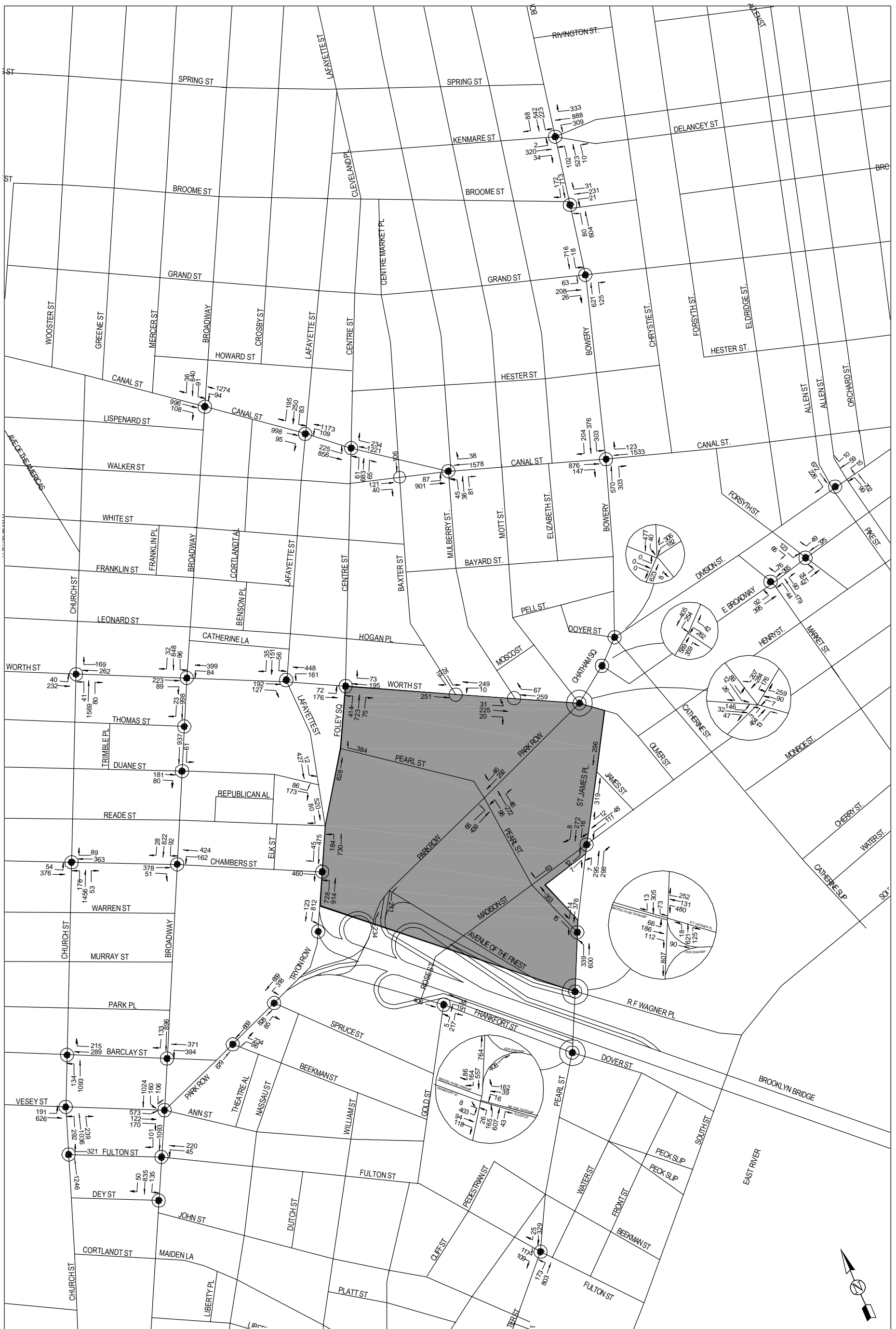
South End Avenue in Battery Park City by looping around the southern tip of Manhattan via Pearl Street/Water Street and Battery Place.

In May 2005, the M103 bus returned to its original route via Park Row (see Figure 7-2, 2005 map) on a trial basis. Buses that traverse the security zone are subject to inspection and there are no stops within the zone itself, but on either end of it. The test was expanded in November 2005 when the M15 and B51 buses also returned to their original routes via Park Row to/from City Hall.

Baseline Traffic Volumes

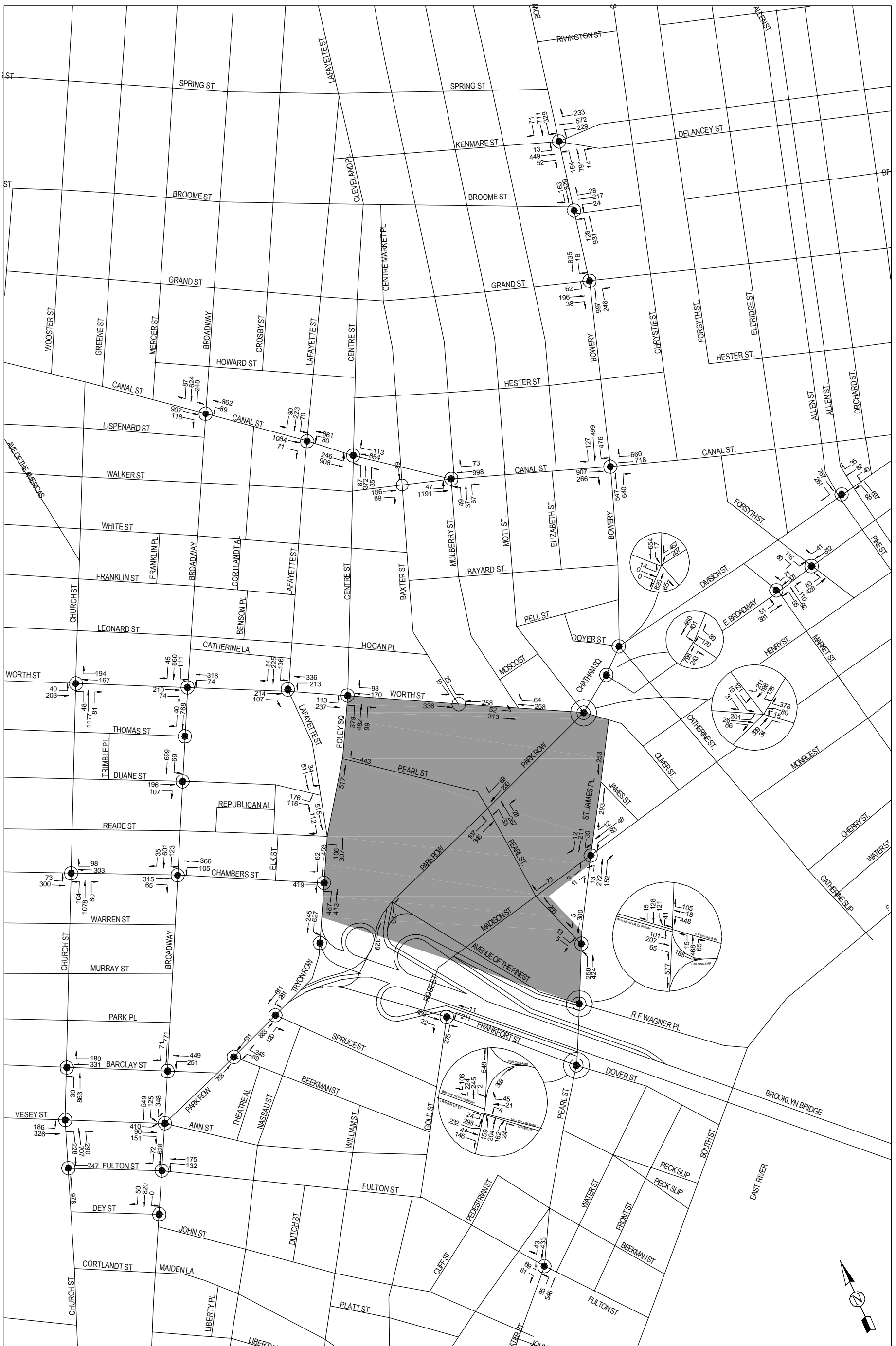
Figure 7-3 shows the estimated baseline traffic volumes in the study area for the weekday AM, midday and PM peak hours. It should be noted that the baseline condition is presented as a reference to show pre-Park Row closure conditions. As noted above, this network represents pre-2001 historical data and does not reflect the loss of millions of square feet of office space and substantial street changes in Lower Manhattan and the study area.

The baseline data shows that traffic volumes entering the overall security zone, mainly from Park Row (north and south), Pearl Street and the Brooklyn Bridge Manhattan bound exit ramp to Park Row amount to 1,259, 1,079, and 1,193 vehicles per hour in the AM, midday and PM peak hours, respectively. These three entering volumes are the principal flows that were subject to diversion upon implementation of the security plan after 9/11. Under the baseline condition, approximately 271, 123, and 201 vehicles per peak hour exited the Brooklyn Bridge ramp to northbound Park Row and other local streets in the AM, midday and PM peak hours, respectively. The baseline data also show other selected traffic patterns of note. Eastbound Vesey Street at Broadway contributed substantial volume to northbound Park Row. There was also a substantial volume on westbound Pearl Street that then proceeded through Foley Square to access Lafayette Street and then to westbound Reade Street. As discussed below, both of the above flows no longer exist (or are feasible) due to actions independent of the security zone and their absence, and other changes in Lower Manhattan make a comparison of baseline traffic volumes with the 2006 No-Action conditions a difficult one.



- Legend**
- Unsignalized Intersections
 - Signalized Intersections

■ Security Zone



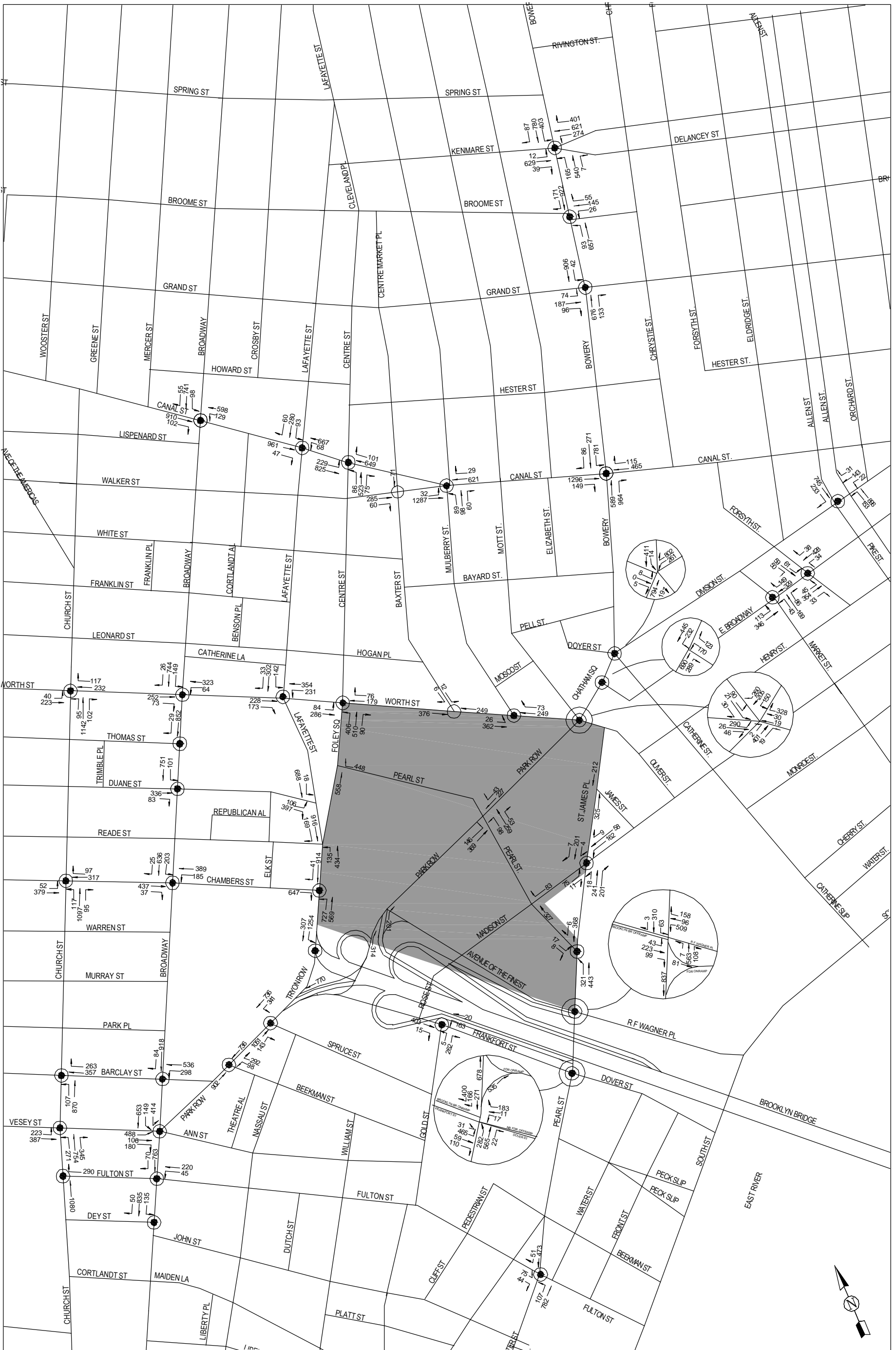
Legend

- Unsignalized Intersections
- Signalized Intersections

■ Security Zone

One Police Plaza Security Plan EIS

Figure 7-3b
2000 Baseline Traffic Volumes - MD Peak Hour



- Legend**
- Unsignalized Intersections
 - Signalized Intersections

■ Security Zone

Intersection Capacity Analyses

Methodology

Capacity analyses for the selected intersections were conducted based on the 2000 Highway Capacity Manual (HCM) methodology, using Version 4.1f of the Highway Capacity Software (HCS). The traffic data required for these analyses include the volumes on each approach, signal timings, peak hour factors (PHF), percentage of heavy vehicles, basic roadway geometries including number and width of lanes on each approach, curbside parking usage and various other physical and operational characteristics. This methodology provides a volume-to-capacity (v/c) ratio, delay and level of service (LOS) for each signalized intersection approach.

The HCM methodology provides a volume-to-capacity (v/c) ratio for each signalized intersection approach, representing the ratio of traffic volumes on an approach to its traffic-carrying capacity. A ratio of less than 0.85 is generally considered to be a non-congested condition in Manhattan; when this value increases, congestion increases. At a value of 1.0, the intersection lane group operates at or over capacity. This situation is associated with severe traffic flow congestion, with stop-and-start conditions and extensive vehicle queuing and delays.

The HCM procedure also expresses quality of flow at signalized intersections in terms of level of service, based on the amount of delay experienced by a driver at an intersection. LOS values range from LOS A, with a minimum delay, to LOS F, representing long delays. The following table shows the LOS/delay relationship for signalized and unsignalized intersections, using the HCM methodology. Levels of service A, B, and C generally represent extremely favorable to fair levels of traffic flow; at LOS D the influence of congestion will become noticeable; LOS E is considered to be the limit of acceptable delay, and LOS F is considered as unacceptable to most drivers. In this traffic study, a signalized lane group operating at LOS E or F is identified as congested.

Table 7-1 shows the LOS/delay relationship for signalized and unsignalized intersections using the HCM methodology.

Table 7-1
Roadway Level of Service Criteria

LOS	Signalized	Unsignalized
	Delay (Seconds)	Delay (Seconds)
A	10.0 or less	10.0 or less
B	10.1 to 20.0	10.1 to 15.0
C	20.1 to 35.0	15.1 to 25.0
D	35.1 to 55.0	25.1 to 35.0
E	55.1 to 80.0	35.1 to 50.0
F	greater than 80.0	greater than 50.0

Source: 2000 Highway Capacity Manual

Based on the thresholds established for signalized intersections in the CEQR Technical Manual, if a No-Action LOS A, B or C deteriorates to unacceptable mid-LOS D, or a LOS E or F in the With-Action condition, then a significant traffic impact has occurred. The CEQR Technical Manual further states that for a No-Action LOS A, B or C, which declines to mid-LOS D or worse under the With-Action condition, mitigation to mid-LOS D is required. For a No-Action mid-LOS D, an increase of five or more seconds of delay in a lane group in the With-Action condition should be considered significant. For No-Action LOS E, an increase in delay of four seconds of delay should be considered significant. For No-Action LOS F, three seconds of delay should be considered significant, however, if a No-Action LOS F condition already has delays in excess of 120 seconds, an increase of 1.0 second in delay should be considered significant, unless the proposed action would generate fewer than five vehicles through that lane group in the peak hour.

To evaluate current operation conditions in the study area, capacity analyses were performed at each analyzed intersection utilizing the procedures described above. Table 7-2 summarizes the results of these analyses at signalized and unsignalized intersections in all peak hours analyzed. The table highlights those intersection movements that operate at LOS E or F or have a high v/c ratio (generally 0.90 and above), and are therefore considered to be congested.

Table 7-2: Baseline LOS at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	Baseline AM Peak Hour			Baseline Midday Peak Hour			Baseline PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS
Bowery Corridor										
1) Bowery (N-S) @ Kenmare Street (E-W) ²	NB-DefL	0.84	72.9	E *	0.98	95.0	F *	0.89	67.9	E *
	NB-TR	0.65	29.9	C	0.91	42.3	D *	0.58	26.6	C
	SB-Def L				0.84	44.6	D			
	SB-TR				1.04	62.6	E *			
	SB-LTR	1.04	63.9	E *				1.05	65.4	E *
	EB-LTR	0.39	19.2	B	0.61	25.9	C	0.69	26.0	C
	WB-L	0.93	57.6	E *	1.04	97.9	F *	0.92	58.1	E *
	WB-T	0.80	28.2	C	0.55	24.0	C	0.56	22.8	C
WB-R	1.02	80.3	F *	0.76	40.0	D	1.04	81.9	F *	
2) Bowery (N-S) @ Broome Street (E-W)	NB-LT	0.73	20.2	C	1.03	55.3	E *	0.88	29.7	C
	SB-TR	0.76	20.5	C	0.88	27.1	C	0.86	25.3	C
	WB-LTR	0.78	41.1	D	0.75	38.9	D	0.70	36.7	D
3) Bowery (N-S) @ Grand Street (E-W)	NB-T	0.48	13.8	B	0.78	21.0	C	0.48	13.8	B
	NB-R	0.48	18.3	B	1.01	80.1	F *	0.54	21.2	C
	SB-TL	0.64	16.8	B	0.71	18.7	B	0.74	19.3	B
	EB-LTR	0.76	38.3	D	0.75	37.6	D	0.94	60.8	E *
(4) Bowery (N-S) @ Canal Street (E-W) ²	NB-T	1.04	85.0	F *	0.85	44.4	D	0.84	42.7	D
	SB-L	0.48	38.2	D	0.56	23.9	C	1.00	62.7	E *
	SB-LTR	1.04	72.2	E *	1.01	60.1	E *	0.71	29.5	C
	EB-T	1.05	56.9	E *	1.00	56.4	E *	1.03	56.3	E *
	EB-R	0.33	15.0	B	0.64	30.7	C	0.15	14.1	B
	WB-LTR	0.59	16.9	B	0.86	36.6	D	0.30	15.4	B
5) Bowery (N-S) @ Division Street (E-W)	NB-T	0.58	20.9	C	0.69	23.2	C	0.66	22.5	C
	NB-R	0.05	14.6	B	0.32	20.0	C	0.09	15.3	B
	SB-LT	0.56	20.7	C	0.64	22.2	C	0.41	18.1	B
	EB-LTR	0.00	32.9	C	0.06	33.8	C	0.07	34.1	C
	WB-T	0.64	40.7	D	0.70	43.4	D	0.81	51.0	D
	WB-R	0.53	21.3	C	0.75	28.7	C	1.03	64.1	E *
6) Chatham Square (N-S) @ East Broadway (E-W)	NB-T	0.40	9.8	A	0.47	10.5	B	0.36	9.3	A
	NB-R	0.99	62.0	E *	0.74	26.2	C	0.81	30.6	C
	SB-L	0.93	52.8	D *	1.01	65.6	E *	0.96	63.7	E *
	SB-T	0.26	8.5	A	0.29	8.7	A	0.25	8.3	A
	WB-L	0.82	49.6	D	0.33	28.1	C	0.40	29.0	C
	WB-R	0.25	28.5	C	0.47	34.7	C	0.59	39.0	D
(7) Park Row (N-S) @ Mott Street (SB) Worth Street (E-W) ² Mott Street	NB-LTR	0.65	29.7	C	0.56	27.9	C	0.53	23.5	C
	SB-L	1.02	100.7	F *	1.03	104.5	F *	0.83	57.5	E *
	SB-TR	1.02	74.2	E *	1.01	77.6	E *	1.05	82.3	F *
	EB-DefL	1.01	105.7	F *	0.63	33.6	C	1.05	97.5	F *
	EB-TR	0.26	23.1	C	0.41	26.7	C	0.25	23.7	C
	WB-LT	0.21	21.7	C	0.22	22.0	C	0.13	21.6	C
	WB-R	0.91	60.8	E *	1.04	86.4	F *	0.97	70.9	E *
	SB-LTR	0.77	63.3	E *	0.22	21.6	C	1.01	116.3	F *

Sources

- 1 Pre-9/11/01 Signal Timing Provided by NYCDOT
- 2 Estimated Signal Timing for Pre-9/11/01 Conditions

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
 L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .
 V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
 LOS - Level of service
 Appr - Approach

Table 7-2: Baseline LOS at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	Baseline AM Peak Hour			Baseline Midday Peak Hour			Baseline PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS
Broadway Corridor										
(8) Broadway (SB) @ Canal Street (E-W)	SB-LTR	0.77	30.2	C	0.71	27.0	C	0.71	28.3	C
	EB-LTR	0.87	33.7	C	0.87	33.8	C	0.75	27.9	C
	WB-LTR	0.93	30.2	C *	0.99	45.9	D *	WB-DefL 0.43	28.1	C
								WB-T 0.42	13.5	B
(9) Broadway (SB) @ Worth Street (E-W) ¹	SB-LTR	0.57	16.9	B	0.49	12.4	B	0.54	16.7	B
	EB-TR	0.62	27.4	C	0.51	24.3	C	0.56	25.0	C
	WB-L	0.48	29.5	C	0.40	25.8	C	0.35	24.5	C
	WB-T	0.71	30.2	C	0.55	25.1	C	0.54	24.5	C
10) Broadway (N-S) @ Thomas Street (E-W)	SB-T	0.79	21.6	C	0.57	11.7	B	0.59	16.1	B
	SB-R	0.10	11.1	B	0.07	7.5	A	0.15	12.2	B
(11) Broadway (SB) @ Duane Street (EB)	SB-LT	0.81	25.1	C	0.59	14.7	B	0.68	20.5	C
	EB-T	0.37	21.6	C	0.35	21.1	C	0.53	24.2	C
	EB-R	0.31	21.9	C	0.39	23.9	C	0.22	19.7	B
(12) Broadway (SB) @ Chambers Street (E-W) ¹	SB-LT	0.79	24.6	C	0.63	15.8	B	0.81	25.7	C
	SB-R	0.13	13.6	B	0.15	14.1	B	0.11	13.4	B
	EB-TR	0.68	28.5	C	0.85	42.3	D	0.70	28.9	C
	WB-LT	0.96	53.0	D *	0.73	30.3	C	1.04	76.6	E *
(13) Broadway (SB) @ Barclay Street (E-W)	SB-T	0.61	23.2	C	0.45	20.6	C	0.60	23.0	C
	SB-R	0.49	26.1	C	0.26	20.3	C	0.32	21.7	C
	WB-L	1.03	101.8	F *	0.72	52.7	D	0.98	91.0	F *
	WB-LT	1.02	78.1	E *	0.82	43.4	D	1.00	69.1	E *
(14) Broadway (SB) @ Vesey/Ann Street (EB)	SB-L	0.45	19.6	B	0.74	24.8	C	0.89	39.6	D
	SB-LT	0.62	20.9	C	0.30	13.9	B	0.38	17.3	B
	EB-TR	0.83	29.6	C	0.63	22.2	C	0.73	24.6	C
(15) Broadway (SB) @ Fulton Street (WB)	SB-TR	0.55	11.2	B	0.33	5.0	A	0.37	9.2	A
	WB-LT	0.40	28.1	C	0.30	26.6	C	0.35	27.3	C
Canal Corridor										
16) Lafayette Street (N-S) @ Canal Street (E-W)	SB-L	0.49	36.7	D	0.40	32.9	C	0.56	39.9	D
	SB-T	0.66	36.7	D	0.56	33.0	C	0.73	40.6	D
	SB-R	1.02	100.9	F *	0.58	42.0	D	0.40	33.9	C
	EB-TR	0.71	21.7	C	0.72	21.8	C	0.59	19.1	B
	WB-LT	0.78	16.4	B	0.54	11.3	B	0.39	9.6	A
17) Centre Street (N-S) @ Canal Street (E-W) ²	NB-LT	1.02	68.5	E *	0.87	49.9	D	0.91	49.0	D *
	NB-R	0.35	29.4	C	0.24	32.0	C	0.40	32.4	C
	EB-DefL	0.86	60.8	E *	0.71	36.2	D	0.62	25.8	C
	EB-T	0.59	13.2	B	1.04	56.7	E *	0.50	10.9	B
	WB-TR	1.02	54.3	D *	1.00	53.8	D *	0.49	19.4	B
18) Mulberry Street (N-S) @ Canal Street (E-W) ²	NB-LTR	0.86	66.6	E *	0.56	31.0	C	0.79	43.5	D
	EB-LT	1.04	56.9	E *	0.91	28.5	C *	0.99	41.8	D *
	WB-TR	1.00	37.4	D *	0.86	25.4	C	0.43	13.1	B

Sources

- 1 Pre-9/11/01 Signal Timing Provided by NYCDOT
- 2 Estimated Signal Timing for Pre-9/11/01 Conditions

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
 L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .
 V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
 LOS - Level of service
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Table 7-2: Baseline LOS at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	Baseline AM Peak Hour			Baseline Midday Peak Hour			Baseline PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS
Centre Corridor										
(19) Centre Street (N-S) @ Chambers Street (EB) ^{1,2}	NB-L	1.04	72.9	E *	0.90	51.4	D *	1.01	62.6	E *
	NB-LT	1.05	66.8	E *	0.79	31.5	C	0.92	45.7	D *
	SB-TR	0.43	19.4	B	0.47	20.8	C	0.86	32.2	C
	EB-R	0.58	27.8	C	0.36	16.2	B	0.56	19.2	B
(20) Centre Street (N-S) @ Tryon Row - Brooklyn Bridge (E-W)	SB-L	0.47	9.6	A	0.65	13.1	B	0.96	35.7	D *
	SB-LT	0.49	10.1	B	0.27	7.6	A	0.70	14.6	B
Church Corridor										
(21) Church Street (NB) @ Fulton Street (WB)	NB-T	0.70	19.5	B	0.53	12.8	B	0.56	16.8	B
	WB-R	0.90	55.9	E *	0.58	30.8	C	0.67	34.2	C
(22) Church Street (NB) @ Vesey Street (EB)	NB-LT	0.75	18.5	B	0.43	9.0	A	0.52	14.0	B
	NB-R	0.50	16.4	B	0.58	14.0	B	0.60	18.4	B
	EB-LT	0.84	35.3	D	0.52	25.5	C	0.60	26.9	C
(23) Church Street (NB) @ Barclay Street (WB)	NB-LT	0.54	11.6	D	0.42	12.7	B	0.43	12.8	D
	WB-TR	0.48	24.6	C	0.41	23.5	C	0.51	25.0	C
(24) Church Street (NB) Chambers Street (E-W) ¹	NB-LTR	0.99	44.5	D *	0.76	21.0	C	0.81	26.1	C
	EB-LT	0.71	26.8	C	0.63	24.3	C	0.64	24.0	C
	WB-TR	0.77	30.1	C	0.58	22.1	C	0.60	22.5	C
(25) Church Street (NB) Worth Street (E-W) ¹	NB-LTR	0.86	22.4	C	0.64	11.5	B	0.63	15.6	B
	EB-LT	0.43	24.6	C	0.35	23.3	C	0.29	22.2	C
	WB-TR	0.98	66.3	E *	0.89	51.5	D	0.72	33.9	C
Division Corridor										
(26) Pike Street (N-S) @ Division Street (E-W)	NB-LT	0.58	14.2	B	0.44	12.1	B	0.71	16.9	B
	SB-T	0.34	10.9	B	0.37	11.1	B	0.35	10.9	B
	SB-R	0.62	20.3	C	0.67	22.3	C	0.58	18.5	B
	WB-LTR	0.27	24.6	C	0.51	30.4	C	0.57	31.7	C
East Broadway Corridor										
(27) Forsyth Street (N-S) @ East Broadway (E-W)	SB-LR	0.68	40.4	D	0.52	32.1	C	0.49	31.2	C
	EB-LT	0.67	16.7	B	0.34	9.7	A	0.31	9.4	A
	WB-TR	0.35	9.9	A	0.26	9.0	A	0.40	10.4	B
(28) Market Street (N-S) @ East Broadway (E-W)	NB-LTR	0.86	48.9	D	0.80	44.1	D	0.47	14.8	B
	EB-LT	0.90	37.8	D *	0.37	12.6	B	0.91	50.8	D *
	WB-TR	0.71	21.4	C	0.54	16.1	B	1.03	79.0	E *
Frankfort Corridor										
(29) Madison/Gold St (N-S) @ Frankfort Street (E-W) ²	NB-T	0.00	25.7	C	0.00	28.0	C	0.00	26.5	C
	EB-TR	1.04	84.2	D	0.98	63.6	E	1.03	79.2	E
	WB-L	0.50	33.7	D	0.75	47.2	D	0.73	48.8	D
	WB-T	0.10	26.8	D	0.03	26.0	C	0.06	26.4	C
(30) Park Row (N-S) @ Beekman Street (E-W)	NB-T	0.37	13.9	B	0.37	13.8	B	0.42	14.3	B
	SB-T	0.34	13.4	B	0.27	12.7	B	0.32	13.2	B
	WB-LR	0.68	30.6	C	0.64	28.9	C	0.78	35.4	D
(31) Park Row (N-S) @ Spruce Street (E-W)	NB-TR	0.43	9.9	A	0.44	9.9	A	0.74	15.3	B
	SB-L	0.57	8.8	A	0.46	5.2	A	0.60	17.9	B
	SB-T	0.43	10.1	B	0.36	9.3	A	0.44	10.1	B

Sources

- 1 Pre-9/11/01 Signal Timing Provided by NYCDOT
- 2 Estimated Signal Timing for Pre-9/11/01 Conditions

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
 L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .
 V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
 LOS - Level of service
 Appr - Approach

Table 7-2: Baseline LOS at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	Baseline AM Peak Hour			Baseline Midday Peak Hour			Baseline PM Peak Hour				
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS		
Pearl Corridor												
(32) Pearl Street (N-S) @ Fulton Street (E-W)	NB-LT	1.01	54.1	D	*	0.74	23.3	C	0.94	38.8	D	*
	SB-T	0.49	17.4	B		0.59	19.2	B	0.64	20.5	C	
	SB-R	0.08	12.3	B		0.13	12.8	B	0.08	11.9	B	
	EB-LR	1.01	94.7	F	*	0.66	43.3	D	0.47	33.6	C	
(33) Pearl Street (N-S) @ Frankfort/Dover St. (E-W) ²	NB-LTR	1.03	59.6	E	*	0.59	16.3	B	NB-DefL 0.69	24.9	C	
	SB-LTR	0.61	17.0	B		0.50	14.3	B	NB-TR 0.68	20.1	C	
	EB-L	1.00	79.7	E	*	0.99	69.5	E	0.71	19.6	B	
	EB-LTR	1.00	77.0	E	*	0.99	75.7	E	1.02	81.5	F	*
	WB-LTR	0.52	26.6	C		0.12	20.6	C	1.02	83.3	F	*
(34) Pearl Street (N-S) @ Avenue of the Finest (E-W) ²	NB-LTR	0.89	36.6	D		0.62	24.8	C	0.67	24.3	C	
	SB-LTR	0.57	23.0	C		0.39	20.5	C	0.46	20.5	C	
	EB-LTR	0.95	67.3	E	*	1.00	78.9	E	0.82	48.0	D	
	WB-L	0.79	44.4	D		0.84	49.4	D	0.86	49.7	D	
	WB-TR	0.46	37.5	D		0.06	30.4	C	0.31	33.9	C	
	WB-R	0.41	17.7	B		0.16	13.2	B	0.57	41.3	D	
(35) St. James (N-S) @ Pearl St. (E-W) ¹	NB-DefL	0.70	20.9	C		NB-LT	0.62	14.6	B	0.86	35.9	D
	NB-T	0.94	39.0	D	*					0.55	13.7	B
	SB-TR	0.27	9.5	A						0.23	9.1	A
	EB-LR	0.06	23.6	C						0.06	23.4	C
St. James Corridor												
(36) St. James (N-S) @ Madison St. (E-W) ¹	NB-LTR	0.86	35.3	D		0.52	20.3	C	0.58	21.6	C	
	SB-LTR	0.51	21.1	C		0.46	20.0	B	0.33	17.6	B	
	EB-LTR	0.04	14.3	B		0.05	14.4	B	0.09	14.9	B	
	WB-LTR	0.17	15.4	B		0.15	15.2	B	0.26	16.4	B	
Worth Street Corridor												
(37) Centre Street (NB) @ Worth Street (E-W) ^{1,2}	NB-L	1.04	69.3	E	*	1.01	63.3	E	1.04	73.1	E	*
	NB-TR	0.54	9.6	A		0.42	9.7	A	0.43	10.2	B	
	EB-LT	0.80	51.3	D		0.89	55.6	E	0.80	43.6	D	
	WB-TR	0.89	63.3	E	*	0.82	50.8	D	0.67	38.2	D	
(38) Lafayette Street (SB) @ Worth Street (E-W) ¹	SB-LTR	0.19	15.5	B		0.33	16.9	B	0.36	17.3	B	
	EB-TR	0.34	17.2	B		0.31	16.9	B	0.40	18.0	B	
	WB-L	0.68	33.7	C		0.89	57.0	E	1.00	81.5	F	*
	WB-T	0.79	31.4	C		0.58	22.9	C	0.58	22.6	C	

Table 7-2: Baseline LOS at Unsignalized Intersections

UNSIGNALIZED INTERSECTION	Lane Group	Baseline AM Peak Hour			Baseline Midday Peak Hour			Baseline PM Peak Hour					
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS			
Baxter Corridor													
1) Baxter Street (N-S) @ Walker Street (E-W)	EB-TR	0.51	24.8	C		0.82	44.5	E	*	0.98	69.1	F	*
(2) Baxter Street (NB) @ Worth Street (E-W)	SB-LR	0.08	11.9	B		0.08	12.6	B		0.0	12.2	B	

Sources

- 1 Pre-9/11/01 Signal Timing Provided by NYCDOT
- 2 Estimated Signal Timing for Pre-9/11/01 Conditions

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .
V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
LOS - Level of service
Appr - Approach

Signalized and Unsignalized Intersections

Along Bowery, the intersection at Kenmare Street has at least four congested intersections in all three peak periods, while there is one congested approach during the midday peak period at Broome Street and one congested approach at Grand Street during the midday and PM peak hours. Additionally, at least one approach at Canal, East Broadway, and Worth Street are congested in each peak hour. Also, at the intersection of Bowery and Division Street, one approach is congested in the PM peak hour.

At the intersection of Broadway and Canal Street, one congested movement was present in the AM and midday peak hours while at Broadway and Chambers Street and Broadway and Barclay Street, there was at least one congested approach in both AM and PM peak periods. Along Canal Street, there was at least one congested approach in all three peak periods at Centre Street and Mulberry Street while there was one congested approach at Lafayette Street during the AM peak period.

At Centre Street and Chambers Street at least one approach was congested in each peak hour. Along the Church Street corridor, at the western edge of the study area, one congested approach was observed during the AM peak period at Fulton Street, Chambers Street, and Worth Street. At Market Street and East Broadway, one approach was congested during the AM peak hour while two approaches were congested during the PM peak period.

On the southeastern edge of the study area, the intersection of Pearl Street and Fulton Street experienced two congested approaches during the AM peak period and one during the PM peak period. At Pearl Street and Frankfort Street at least two approaches were congested during each peak hour while one approach was congested during the AM and midday peak periods at Pearl Street and Avenue of the Finest. At Pearl Street and St. James Street, one approach was congested during the AM Peak hour.

At Worth Street and Centre Street, all three peak periods have at least one congested approach while at Worth Street and Lafayette Street, the midday and PM peak periods have one congested approach. At the unsignalized intersection of Baxter Street and Walker Street, one approach was congested in the midday and PM peak periods.

Parking

The information presented here was assembled from various sources including the 1993 *Foley Square Final Environmental Impact Statement (FEIS)*, the 2004 *World Trade Center Memorial and Redevelopment Plan Generic Impact Statement (GEIS)*, the 2001 *Public Safety Answer Center Environmental Assessment Statement (EAS)*, and the 2000 Department of City Planning's *Parking Guide*.

Off-Street Parking

Prior to September 11, 2001, there were 41 identified off-street parking facilities within a quarter-mile radius of the security zone area. This public parking facility inventory is provided in Table 7-3. Figure 7-4 depicts the location of each of the identified public parking facilities.

Parking facility occupancy data was available for midday (between 11:30 AM and 1:30 PM) on a typical weekday, with capacities ranging from 9- to 400-vehicle range.

As shown in Table 7-3, pre-September 11, 2001 parking utilization data was not available for all garages within the study area. An average of the known pre-September 11, 2001 utilization rates was applied to the total capacity. As such, as shown in Table 7-3, the public parking facilities surveyed contained over 4,711 spaces, with an estimated occupancy level of about 88 percent at midday. This means that there were 566 unoccupied spaces available within off-street parking facilities under baseline conditions.

As shown in Table 7-3, the municipal parking garage (No. 41) located at 109 Park Row had a capacity of 400 spaces with a low midday utilization of 68% with 129 spaces available to the public during this time.

On-Street Parking

Data regarding on-street parking regulations was also obtained from the studies mentioned above. Legal on-street parking in this area was very limited. Overall, within the parking study area, there was a relatively limited number of legal parking spaces available on-street for use by motorists. The limited number of spaces is due to the minimal width of the east/west cross streets and truck delivery activities which occur throughout the day. In addition, as this area has a high concentration of government facilities, the limited number of legal parking spaces are also due to the large number of curbside parking spaces reserved for government officials.

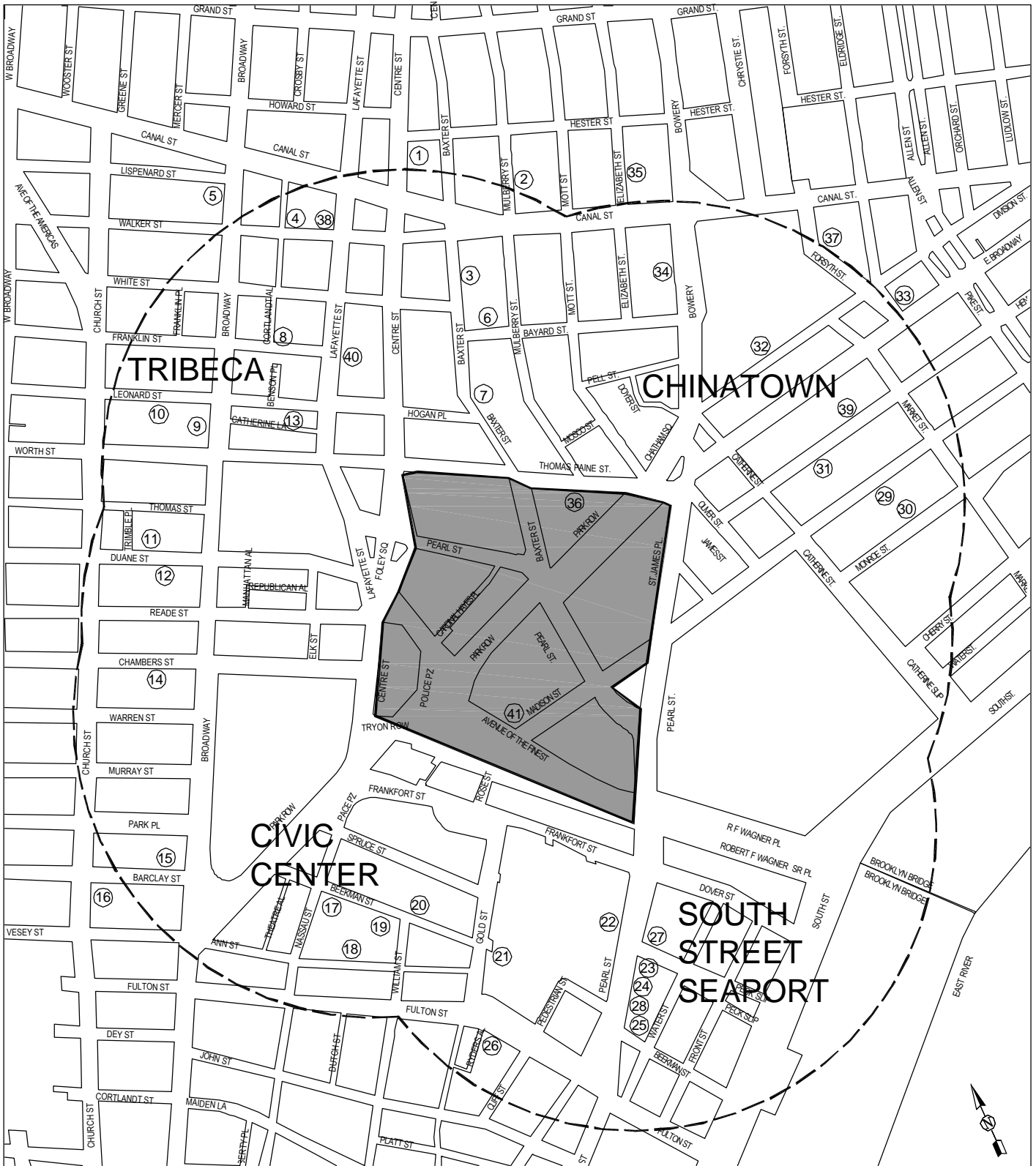
Within the study area, no parking except for authorized vehicles was allowed along Broadway, Church Street and Worth Street. No parking was allowed throughout the day on both the north and south side of Chambers Street. Parking on Duane, Reade, Lafayette and Centre Streets, and Pearl Street between Centre Street and Cardinal Hayes Place was restricted to authorized vehicles only.

Illegal curbside parking and standing were prevalent throughout the study area. Illegal parking and standing along the study area roadways for either a short- or long-term period impeded traffic flow and reduced available capacity. However, specific quantitative pre-September 11, 2001 on-street parking capacity and utilization data are not available for the study area.

Table 7-3: Pre-9/11/01 Off-Street Parking Facilities within 1/4-mile of the Security Zone and Estimated Weekday Utilization

No.	Operator	Address	Capacity	MD (12-1) Util.	Spaces Avail.
1	Edison NY Parking LLC	174 Centre Street	93	n/a	n/a
2	Kennee Parking Corp	114-116 Mulberry Street	42	n/a	n/a
3	Chung Pak Parking Corp	95-97 1/2 Baxter Street	28	n/a	n/a
4	Chinatown Parking Corp	88 Walker Street	35	n/a	n/a
5	Champion Tribeca LLC	411-413 Broadway	60	n/a	n/a
6	Margaret E Pescatore	98-100 Bayard Street	12	n/a	n/a
7	Champion Mulberry LLC	62-64 Mulberry Street	191	n/a	n/a
8	SSL Franklin St Parking Lot Inc	48-52 Franklin Street	40	n/a	n/a
9	(name unknown)	341 Broadway	150	93%	10
10	(name unknown)	84 Leonard Street	54	93%	4
11	Katz Parking Systems	130 Duane Street	40	63%	15
12	Kids Parking Corp	105 Duane Street	72	100%	0
13	Cobalt Car Park LLC	108 Leonard Street	150	93%	10
14	RAEM	93 Chambers Street	48	n/a	n/a
15	BGB Parking System	6 Barclay Street	86	100%	0
16	Central Parking System of NY	47 Church Street	65	n/a	n/a
17	25-27 Beekman Street Associates	25-27 Beekman Street	149	100%	0
18	John Street Parking	57-61 Ann Street	276	n/a	n/a
19	Central Parking Systems Inc	169 William Street	50	100%	0
20	NYU Downtown Hospital	170 Williams Street	144	100%	0
21	Ropetmar Garage Inc	80 Gold Street	351	100%	0
22	Ropetmar Garage Inc	299 Pearl Street	310	95%	15
23	Allright Parking Management Corp	10-12 Peck Slip	105	77%	24
24	Edison Lafayette Corp	300-302 Pearl Street	25	76%	6
25	Edison Lafayette Corp	288-294 Pearl Street	36	78%	8
26	Downtown Parking Corp	56 Fulton Street	280	n/a	n/a
27	320 Pearl Street Realty LLC	322 Pearl Street	31	81%	6
28	Edison Lafayette Corp	228-232 Water Street	120	77%	28
29	(name unknown)	88 Madison Street	50	n/a	n/a
30	(name unknown)	31 Monroe Street	110	n/a	n/a
31	(name unknown)	38 Henry Street	150	n/a	n/a
32	(name unknown)	2 Division Street	300	n/a	n/a
33	(name unknown)	79 Division Street	9	n/a	n/a
34	(name unknown)	38 Bowery	140	n/a	n/a
35	(name unknown)	44 Elizabeth Street	150	n/a	n/a
36	Chatham Parking Systems Inc	180 Park Row	130	85%	20
37	(name unknown)	26 Forsyth Street	42	n/a	n/a
38	(name unknown)	58 Walker Street	40	n/a	n/a
39	(name unknown)	49-59 Henry Street	102	n/a	n/a
40	Municipal Lot	Leonard St & Lafayette St	45	100%	0
41	Department of Transportation	109 Park Row	400	68%	129
Total			4,711	88%	566

Sources: World Trade Center Memorial and Redevelopment Plan FEIS (2004), Public Safety Answering Center II EAS (2001), Parking Guide to New York City (March 2000), 48-52 Franklin Street EAS (2000)



Legend

--- 1 / 4 Mile Boundary

① Pre-9 / 11 Off-Street Public Parking Facility

■ Security Zone

C. 2006 NO-ACTION CONDITION

Vehicular Traffic

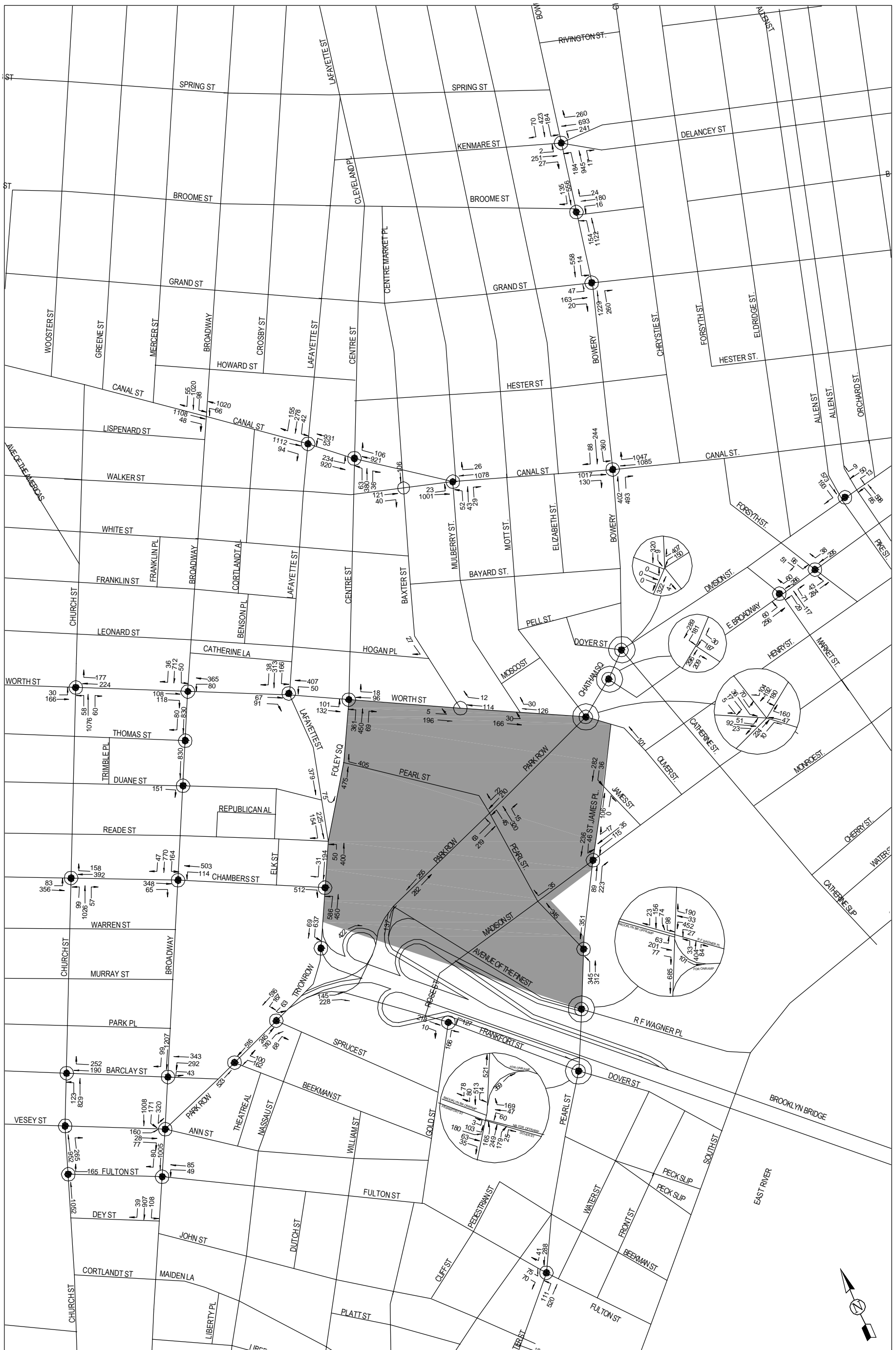
The initial traffic capacity analysis using the *2000 Highway Capacity Manual (HCM)* was performed on the 2006 No-Action condition. Under this condition, the security zone installed by NYPD after 9/11 would not be in place and traffic flow patterns, including the four bus routes discussed above, would be maintained. However, while most of the patterns would be maintained, as discussed above, the actual traffic volumes would be different (sometimes measurably) from those documented in the baseline conditions. Figure 7-5 provides the estimated 2006 No-Action traffic volumes in the study area. These traffic volumes reflect physical and land use changes that have occurred independent of the action. Generally, when compared to the baseline conditions, traffic in much of the network has declined due to lower demand and/or shifted demand due to street configuration changes, the absence of portions of Vesey Street, the security plans for 26 Federal Plaza and for the NYSE, and other roadway changes. There have also been traffic demand changes due to loss of office space, conversion of office to residential space, declining employment in certain sections of Chinatown and other socioeconomic variations. Under 2006 No-Action conditions, however, all bus routes would be maintained on Park Row as in the baseline condition, except for the M9 which is assumed to remain on its present “diverted” route to/from Battery Park City.

Signalized and Unsignalized Intersections

Table 7-4 shows the results of the 2006 No-Action capacity analysis at the 38 signalized and 2 unsignalized intersections studied for the weekday AM, midday and PM peak hours. The table shows the v/c ratio, delay and level of service (LOS) for each intersection movement in each analyzed peak hour. It should be noted that signal timing plans currently in effect (2006 Action conditions) have been used for the 2006 No-Action condition for all intersections.

Table 7-4 shows that in the 2006 No-Action condition, 15 signalized intersections would experience congestion on one or more approaches in the AM peak hour, 8 in the midday, and 13 in the PM peak hour. In the 2006 No-Action condition, there would be several signalized intersections with one or more movements with a v/c ratio of 0.90 or greater. In the AM peak hour, there would be 14 such movements, in the midday peak hour there would be 7 such movements, and in the PM peak hour there would be 13 such movements.

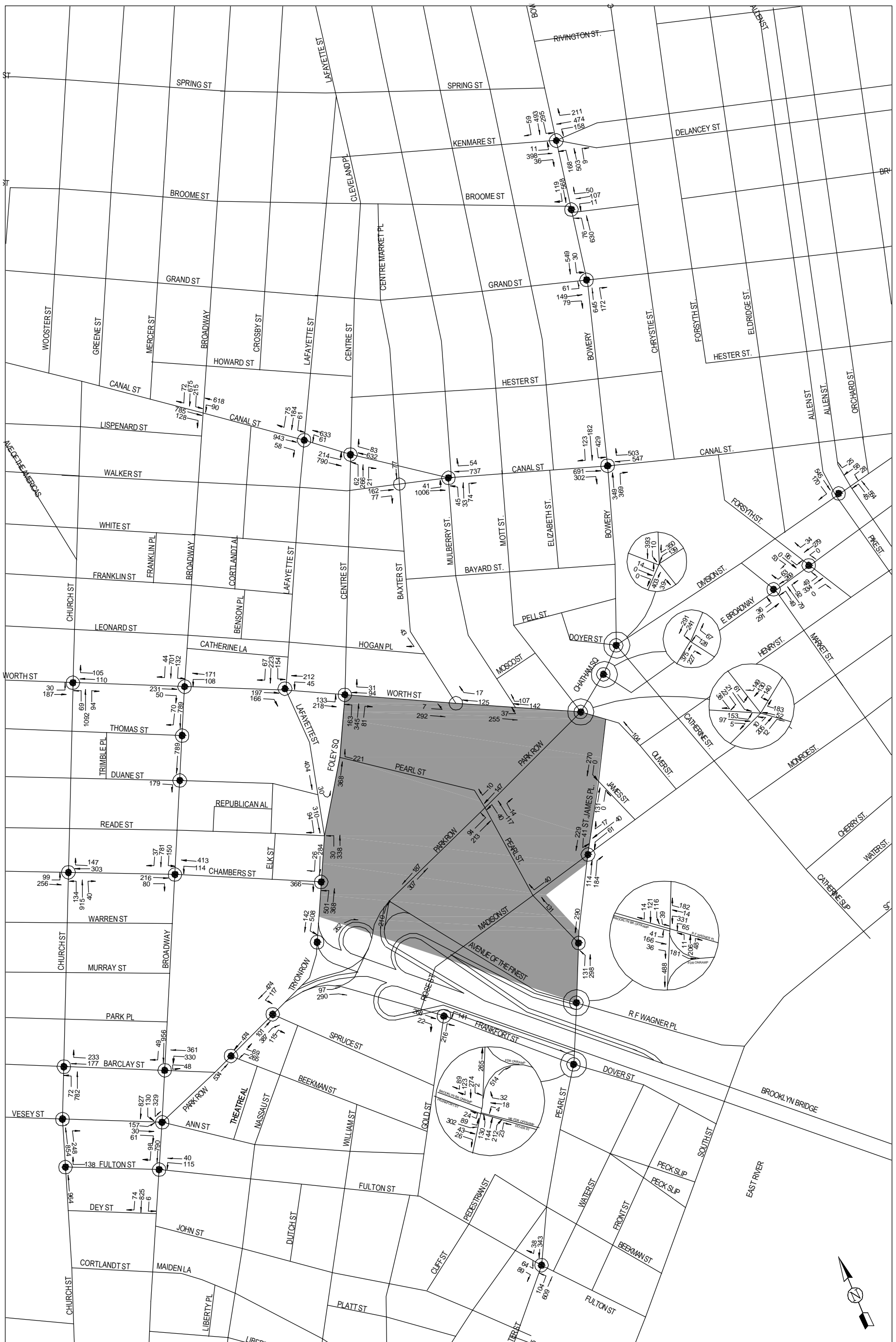
As shown in Table 7-4, of the two unsignalized intersections analyzed, the intersection of Baxter and Walker Streets was found to experience congestion in the PM peak hour in the 2006 No-Action conditions.



Legend

- Analyzed Intersections (Unsignalized)
- Analyzed Intersections (Signalized)

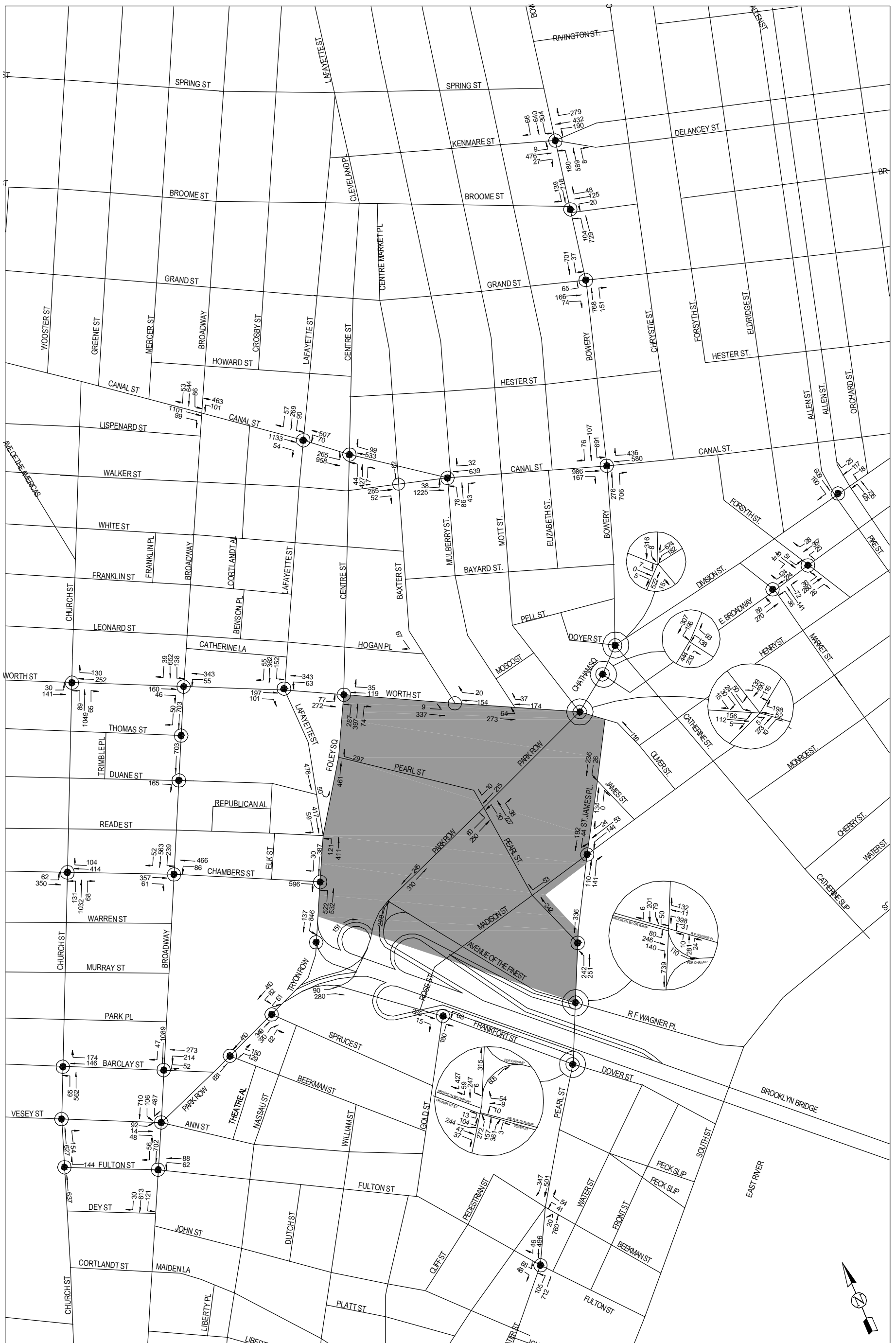
■ Security Zone



Legend

- Analyzed Intersections (Unsignalized)
- Analyzed Intersections (Signalized)

■ Security Zone



Legend

- Analyzed Intersections (Unsignalized)
- Analyzed Intersections (Signalized)

■ Security Zone

Along the Bowery corridor, the intersection at Kenmare Street has congested movements in each peak hour, while at Canal Street and Broome Street, congested movements are noted in the AM and PM peak hours. The Grand Street and Division Street intersections have congestion in the AM and PM peak hours, respectively, while at Chatham Square, selected movements are congested in each peak hour analyzed.

Along the Broadway corridor, congestion is found at Canal during the AM peak hour, at Chambers Street in the AM and PM peak hours, while at Barclay Street congested movements are in AM and midday peak hours. In addition, congestion occurs at Vesey Street during the AM, midday, and PM peak hours

In addition to the above noted Canal Street intersection, the intersection of Canal Street with Lafayette Street exhibits one congested movement in the AM peak hour, during the midday period at the intersection with Centre Street, and during the PM peak hour at Mulberry Street. At the intersection of Centre Street and Chambers Street, congestion occurs during the MD and PM peak hours. Along Church Street, the intersections at Chambers Street and Worth Street have congested movements in the AM peak hour.

In the eastern portion of the study area, the East Broadway/Market Street intersection has one congested movement in the PM peak hour. Along Pearl Street, the intersection with Frankfort Street exhibits at least one congested movement in each peak hour, while at Robert F. Wagner Sr. Place, eastbound congestion is found in the AM and PM peak hours as noted in Table 7-4. Table 7-4 also shows that under No-Action conditions, the Worth Street/Centre Street intersection has northbound congestion in all peak hours, while one unsignalized intersection at Baxter Street/Walker Street exhibits PM congestion in the eastbound movement.

Parking

Off-Street Parking

The 400-space municipal parking lot that was located adjacent to Police Plaza was closed to the public in June 2001 and would continue to be closed to the public in the 2006 No-Action condition. As discussed in Chapter 1, "Project Description," in early 2001, an EAS was prepared for the *Public Safety Answering Center II* that was to be located in an existing building at 109-113 Park Row. This EAS analyzed the closure of the 400-space municipal garage to the public, and a negative declaration was issued June 12, 2001. The garage was then officially closed to the public on June 30, 2001. However, following the events of September 11, 2001, the above-mentioned project was cancelled and the building remains vacant. The municipal garage was reconstructed and re-opened to NYPD authorized vehicles in April of 2004. Table 7-5 shows the

Table 7-4: 2006 No-Action Traffic Conditions at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour				Lane Group	2006 No-Action Midday Peak Hour				Lane Group	2006 No-Action PM Peak Hour			
		V/C Ratio	Delay (sec/veh)	LOS	*		V/C Ratio	Delay (sec/veh)	LOS	*		V/C Ratio	Delay (sec/veh)	LOS	*
Bowery Corridor															
1) Bowery (N-S) @ Kenmare Street (E-W)	NB-DefL					NB-DefL	0.91	72.3	E	*	NB-DefL	1.03	102.4	F	*
	NB-TR					NB-TR	0.58	26.7	C		NB-TR	0.64	27.8	C	
	NB-LTR	0.94	42.9	D	*	NB-LTR					NB-LTR				
	SB-Def L	0.72	47.6	D		SB-Def L	0.86	48.7	D		SB-Def L	0.99	73.4	E	*
	SB-TR	0.89	38.4	D		SB-TR	0.95	47.5	D	*	SB-TR	0.55	17.6	B	
	EB-LTR	0.33	19.6	B		EB-LTR	0.49	22.0	C		EB-LTR	0.52	22.2	C	
	WB-L	1.03	91.5	F	*	WB-L	0.78	47.5	D		WB-L	0.89	60.9	E	*
	WB-TR	0.66	25.0	C		WB-TR	0.43	20.8	C		WB-TR	0.39	20.2	C	
WB-R	1.00	81.1	F	*	WB-R	0.64	30.6	C		WB-R	0.84	45.1	D		
2) Bowery (N-S) @ Broome Street (E-W)	NB-LT	0.97	38.6	D	*	NB-LT	0.74	20.6	C		NB-LT	0.90	31.5	C	*
	SB-TR	0.60	16.0	B		SB-TR	0.61	16.4	B		SB-TR	0.68	17.7	B	
	WB-LTR	0.61	31.4	C		WB-LTR	0.51	29.0	C		WB-LTR	0.60	31.9	C	
3) Bowery (N-S) @ Grand Street (E-W)	NB-T	0.95	33.9	C	*	NB-T	0.51	14.3	B		NB-T	0.55	14.8	B	
	NB-R	0.99	72.4	E	*	NB-R	0.77	38.2	D		NB-R	0.62	24.6	C	
	SB-TL	0.51	14.4	B		SB-TL	0.50	14.2	B		SB-TL	0.58	15.5	B	
	EB-LTR	0.58	30.0	C		EB-LTR	0.79	41.9	D		EB-LTR	0.79	41.3	D	
4) Bowery (N-S) @ Canal Street (E-W) +	NB-T	0.62	33.9	C		NB-T	0.54	32.0	C		NB-T	0.39	29.3	C	
	SB-DefL	0.96	67.3	E	*	SB-DefL	0.73	35.7	D		SB-DefL	1.00	64.3	E	*
	SB-TR	0.71	29.5	C		SB-TR	0.70	30.0	C		SB-TR	0.40	20.7	C	
	EB-T	1.02	60.8	E	*	EB-T	0.70	26.2	C		EB-T	0.91	38.1	D	*
	EB-R	0.47	25.3	C		EB-R	0.67	29.3	C		EB-R	0.20	18.1	B	
	WB-T	0.94	41.2	D	*	WB-T	0.60	24.0	C		WB-T	0.44	20.7	C	
5) Bowery (N-S) @ Division Street (E-W)	NB-T	0.30	16.7	B		NB-T	0.34	17.1	B		NB-T	0.44	18.3	B	
	NB-R	0.02	14.2	B		NB-R	0.19	17.2	B		NB-R	0.07	15.0	B	
	SB-LT	0.32	17.0	B		SB-LT	0.38	17.6	B		SB-LT	0.31	16.8	B	
	EB-LTR	0.00	32.9	C		EB-LTR	0.06	33.8	C		EB-LTR	0.07	34.0	C	
	WB-T	0.53	36.1	D		WB-T	0.46	33.6	C		WB-T	0.57	36.6	D	
	WB-R	0.70	26.6	C		WB-R	0.57	22.4	C		WB-R	1.02	63.5	E	*
6) Chatham Square (N-S) @ East Broadway (E-W)	NB-T	0.20	8.1	A		NB-T	0.22	8.2	A		NB-T	0.23	8.2	A	
	NB-R	0.73	26.4	C		NB-R	0.69	22.9	C		NB-R	0.65	19.7	B	
	SB-L	0.69	24.6	C		SB-L	0.88	45.3	D		SB-L	0.66	21.7	C	
	SB-T	0.19	7.9	A		SB-T	0.18	7.9	A		SB-T	0.17	7.8	A	
	WB-L	0.58	35.1	D		WB-L	0.34	28.2	C		WB-L	0.32	27.6	C	
	WB-R	0.18	26.8	C		WB-R	0.35	30.8	C		WB-R	0.44	33.0	C	
7) Chatham Square (N-S) @ Worth Street (E-W)	NB-TR	0.28	21.9	C		NB-TR	0.37	24.4	C		NB-TR	0.41	24.9	C	
	SB-L	1.00	95.1	F	*	SB-L	0.83	62.9	E	*	SB-L	0.75	53.9	D	
	SB-TR	0.93	63.8	E	*	SB-TR	0.98	77.1	E	*	SB-TR	0.96	68.8	E	*
	EB-DefL					EB-DefL	0.46	27.4	C		EB-DefL	0.55	31.1	C	
	EB-LTR	0.29	25.1	C		EB-LTR					EB-LTR				
	EB-TR					EB-TR	0.23	22.1	C		EB-TR	0.26	22.6	C	
	WB-LT	0.10	22.7	C		WB-LT	0.11	20.5	C		WB-LT	0.10	20.5	C	
	WB-R	0.60	35.8	D		WB-R	0.76	45.9	D		WB-R	0.66	35.7	D	
	WB-LTR	0.71	58.3	E	*	WB-LTR	0.87	78.6	E	*	WB-LTR	0.65	51.8	D	
	Mott Street (E-W)														

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound

L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .

V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle

LOS - Level of service

* -Denotes Congested Location in the 2006 No-Action Condition

Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).

+ -Westbound right movement at Canal Street and Bowery is controlled by a separate signal as it is a channelized right turn

Table 7-4: 2006 No-Action Traffic Conditions at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			Lane Group	2006 No-Action Midday Peak Hour			Lane Group	2006 No-Action PM Peak Hour				
		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS		
Broadway Corridor														
8) Broadway (N-S) @ Canal Street (E-W)	SB-LTR	0.94	41.8	D	*	SB-LTR	0.81	30.4	C	SB-LTR	0.63	26.3	C	
	EB-TR	0.88	34.4	C		EB-TR	0.72	27.4	C	EB-TR	0.88	33.9	C	
	WB-DefL					WB-DefL				WB-DefL	0.35	29.2	C	
	WB-LT WB-T	0.71 18.5	B		WB-LT WB-T	0.71 20.1	C		WB-LT WB-T	0.32 12.4	B			
9) Broadway (N-S) @ Worth Street (E-W)	SB-LTR	0.46	15.4	B		SB-LTR	0.53	12.8	B	SB-LTR	0.50	16.0	B	
	EB-TR	0.52	25.2	C		EB-TR	0.49	23.5	C	EB-TR	0.35	21.0	C	
	WB-L	0.40	25.3	C		WB-L	0.58	33.7	C	WB-L	0.25	21.1	C	
	WB-T	0.65	27.9	C		WB-T	0.30	20.3	C	WB-T	0.57	25.3	C	
10) Broadway (N-S) @ Thomas Street (E-W)	SB-T	0.66	17.6	B		SB-T	0.59	11.9	B	SB-T	0.49	14.4	B	
	SB-R	0.34	15.7	B		SB-R	0.12	7.9	A	SB-R	0.26	14.3	B	
11) Broadway (N-S) @ Duane Street (E-W)	SB-T	0.66	19.4	B		SB-T	0.59	14.1	B	SB-T	0.55	17.2	B	
	EB-R	0.45	24.5	C		EB-R	0.51	26.0	C	EB-R	0.36	21.7	C	
12) Broadway (N-S) @ Chambers Street (E-W)	SB-LT	1.01	59.0	E	*	SB-LT	0.81	21.0	C	SB-LT	0.80	26.0	C	
	SB-R	0.32	25.2	C		SB-R	0.17	14.3	B	SB-R	0.24	15.7	B	
	EB-TR	0.69	29.7	C		EB-TR	0.68	30.1	C	EB-TR	0.63	25.8	C	
	WB-LT	1.04	74.0	E	*	WB-LT	0.80	33.3	C	WB-LT	0.98	58.9	E	
13) Broadway (N-S) @ Barclay Street (E-W)	SB-T	0.82	29.1	C		SB-T	0.56	22.2	C	SB-T	0.71	25.4	C	
	SB-R	0.37	22.6	C		SB-R	0.18	18.8	B	SB-R	0.18	18.9	B	
	WB-L	0.99	99.9	F	*	WB-L	1.00	97.2	F	*	WB-L	0.72	53.2	D
	WB-LT	0.86	48.3	D		WB-LT	0.81	43.1	D		WB-LT	0.58	34.4	C
14) Broadway (N-S) @ Vesey Street (E-W)	SB-L	0.82	33.3	C		SB-L	0.72	23.8	C	SB-L	0.94	46.5	D	
	SB-T	0.61	20.7	C		SB-T	0.45	15.5	B	SB-T	0.42	17.7	B	
	EB-TR	1.00	93.6	F	*	EB-TR	1.02	102.8	F	*	EB-TR	0.65	50.5	D
15) Broadway (N-S) @ Fulton Street (E-W)	SB-TR	0.50	10.6	B		SB-TR	0.41	5.6	A	SB-TR	0.33	8.9	A	
	WB-LT	0.22	25.9	C		WB-LT	0.33	27.5	C	WB-LT	0.20	25.5	C	
Canal Corridor														
16) Lafayette Street (N-S) @ Canal Street (E-W)	SB-L	0.25	28.6	C		SB-L	0.35	31.3	C	SB-L	0.54	39.0	D	
	SB-T	0.73	40.4	D		SB-T	0.46	30.5	C	SB-T	0.70	39.0	D	
	SB-R	1.04	114.2	F	*	SB-R	0.48	36.8	D	SB-R	0.38	33.2	C	
	EB-TR	0.77	23.6	C		EB-TR	0.62	19.7	B	EB-TR	0.70	21.2	C	
	WB-LT	0.54	11.3	B		WB-LT	0.38	9.4	A	WB-LT	0.32	8.9	A	
17) Centre Street (N-S) @ Canal Street (E-W)	NB-LT	0.75	37.5	D		NB-LT	0.52	30.3	C	NB-LT	0.68	34.1	C	
	NB-R	0.21	27.7	C		NB-R	0.12	25.5	C	NB-R	0.09	25.0	C	
	EB-DefL	0.78	42.8	D		EB-DL				EB-DL	0.68	26.8	C	
	EB-T	0.61	12.5	B		EB-T	0.99	43.5	D	*	EB-T	0.59	12.1	B
	WB-TR	0.70	23.4	C		WB-TR	0.74	26.0	C		WB-TR	0.42	18.5	B
18) Mulberry Street (N-S) @ Canal Street (E-W)	NB-LTR	0.44	27.3	C		NB-LTR	0.49	28.5	C	NB-LTR	0.64	34.1	C	
	EB-LT	0.79	21.2	C		EB-LT	0.77	20.1	C	EB-LT	0.96	36.1	D	
	WB-TR	0.79	20.9	C		WB-TR	0.64	16.7	B	WB-TR	0.45	13.3	B	

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
 L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .
 V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
 LOS - Level of service
 * -Denotes Congested Location in the 2006 No-Action Condition
 Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).

Table 7-4: 2006 No-Action Traffic Conditions at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			Lane Group	2006 No-Action Midday Peak Hour			Lane Group	2006 No-Action PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS
Centre Corridor												
19) Centre Street (N-S) @ Chambers Street (E-W)	NB-L	0.88	33.7	C	NB-L	0.91	46.9	D *	NB-L	0.93	50.2	D *
	NB-LT	0.29	10.1	B	NB-LT	0.38	8.8	A	NB-LT	0.49	10.0	A
	SB-TR	0.28	25.5	C	SB-TR	0.40	27.2	C	SB-TR	0.54	29.6	C
	EB-RT	0.75	36.1	D	EB-RT	0.51	29.1	C	EB-RT	0.83	40.4	D
20) Centre Street (N-S) @ Tryon Row - Brooklyn Bridge (E-W)	SB-L	0.62	12.0	B	SB-L	0.53	10.6	B	SB-L	0.87	22.8	C
	SB-LT	0.08	6.1	A	SB-LT	0.16	6.7	A	SB-LT	0.15	6.6	A
Church Corridor												
21) Church Street (N-S) @ Fulton Street (E-W)	NB-T	0.59	17.3	B	NB-T	0.52	12.7	B	NB-T	0.33	13.9	B
	WB-R	0.46	28.4	C	WB-R	0.32	25.0	C	WB-R	0.34	25.2	C
22) Church Street (N-S) @ Vesey Street (E-W)	NB-T	0.46	13.1	B	NB-T	0.39	8.7	A	NB-T	0.28	11.3	B
	NB-R	0.87	43.6	D	NB-R	0.77	26.5	C	NB-R	0.36	13.9	B
23) Church Street (N-S) @ Barclay Street (E-W)	NB-LT	0.54	9.9	A	NB-LT	0.42	12.8	B	NB-LT	0.29	11.5	B
	WB-TR	0.34	24.5	C	WB-TR	0.36	23.0	C	WB-TR	0.28	22.0	C
24) Church Street (N-S) @ Chambers Street (E-W)	NB-LTR	0.77	24.8	C	NB-LTR	0.67	18.9	B	NB-LTR	0.76	24.3	C
	EB-LT	0.99	63.1	E *	EB-LT	0.76	31.5	C	EB-LT	0.73	28.4	C
	WB-TR	0.99	58.5	E *	WB-TR	0.68	25.1	C	WB-TR	0.73	27.0	C
25) Church Street (N-S) @ Worth Street (E-W)	NB-LTR	0.62	15.5	B	NB-LTR	0.63	11.3	B	NB-LTR	0.56	14.5	B
	EB-LT	0.29	22.5	C	EB-LT	0.28	22.3	C	EB-LT	0.19	21.1	C
	WB-TR	0.94	57.9	E *	WB-TR	0.51	27.7	C	WB-TR	0.79	38.1	D
Division Corridor												
26) Pike Street (N-S) @ Division Street (E-W)	NB-LT	0.48	12.7	B	NB-LT	0.34	11.0	B	NB-LT	0.55	13.7	B
	SB-T	0.29	10.5	B	SB-T	0.26	10.2	B	SB-T	0.28	10.4	B
	SB-R	0.53	17.2	B	SB-R	0.44	14.7	B	SB-R	0.48	15.4	B
	WB-LTR	0.23	23.9	C	WB-LTR	0.36	26.5	C	WB-LTR	0.46	28.5	C
East Broadway Corridor												
27) Forsyth Street (N-S) @ East Broadway (E-W)	SB-LR	0.53	33.5	C	SB-LR	0.44	30.0	C	SB-LR	0.41	29.2	C
	EB-LT	0.44	11.6	B	EB-LT	0.47	11.9	B	EB-LT	0.24	8.8	A
	WB-TR	0.28	9.2	A	WB-TR	0.23	8.7	A	WB-TR	0.32	9.5	A
28) Market Street (N-S) @ East Broadway (E-W)	NB-LTR	0.61	31.8	C	NB-LTR	0.68	35.8	D	NB-LTR	0.39	13.5	B
	EB-LT	0.53	16.2	B	EB-LT	0.28	11.6	B	EB-LT	0.65	30.6	C
	WB-TR	0.55	16.7	B	WB-TR	0.48	14.9	B	WB-TR	1.02	79.6	E *
Frankfort Corridor												
29) Gold Street (N-S) @ Frankfort Street (E-W)	NB-T	0.00	25.7	C	NB-T	0.00	25.7	C	NB-T	0.00	25.7	C
	NB-R	0.00	25.7	C	NB-R				NB-R			
	EB-TR	0.58	30.0	C	EB-TR	0.65	31.6	C	EB-TR	0.71	35.5	D
	WB-L	0.17	27.3	C	WB-L	0.30	29.3	C	WB-L	0.18	27.8	C
30) Park Row (N-S) @ Beekman Street (E-W)	NB-T	0.27	12.8	B	NB-T	0.26	12.7	B	NB-T	0.30	13.0	B
	SB-T	0.26	12.7	B	SB-T	0.21	12.2	B	SB-T	0.18	12.0	B
	WB-LR	0.57	26.8	C	WB-LR	0.61	27.5	C	WB-LR	0.55	25.9	C
31) Park Row (N-S) @ Spruce Street (E-W)	NB-TR	0.40	22.3	C	NB-TR	0.28	8.5	A	NB-TR	0.47	10.4	B
	SB-L	0.55	20.4	C	SB-L	0.18	0.8	A	SB-L	0.20	1.6	A
	SB-T	0.45	23.3	C	SB-T	0.28	8.6	A	SB-T	0.24	8.3	A

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound

L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .

V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle

LOS - Level of service

* -Denotes Congested Location in the 2006 No-Action Condition

Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).

Table 7-4: 2006 No-Action Traffic Conditions at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			Lane Group	2006 No-Action Midday Peak Hour			Lane Group	2006 No-Action PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS
Pearl Corridor												
32) Pearl Street (N-S) @ Fulton Street (E-W)	NB-LT	0.72	22.5	C	NB-LT	0.77	24.2	C	NB-LT	0.89	32.0	C
	SB-T	0.43	16.1	B	SB-T	0.46	16.5	B	SB-T	0.67	21.4	C
	SB-R	0.13	12.8	B	SB-R	0.11	12.5	B	SB-R	0.07	11.8	B
	EB-LR	0.66	43.4	D	EB-LR	0.72	48.4	D	EB-LR	0.49	34.4	C
33) Pearl Street (N-S) @ Frankfort Street (E-W)	NB-DefL	0.62	14.2	B	NB-DefL	0.44	11.0	B	NB-DefL	0.97	62.4	E *
	NB-TR	0.46	11.0	B	NB-TR	0.35	9.8	A	NB-TR	0.52	12.3	B
	SB-LTR	0.92	69.7	E *	SB-LTR	0.89	59.1	E *	SB-LTR	0.55	12.3	B
	EB-L	0.80	54.1	D	EB-L	0.71	41.1	D	EB-L	0.92	67.3	E *
	EB-TR	0.85	52.3	D	EB-TR	0.11	24.0	C	EB-TR	0.79	50.7	D
WB-LTR				WB-LTR				WB-LTR	0.16	24.6	C	
34) Pearl Street (N-S) @ Robert F Wagner Sr. Place (E-W)	NB-LTR	0.63	24.0	C	NB-LTR	0.30	18.0	B	NB-LTR	0.30	17.9	B
	SB-TR	0.53	22.1	C	SB-TR	0.33	18.5	B	SB-TR	0.37	18.8	B
	EB-LTR	0.88	55.9	E *	EB-LTR	0.71	43.6	D	EB-LTR	1.04	88.7	F *
	WB-L	0.79	44.3	D	WB-L	0.74	43.1	D	WB-L	0.72	41.5	D
	WB-RT	0.12	31.1	C	WB-RT	0.05	30.2	C	WB-RT	0.04	30.0	C
	WB-R	0.31	16.2	B	WB-R	0.29	15.9	B	WB-R	0.48	38.2	D
35) Pearl Street (N-S) @ St. James Place (E-W)	NB-DefL	0.67	18.7	B	NB-DefL				NB-DefL	0.62	18.2	B
	NB-T	0.48	12.5	B	NB-T	0.37	10.1	B	NB-T	0.30	9.7	A
	NB-LT				NB-LT				NB-LT			
	SB-T	0.24	8.8	A	SB-T	0.19	8.4	A	SB-T	0.20	8.4	A
St. James Corridor												
36) St. James Place (N-S) @ Madison Street (E-W)	NB-TR	0.52	21.2	C	NB-TR	0.42	18.9	B	NB-TR	0.33	17.4	B
	SB-LT	0.55	22.2	C	SB-LT	0.50	21.0	C	SB-LT	0.43	19.5	B
	WB-L				WB-L				WB-L			
	WB-LTR	0.13	15.0	B	WB-LTR	0.09	14.6	B	WB-LTR	0.17	15.3	B
	WB-R				WB-R				WB-R			
Worth Street Corridor												
37) Centre Street (N-S) @ Worth Street (E-W)	NB-L	1.05	92.4	F *	NB-L	1.04	110.3	F *	NB-L	1.05	96.3	F *
	NB-TR	0.73	32.3	C	NB-TR	0.58	28.0	C	NB-TR	0.64	29.4	C
	EB-DefL				EB-DefL				EB-DefL			
	EB-T	0.23	10.7	B	EB-T	0.32	11.6	B	EB-T	0.28	11.1	B
	WB-TR	0.18	16.2	B	WB-TR	0.20	16.5	B	WB-TR	0.23	16.9	B
38) Lafayette Street (N-S) Worth Street (E-W)	SB-LTR	0.44	20.8	C	SB-LTR	0.40	20.4	C	SB-LTR	0.48	21.4	C
	EB-TR	0.23	20.5	C	EB-TR	0.47	23.7	C	EB-TR	0.35	21.7	C
	WB-L	0.16	14.0	B	WB-L	0.15	15.1	B	WB-L	0.19	14.9	B
	WB-T	0.65	22.1	C	WB-T	0.33	15.4	B	WB-T	0.51	18.4	B

Table 7-4: 2006 No-Action Traffic Conditions at Unsignalized Intersections

UNSIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			Lane Group	2006 No-Action Midday Peak Hour			Lane Group	2006 No-Action PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS
Baxter Corridor												
1) Baxter Street (N-S) @ Walker Street (E-W)	EB-TR	0.46	22.9	C	EB-TR	0.62	27.2	D	EB-TR	0.95	67.7	F *
2) Baxter Street (N-S) @ Worth Street (E-W)	EB-LT	0.01	7.6	A	EB-LT	0.00	7.5	A	EB-LT	0.01	7.6	A

NOTES:

- EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
- L-Left, T-Through, R-Right, DefL-Analysis considers a Defacto Left Lane on this approach .
- V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
- LOS - Level of service
- * -Denotes Congested Location in the 2006 No-Action Condition
- Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1e).

2006 No-Action off-street parking facilities in the study area and their estimated weekday midday utilizations. It is assumed that the off-street parking facilities in the study area in the 2006 No-Action condition would be the same in the 2006 With-Action condition. Therefore, the parking survey of capacity and utilization conducted in 2006 with the street closures in place would be the same if the street closures were not in place. In 2006, as shown in the table, there are 37 facilities with an overall capacity of 4,409 spaces (see Figure 7-6 for off-street parking facilities). The overall midday utilization rate was observed at about 86% with about 596 spaces available.

All other off-street parking facilities within the study area would most likely not be affected in 2006 if the action was not in place.

On-Street Parking

As discussed above, in the 2006 No-Action condition streets that were closed as part of the 2001 security plan would be open to all vehicles. Based on available information, it is estimated that parking for approximately 70 vehicles existed along Park Row, Madison Street, Pearl Street, and other roadways now closed due to the security plan. Outside of the security zone, it is not expected that regulations or supply would be different in the 2006 No-Action or under With-Action conditions. Legal on-street parking spaces within the security zone would be available to all public vehicles in the 2006 No-Action condition. On-street parking conditions within the study area would most likely not be different in the 2006 No-Action condition from the 2006 With-Action condition. Legal on-street parking would continue to be very limited and illegal curbside parking and standing would continue to be prevalent throughout the study area.

D. 2006 WITH-ACTION CONDITION

Vehicular Traffic

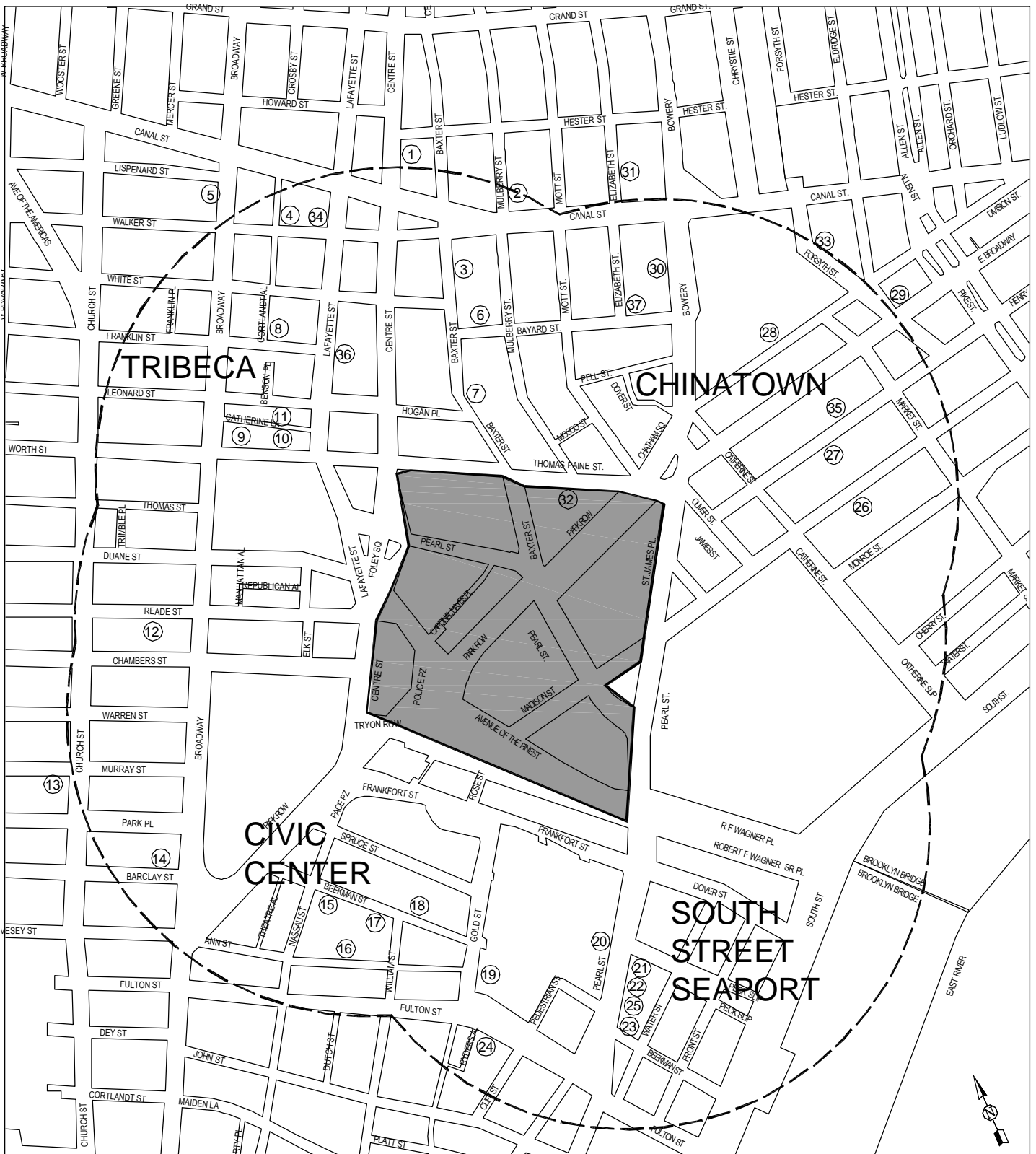
In conjunction with the May 2005 data collection effort, traffic volumes and other characteristics of the study area were documented. While action conditions are rarely measured in the field, for this action, the transportation effects of the security plan have been documented and are presented in this section. It should be noted that With-Action condition does not include any NYC Transit buses on Park Row. The return of permanent bus services to Park Row is addressed in Chapter 11, "Mitigation".

Figure 7-7 provides the 2006 With-Action condition traffic volumes in the study area for the AM, midday and PM peak hours. The resulting traffic capacity analysis of the 2006 With-Action conditions is presented in Table 7-6 along with a comparison with 2006 No-Action conditions.

Table 7-5: 2006 No-Action Off-Street Parking Facilities within 1/4-mile of the Site and Weekday Utilization

No.	Operator	Address	Capacity	MD (12-1) Util.	Spaces Avail.
1	Edison NY Parking LLC	174 Centre Street	93	100%	0
2	Kennee Parking Corp	114-116 Mulberry Street	42	93%	3
3	Chung Pak Parking Corp	95-97 1/2 Baxter Street	28	89%	3
4	Chinatown Parking Corp	88 Walker Street	40	100%	0
5	Champion Tribeca LLC	411-413 Broadway	60	70%	18
6	Margaret E Pescatore	98-100 Bayard Street	12	100%	0
7	Champion Mulberry LLC	62-64 Mulberry Street	191	90%	19
8	SSL Franklin St Parking Lot Inc	48-52 Franklin Street	40	100%	0
9	95 Worth LLC	336 Broadway/95 Worth St	114	95%	6
10	Central Parking System of NY	101 Worth Street	226	90%	23
11	Cobalt Car Park LLC	108 Leonard Street	143	95%	7
12	RAEM	93 Chambers Street	48	79%	10
13	Washington Street Corp	89-91 Murray Street	149	100%	0
14	BGB Parking System	6 Barclay Street	86	40%	52
15	25-27 Beekman Street Associates	25-27 Beekman Street	149	80%	30
16	John Street Parking	57-61 Ann Street	276	64%	100
17	Central Parking Systems Inc	169 William Street	52	100%	0
18	NYU Downtown Hospital	170 William Street	110	100%	0
19	Ropetmar Garage Inc	80 Gold Street	351	100%	0
20	Ropetmar Garage Inc	299 Pearl Street	310	92%	25
21	Allright Parking Management Corp	10-12 Peck Slip	105	77%	24
22	Edison Lafayette Corp	300-302 Pearl Street	25	76%	6
23	Edison Lafayette Corp	288-294 Pearl Street	36	78%	8
24	Downtown Parking Corp	56 Fulton Street	280	50%	140
25	Edison Lafayette Corp	228-232 Water Street	120	88%	14
26	(name unknown)	88 Madison Street	50	100%	0
27	(name unknown)	38 Henry Street	150	100%	0
28	(name unknown)	2 Division Street	300	90%	30
29	(name unknown)	79 Division Street	9	100%	0
30	(name unknown)	38 Bowery	140	90%	14
31	(name unknown)	44 Elizabeth Street	150	80%	30
32	Chatham Parking Systems Inc	180 Park Row	130	90%	13
33	(name unknown)	26 Forsyth Street	60	95%	3
34	(name unknown)	58 Walker Street	40	90%	4
35	(name unknown)	49-59 Henry Street	114	100%	0
36	Municipal Lot	Leonard St & Lafayette St	40	100%	0
37	Quick Park	2 Elizabeth Street	140	90%	14
Total			4,409	86%	596

Source: PHA Field Survey 2006 & 2007

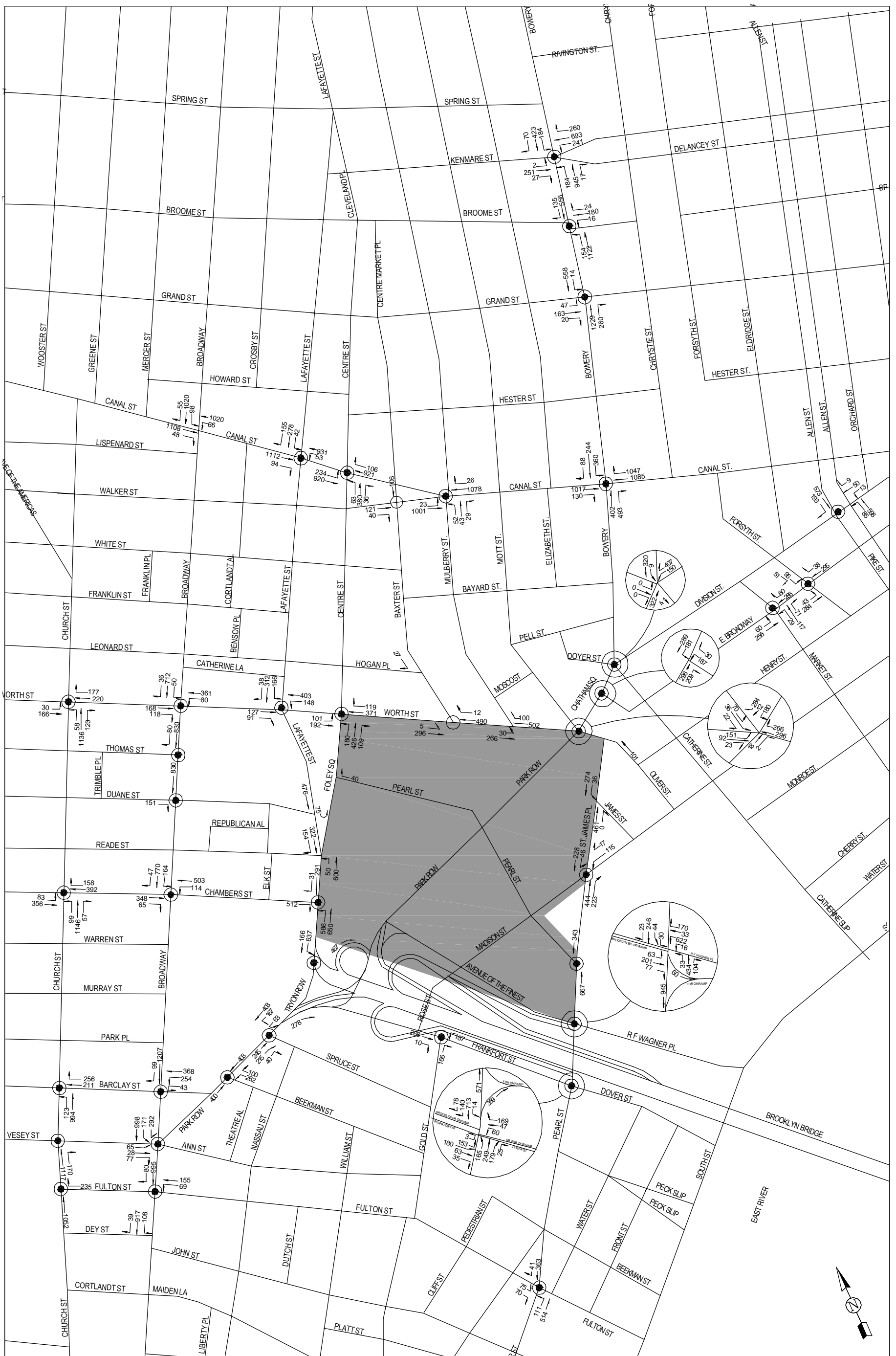


Legend

--- 1 / 4 Mile Boundary

① 2005 Off-Street Public Parking Facility

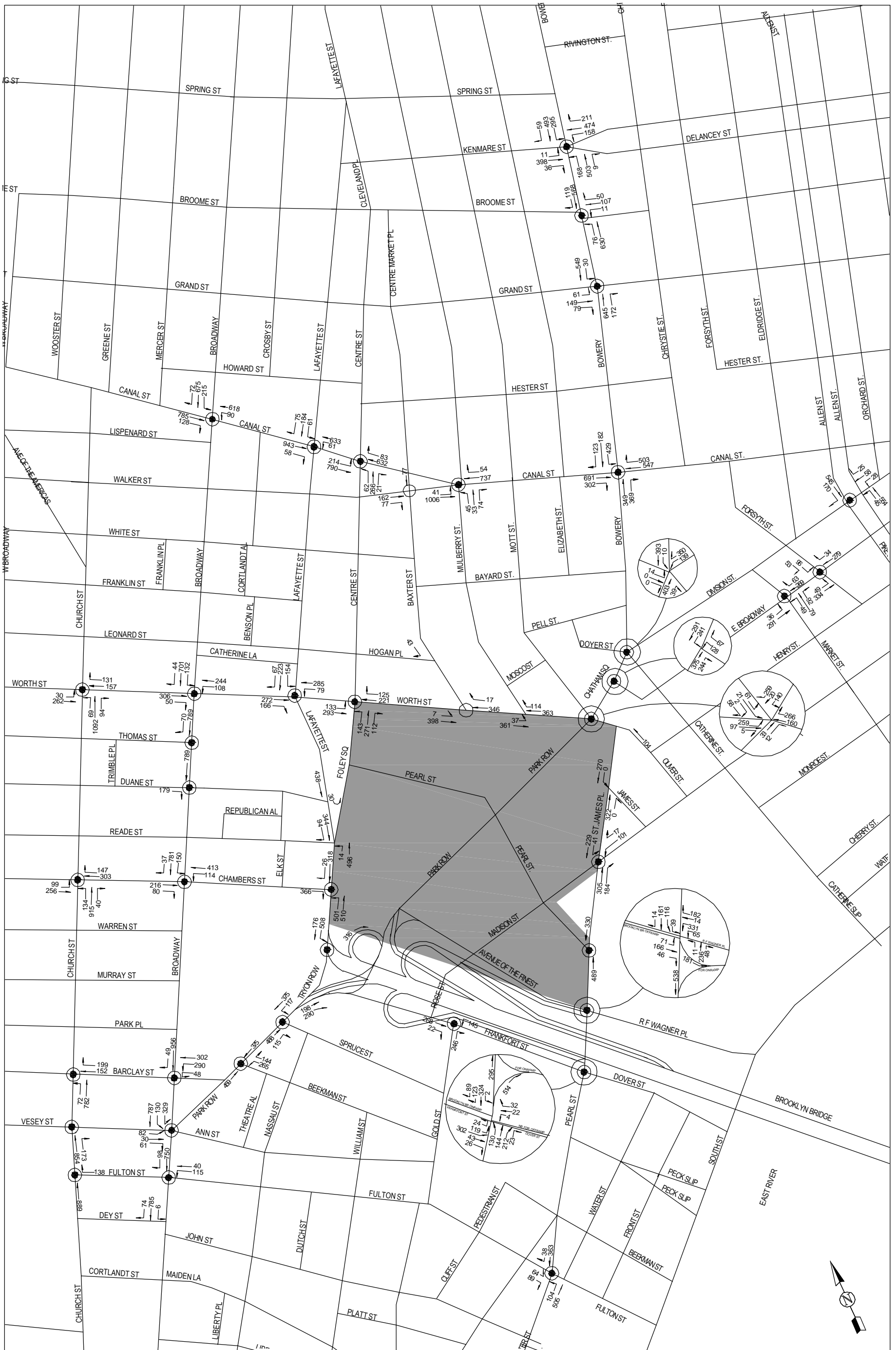
■ Security Zone



Legend

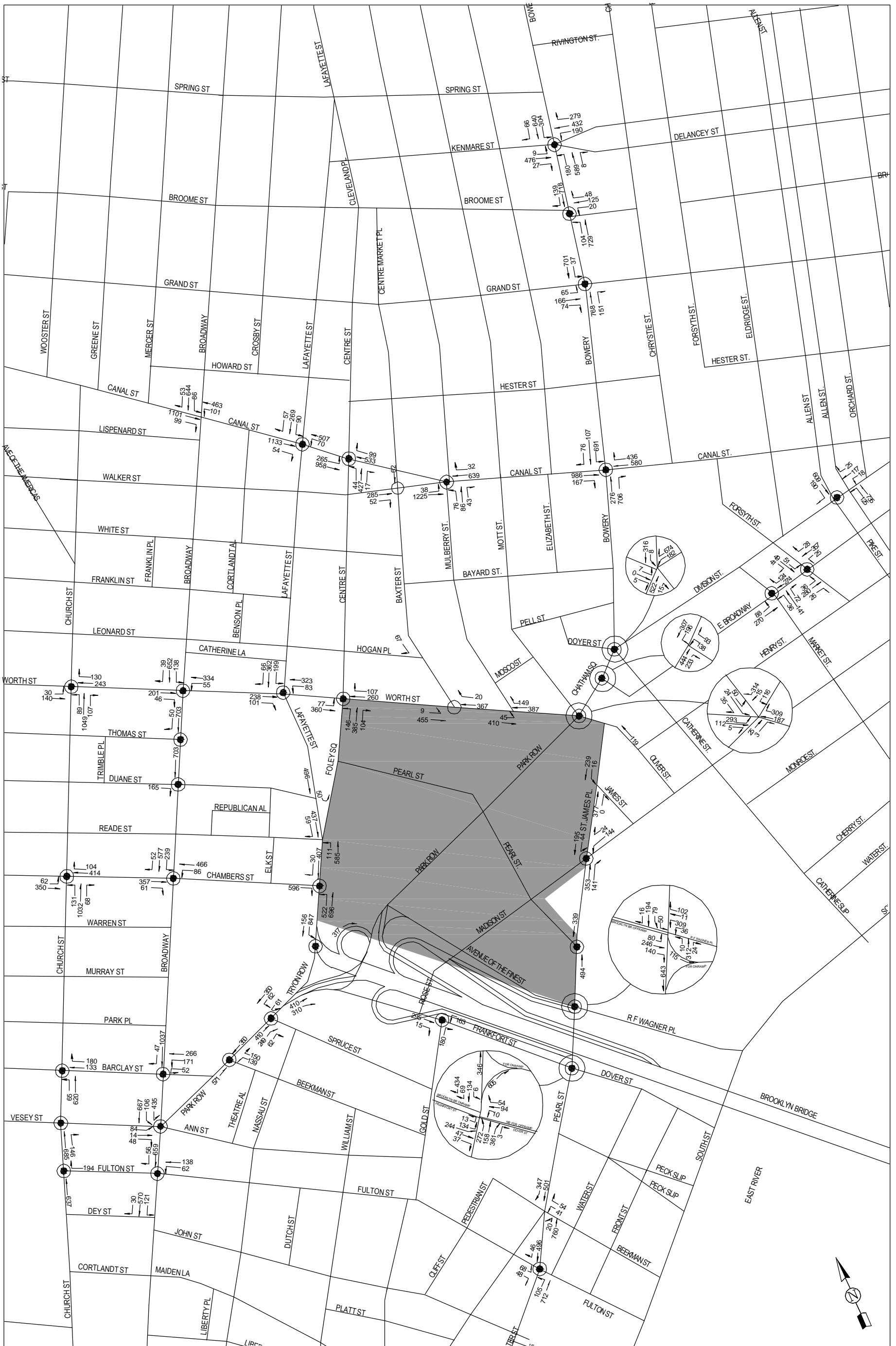
- Analyzed Intersections (Unsignalized)
- Analyzed Intersections (Signalized)

■ Security Zone



Legend

- Analyzed Intersections (Unsignalized)
- Analyzed Intersections (Signalized)
- Security Zone



Legend

- Analyzed Intersections (Unsignalized)
- Analyzed Intersections (Signalized)

■ Security Zone

Table 7-6: 2006 No-Action and With-Action Traffic Conditions at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			2006 Action AM Peak Hour			Lane Group	2006 No-Action Midday Peak Hour			2006 Action Midday Peak Hour			Lane Group	2006 No-Action PM Peak Hour			2006 Action PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS
1) Bowers (N-S) @ Kenmare Street (E-W)	NB-De/L	0.94	42.9	D	0.94	42.9	D	NB-De/L	0.91	72.3	E	0.91	72.3	E	NB-De/L	1.03	102.4	F	1.03	102.4	F
	NB-TR	0.72	47.6	D	0.72	47.6	D	NB-TR	0.58	26.7	C	0.58	26.7	C	NB-TR	0.64	27.8	F	0.64	27.8	F
	NB-LTR	0.89	38.4	D	0.89	38.4	D	NB-LTR	0.86	48.7	D	0.86	48.7	D	NB-LTR	0.99	73.4	E	0.99	73.4	E
	SB-De/L	0.72	47.6	D	0.72	47.6	D	SB-De/L	0.95	47.5	D	0.95	47.5	D	SB-De/L	0.99	73.4	E	0.99	73.4	E
	SB-TR	0.33	19.6	B	0.33	19.6	B	SB-TR	0.49	22.0	C	0.49	22.0	C	SB-TR	0.52	22.2	C	0.52	22.2	C
	SB-LTR	1.03	91.5	F	1.03	91.5	F	SB-LTR	0.78	47.5	D	0.78	47.5	D	SB-LTR	0.89	60.9	E	0.89	60.9	E
	WB-L	0.66	25.0	C	0.66	25.0	C	WB-L	0.43	20.8	C	0.43	20.8	C	WB-L	0.39	20.2	C	0.39	20.2	C
	WB-R	1.00	81.1	F	1.00	81.1	F	WB-R	0.64	30.6	C	0.64	30.6	C	WB-R	0.84	45.1	D	0.84	45.1	D
2) Bowers (N-S) @ Broome Street (E-W)	NB-LT	0.97	38.6	D	0.97	38.6	D	NB-LT	0.74	20.6	C	0.74	20.6	C	NB-LT	0.90	31.5	C	0.90	31.5	C
	NB-TR	0.60	16.0	B	0.60	16.0	B	NB-TR	0.61	16.4	B	0.61	16.4	B	NB-TR	0.68	17.7	B	0.68	17.7	B
	NB-LTR	0.61	31.4	C	0.61	31.4	C	NB-LTR	0.51	29.0	C	0.51	29.0	C	NB-LTR	0.60	31.9	C	0.60	31.9	C
	WB-LTR	0.95	33.9	C	0.95	33.9	C	WB-LTR	0.51	14.3	B	0.51	14.3	B	WB-LTR	0.55	14.8	B	0.55	14.8	B
3) Bowers (N-S) @ Grand Street (E-W)	NB-R	0.99	72.4	E	0.99	72.4	E	NB-R	0.77	38.2	D	0.77	38.2	D	NB-R	0.62	24.6	C	0.62	24.6	C
	SB-TL	0.51	14.4	B	0.51	14.4	B	SB-TL	0.50	14.2	B	0.50	14.2	B	SB-TL	0.58	15.5	B	0.58	15.5	B
	EB-LTR	0.58	30.0	C	0.58	30.0	C	EB-LTR	0.79	41.9	D	0.79	41.9	D	EB-LTR	0.79	41.3	D	0.79	41.3	D
	WB-T	0.62	33.9	C	0.62	33.9	C	WB-T	0.54	32.0	C	0.54	32.0	C	WB-T	0.39	29.3	C	0.39	29.3	C
4) Bowers (N-S) @ Canal Street (E-W) +	SB-De/L	0.96	67.3	E	0.96	67.3	E	SB-De/L	0.73	35.7	D	0.73	35.7	D	SB-De/L	1.00	64.3	E	1.00	64.3	E
	SB-TR	0.71	29.5	C	0.71	29.5	C	SB-TR	0.70	30.0	C	0.70	30.0	C	SB-TR	0.40	20.7	C	0.40	20.7	C
	EB-T	1.02	60.8	E	1.02	60.8	E	EB-T	0.70	26.2	C	0.70	26.2	C	EB-T	0.91	38.1	D	0.91	38.1	D
	EB-R	0.47	25.3	C	0.47	25.3	C	EB-R	0.67	29.3	C	0.67	29.3	C	EB-R	0.20	18.1	B	0.20	18.1	B
	WB-T	0.94	41.2	D	0.94	41.2	D	WB-T	0.60	24.0	C	0.60	24.0	C	WB-T	0.44	20.7	C	0.44	20.7	C
	NB-T	0.30	16.7	B	0.30	16.7	B	NB-T	0.34	17.1	B	0.34	17.1	B	NB-T	0.44	18.3	B	0.44	18.3	B
	NB-R	0.02	14.2	B	0.02	14.2	B	NB-R	0.19	17.2	B	0.19	17.2	B	NB-R	0.07	15.0	B	0.07	15.0	B
	SB-LTR	0.32	17.0	B	0.32	17.0	B	SB-LTR	0.38	17.6	B	0.38	17.6	B	SB-LTR	0.31	16.8	B	0.31	16.8	B
5) Bowers (N-S) @ Division Street (E-W)	EB-LTR	0.00	32.9	C	0.00	32.9	C	EB-LTR	0.06	33.8	C	0.06	33.8	C	EB-LTR	0.07	34.0	C	0.07	34.0	C
	WB-T	0.53	36.1	D	0.53	36.1	D	WB-T	0.46	33.6	C	0.46	33.6	C	WB-T	0.57	36.6	D	0.57	36.6	D
	WB-R	0.70	26.6	C	0.70	26.6	C	WB-R	0.57	22.4	C	0.57	22.4	C	WB-R	1.02	63.5	E	1.02	63.5	E
	NB-T	0.20	8.1	A	0.20	8.1	A	NB-T	0.22	8.2	A	0.22	8.2	A	NB-T	0.23	8.2	A	0.23	8.2	A
	NB-R	0.73	26.4	C	0.73	26.4	C	NB-R	0.69	22.9	C	0.69	22.9	C	NB-R	0.65	19.7	B	0.65	19.7	B
	SB-L	0.69	24.6	C	0.69	24.6	C	SB-L	0.88	45.3	D	0.88	45.3	D	SB-L	0.66	21.7	C	0.66	21.7	C
	SB-T	0.19	7.9	A	0.19	7.9	A	SB-T	0.18	7.9	A	0.18	7.9	A	SB-T	0.17	7.8	A	0.17	7.8	A
	WB-L	0.58	35.1	D	0.58	35.1	D	WB-L	0.34	28.2	C	0.34	28.2	C	WB-L	0.32	27.6	C	0.32	27.7	C
6) Chatham Square (N-S) @ East Broadway (E-W)	WB-R	0.18	26.8	C	0.18	26.8	C	WB-R	0.35	30.8	C	0.35	30.8	C	WB-R	0.44	33.0	C	0.44	33.2	C
	NB-T	0.28	21.9	C	0.28	21.9	C	NB-T	0.37	24.4	C	0.37	24.4	C	NB-T	0.41	24.9	C	0.41	24.9	C
	SB-L	1.00	95.1	F	1.00	95.1	F	SB-L	0.83	62.9	E	0.83	62.9	E	SB-L	0.75	53.9	D	0.75	53.9	D
	SB-TR	0.93	63.8	E	0.93	63.8	E	SB-TR	0.98	77.1	E	0.98	77.1	E	SB-TR	0.96	68.8	E	0.96	68.8	E
	EB-De/L	0.29	25.1	C	0.29	25.1	C	EB-De/L	0.46	27.4	C	0.46	27.4	C	EB-De/L	0.55	31.1	C	0.55	31.1	C
	EB-LTR	0.10	22.7	C	0.10	22.7	C	EB-LTR	0.23	22.1	C	0.23	22.1	C	EB-LTR	0.26	22.6	C	0.26	22.6	C
	WB-LT	0.60	35.8	D	0.60	35.8	D	WB-LT	0.11	20.5	C	0.11	20.5	C	WB-LT	0.10	20.5	C	0.10	20.5	C
	WB-R	0.71	58.3	E	0.71	58.3	E	WB-R	0.76	45.9	D	0.76	45.9	D	WB-R	0.66	35.7	D	0.66	35.7	D
7) Chatham Square (N-S) @ Worth Street (E-W)	EB-LTR	0.71	58.3	E	0.71	58.3	E	EB-LTR	0.88	68.7	E	0.88	68.7	E	EB-LTR	0.65	51.8	D	0.65	51.8	D
	WB-R	0.71	58.3	E	0.71	58.3	E	WB-R	0.74	61.9	E	0.74	61.9	E	WB-R	0.65	51.8	D	0.65	51.8	D

NOTES:

- EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
- L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .
- V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
- LOS - Level of service
- * -Denotes Congested Location in the 2006 No-Action Condition
- -Denotes Impacted Location in the 2006 With-Action Condition
- Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).
- + -Westbound right movement at Canal Street and Bowers is controlled by a separate signal as it is a channelized right turn

Table 7-6: 2006 No-Action and With-Action Traffic Conditions at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			2006 Action AM Peak Hour			2006 No-Action Midday Peak Hour			2006 Action Midday Peak Hour			2006 No-Action PM Peak Hour			2006 Action PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS
8) Broadway (N-S) @ Canal Street (E-W) Broadway Corridor	SB-LTR	0.94	41.8	D	0.94	41.8	D	0.81	30.4	C	0.81	30.4	C	0.63	26.3	C	0.63	26.3	C
	EB-TR	0.88	34.4	C	0.88	34.4	C	0.72	27.4	C	0.72	27.4	C	0.88	33.9	C	0.88	33.9	C
	WB-Defl													0.35	29.2	C	0.35	29.2	C
	WB-LT	0.71	18.5	B	0.71	18.5	B	0.71	20.1	C	0.71	20.1	C	0.32	12.4	B	0.32	12.4	B
	WB-T																		
9) Broadway (N-S) @ Worth Street (E-W)	SB-LTR	0.46	15.4	B	0.46	15.4	B	0.53	12.8	B	0.53	12.8	B	0.50	16.0	B	0.50	16.0	B
	EB-TR	0.52	25.2	C	0.61	27.6	C	0.49	23.5	C	0.60	26.3	C	0.35	21.0	C	0.41	22.0	C
	WB-L	0.40	25.3	C	0.44	27.4	C	0.58	33.7	C	0.66	41.3	D	0.25	21.1	C	0.26	21.7	C
	WB-T	0.65	27.9	C	0.64	27.6	C	0.30	20.3	C	0.43	22.4	C	0.57	25.3	C	0.56	25.0	C
10) Broadway (N-S) @ Thomas Street (E-W)	SB-T	0.66	17.6	B	0.66	17.6	B	0.59	11.9	B	0.59	11.9	B	0.49	14.4	B	0.49	14.4	B
	SB-R	0.34	15.7	B	0.34	15.7	B	0.12	7.9	A	0.12	7.9	A	0.26	14.3	B	0.26	14.3	B
11) Broadway (N-S) @ Duane Street (E-W)	SB-T	0.66	19.4	B	0.66	19.4	B	0.59	14.1	B	0.59	14.1	B	0.55	17.2	B	0.55	17.2	B
	EB-R	0.45	24.5	C	0.45	24.5	C	0.51	26.0	C	0.51	26.0	C	0.36	21.7	C	0.36	21.7	C
12) Broadway (N-S) @ Chambers Street (E-W)	SB-LT	1.01	59.0	E	1.01	59.0	E	0.81	21.0	C	0.81	21.0	C	0.80	26.0	C	0.81	26.5	C
	SB-R	0.32	25.2	C	0.32	25.2	C	0.17	14.3	B	0.17	14.3	B	0.24	15.7	B	0.24	15.7	B
	EB-TR	0.69	29.7	C	0.69	29.7	C	0.68	30.1	C	0.68	30.1	C	0.63	25.8	C	0.63	25.8	C
	WB-LT	1.04	74.0	E	1.04	74.0	E	0.80	33.3	C	0.80	33.3	C	0.98	58.9	E	0.98	58.9	E
13) Broadway (N-S) @ Barclay Street (E-W)	SB-T	0.82	29.1	C	0.82	29.1	C	0.56	22.2	C	0.56	22.2	C	0.71	25.4	C	0.68	24.6	C
	SB-R	0.37	22.6	C	0.37	22.6	C	0.18	18.8	B	0.18	18.8	B	0.18	18.9	B	0.18	18.9	B
	WB-L	0.99	99.9	F	0.94	87.3	F	1.00	97.2	F	0.97	92.1	F	0.72	53.2	D	0.58	42.9	D
	WB-LT	0.86	48.3	D	0.82	44.3	D	0.81	43.1	D	0.69	37.5	D	0.58	34.4	C	0.53	33.2	C
14) Broadway (N-S) @ Vessey Street (E-W)	SB-L	0.82	33.3	C	0.78	30.2	C	0.72	23.8	C	0.72	23.8	C	0.94	46.5	D	0.86	35.7	D
	SB-T	0.61	20.7	C	0.61	20.6	C	0.45	15.5	B	0.43	15.2	B	0.42	17.7	B	0.39	17.4	B
	EB-TR	1.00	93.6	F	0.84	69.6	E	1.02	102.8	F	0.78	61.0	E	0.65	50.5	D	0.62	49.4	D
15) Broadway (N-S) @ Fulton Street (E-W)	SB-TR	0.50	10.6	B	0.50	10.5	B	0.41	5.6	A	0.40	5.5	A	0.33	8.9	A	0.31	8.8	A
	WB-LT	0.22	25.9	C	0.36	27.7	C	0.33	27.5	C	0.33	27.5	C	0.20	25.5	C	0.27	26.2	C

NOTES:

- EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
 - L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach.
 - V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
 - LOS - Level of service
 - * -Denotes Congested Location in the 2006 No-Action Condition
 - -Denotes Impacted Location in the 2006 With-Action Condition
- Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).

Table 7-6: 2006 No-Action and With-Action Traffic Conditions at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			2006 Action AM Peak Hour			2006 No-Action Midday Peak Hour			2006 Action Midday Peak Hour			2006 No-Action PM Peak Hour			2006 Action PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS
Canal Corridor																			
16) Lafayette Street (N-S) @ Canal Street (E-W)	SB-L	0.25	28.6	C	0.25	28.6	C	0.35	31.3	C	0.35	31.3	C	0.54	39.0	D	0.54	39.0	D
	SB-T	0.73	40.4	D	0.73	40.4	D	0.46	30.5	C	0.46	30.5	C	0.70	39.0	D	0.70	39.0	D
	SB-R	1.04	114.2	F *	1.04	114.2	F	0.48	36.8	D	0.48	36.8	D	0.38	33.2	C	0.38	33.2	C
	EB-TR	0.77	23.6	C	0.77	23.6	C	0.62	19.7	B	0.62	19.7	B	0.70	21.2	C	0.70	21.2	C
	WB-LT	0.54	11.3	B	0.54	11.3	B	0.38	9.4	A	0.38	9.4	A	0.32	8.9	A	0.32	8.9	A
17) Centre Street (N-S) @ Canal Street (E-W)	NB-LT	0.75	37.5	D	0.75	37.5	D	0.52	30.3	C	0.52	30.3	C	0.68	34.1	C	0.68	34.1	C
	NB-R	0.21	27.7	C	0.21	27.7	C	0.12	25.5	C	0.12	25.5	C	0.09	25.0	C	0.09	25.0	C
	EB-DL	0.78	42.8	D	0.78	42.8	D	0.99	43.5	D *	0.99	43.5	D	0.68	26.8	C	0.68	26.8	C
	EB-T	0.61	12.5	B	0.61	12.5	B	0.74	26.0	C	0.74	26.0	C	0.59	12.1	B	0.59	12.2	B
	WB-TR	0.70	23.4	C	0.70	23.4	C	0.49	28.5	C	0.49	28.5	C	0.42	18.5	B	0.42	18.5	B
18) Mulberry Street (N-S) @ Canal Street (E-W)	NB-LTR	0.44	27.3	C	0.44	27.3	C	0.77	20.1	C	0.77	20.1	C	0.84	34.1	C	0.84	34.1	C
	EB-LT	0.79	21.2	C	0.79	21.2	C	0.64	16.7	B	0.64	16.7	B	0.96	36.1	D *	0.96	36.1	D
	WB-TR	0.79	20.9	C	0.79	20.9	C	0.64	16.7	B	0.64	16.7	B	0.45	13.3	B	0.45	13.3	B
Centre Corridor																			
19) Centre Street (N-S) @ Chambers Street (E-W)	NB-L	0.88	33.7	C	0.88	33.7	C	0.91	46.9	D *	0.89	42.2	D	0.93	50.2	D *	0.91	47.9	D
	NB-LT	0.29	10.1	B	0.43	11.6	B	0.38	8.8	A	0.47	9.7	A	0.49	10.0	A	0.59	11.4	B
	SB-TR	0.28	25.5	C	0.39	27.0	C	0.40	27.2	C	0.44	27.8	C	0.54	29.6	C	0.57	30.1	C
	EB-RT	0.75	36.1	D	0.75	36.1	D	0.51	29.1	C	0.51	29.1	C	0.83	40.4	D	0.83	40.4	D
20) Centre Street (N-S) @ Tryon Row - Brooklyn Bridge (ESB-LT)	SB-L	0.62	12.0	B	0.62	12.0	B	0.53	10.6	B	0.53	10.6	B	0.87	22.8	C	0.87	22.8	C
		0.08	6.1	A	0.18	6.9	A	0.16	6.7	A	0.20	7.0	A	0.15	6.6	A	0.17	6.8	A
Church Corridor																			
21) Church Street (N-S) @ Fulton Street (E-W)	NB-T	0.59	17.3	B	0.59	17.3	B	0.52	12.7	B	0.48	12.2	B	0.33	13.9	B	0.33	13.9	B
	WB-R	0.46	28.4	C	0.66	35.0	C	0.32	25.0	C	0.32	25.0	C	0.34	25.2	C	0.45	27.4	C
22) Church Street (N-S) @ Vesey Street (E-W)	NB-T	0.46	13.1	B	0.54	14.2	B	0.39	8.7	A	0.39	8.7	A	0.28	11.3	B	0.30	11.5	B
	NB-R	0.87	43.6	D	0.56	20.2	C	0.77	26.5	C	0.34	9.7	A	0.36	13.9	B	0.34	13.6	B
23) Church Street (N-S) @ Barclay Street (E-W)	NB-LT	0.54	9.9	A	0.59	10.8	B	0.42	12.8	B	0.42	12.8	B	0.29	11.5	B	0.32	11.7	B
	WB-TR	0.34	24.5	C	0.48	24.8	C	0.36	23.0	C	0.31	22.4	C	0.28	22.0	C	0.28	22.0	C
24) Church Street (N-S) @ Chambers Street (E-W)	NB-LTR	0.77	24.8	C	0.85	27.8	C	0.67	18.9	B	0.67	18.9	B	0.76	24.3	C	0.76	24.3	C
	EB-LT	0.99	63.1	E *	0.99	63.1	E	0.76	31.5	C	0.76	31.5	C	0.73	28.4	C	0.73	28.4	C
	WB-TR	0.99	58.5	E *	0.99	58.5	E	0.68	25.1	C	0.68	25.1	C	0.73	27.0	C	0.73	27.0	C
25) Church Street (N-S) @ Worth Street (E-W)	NB-LTR	0.62	15.5	B	0.69	17.0	B	0.63	11.3	B	0.63	11.3	B	0.56	14.5	B	0.59	15.0	B
	EB-LT	0.29	22.5	C	0.29	22.5	C	0.28	22.3	C	0.37	23.5	C	0.19	21.1	C	0.18	21.1	C
	WB-TR	0.94	57.9	E *	0.93	56.7	E	0.51	27.7	C	0.67	33.0	C	0.79	38.1	D	0.77	37.2	D

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound

L-Left, T-Through, R-Right, DL-Analysis considers a Defacto Left Lane on this approach.

V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle

LOS - Level of service

* -Denotes Congested Location in the 2006 No-Action Condition

* -Denotes Impacted Location in the 2006 With-Action Condition

Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).

Table 7-6: 2006 No-Action and With-Action Traffic Conditions at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			2006 Action AM Peak Hour			2006 No-Action Midday Peak Hour			2006 Action Midday Peak Hour			2006 No-Action PM Peak Hour			2006 Action PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS
Division Corridor 26) Pike Street (N-S) @ Division Street (E-W)	NB-LT	0.48	12.7	B	0.48	12.7	B	0.34	11.0	B	0.34	11.0	B	0.55	13.7	B	0.55	13.7	B
	SB-T	0.29	10.5	B	0.29	10.5	B	0.26	10.2	B	0.26	10.2	B	0.28	10.4	B	0.28	10.4	B
	SB-R	0.53	17.2	B	0.53	17.2	B	0.44	14.7	B	0.44	14.7	B	0.48	15.4	B	0.48	15.4	B
	WB-LTR	0.23	23.9	C	0.23	23.9	C	0.36	26.5	C	0.36	26.5	C	0.46	28.5	C	0.46	28.5	C
East Broadway Corridor 27) Forsyth Street (N-S) @ East Broadway (E-W)	SB-LR	0.53	33.5	C	0.53	33.5	C	0.44	30.0	C	0.44	30.0	C	0.41	29.2	C	0.41	29.2	C
	EB-LT	0.44	11.6	B	0.44	11.6	B	0.47	11.9	B	0.47	11.9	B	0.24	8.8	A	0.45	11.7	B
	WB-TR	0.28	9.2	A	0.28	9.2	A	0.23	8.7	A	0.23	8.7	A	0.32	9.5	A	0.31	9.5	A
28) Market Street (N-S) @ East Broadway (E-W)	NB-LTR	0.61	31.8	C	0.61	31.8	C	0.68	35.8	D	0.68	35.8	D	0.39	13.5	B	0.39	13.5	B
	EB-LT	0.53	16.2	B	0.53	16.2	B	0.28	11.6	B	0.28	11.6	B	0.65	30.6	C	0.65	30.6	C
	WB-TR	0.55	16.7	B	0.55	16.7	B	0.48	14.9	B	0.48	14.9	B	1.02	79.6	E *	1.02	79.6	E *
Frankfort Corridor 29) Gold Street (N-S) @ Frankfort Street (E-W)	NB-T	0.00	25.7	C	0.00	25.7	C	0.00	25.7	C	0.00	25.7	C	0.00	25.7	C	0.00	25.7	C
	NB-R	0.00	25.7	C	0.00	25.7	C												
	EB-TR	0.58	30.0	C	0.71	35.2	D	0.65	31.6	C	0.65	31.6	C	0.71	35.5	D	0.79	40.4	D
	WB-L	0.17	27.3	C	0.25	28.2	C	0.30	29.3	C	0.31	29.4	C	0.18	27.8	C	0.41	31.4	C
30) Park Row (N-S) @ Beekman Street (E-W)	NB-T	0.27	12.8	B	0.22	12.4	B	0.26	12.7	B	0.22	12.4	B	0.30	13.0	B	0.27	12.8	B
	SB-T	0.26	12.7	B	0.20	12.2	B	0.21	12.2	B	0.16	11.9	B	0.18	12.0	B	0.15	11.8	B
	WB-LR	0.57	26.8	C	0.72	31.9	C	0.61	27.5	C	0.76	33.8	C	0.55	25.9	C	0.56	26.3	C
31) Park Row (N-S) @ Spruce Street (E-W)	NB-TR	0.40	22.3	C	0.24	8.2	A	0.28	8.5	A	0.28	8.5	A	0.47	10.4	B	0.43	10.1	B
	SB-L	0.55	19.7	B	0.39	2.2	A	0.18	0.8	A	0.18	0.8	A	0.20	1.6	A	0.20	1.4	A
	SB-T	0.45	23.3	C	0.26	8.5	A	0.28	8.6	A	0.22	8.2	A	0.24	8.3	A	0.21	8.1	A

NOTES:

- EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
- L-Left, T-Through, R-Right, DfL-Analysis considers a Defacio Left Lane on this approach.
- V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
- LOS - Level of service
- * -Denotes Congested Location in the 2006 No-Action Condition
- █ -Denotes Impacted Location in the 2006 With-Action Condition

Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).

Table 7-6: 2006 No-Action and With-Action Traffic Conditions at Signalized Intersections

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			2006 Action AM Peak Hour			2006 No-Action Midday Peak Hour			2006 Action Midday Peak Hour			2006 No-Action PM Peak Hour			2006 Action PM Peak Hour		
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS
Pearl Corridor	NB-LT SB-T SB-R EB-LR	0.72	22.5	C	0.77	24.7	C	0.77	24.2	C	0.69	21.1	C	0.89	32.0	C	0.87	30.6	C
		0.43	16.1	B	0.55	18.5	B	0.46	16.5	B	0.49	17.0	B	0.67	21.4	C	0.66	21.1	C
		0.13	12.8	B	0.14	13.0	B	0.11	12.5	B	0.11	12.5	B	0.07	11.8	B	0.07	11.7	B
		0.86	43.4	D	0.86	42.3	D	0.72	48.4	D	0.72	48.4	D	0.49	34.4	C	0.49	35.2	D
33) Pearl Street (N-S) @ Frankfort Street (E-W)	NB-Defl NB-TR NB-LTR SB-LTR EB-L EB-TR WB-LTR	0.83	44.9	D	0.83	44.9	D							0.97	62.4	E *	0.93	53.6	D
		0.62	14.2	B	0.60	14.6	B	0.44	11.0	B	0.45	11.1	B	0.52	12.3	B	0.52	12.3	B
		0.46	11.0	B	0.64	13.6	F	0.35	9.8	A	0.39	10.1	B	0.55	12.3	B	0.51	11.7	B
		0.92	69.7	E *	0.99	83.8	F	0.89	59.1	E *	0.96	72.0	E *	0.92	67.3	E *	0.99	84.1	F *
34) Pearl Street (N-S) @ Robert F. Wagner Sr. Place (E-W)	NB-LTR SB-TR EB-LTR WB-L WB-RT WB-R	0.80	54.1	D	0.83	58.0	E	0.71	41.1	D	0.75	43.8	D	0.79	50.7	D	0.95	79.1	E *
		0.85	52.3	D	0.85	52.3	D	0.11	24.0	C	0.12	24.1	C	0.16	24.6	C	0.32	26.7	C
		0.63	24.0	C	0.70	26.0	C	0.30	18.0	B	0.33	18.4	B	0.30	17.9	B	0.32	18.2	B
		0.53	22.1	C	0.38	19.0	B	0.33	18.5	B	0.37	19.0	B	0.37	18.8	B	0.38	19.0	B
35) Pearl Street (N-S) @ St. James Place (E-W)	NB-Defl NB-T NB-LT SB-T	0.88	55.9	E *	0.88	55.9	E *	0.71	43.6	D	0.83	52.9	D	1.04	88.7	F *	1.04	88.7	F *
		0.79	44.3	D	1.05	86.1	F	0.74	43.1	D	0.74	43.1	D	0.72	41.5	D	0.58	37.2	D
		0.12	31.1	C	0.12	31.1	C	0.05	30.2	C	0.05	30.2	C	0.04	30.0	C	0.04	30.0	C
		0.31	16.2	B	0.28	15.7	B	0.29	15.9	B	0.29	15.9	B	0.48	38.2	D	0.15	14.2	B
St. James Corridor	NB-Defl NB-T NB-LT SB-T	0.67	18.7	B	0.49	11.4	B	0.37	10.1	B	0.33	9.6	A	0.30	9.7	A	0.29	9.2	A
		0.48	12.5	B	0.23	8.7	A	0.19	8.4	A	0.22	8.6	A	0.20	8.4	A	0.20	8.4	A
		0.24	8.8	A	0.04	14.3	B	0.42	18.9	B	0.57	21.2	C	0.33	17.4	B	0.53	20.1	C
		0.52	21.2	C	0.57	23.2	C	0.50	21.0	C	0.51	21.4	C	0.43	19.5	B	0.45	20.0	B
36) St. James Place (N-S) @ Madison Street (E-W)	NB-TR SB-LT WB-L WB-LTR WB-R	0.19	15.8	B	0.19	15.8	B	0.09	14.6	B	0.15	15.4	B	0.17	15.3	B	0.23	16.2	B
		0.13	15.0	B	0.04	14.3	B	0.09	14.6	B	0.04	14.4	B	0.17	15.3	B	0.06	14.6	B
		0.52	21.2	C	0.80	29.2	C	0.42	18.9	B	0.57	21.2	C	0.33	17.4	B	0.53	20.1	C
		0.55	22.2	C	0.57	23.2	C	0.50	21.0	C	0.51	21.4	C	0.43	19.5	B	0.45	20.0	B
Worth Street Corridor	NB-L NB-TR EB-Defl EB-T WB-TR	1.05	92.4	F *	0.93	76.2	E	1.04	110.3	F *	0.98	97.7	F	1.05	96.3	F *	0.72	45.1	D
		0.73	32.3	C	0.75	33.4	C	0.58	28.0	C	0.53	27.0	C	0.64	29.4	C	0.70	31.5	C
		0.23	10.7	B	0.38	24.3	C	0.32	11.6	B	0.40	12.6	B	0.28	11.1	B	0.36	12.0	B
		0.18	16.2	B	0.27	11.4	B	0.20	16.5	B	0.60	23.7	C	0.23	16.9	B	0.58	22.9	C
38) Lafayette Street (N-S) @ Worth Street (E-W)	SB-LTR EB-TR WB-L WB-T	0.44	20.8	C	0.44	20.8	C	0.40	20.4	C	0.40	20.4	C	0.48	21.4	C	0.55	22.6	C
		0.23	20.5	C	0.29	21.1	C	0.47	23.7	C	0.54	24.9	C	0.35	21.7	C	0.38	22.2	C
		0.16	14.0	B	0.48	21.0	C	0.15	15.1	B	0.28	18.6	B	0.19	14.9	B	0.26	16.7	B
		0.65	22.1	C	0.64	21.9	C	0.33	15.4	B	0.45	17.3	B	0.51	18.4	B	0.48	17.8	B

NOTES:
 EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
 L-Left, T-Through, R-Right, DL-Analysis considers a Defacto Left Lane on this approach.
 V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
 LOS - Level of service
 * -Denotes Congested Location in the 2006 No-Action Condition
 -Denotes Impacted Location in the 2006 With-Action Condition
 Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.11).

Table 7-6: 2006 No-Action and With-Action Traffic Conditions at Unsignalized Intersections

UN SIGNALIZED INTERSECTION	2006 No-Action AM Peak Hour			2006 Action AM Peak Hour			2006 No-Action Midday Peak Hour			2006 Action Midday Peak Hour			2006 No-Action PM Peak Hour			2006 Action PM Peak Hour			
	Lane Group	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	Lane Group	V/C Ratio	Delay (sec/veh)	LOS	Lane Group	V/C Ratio	Delay (sec/veh)	LOS	Lane Group	V/C Ratio	Delay (sec/veh)	LOS
Baxter Corridor 1) Baxter Street (N-S) @ Walker Street (E-W)	EB-TR	0.46	22.9	C	0.46	22.9	C	EB-TR	0.62	27.2	D	EB-TR	0.95	67.7	F *	EB-TR	0.95	67.7	F
	EB-LT	0.01	7.6	A	0.00	8.5	A	EB-LT	0.00	7.5	A	EB-LT	0.01	7.6	A	EB-LT	0.01	8.1	A
2) Baxter Street (N-S) @ Worth Street (E-W)	EB-LT	0.01	7.6	A	0.00	8.5	A	EB-LT	0.00	7.5	A	EB-LT	0.01	7.6	A	EB-LT	0.01	8.1	A

NOTES:

- EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
 - L-Left, T-Through, R-Right, DIL-Analysis considers a Defacto Left Lane on this approach .
 - V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
 - LOS - Level of service
 - * - Denotes Congested Location in the 2006 No-Action Condition
 - - Denotes Impacted Location in the 2006 With-Action Condition
- Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.11).

Impact Analysis Methodology

Based on the thresholds established for signalized intersections in the *CEQR Technical Manual*, if a No-Action LOS A, B or C deteriorates to unacceptable mid-LOS D, or a LOS E or F in the future action condition, then a significant traffic impact has occurred. The *CEQR Technical Manual* further states that for a No-Action LOS A, B or C, which declines to mid-LOS D (45 seconds) or worse under the With-Action condition, mitigation to mid-LOS D is required. For a No-Action mid-LOS D, an increase of five or more seconds of delay in a lane group in the With-Action condition should be considered significant. For No-Action LOS E, an increase in delay of four seconds of delay should be considered significant. For No-Action LOS F, three seconds of delay should be considered significant; however, if a No-Action LOS F condition already has delays in excess of 120 seconds, an increase of 1.0 second in delay should be considered significant, unless the action would generate fewer than five vehicles through that lane group in the peak hour. These impact criteria are also applicable to unsignalized intersections. However, for the minor street to trigger a significant impact, 90 passenger-car-equivalents must be identified in the With-Action condition in any peak hour.

Table 7-6 shows the AM, midday, and PM peak hour volume-to-capacity ratios, delays and levels of service at signalized and unsignalized study area intersections, respectively, in the 2006 With-Action condition. The tables also identify those locations that would be impacted based on the criteria discussed above. A summary of significantly impacted intersections is provided in Table 7-7.

Signalized Intersections

As shown in Table 7-7, the AM, midday, and PM peak hours have three impacted intersections each. The following provides a discussion of the impacted locations by corridor. Measures to mitigate traffic impacts are presented in Chapter 11, “Mitigation.”

Pearl Street: At the intersection of Pearl Street and Frankfort Street, the eastbound left turn movement is impacted by the action in the AM, midday, and PM peak hours, operating at LOS F (83.8 seconds of delay), versus a No-Action LOS E (69.7 seconds of delay), operating at LOS E (72.0 seconds of delay), versus a No-Action LOS E (59.1 seconds), and operating at LOS F (84.1 seconds of delay), versus a No-Action LOS E (67.3 seconds of delay), respectively. The eastbound thru-right approach at this intersection would also be impacted in the PM peak hour operating at LOS E (79.1 seconds of delay), versus a No-Action LOS D (50.7 seconds of delay), respectively.

At Pearl Street and Robert F. Wagner Place, the westbound left turn movement would be impacted in the AM peak hour, operating at LOS F (86.1 seconds of delay), versus a No-Action

LOS D (44.3 seconds of delay). The eastbound approach at this intersection would also be impacted in the midday peak hour, operating at LOS D (52.9 seconds of delay), versus a No-Action LOS D (43.6 seconds of delay).

TABLE 7-7
Summary of Impacted Intersections

Signalized Intersections	AM	MD	PM
Pearl Street @ Frankfort Street	X	X	X
	X	X	
Chatham Square @ Worth Street	X	X	X
			X
X impacts to one or more movements in the peak hour.			

Chatham Square: At the intersection of Chatham Square and Worth Street, the Bowery southbound thru-right approach would be impacted in all three peak hours, deteriorating to LOS E (76.3 seconds of delay) in the AM, LOS F (86.7 seconds of delay) in the midday, and LOS F (86.9 seconds of delay) in the PM. The eastbound Worth Street left turn movement at this intersection would also be impacted in all three peak hours, deteriorating to LOS E (68.7 seconds of delay) in the AM, LOS E (59.1 seconds of delay) in midday, and LOS F (92.8 seconds of delay) in the PM. The westbound St. James Place right turn movement would also be impacted at this intersection in all three peak hours, deteriorating to LOS E (65.1 seconds of delay) in the AM, LOS E (61.4 seconds of delay) in the midday, and LOS F (92.8 seconds of delay) in the PM.

At Chatham Square at Mott Street, the Mott Street approach would also be impacted in the PM peak hour operating at LOS E (58.1 seconds of delay), versus a No-Action LOS D (51.8 seconds of delay).

Unsignalized Intersections

As shown in Table 7-6, neither of the two unsignalized intersections analyzed as part of this study would be impacted by project diverted traffic in any peak hour.

Chapter 11, “Mitigation,” provides a detailed assessment of mitigation options for these impacted intersections.

Traffic Simulation

Traffic modeling was performed within the vicinity of the security zone (Worth Street, Broadway, Centre Street, Pearl Street, St. James Street, and Frankfort Street) with Synchro Version 6.0 to identify traffic patterns in the No-Action and With-Action conditions. The traffic model is a computer based tool by which the flow of traffic is modeled and simulated. The modeling and simulation were performed to determine the points of congestion in the current road network and to propose solutions to improve the traffic flow by providing alternative use of the existing road networks and modification of signal timing and road lane geometry.

A traffic model was created to show traffic flow conditions in the No-Action condition and in the With-Action condition. The simulation of the No-Action and With-Action traffic flow conditions provides a visual representation of how the street closures have affected congestion and traffic queuing in the vicinity of the security zone in the AM, midday, and PM peak hours. The traffic simulation showed heavy congestion and long traffic queues at the impacted intersections listed in Table 7-7 above. Traffic simulation and modeling was also utilized in testing the feasibility of different mitigation measures to alleviate the significant adverse impacts created by the action. These mitigation measures are described in detail in Chapter 11, “Mitigation.”

Parking

Off-Street Parking

An inventory of current parking conditions was conducted in 2006 for all off-street public parking facilities within a quarter-mile radius of the security zone. As discussed above under “2006 No-Action Condition,” it is assumed that off-street parking facilities in the 2006 No-Action condition would not be different from the 2006 With-Action condition as the security plan has not resulted in changes to off-street public parking facilities.

As shown in Table 7-5 above, there are 37 off-street parking facilities within a quarter-mile radius of the security zone containing 4,409 spaces (see Figure 7-6 for 2006 off-street parking locations). The surveyed occupancy of these spaces at midday was approximately 86 percent, with 596 available spaces. Table 7-8 indicates that since the 400-space municipal garage was closed in 2001, the number of off-street public parking spaces has decreased to 4,409 versus 4,711 under baseline conditions, as shown in Table 7-3.

Table 7-8: Baseline vs. With-Action Off-Street Parking Capacity and Utilization

	Capacity	Utilization	Available Spaces
Baseline Condition	4,711	88%	566
With-Action Condition	<u>4,409</u>	86%	<u>596</u>

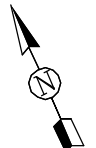
As the security plan neither creates demand for public parking nor eliminates any of the off-street public parking supply, no significant adverse impacts in off-street parking have occurred as a result of the implementation of the security plan.

On-Street Parking

As with the baseline and No-Action conditions, legal on-street parking is very limited within the study area in the 2006 With-Action condition. Curbside regulations vary greatly, and most blockfronts have more than one regulation in effect. Most of the regulations change at different times of the day and night and are different on weekdays and weekends. Curbside parking regulations within the study area were surveyed in January 2006 and are shown in Figure 7-8. Within the security zone, on-street parking is permitted for authorized vehicles only, with the exception of Park Row where no on-street parking is permitted for any vehicles.

As shown in Figure 7-8, street regulations in the historic Chinatown core tend to be highly restrictive. During the daytime, many areas are limited to standing only by trucks loading and unloading. Narrow streets often have no standing anytime on one side, and busy streets often restrict any standing during peak traffic periods. Where parking is permitted, it is generally metered, limited to one or two hours. The blocks in the vicinity of government facilities limit parking to authorized police or court officer vehicles only. In this area, residential parking competes with parking by shoppers and diners, freight unloading at stores, and vendors' vehicles parked on various streets. Due to the high number of visitors driving to this area, this section of the study area has the most intense parking demand, and is also busy on weeknights and weekends. This competition for public parking spaces in the area is exacerbated by the demand for parking by police and court officers, who have special parking privileges.

Field surveys of weekday utilization of on-street parking capacity were conducted in January 2006. The surveys focused on the weekday midday period, and included all legal curbside spaces within a quarter-mile of the security zone area. In order to take a closer look at on-street parking, the area within a quarter-mile of the security zone was divided into four zones, as shown in Figure 7-9. As seen in Table 7-9, during the weekday midday period the number of legal curbside public parking spaces within the total study area totals approximately 426. Utilization



Legend

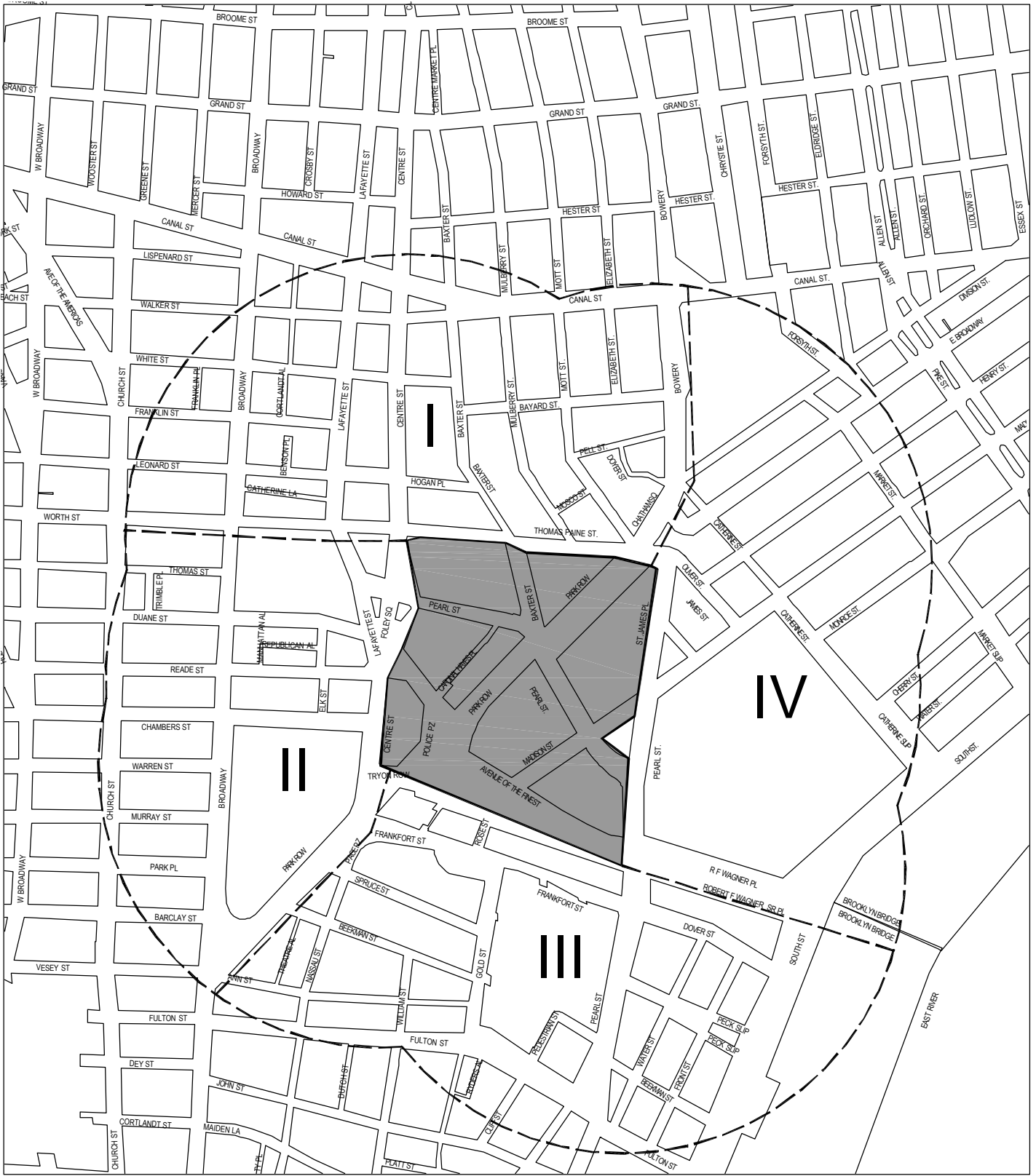
① Parking Restriction

----- Traffic Study Area

█ Security Zone

On-Street Parking Regulations

- ① No Parking Anytime
- ② No Standing Anytime
- ③ 2 Hour Parking 9am-7pm Mon-Fri
- ④ No Parking 3am - 6am Tues, Thurs, Sat
- ⑤ No Parking 3am - 6am Mon, Wed, Fri
- ⑥ No Standing 8am - 6pm Mon-Fri
Except Trucks Unloading & Loading
- ⑦ No Parking Midnight - 3am Tues, Thurs, Sat
- ⑧ No Parking Midnight - 3am Mon, Wed, Fri
- ⑨ No Standing Anytime Except
Trucks Unloading & Loading
- ⑩ 1 Hour Parking 9am-7pm Mon-Fri
- ⑪ No Parking 7:30am - 8am Except Sunday
- ⑫ No Standing 7am - 10am Mon-Fri
- ⑬ 1 Hour Parking 10am-7pm Mon-Fri
- ⑭ No Standing 7am - 7pm Mon-Fri
- ⑮ No Parking 8:30am - 9am Except Sunday
- ⑯ No Parking 8am - 6pm Mon-Fri
- ⑰ No Standing 7am - 10am & 4pm - 7pm No
Standing All Other Times Except Trucks
Unloading & Loading Mon-Fri
- ⑱ 1 Hour Parking 10am-4pm Mon-Fri
- ⑲ No Parking 8am - 9:30am Tues & Fri
- ⑳ No Standing 4pm - 7pm Mon - Fri
- ㉑ No Standing 7am - 7pm Mon - Fri
Except Trucks Loading & Unloading
- ㉒ No Parking 7am - 4pm School Days
- ㉓ No Standing 7am - 4pm Mon - Fri
Except Trucks Loading & Unloading
- ㉔ No Parking 7am - 10am Except Sunday
- ㉕ No Standing Anytime Except Authorized Vehicles
- ㉖ No Standing 7am - 10am Except Sunday
- ㉗ No Standing 10am - 7pm
Except Trucks Unloading & Loading
- ㉘ No Parking 8am - 8:30am Except Sunday
- ㉙ No Standing 7am - 7pm Except Authorized Vehicles
- ㉚ No Standing Hotel Loading Zone
- ㉛ No Standing 7am - 7pm
- ㉜ No Standing 7am - 7pm Except Trucks Loading & Unloading
- ㉝ No Standing 7am - 7pm Except Authorized Vehicles
- ㉞ No Standing 7am - 10am & 4pm - 7pm No Standing All Other
Times Except Trucks Unloading & Loading Mon-Fri
- ㉟ 1 Hour Parking 10am-4pm Mon-Fri 9am - 7pm Sat & Sun
- ㊱ No Parking 2am - 6am Mon & Thurs
- ㊲ No Standing 7am - 10am & 3pm - 7pm No Standing
10am - 3pm Except Trucks Loading & Unloading Mon-Fri
- ㊳ No Parking 2am - 6am Tues & Fri
- ㊴ No Standing 8am - 6pm Except Trucks Loading & Unloading
- ㊵ No Parking 11am - 12:30pm Tues & Fri
- ㊶ 1 Hour Parking 8am - 7pm Including Sunday
- ㊷ No Parking 8am - 6pm Mon-Fri
- ㊸ No Standing 7am - 3pm Except Trucks
Loading & Unloading No Standing 3pm - 7pm Mon-Fri
- ㊹ No Standing 4pm - 7pm No Standing 7am - 4pm Anytime
Except Trucks Loading & Unloading Mon-Fri
- ㊺ No Parking 7:30am - 8am Except Sunday
- ㊻ No Standing 7am - 10am & 4pm - 7pm
No Standing 10am - 4pm
Except Truck Loading & Unloading
- ㊼ No Standing 7am - 11am & 2pm
No Standing 7am - 11am & 2pm -7pm
Except Truck Loading & Unloading Mon-Fri
- ㊽ No Standing 1pm - 7pm No Standing All Other Times
- ㊾ No Parking 8am - 8:30am Mon-Fri
- ㊿ 2 Hour Parking 8:30am - 7pm Mon-Fri
- ① No Parking 11am - 12:30pm Tues & Fri
- ② No Parking 11am - 12:30pm Mon & Thurs
- ③ No Stopping Anytime
- ④ No Standing 4pm - 7pm Except Sunday &
No Standing 7am - 4pm Except Truck
Loading & Unloading except Sunday
- ⑤ No Parking 7am - 4pm Except Sunday
No Standing 4pm - 7pm Except Sunday
- ⑥ No Parking 7am - 7pm Except Sunday
- ⑦ No Parking 11am - 12:30pm Mon & Thurs



Legend

--- On-Street Parking Zone Boundary
 IV Zone Number

█ Security Zone

during this period was found to be essentially at capacity (approximately 96 percent), with an average of approximately 15 spaces available in the overall study area.

Table 7-9: Legal On-Street Parking Capacity and Utilization

	Public			Authorized Vehicles		
	Capacity	Utilization	Available Spaces	Capacity	Utilization	Available Spaces
Zone 1	117	96%	5	447	96%	19
Zone 2	0	n/a	n/a	280	96%	11
Zone 3	20	100%	0	75	81%	14
Zone 4	289	97%	10	144	97%	4
Total - Study Area	426	96%	15	946	95%	48

The study area contains a number of government facilities and much of the on-street parking in the area is designated for government officials and employees. The field surveys indicated that there are approximately 946 on-street parking spaces available for official vehicles only in the total study area. As shown in Table 7-9, during the weekday midday period, utilization of these curbside parking spaces was found to be approximately 95 percent, with an average of approximately 48 spaces available for official vehicles only. It should be noted that the number of available spaces fluctuates somewhat by time of day and day of week, depending on the prevailing parking regulations. The capacities quoted here are typical for the time periods examined.

As seen in Table 7-9, Zone I contained approximately 117 spaces for the general public and 447 spaces reserved for authorized government vehicles. In Zone II, there were no parking spaces designated for the general public and approximately 280 spaces for authorized vehicles. In terms of legal parking spaces for Zone III, 20 spaces were available to the public while 75 were reserved for authorized vehicles. In Zone IV there were approximately 289 spaces for the general public and 144 for authorized vehicles.

Field observations also indicate that illegal curbside parking is prevalent within the study area. The illegal parking by passenger cars generally involved fire hydrant spaces, parking in truck loading zones and bus stops, and in areas designated as no standing or no parking. Many of these vehicles are the private vehicles of government employees with a placard displayed in the

windshield of the cars. Illegal parking among the four zones can be seen in Table 7-10. During the field survey, it was observed that approximately 1,012 vehicles with City placards and 205 non-City employee vehicles were parked illegally during the typical weekday midday period within the study area. These are in addition to those listed in Table 7-10.

In Zone I, there were 568 illegally parked vehicles with 454 of them belonging to city employees. Zone II contained approximately 202 vehicles parked illegally, of which 156 were official vehicles. The zone south of the security area, Zone III, was observed to have approximately 239 vehicles illegally parked with 213 belonging to city employees. With regards to Zone IV, approximately 208 vehicles were parked illegally. Of these vehicles, 189 belonged to city employees and displayed placards.

Table 7-10: Illegal On-Street Parking

Zone	I	II	III	IV	Total
Total of Illegally Parked Vehicles	568	202	239	208	1,217
Number of Illegally Parked Vehicles Displaying City Placards	454	156	213	189	1,012

In addition to the authorized vehicles parking in the four zones, there are a substantial number of such vehicles (primarily NYPD employee vehicles) parking in the security zone area. There is parking along the streets, ramps, and other areas (except along Park Row) within the security zone since the streets were closed to unauthorized vehicles.

As demonstrated in Tables 7-9 and 7-10, there are about 616 private vehicles and 1,910 authorized vehicles (or City-employee owned) parked curbside (both legally and illegally) within the quarter mile study area boundary. In addition, approximately 135 vehicles park on the street within the security zone. While the implementation of the security plan resulted in the loss of on-street parking spaces within the security zone, which were formerly available to the public, this loss is substantially less than the number of on-street spaces created for authorized vehicles only along closed streets and ramps. Under No-Action conditions, most of these authorized vehicles would be displaced outside of the security zone, further exacerbating the private/public imbalance in curbside parking capacity. Consequently, while there is substantial competition for curbside space outside of the security zone, the action has not been the cause of this condition and, therefore, there would be no significant on-street parking impacts.

E. CONCLUSION

This chapter analyzes the effects of the diverted traffic that has resulted from the implementation of the security plan on the Lower Manhattan street network during the weekday AM, midday, and PM peak hours. The results of the analyses show that diverted traffic has created significant traffic impacts (see Table 7-7). Chapter 11, “Mitigation,” of this EIS provides a description of measures to be developed to mitigate the traffic impacts identified in this chapter.

While parking conditions, both off-street and on-street remain very competitive and the availability of curbside parking for shoppers and others is very limited, these conditions did not result from the With-Action condition. In addition, as the security plan neither creates demand for public parking nor eliminates any off-street public parking supply. Consequently, no significant adverse impacts on parking have occurred as a result of the implementation of the security plan.

One Police Plaza Security Plan EIS

CHAPTER 8: TRANSIT AND PEDESTRIANS

A. INTRODUCTION

This chapter of the EIS describes the transit and pedestrian travel characteristics and potential impacts associated with the security plan, which affects an approximately 7-block area in Lower Manhattan, bounded generally by Worth Street to the north, Centre Street to the west, Frankfort Street to the south, and St. James Place and Pearl Street to the east (see Figure 1-1 in Chapter 1, “Project Description”). As described in detail in earlier chapters of this EIS, the security measures include the installation of attended security checkpoint booths, planters, bollards and hydraulically operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza. The transit and pedestrian analysis focuses on the bus and pedestrian diversions related to the street closures. The analyses that follow provide an overview of existing conditions, both before the events of September 11, 2001 and post-September 11, 2001, to establish a baseline condition from which impact significance can be determined. The security zone has been operational for over four years and therefore the transit and pedestrian effects of the action (the With-Action condition) are readily evident and are documented in the field under 2006 conditions.

As the security plan has not affected subway facilities or service, an assessment of subway facilities and services has been screened out and is not included within this chapter.

Following the baseline discussion is an assessment of No-Action conditions (no security plan in 2006) and With-Action conditions (the security plan in place in 2006) for an assessment of potential impacts based on criteria established in the *CEQR Technical Manual*.

B. BASELINE CONDITIONS

Transit

Local Bus Service

The roles of local buses are to serve the immediate Lower Manhattan area and to connect it with various parts of Manhattan to the north and Downtown Brooklyn. Local bus routes are designed to collect and distribute passengers throughout the service area. All local bus routes operate during the weekdays and most provided weekend service. All public local bus routes are operated

by the New York City Transit (NYCT) and provided extensive service throughout Lower Manhattan. Prior to September 11, 2001, NYCT operated 4 local bus routes that traversed Park Row including the M9, M15, M103, and B51. In addition, the M22 operated on Worth Street (westbound) and St. James Place (eastbound).

Since local buses operated with relatively short headways, i.e., the time between bus arrivals, (less than 10 minutes) and made many stops, service was frequent through the study area, particularly during the weekday morning and afternoon peak periods. All local bus routes in the study area started/terminated in Lower Manhattan and connected with destinations in Midtown and Upper Manhattan with the exception of the B51, which operated between Lower Manhattan and Downtown Brooklyn via the Manhattan Bridge. The busiest local route in Lower Manhattan was the M15 (including limited-stop service), which typically served over 65,000 riders on an average weekday. The M15 was also the only bus route with two different terminal points in Lower Manhattan (South Ferry and Park Row/City Hall). The M15 route operated “limited stop” local service that skipped selected bus stops to provide faster service.

Figure 8-1 shows the Lower Manhattan area bus route maps for 2000, 2003 and 2005. As shown in the figure, prior to implementing the security plan in 2001, Park Row hosted the M9, M15, M103 and B51 bus routes. The M9 route operated between Union Square and South End Avenue in Battery Park City, while the M15 (the segment through Park Row) traversed from East 126th Street to City Hall via 1st and 2nd Avenues. The M103 operated between East 125th Street and City Hall via Lexington and 3rd Avenues, while the B51 route traversed from the Fulton Mall in Brooklyn to City Hall (Manhattan) via the Manhattan Bridge. Together these four bus routes provided 25 to 30 buses per hour per direction in the peak commuter periods. Table 8-1 presents the pre-September 11, 2001 data on the average weekday bus ridership for the total length of these routes.

**Table 8-1: Pre-September 11, 2001
Average Weekday Local Bus Ridership**

Route	Ridership
M9	5,015
M15	65,385
M103	15,402
B51	4,528
Total	90,330

Source: Historical data from the MTA 2003 *Subway and Bus Ridership Report*



**Bus Routes
January 2000**



**Bus Routes
April 2003**



**Bus Routes
July 2005**

Express Bus Service

The role of the express bus service in the area is to serve commuters from communities generally outside of Manhattan, and to transport them to and from Lower Manhattan. Some express routes were operated by NYCT, while other express routes were operated by private companies under contract to the New York City Department of Transportation. A total of 36 express bus routes operated by the NYCT between Lower Manhattan and various parts of New York City (mostly the outer boroughs), and 9 express bus routes were operated by private companies between Lower Manhattan and the Bronx, Queens, and Brooklyn. These express bus routes operate on a limited schedule (usually during the morning and evening peak periods) and are designed to bring commuters from distant locations into Lower Manhattan in a quick and efficient manner.

Prior to September 11, 2001, NYCT operated two express bus routes that traversed Park Row including the X25 and X90 (see Figure 8-2). Both of these bus routes started/terminated in Lower Manhattan and connected with destinations in Midtown and Upper Manhattan

Figure 8-2 shows the Lower Manhattan area bus route maps for 1995 and 2006. As shown in the figure, prior to implementing the security plan in 2001, Park Row hosted the X25 and X90 express bus routes. The X25 route operated between Grand Central and Battery Park via the FDR Drive, while the X90 operated between East 110th Street and Fifth Avenue and the World Financial Center via the FDR Drive. Table 8-2 presents the pre-September 11, 2001 data on the average weekday express bus ridership for the total length of these routes.

**Table 8-2: Pre-September 11, 2001
Average Weekday Express Bus Ridership**

Route	Ridership
X25	132
X90	609
Total	741

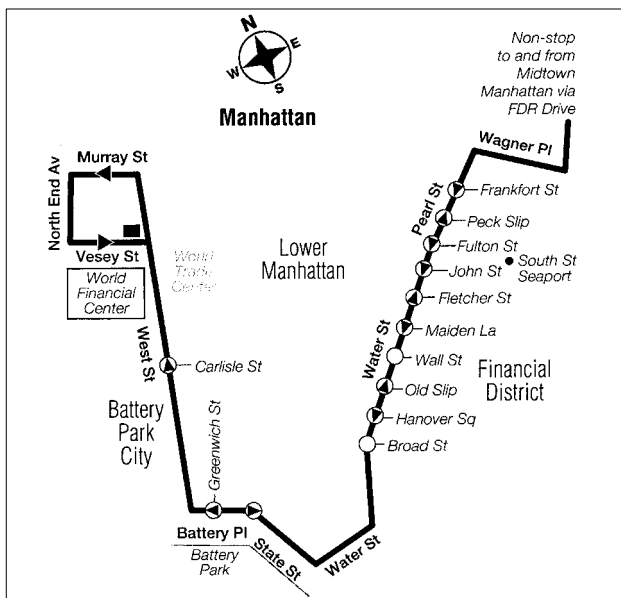
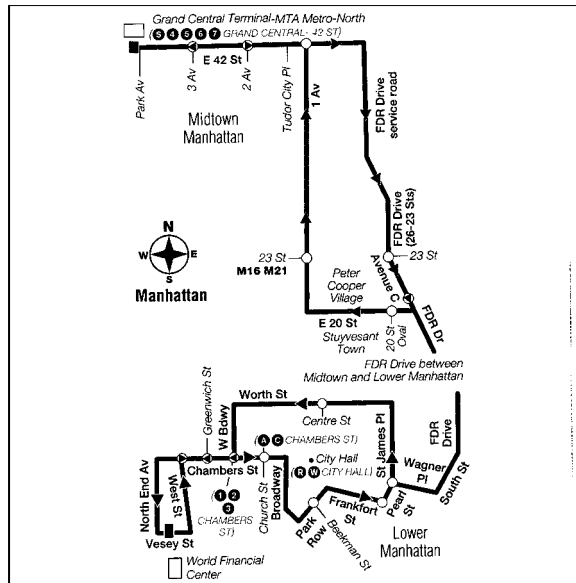
Source: MTA Subway & Bus Ridership Data

Also prior to September 11, 2001, one private company (Command Bus Company, Inc.) operated four express bus routes that traversed Park Row and Pearl Street, i.e., routes BM1, BM2, BM3, and BM4 (see Figure 8-2). In the morning these four routes all originated in Brooklyn, traveled through the study area, and terminated in Lower Manhattan on Worth Street at Centre Street. During the midday, these four routes originated on Worth Street at Centre Street, but remained on the periphery of the study area (using Lafayette Street, Centre Street, and Park Row to reach Broadway) before returning to Brooklyn. No pre-9/11 data on bus ridership for these four bus routes is available.

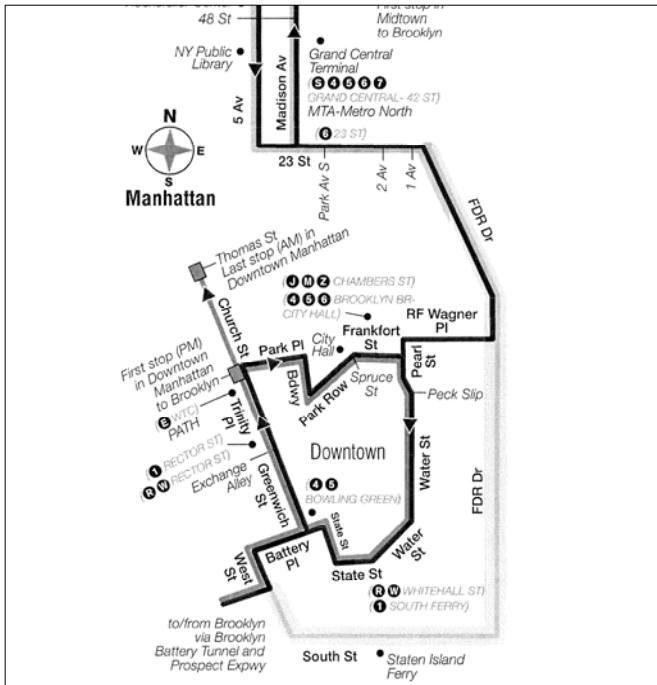


Express Bus Routes
1995

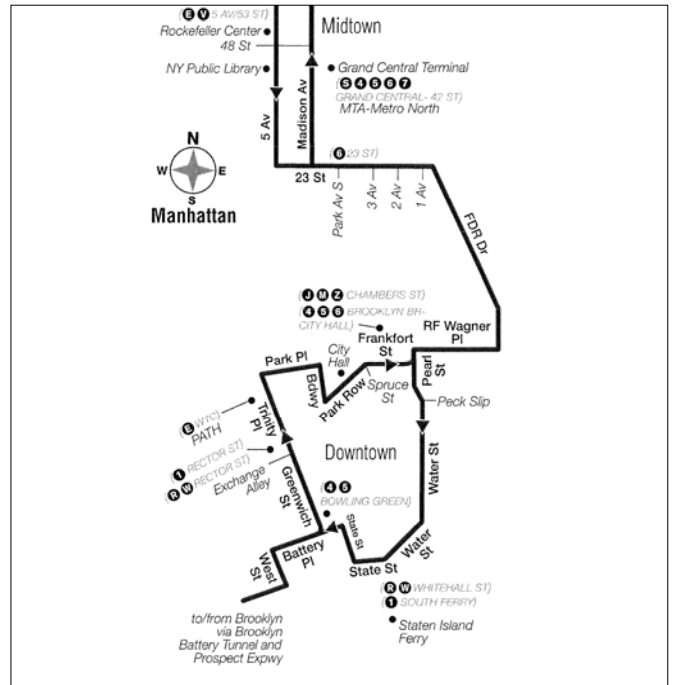
X25 Bus Route
September 2005



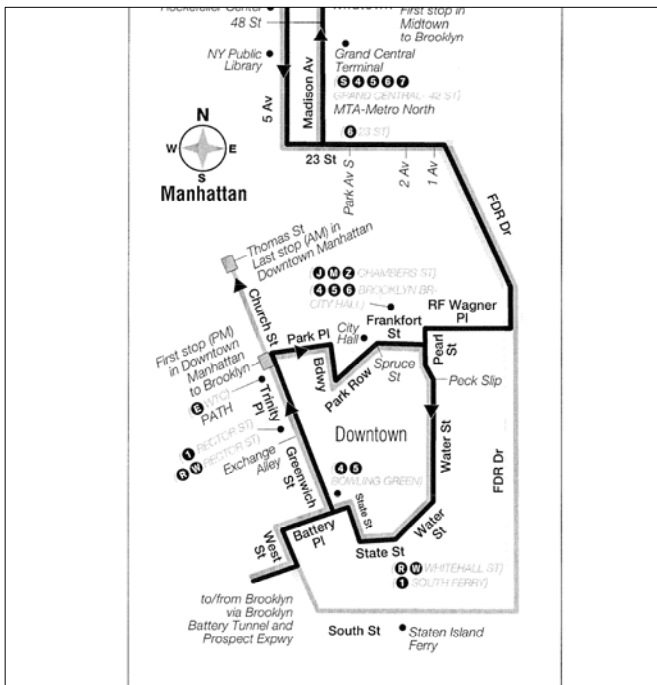
X90 Bus Route
September 2005



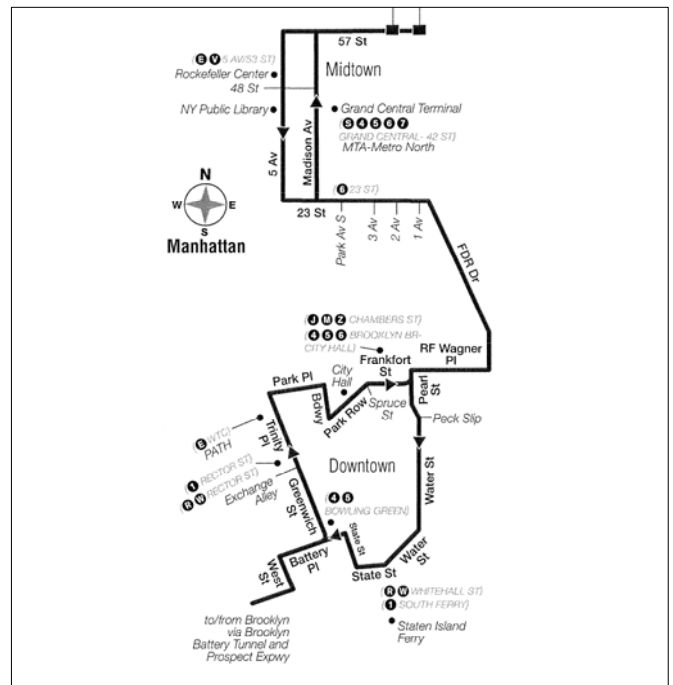
**BM1 Route
2006**



**BM2 Route
2006**



**BM3 Route
2006**



**BM4 Route
2006**

Pedestrians

All pedestrian corridors within the security zone were unrestricted in the pre-September 11, 2001 baseline condition. The 1999 street closures did not restrict any pedestrian corridors. As the area within the security zone was composed of mainly institutional and residential uses, the courthouses and office buildings drew large volumes of employees to the area throughout the day. The Verizon Building and Murray Bergtraum High School also attracted large numbers of pedestrians to the area. On weekday mornings, many students and employees arrived at the subway station located under the Municipal Building and then walked across Police Plaza and then down the stairs to Madison Street to access the high school and Verizon.

A review of the year 2000 high-accident pedestrian intersections (those with 5 or more pedestrian accidents) was also undertaken. According to the year 2000 data, table 8-3 shows that there were eight such locations in the study area. Of particular note were Catherine Street/East Broadway and Bayard Street/Bowery, both close to Chatham Square. At the north end of the study area, Canal Street had two high-accident locations (at Mott Street and at Elizabeth Street), while Broadway to the west also had two such locations (Chambers Street and Ann Street in 2000).

Table 8-3: Pedestrian High-Accident Locations (year 2000)

Intersection	Number of Pedestrian Accidents
East Broadway/Catherine Street	7
Broadway/Chambers Street	7
Bowery/Bayard Street	6
Broadway/Ann Street	6
East Broadway/Pike Street	6
Canal Street/Mott Street	6
Canal Street/Elizabeth Street	5
Church Street/Chambers Street	5

Source: 2001 CEQR Technical Manual

C. 2006 NO-ACTION CONDITION

Transit

Local Buses

In the 2006 No-Action condition, the local bus system within the study area would remain unchanged from the 2001 baseline condition. As a result of the terrorist attacks on September 11, 2001, 34.5 million square feet of office space in Lower Manhattan was destroyed or damaged. This loss of office space resulted in some loss of ridership on local bus routes (see Table 8-4 below). As discussed above and shown in Figure 8-1, prior to implementing the security plan

in 2001, Park Row hosted the M9, M15, M103, and B51 bus routes. The M9 route operated between Union Square and South End Avenue in Battery Park City, while the M15 (the segment through Park Row) traversed from East 126th Street to City Hall via 1st and 2nd Avenues. The M103 operated between East 125th Street and City Hall via Lexington and 3rd Avenues, while the B51 route traversed from the Fulton Mall in Brooklyn to City Hall (Manhattan) via the Manhattan Bridge. Together these four bus routes provided 25 to 30 buses per hour per direction in the peak commuter periods. The bus routes discussed above would travel along the same route as they did prior to the implementation of the security plan, except the M9 route to/from Battery Park City, which would traverse along Pearl Street around the southern tip of Manhattan. The closure of Vesey Street after September 11, 2001 eliminated the important eastbound portion of this route, necessitating its formal relocation along Pearl Street.

Table 8-4 below shows changes in average weekday bus ridership on all bus routes that travel to Lower Manhattan as well the total for all Manhattan bus routes. As shown in the table, average weekday bus ridership increased between 2000 and 2002 for Lower Manhattan routes and for all Manhattan routes. Between 2002 and 2003, ridership decreased by approximately 5% for both Lower Manhattan bus routes and all Manhattan bus routes. However, between 2003 and 2004 average weekday ridership increased for both Lower Manhattan (1.1%) bus routes and all Manhattan bus routes (0.6%). Between 2004 and 2005 average weekday ridership decreased for both Manhattan bus routes (0.2%) and Lower Manhattan (1.3%).

Table 8-4: Changes in Average Weekday Bus Ridership for Lower Manhattan Bus Routes and all Manhattan Bus Routes (2000-2005)

Year	2000	2001	2002	2003	2004	2005
<i>Average Daily Ridership</i>						
Lower Manhattan	116,980	122,048	123,484	117,540	118,887	<u>117,377</u>
Manhattan	586,010	612,742	625,742	594,607	598,090	<u>596,635</u>

Source: MTA Subway & Bus Ridership Data

Express Bus Service

As discussed above, Park Row hosted the X25, X90, BM1, BM2, BM3, and BM4 bus routes. In the No-Action condition, these bus routes would not have been rerouted around Park Row and would continue to run on the pre-September 11, 2001 routes (see Figure 8-2). The ridership for these bus routes, like local bus routes, also decreased as a result of the loss of office space in Lower Manhattan due to the events on September 11, 2001 (see Table 8-8 below).

Pedestrians

In the 2006 No-Action condition, pedestrian corridors within the study area would remain unchanged from the 2001 baseline condition. The 1999 street closures would be in place, but pedestrian access within the security zone would continue to be uninterrupted. As discussed in further detail below, one pedestrian corridor along police headquarters was closed as a result of the security plan. In the 2006 No-Action condition, this corridor would be open. Pedestrian volumes and access routes in the area would be expected to remain the same in the 2006 No-Action condition compared to the 2006 With-Action condition.

Pedestrian accident locations in the study area would likely change somewhat in the northern/eastern portion of the study area with the reconfiguration of Chatham Square into a large pedestrian space in 2004 and the construction of Foley Square Park (bounded by Worth, Centre, Lafayette, and Duane Streets) in 2001. In addition, there was an overall reduction in travel in portions of the study area with the closure of several streets in the study area. While actual No-Action data are not available, the following pedestrian section on With-Action conditions presents some data on expected No-Action conditions.

D. 2006 WITH-ACTION CONDITION

Transit

Local Bus Service

The local bus system has changed in conjunction with both the security plan as well as other Lower Manhattan street closures. Figure 8-1 shows the Lower Manhattan area bus route maps for 2000, 2003 and 2005. As shown in the figure, prior to implementing the security plan in 2001, Park Row hosted the M9, M15, M103 and B51 bus routes. After the security plan was implemented, these routes continued to operate, albeit with some modifications to route and stop locations due to the street closures.

The collective total ridership along the total length of these routes did not change substantially following the implementation of the security plan after September 11, 2001. Specific ridership data for the Lower Manhattan portion of these routes are not available; however, Table 8-5 below presents a comparison of pre- and post- September 11, 2001 average weekday bus ridership for the total length of these routes.

Table 8-5: Pre- and Post-September 11, 2001 Average Weekday Local Bus Ridership

Route	Pre-9/11/2001 *	Post-9/11/2001**	Percent Change
M9	4,528	5,371	19%
M15	62,073	61,430	-1%
M103	14,265	16,766	18%
B51	983	909	8%
Total	81,849	84,476	3%

*Year 2000

** Year 2005

Source: MTA Subway & Bus Ridership Report

In May 2005, the M103 bus (up to 6 buses per hour in each direction) returned to its original route via Park Row (see Figure 8-1, 2005 map) as a 90-day trial. Buses traveling through the security zone are subject to inspection. There are no stops within the zone itself, but immediately on either end of the zone. The test was expanded in November 2005 when the M15 and B51 buses also returned to their original routes via Park Row to/from City Hall. The M9 remains on its current diverted route. As discussed in Chapter 11, "Mitigation," the re-introduction of the M15, M103, and B51 buses to Park Row is part of a mitigation plan and is not considered in the With-Action conditions.

Under the With-Action condition, the re-routing of the above mentioned local buses has increased the route lengths. Table 8-6 below summarizes the total bus route lengths before the street closures and after the street closures. The route for the M103 prior to the street closures was approximately 15.3 miles in length (round trip). The re-routing of the M103 after the street closures were put into place increased this distance by 0.4 miles, making the total route length approximately 15.7 miles (round trip). The route for the M9 prior to the street closures was approximately 10 miles (round trip). After the street closures were put into place, the M9 was re-routed to Pearl Street/Water Street increasing the route distance by 2 miles (round trip- see Figure 8-1 for route). The route for the M15 prior to the street closures was approximately 19 miles (round trip- including part-time service along Park Row) and increased by 0.9 miles to 19.9 miles (round trip - including part-time service along Park Row) after the street closures were put into place. The route for the B51 was approximately 7.9 miles (round trip - including part-time service along Park Row). The re-routing of the B51 after the street closures were put into place increased this distance by 0.3 miles, making the total route length 8.2 miles (round trip).

Table 8-6: Local Bus Route Lengths Pre-Security Street Closures and Post-Security Street Closures (in miles)

Route	Pre-Street Closure Length	Post-Street Closure Length	Difference
M103	15.3	15.7	0.4
M9	10	12	2.0
M15	19	19.9	0.9
B51	7.9	8.2	0.3

It should be noted that the re-routing of the M9 local bus to its new route is somewhat independent of the With-Action condition as Vesey Street, which is adjacent to the World Trade Center, has been closed. To be conservative, the rerouting of the M9 is considered part of the With-Action condition.

The relocation of these routes is also affected by changes in travel patterns of overall traffic. As noted in Chapter 7, “Traffic and Parking”, there has been increased congestion on both Worth Street and St. James Place, which has also slowed service on the bus routes diverted to these paths, especially in the peak traffic periods. Tables 8-7 show the northbound and southbound pre-9/11 and post-9/11 travel times for the southern portions of the M15 and M103 bus routes.

As shown in Table 8-7, travel times for these legs of the M15 and M103 routes generally have increased by 1 to up to 7 minutes during peak hours. These substantial increases in travel time could result in the potential need to add one or more buses per hour to maintain the No-Action level of service for both operations and ridership. This is especially the case in the AM and midday peak hour and in the southbound direction for the M15 route. Specific data on travel times for the B51 route was not available as the NYCT has not adjusted the B51 schedule since the security plan has been in place, but it should be assumed that the B51 route has experienced similar delays. As noted earlier, the present routing of the M9 is not primarily a result of the security plan but due to the loss of Vesey Street to service the original route. Because the present M9 route is significantly different than its route prior to September 11, 2001, the M9 will continue to remain on this current route and is therefore not included in this discussion of travel times.

Table 8-7: Local Bus Route Travel Times Pre-September 11, 2001 and Post-September 11, 2001 (in minutes)

	8-9 AM			12-1 PM			5-6 PM		
Northbound									
	Pre-9/11	Post-9/11*	Diff.	Pre-9/11	Post-9/11*	Diff.	Pre-9/11	Post-9/11*	Diff.
M15 ¹	16	20	4	16	20	4	16	18	2
M103 ²	20	21	1	20	21	1	18	20	2
B51	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Southbound									
	Pre-9/11	Post-9/11*	Diff.	Pre-9/11	Post-9/11*	Diff.	Pre-9/11	Post-9/11*	Diff.
M15 ³	15	20	5	15	22	7	13	18	5
M103 ⁴	15	20	5	15	20	5	23	22	-1
B51	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

*Year 2003 representing the With-Action Conditions

¹ Partial route starting at Park Row/Beekman St. to 3rd Ave./ St. Marks Pl

² Partial route starting at Park Row/Beekman St. to 1st Ave./E. 1st St.

³ Partial route starting at E. Houston St./2nd Ave. to Park Row/Spruce St.

⁴ Partial route starting at 3rd Ave./E.6th St. to Park Row/Beekman St

Source: New York City Transit Authority

Express Bus Service

Table 8-8 presents a comparison of pre- and post-September 11, 2001 average weekday ridership for the NYCT X25, X90, and X92 express bus routes that have been rerouted due to the With-Action condition. Besides being rerouted around Park Row, the route for the X90 bus changed somewhat from the pre-September 11, 2001 route, unrelated to the security plan. The X90 was consolidated with the X92 route after 2002 and now operates between East 92nd Street and York Avenue and the World Financial Center via the FDR Drive and Pearl/Water Street (see Figure 8-2). According to the MTA, the rerouting of the X90 is permanent and would not return to its former route down Park Row. Bus ridership on the X25 bus fell dramatically (approximately 49%) from pre-September 11, 2001 to post-September 11, 2001 conditions. Bus ridership on the X90 rose by approximately 18% between 2000 and 2002 before it was consolidated with the X92 after 2002 (not shown on Table 8-8). Average weekday bus ridership for the X90/X92 was approximately 1,049 in 2005.

Table 8-8: Pre- and Post-September 11, 2001 Average Weekday Express Bus Ridership

Route	2000	2005	Percent Change
X25	132	67	-49%
X90/X92*	609	1,049	47%
Total	741	1,116	30%

* The X90 and X92 buses were consolidated after September 11, 2001

Source: MTA *Subway & Bus Ridership Data*

The BM1, BM2, BM3, and BM4 bus routes were also rerouted after September 11, 2001. In the AM peak hour, in Lower Manhattan, these bus routes operate between Brooklyn via the Brooklyn Batter Tunnel and Church Street/Thomas Street via Greenwich Street/Trinity Place/Church Street. In the PM peak hour, in Lower Manhattan, these bus routes operate between Park Place/Church Street and Brooklyn via Frankfort Street, Water Street, and Battery Place (see Figure 8-2). Ridership data for these bus routes is not available.

As discussed above, as a result of the terrorist attacks on September 11, 2001, 34.5 million square feet of office space in Lower Manhattan was destroyed or damaged. The loss of ridership on the express bus routes is attributed to the loss of office space that occurred and not to the rerouting of the bus routes. As shown in Figure 8-2, the rerouting of the X25 around the security plan street closures did not change drastically from its previous route. As such, the drop in ridership between pre- and post-September 11, 2001 is most likely not attributable to the rerouting of the bus route.

Tour Bus Operations

There are two types of tours that operate within the vicinity of the study area; regionally-based tours that bring people to the area from outside of New York City and locally-based tour bus operations. According to the *Chinatown Access and Circulation Study* prepared by the Lower Manhattan Development Corporation (LMDC) in 2004, both tour types have their own unique issues with respect to pedestrian and vehicular traffic flows and parking within the vicinity of the study area.

Regional Tour Buses

Regional tour buses are not regulated by the City and there are no designated drop-off points and no specific layover locations are provided. These regionally-based tours typically drop off a bus load of tourists, relocate to a site that is on the fringes of the community where the bus lays over for a period of time, and then the tour bus returns to a designated pick-up location to continue the tour.

Since there are specific drop-off and pick-up areas for these tours, they create a concentrated crowd of people unfamiliar with the neighborhood. This process can cause vehicular congestion when the buses are idling to drop their passengers, especially if the locations are on a particularly congested street such as Canal Street. This can also be problematic for local pedestrian movements. During layover periods, regional tour buses tend to congregate in single locations along South Street and Pike Street under and near the Manhattan Bridge. This is problematic as these buses tend to form a wall along this area, blocking both visual and physical access to the waterfront, and creating air and noise pollution.

Local Tours Buses

Local tours run a prescribed route with designated stop locations. The primary local tour operator in the City (Gray Line) runs bus tours on a twenty minute headway south down Broadway. The bus then loops around Battery Park and continues north back through Chinatown along Allen Street. There are three designated stops within the study area:

- Chinatown/Little Italy - Broadway between Walker and Lispenard Streets
- City Hall/Brooklyn Bridge - Park Row at City Hall Park
- South Street Seaport - South Street between Fulton and John Streets

According to the LMDC study, the local tour bus stop for Chinatown/Little Italy is far from the tourist cores of these areas. The primary advertised Chinatown stop is on Broadway, two blocks west of the historic Chinatown core. The key issue is the economic impact of not having a stop located closer to the focus of tourist activity in Chinatown and Little Italy, particularly on the northbound part of the tour loop.

Although tour bus operations have affected street conditions and mobility within the study area, these problems do not appear to be a result of the action. The street closures have not limited access and circulation for local tour bus routes within the vicinity of the study area. In addition, the action has not affected regional tour bus operations as the problems with the regional tour buses discussed above are not a result of the street closures.

Pedestrians

According to the CEOR Technical Manual, a pedestrian analysis is appropriate when a proposed action would result in 200 or more pedestrian trips per hour at any pedestrian element. As the action has not or would not result in additional pedestrian trips in the area, a pedestrian analysis is not warranted. However, as the action has limited pedestrian accessibility in certain areas of the security zone, a brief discussion of this pedestrian detour is discussed below.

With the exception of one corridor, the streets that are closed to vehicular traffic as a result of the security plan are open to pedestrian activity. The pedestrian corridor running between Police Headquarters to the intersection of Madison Street and Pearl Street was closed as part of the security plan. This corridor connects the plaza in front of Police Headquarters to the intersection of Madison and Pearl Streets. The distance through this corridor from the edge of the plaza to the intersection is approximately 540'. There is a staircase along this corridor and, it is therefore not a handicapped route. With this route closed, pedestrians must travel along the south side of the headquarters building along Avenue of the Finest and Madison Street. The distance for this alternate route from the edge of the plaza to the intersection of Madison and Pearl Streets is approximately 780'. There is a staircase along this route as well. The increase in walking distance for pedestrians equals 240' or about one average city block. Based on field observations, there does not appear to be any congested pedestrian sidewalks resulting from the closed path adjacent to police headquarters. This change would not constitute a significant adverse impact.

Pedestrian Safety

As discussed in Chapter 7, "Traffic and Parking," the With-Action security measures have restricted unauthorized vehicular access within the security zone boundary. Much of the traffic that would otherwise use these street segments are diverted to the Worth Street, St. James/Pearl Street, Frankfort Street, and Centre Street corridors. As a consequence of these diversions, there have been changes in the numbers of vehicles turning across various crosswalks within the security zone and within the immediate vicinity of the security zone (see Figures 7-7a through 7-7c in Chapter 7, "Traffic and Parking"). For example, the numbers of turning vehicles traversing crosswalks on Park Row have decreased substantially, while the number of vehicles turning across the west crosswalk at Worth Street at Chatham Square has increased.

Table 8-9 shows 2005 pedestrian high accident locations in the study area compared to the high-accident locations in the year 2000.

**Table 8-9: Pedestrian High Accident Locations
(2000 vs. 2005)**

Intersection	Number of Pedestrian Accidents	
	2000*	2005**
East Broadway/Catherine Street	7	0
Broadway/Chambers Street	7	3
Bowery/Bayard Street	6	1
Broadway/Ann Street	6	0
East Broadway/Pike Street	6	1
Canal Street/Mott Street	6	2
Canal Street/Elizabeth Street	5	3
Church Street/Chambers Street	5	2

Source: *2001 *CEQR Technical Manual*

** NYC Department of Transportation

As shown in Table 8-9, the number of pedestrian accidents at high accident locations in the study area have significantly decreased from 2000 to 2005. As such, the traffic diversions due to the security plan have not increased the number of pedestrian accidents at any previous high accident location within the study area. However, as the security plan has increased traffic on the principle diversion routes of Worth Street and St. James Place/Pearl Street, an examination of pedestrian accidents along these diversion routes is warranted.

According to the 2001 *CEQR Technical Manual*, in 2000, any intersection in the City with 4 or more pedestrian accidents was considered a high pedestrian accident location. As shown in Table 8-9, no intersections along Worth Street or St. James Place/Pearl Street were considered high pedestrian accident locations in 2000. However, as shown in Table 8-10, certain intersections along Worth Street within the vicinity of the study area have had four or more pedestrian accidents between 2003 and 2005, particularly at Worth Street and Broadway. In 2003, there were four pedestrian accidents at Worth Street and Broadway and 5 pedestrian accidents at both Worth Street and Centre and Lafayette Streets. In 2004, there were 4 pedestrian accidents at Worth Street and Broadway, 2 at Worth Street and Centre Street, and none at the remaining intersections. In 2005, there were 5 pedestrian accidents at Worth Street and Broadway, 1 accident at both Worth Street and Centre and Baxter Streets, and none at the remaining intersections.

Table 8-10: Pedestrian Accidents Along Worth Street Corridor (2003-2005)

Intersection	Number of Pedestrian Accidents		
	2003	2004	2005
Worth Street/Centre Street	5	2	1
Worth Street/Lafayette Street	5	0	0
Worth Street/Bowery	n/a	0	0
Worth Street/Broadway	4	4	5
Worth Street/Chatham Sq.	0	0	0
Worth Street/Baxter Street	0	0	1

Source: NYC Department of Transportation

As shown in Table 8-11, there have been few pedestrian accidents along the St. James Place/Pearl Street corridor between 2003 and 2005. Most intersections had one or no accidents in this time period, with the exception of the 2 pedestrian accidents at St. James Place at James Street in 2003.

Table 8-11: Pedestrian Accidents Along St. James Place/Pearl Street Corridor (2003-2005)

Intersection	Number of Pedestrian Accidents		
	2003	2004	2005
St. James Pl./James Street	2	0	0
St. James Pl./Madison	1	0	0
St. James Pl./Pearl Street	1	0	0
St. James Pl./Park Row	0	0	0
Pearl Street/RF Wagner Place	1	0	0
Pearl Street/Ave. Of the Finest	0	1	0

Source: NYC Department of Transportation

In summary, the security plan has not generated any new pedestrian trips nor will it generate any pedestrian congestion on sidewalks. Pedestrian activity continues uninterrupted, except as described above. Traffic diversions associated with these vehicular restrictions have resulted in an increase in the numbers of vehicle turning movements at some crosswalks, while decreasing or eliminating all such movements at other crosswalks within the security zone. The results of the analysis of high accident locations indicate that the action may have created a high pedestrian accident location at the intersection of Worth Street and Broadway that was not such a location in the year 2000.

E. CONCLUSION

This chapter analyzes the effects of the security plan on bus services and pedestrian activity. The security plan has not generated additional demand for bus service or additional pedestrian activity. As discussed above, the bus routes in the vicinity of the security zone were rerouted

after the security zone was put into place. There have been substantial increases in overall travel time for these bus routes, and these increases have resulted in significant adverse impacts on bus operations for the M15 and M103 routes, especially in the AM peak hour and in the southbound direction for all peak hours.

As discussed above, the security plan appears to have resulted in a significant adverse safety impact on pedestrian conditions at the Broadway/Worth Street intersection. The security plan has not generated any new pedestrian trips nor has it interrupted existing pedestrian activity and no significant adverse impacts on pedestrian flow conditions have occurred or are anticipated as a result of the action.

Chapter 11, "Mitigation," provides mitigation measures to address the bus transit and pedestrian safety impacts identified in this chapter.

One Police Plaza Security Plan EIS

CHAPTER 9: AIR QUALITY

A. INTRODUCTION

This chapter examines the potential for air quality impacts from the action. Air quality impacts can be either direct or indirect. Direct impacts stem from emissions generated by stationary sources from a new development, such as emissions from fuel burned on site for heating, ventilation, and air conditioning (HVAC) systems. Air quality impacts associated with construction activities may include fugitive dust, exhaust and emissions from construction equipment, and increased traffic on local roadways. Indirect impacts are defined as nearby existing stationary sources and the potential for emissions due to mobile sources/vehicles generated by an action. As the action does not involve the construction of any new developments requiring HVAC systems, stationary source and construction air quality analyses are not warranted and are not included in this chapter.

Diverted vehicular trips associated with the action have the potential to affect microscale CO concentrations at affected nearby intersections. According to the *CEQR Technical Manual* the following screening criteria are applicable to this action for identifying intersections that may warrant further analysis:

- Actions resulting in 100 or more trips through an intersection
- Actions resulting in a substantial number of local or regional diesel vehicle trips

As discussed in detail below, the action has resulted in traffic volumes at multiple intersections that have exceeded the 100-vehicle threshold. Therefore, this air quality analysis addresses the potential for diverted vehicles to significantly impact air quality in the area.

B. SCOPE OF WORK

The City Environmental Quality Review (CEQR) process requires review of the potential environmental impacts of the action. This chapter evaluates the potential for air quality impacts. The scope of work focuses on vehicular concentrations of carbon monoxide and PM10/2.5 at the intersections with the highest diverted (project-generated volumes) resulting from the security

measures. Both No-Action and With-Action will be addressed for an analysis year of 2006. The air quality analysis was previously presented in the DEIS for One Police Plaza. This version of the report was prepared for the FEIS. It differs from the DEIS version due to:

- revised standards for fine particulates,
- discussion of bus diversion volumes due to closing of Park Row,
- slight changes in traffic due to the reversal of traffic on Baxter Street, and
- updated information on modeled pollutant concentrations.

C. AIR QUALITY STANDARDS AND CRITERIA

New York and National Ambient Air Quality Standards

Ambient air is defined by the United States Environmental Protection Agency (USEPA) as that portion of the atmosphere, external from buildings, to which the general public has access. National Ambient Air Quality Standards (NAAQS) were promulgated by USEPA for the protection of public health and welfare, allowing for an adequate margin of safety. The USEPA has set NAAQS for the following six criteria pollutants: sulfur dioxide, carbon monoxide, ozone, nitrogen dioxide, inhalable particulates, and lead. They consist of primary standards, established to protect public health with an adequate safety margin, and secondary standards, established to protect "plants and animals and to prevent economic damage." The six major pollutants, deemed criteria pollutants, because threshold criteria can be established for determining adverse effects on human health, are described below:

- Carbon Monoxide (CO). CO is a colorless, odorless gas produced from the incomplete combustion of gasoline and other fossil fuels. The primary source of CO in urban areas is from motor vehicles. Because this gas disperses quickly, CO concentrations can vary greatly over relatively short distances.
- Inhalable Particulates, also known as Respirable Particulates. Particulate matter is a generic term for a broad range of discrete liquid droplets or solid particles of various sizes. The standard now covers only those particles with diameters of 10 micrometers or less, which are the ones most likely to reach the lungs, and PM_{2.5} for particles with diameters of 2.5 micrometers or less. PM_{2.5} is considered to be a regional pollutant.
- Lead (Pb). Lead is a heavy metal. Emissions are principally associated with industrial sources and motor vehicles that use gasoline containing lead additives. Most U.S. vehicles produced since 1975, and all produced after

1980, are designed to use unleaded fuel. As a result, ambient concentrations of lead have declined significantly.

- Nitrogen dioxide (NO₂). Nitrogen dioxide is a highly oxidizing, extremely corrosive toxic gas. It is formed by chemical conversion from nitric oxide (NO), which is emitted primarily by industrial furnaces, power plants, and motor vehicles.
- Ozone (O₃). Ozone, a principal component of smog, is not emitted directly into the air, but is formed through a series of chemical reactions between hydrocarbons and nitrogen oxides in the presence of sunlight.
- Sulfur dioxides (SO₂). Sulfur dioxides are heavy gases primarily associated with the combustion of sulfur-containing fuels such as coal and oil. No significant quantities are emitted from mobile sources.

New York State Ambient Air Quality Standards further regulate concentrations of the criteria pollutants discussed above. The New York State Department of Environmental Conservation (NYSDEC), Air Resources Division, is responsible for air quality monitoring in the state. Monitoring is performed for each of the criteria pollutants to assess compliance. Table 9-1 shows the National and New York State Ambient Air Quality Standards.

Table 9-1
National and New York State Ambient Air Quality Standards

Pollutant	Type of Standard	Averaging Period	Standard
Sulfur Dioxide	Primary	<u>Annual arithmetic mean</u>	80 ug/m ³ (.03 ppm)
	Primary	<u>24-hour average^c</u>	365 ug/m ³ (.14 ppm)
	Secondary	<u>3-hour average^c</u>	1300 ug/m ³ (.5 ppm)
Inhalable Particulates (PM10)	<u>Revoked^a</u>	<u>Annual arithmetic mean</u>	50 ug/m ³
	Primary & Secondary	<u>24-hour average^b</u>	150 ug/m ³
Inhalable Particulates (PM2.5)	Primary & Secondary	<u>Annual arithmetic mean^d</u>	15 ug/m ³
	Primary & Secondary	<u>24-hour average^c</u>	<u>35</u> ug/m ³
Carbon Monoxide	Primary	<u>8-hour average^c</u>	9 ppm (10 mg/m ³)
	Primary	<u>1-hour average^c</u>	35 ppm (40 mg/m ³)
Ozone	Primary & Secondary	<u>1-hour average^f</u>	0.12 ppm (235 ug/m ³)
	Primary & Secondary	<u>8-hour average^g</u>	0.08 ppm (157 ug/m ³)
Nitrogen Dioxide	Primary & Secondary	Annual arithmetic mean	0.053 ppm (100 ug/m ³)
Lead	Primary & Secondary	Quarterly mean	1.5 ug/m ³

Notes: ug/m³ = micrograms per cubic meter, ppm = parts per million

^a Due to a lack of evidence linking health problems to long-term exposure to coarse particle pollution, the agency revoked the annual PM_{10} standard in 2006 (effective December 17, 2006).

^b Not to be exceeded more than once per year on average over 3 years.

^c Not to be exceeded more than once a year.

^d To attain this standard, the 3-year average of the weighted annual mean $PM_{2.5}$ concentrations from single or multiple community-oriented monitors must not exceed $15.0 \text{ ug}/\text{m}^3$.

^e To attain this standard, the 3-year average of the 98th percentile of 24-hour concentrations at each population-oriented monitor within an area must not exceed $35 \text{ ug}/\text{m}^3$ (effective December 17, 2006).

^f The NYC Metropolitan area is no longer subject to the 1-hour ozone standard.

^g To attain this standard, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.08 ppm.

Source: US Environmental Protection Agency

New York City De Minimis Criteria

For carbon monoxide from mobile sources, the City's de minimis criteria are used to determine the significance of the incremental increases in CO concentrations that would result from a proposed action. These set the minimum change in an 8-hour average carbon monoxide concentration that would constitute a significant environmental impact. According to these criteria, significant impacts are defined as follows:

- An increase of 0.5 parts per million (ppm) or more in the maximum 8-hour average carbon monoxide concentration at a location where the predicted No-Action 8-hour concentration is equal to or above 8 ppm.
- An increase of more than half the difference between baseline (i.e., No-Action) concentrations and the 8-hour standard, when No-Action concentrations are below 8 ppm.

For $PM_{2.5}$ analyses of intersections at the microscale level, the City's de minimis criterion for determining significance is:

$2 \text{ ug}/\text{m}^3$ for the 24-hour period, and
 $0.3 \text{ ug}/\text{m}^3$ for the annual period.

For the neighborhood scale of analysis, only the annual period is of concern, and the City's de minimis criterion for determining significance is:

0.1 ug/m³ for the annual period.

For mobile and stationary sources combined, the average PM_{2.5} concentration within a 1 km-square grid centered on the worst-case receptor has a de minimis value of:

0.1 ug/m³ for the annual period.

No de minimis values have been assigned to PM₁₀.

D. EXISTING CONDITIONS

State Implementation Plan

The Clean Air Act requires states to submit to the U.S. Environmental Protection Agency (EPA) a State Implementation Plan (SIP) for attainment of the NAAQS. The 1977 and 1990 amendments require comprehensive plan revisions for areas where one or more of the standards have yet to be attained. New York County is located in the New York Metropolitan Air Quality Control Region and is part of NYSDEC Region 2. New York County meets the NAAQS for all pollutants except ozone, PM₁₀ and PM_{2.5}. Its nonattainment status for ozone is designated as Severe-17 for the 1-hour gone standard and Moderate for the 8-hour standard. It is designated as Moderate nonattainment for PM₁₀. Prior to 5/20/02, the county also was part of a nonattainment area for CO. It is now designated as a CO maintenance area and is subject to the same requirements as a CO nonattainment area. A CO maintenance area must maintain the NAAQS for 20 years by following two sequential 10-year plans.

E. MOBILE SOURCE METHODS OF ANALYSIS

CO Screening Analysis

Diverted vehicular trips associated with the action have the potential to affect microscale CO concentrations at affected nearby intersections. To assess carbon monoxide due to vehicular traffic, a preliminary evaluation of intersections was carried out to identify those with the potential to violate the NAAQS or the NYC de minimis criteria for CO. If the results for the selected intersection(s) show compliance with the NAAQS and NYC de minimis standards under With-

Action conditions, then the remaining intersections are also presumed to be in compliance. Where multiple intersections warrant further analysis, a subset of worst-case intersections is typically selected for modeling. Based on the NYC *CEQR Technical Manual* and subsequent revisions to its procedures, the following screening criteria are applicable to this action for identifying intersections that may warrant further analysis:

- Actions resulting in 100 or more trips through an intersection
- Actions resulting in a substantial number of local or regional diesel vehicle trips

Table 9-2, which is based on the traffic diagrams in Chapter 7 (Traffic and Parking), shows that diverted traffic volumes at multiple intersections will exceed the 100-vehicle threshold under With-Action conditions. Project-generated increments are zero for many intersections, and they range from a negative traffic increment of -236 to an increase of 546 vehicles. The weekday AM period has the highest project-generated increments compared to the other peak traffic periods.

The highest increase in traffic due to the action occurs at the intersection of Mulberry Street and Worth Street, which has a project increment of 546 vehicles during the peak AM period. This is not a signalized intersection, and unsignalized intersections typically are not modeled. This is because the LOS on the primary link, which has the highest traffic volume, is allows traffic to flow freely.

For signalized intersections, the highest project increment, which occurs during the peak AM period, is at the intersection of St. James Place and Madison Street. Here, the peak AM volume would increase by 312 vehicles, from 761 vehicles under No-Action conditions to 1,073 under With-Action conditions. Rerouted buses travel along the primary links for this intersection under With-Action conditions. This intersection is recommended for modeling.

The second modeled intersection during the peak AM period is Foley Square at Worth St./Center Street. It would have a relatively high project increment of 271 vehicles coupled with a low LOS. In addition, the roadway links along this intersection would encompass the unsignalized intersections of Baxter Street at Worth Street and Mulberry Street at Worth Street, both of which showed high project-generated traffic. These links would experience additional bus traffic under With-Action conditions. As mentioned previously, these two unsignalized intersections have the highest project increments.

The third modeled intersection is Park Row at St. James Place/Chatham Square/Worth Street/Mott Street because it has a high increase in volume under With-Action conditions coupled with a low

LOS of E. It is The LOS of E under With-Action conditions shows a greater degree of congestion than the other two intersections selected for modeling.

If modeling with CAL3QHC shows no exceedances of the NAAQS of the NYC de minimis values for CO at these three intersections, then no exceedances would be expected at intersections with lower volumes and lower project increments. The remaining intersections and peak periods with project increments of 100 or more are largely characterized by lower project increments coupled with lower intersection volumes. Those intersections with comparatively higher intersection volumes have substantially lower project increments compared to the three recommended for modeling.

Mobile Source CO Modeling

The air quality mobile source analysis for the action utilized MOBILE6.2 for emission factors. CAL3QHC was the dispersion model used to evaluate 2006 No-Action and With-Action conditions.

Vehicular Data

Traffic volumes were obtained from the traffic analysis, which includes volumes, by approach, for key links and intersections within the study area. Vehicular speeds, also obtained from the traffic study, were based on field observations. Vehicular mix represents the proportions of vehicles falling into the twenty-eight MOBILE6.2 categories. The vehicular mix used for the analysis was based on field classification counts obtained from the traffic analysis for six vehicular types. These were expanded to the 28 MOBILE6.2 categories based on guidance from NYCDEP. The mixture of vehicular types, which may vary by time of day and type of roadway, is used to obtain composite emission factors from MOBILE6.2.

Table 9-2
2006 Intersection Volumes for No-Action and With-Action Conditions

ID	AM Period	No-Action		Project	With-Action	
		LOS	Volume	Volume	LOS	Volume
1	Park Row @ St. James Pl. @ Chatham Sq @ Worth @ Mott	D	1211	241	E	1452
2	Chatham Sq @ E. Broadway	B	1192	0	B	1192
3	Chatham Sq @ Catherine @ Division @ Bowery @ Doyer	C	1212	0	C	1212
4	St. James Pl. @ James		424	347		771
5	St. James Pl. @ Madison	C	761	312	C	1073
6	St. James Pl. @ Pearl	B	1008	2	B	1010
7	Pearl @ Ave of the Finest @ RF Wagner Pl.	C	1915	181	D	2096
8	Pearl @ Frankfort @ Dover		1963	310		2273
9	Gold @ Frankfort @ Rose		521	110		631
10	Park Row @ Pearl		894	-894		0
11	Foley Sq @ Pearl @ Centre @ Reade @ Lafayette		904	297		1201
12	Centre @ Chambers	C	1773	297	C	2070
13	Broadway @ Duane	B	981	0	C	981
14	Broadway @ Thomas	C	910	0	B	910
15	Broadway @ Worth	C	1469	56	C	1525
16	Lafayette @ Worth	C	1132	153	C	1285
17	Foley Square @ Worth @ Centre	F	1227	271	D	1498
18	Baxter @ Hogan Pl.		27	0		27
19	Baxter @ Worth @ Worth		352	444		796
20	Mulberry @ Worth		352	546		898
21	Barclay @ Broadway	D	1984	-13	D	1971
22	Barclay @ Church	B	1394	190	B	1584
23	Beekman @ Park Row	B	1301	-136	B	1165
24	Broome @ Bowery	C	2187	0	C	2187
25	Canal @ Bowery	D	4866	0	D	4866
26	Canal @ Broadway	C	3415	0	C	3415
27	Canal @ Centre	C	2660	0	C	2660
28	Canal @ Lafayette	C	2665	0	C	2665
29	Canal @ Mulberry	C	2252	0	C	2252
30	Chambers @ Broadway	D	2011	0	D	2011
31	Chambers @ Church	D	2171	120	D	2291
32	Division @ Pike	B	1521	0	B	1521
33	Ea Broadway @ Forsyth	B	807	0	B	807
34	Frankfort @ Gold	C	521	110	C	631
35	Frankfort @ Pearl	D	1963	310	C	2273
36	Fulton @ Broadway	B	1219	80	B	1299
37	Fulton @ Church	B	1200	70	C	1270
38	Fulton @ Pearl	C	1105	69	C	1174
39	Bowery @ Grand	C	2291	0	C	2291
40	Bowery @ Kenmare	D	3297	0	D	3297
41	Spruce @ Park Row	C	1369	-236	A	1133
42	Tryon Row @ Centre	B	706	97	B	803
43	Vesey @ Broadway	C	1764	-133	C	1631
44	Vesey @ Church	B	1217	70	B	1287
45	Worth @ Church	C	1791	116	C	1907

ID	MID Period	LOS	Volume	Project Increment	LOS	Volume
1	Park Row @ St. James Pl. @ Chatham Sq @ Worth @ Mott	D	1,278	115	E	1,393
2	Chatham Sq @ Ea Broadway	C	1329	17	C	1346
3	Chatham Sq @ Catherine @ Division @ Bowery @ Doyer	C	1348	0	C	1348
4	St. James Pl. @ James		401	191		592
5	St. James Pl. @ Madison	B	686	191	C	877
6	St. James Pl. @ Pearl	A	719	100	A	819
7	Pearl @ Ave of the Fine @ RF Wagner Pl.	C	1390	110	C	1500
8	Pearl @ Frankfort @ Dover		1535	84		1619
9	Gold @ Frankfort @ Rose		647	34		681
10	Park Row @ Pearl		635	-635		0
11	Foley Sq @ Pearl @ Centre @ Reade @ Lafayette		802	176		978
12	Centre @ Chambers	C	1545	176	C	1721
13	Broadway @ Duane	B	968	0	B	968
14	Broadway @ Thomas	B	859	0	B	859
15	Broadway @ Worth	B	1437	148	B	1585
16	Lafayette @ Worth	C	1064	182	C	1246
17	Foley Square @ Worth @ Centre	D	1065	233	C	1298
18	Baxter @ Hogan Pl.		43	0		43
19	Baxter @ Worth		441	327		768
20	Mulberry @ Worth		541	334		875
21	Barclay @ Broadway	D	1744	-99	C	1645
22	Barclay @ Church	B	1264	-59	B	1205
23	Beekman @ Park Row	B	1342	-99	B	1243
24	Broome @ Bowery	B	1561	0	B	1561
25	Canal @ Bowery	C	3495	0	C	3495
26	Canal @ Broadway	C	2583	0	C	2583
27	Canal @ Centre	D	2068	0	D	2068
28	Canal @ Lafayette	B	2015	0	B	2015
29	Canal @ Mulberry	B	1990	0	B	1990
30	Chambers @ Broadway	C	1791	0	C	1791
31	Chambers @ Church	C	1894	0	C	1894
32	Division @ Pike	B	1425	0	B	1425
33	Ea Broadway @ Forsyth	B	845	0	B	845
34	Frankfort @ Gold	C	647	34	C	681
35	Frankfort @ Pearl	C	1535	84	C	1,619
36	Fulton @ Broadway	A	1,043	-75	A	1,027
37	Fulton @ Church	B	1102	-75	B	1027
38	Fulton @ Pearl	C	1247	-84	C	1163
39	Bowery @ Grand	C	1685	0	C	1685
40	Bowery @ Kenmare	D	2815	0	D	2815
41	Spruce @ Park Row	A	1194	-99	A	1095
42	Tryon Row @ Centre	A	650	34	A	684
43	Vesey @ Broadway	C	1534	-115	C	1419
44	Vesey @ Church	A	1102	-75	A	1027
45	Worth @ Church	B	1687	148	B	1835

ID	PM Period	LOS	Volume	Project Increment	LOS	Volume
1	Park Row @ St. James Pl. @ Chatham Sq @ @ Mott	D	1375	113	E	1488
2	Chatham Sq @ Ea Broadway	B	1411	0	B	1411
3	Chatham Sq @ Catherine @ Division @ Bowery @ Doyer	D	1729	0	D	1729
4	St. James Pl. @ James		396	236		632
5	St. James Pl. @ Madison	B	708	193	B	901
6	St. James Pl. @ Pearl	A	829	4	A	833
7	Pearl @ Ave of the Fine @ RF Wagner Pl.	D	1689	-80	D	1609
8	Pearl @ Frankfort @ Dover		2050	20		2070
9	Gold @ Frankfort @ Rose		528	125		310
10	Park Row @ Pearl		830	-830		0
11	Foley Sq @ Pearl @ Centre @ Reade @ Lafayette		1058	184		1242
12	Centre @ Chambers	C	2067	184	C	2251
13	Broadway @ Duane	B	868	0	B	868
14	Broadway @ Thomas	B	753	0	B	753
15	Broadway @ Worth	B	1443	32	B	1465
16	Lafayette @ Worth	B	<u>1273</u>	<u>99</u>	C	<u>1372</u>
17	Foley Square @ Worth @ Centre	E	<u>1261</u>	178	C	<u>1439</u>
18	Baxter @ Hogan Pl.		<u>67</u>	0		<u>67</u>
19	Baxter @ Worth		<u>520</u>	331		<u>851</u>
20	Mulberry @ Worth		548	443		991
21	Barclay @ Broadway	C	1675	-102	C	1573
22	Barclay @ Church	B	947	51	B	998
23	Beekman @ Park Row	B	1320	-110	B	1210
24	Broome @ Bowery	C	1883	0	C	1883
25	Canal @ Bowery	D	4025	0	D	4025
26	Canal @ Broadway	C	2547	0	C	2547
27	Canal @ Centre	C	<u>2363</u>	0	C	<u>2363</u>
28	Canal @ Lafayette	C	<u>2180</u>	0	C	<u>2180</u>
29	Canal @ Mulberry	C	2139	0	C	2139
30	Chambers @ Broadway	D	1,824	14	D	1838
31	Chambers @ Church	C	2161	0	C	2161
32	Division @ Pike	B	1819	0	B	1819
33	Ea Broadway @ Forsyth	B	893	0	B	893
34	Frankfort @ Gold	C	528	125	D	653
35	Frankfort @ Pearl	C	2,050	20	D	2070
36	Fulton @ Broadway	B	908	7	B	915
37	Fulton @ Church	B	<u>791</u>	<u>40</u>	B	831
38	Fulton @ Pearl	C	1475	0	C	1475
39	Bowery @ Grand	B	1962	0	B	1962
40	Bowery @ Kenmare	D	3200	0	D	3200
41	Spruce @ Park Row	A	1314	-120	A	1194
42	Tryon Row @ Centre	C	983	20	C	1003
43	Vesey @ Broadway	C	1457	-103	C	1354
44	Vesey @ Church	B	781	50	B	831
45	Worth @ Church	C	1756	32	B	1788

Notes: * Numbers in bold type exceed the 100-vehicle screen

** Intersections without LOS are unsignalized

Source: Philip Habib & Associates, Inc.,

Emission Factors

Carbon monoxide emission factors for 2006 were obtained from EPA's MOBILE6.2 model. For New York City, taxis and sport utility vehicles are treated as special categories of vehicles. Sport utility vehicles (SUVs) are included with light duty gasoline trucks in the LDGT1 category. Taxis are counted as a category separate from autos, and a separate MOBILE6.2 run with taxi-specific registration data was carried out.

The ambient temperature used in the model was 50° F, as currently recommended for Manhattan locations. Inputs pertaining to inspection/maintenance, anti-tampering programs, hot/cold starts, volatility, etc., were obtained from NYCDEP. A separate MOBILE6.2 run was set up for taxis, because their mileage and registration data is different from that of other vehicles. The resulting MOBILE6.2 emission factors were combined with the appropriate average vehicular mixes assigned to each of the roadways to calculate the composite emission factors, by speed, for use in the CAL3QHC model. The emission factors for project-generated vehicles also reflect the average relative proportions of 97% autos and 3% SUVs that were observed in the field.

CO Receptors

Sensitive receptors are homes, parks, schools, or other land uses where people congregate and which would be sensitive to air quality impacts. For the purposes of air quality analysis, any point to which the public has continuous access can be deemed a sensitive receptor site. Numerous receptor points are typically modeled at each intersection to identify the points of maximum potential CO concentration. To analyze CO levels, receptor points were modeled on the corners of the affected intersections, and additional points were modeled at 20-foot intervals for a distance of 100 feet along both sides of each intersection leg. Receptors were placed at mid-sidewalk and outside the air quality mixing zone.

Modeling

The CAL3QHC model was used to determine CO concentrations. CAL3QHC is a Gaussian dispersion model which determines pollutant concentrations at specified receptor points. It accounts for CO from both free-flowing vehicles and vehicles idling at signalized intersections. Inputs to the model included Cartesian coordinates for receptors, free flow approach and departure links, and the approach links for queued vehicles at intersections. Peak hour traffic volumes, signal cycle information, composite vehicular emission factors, and adjusted saturation flow rate are also input to the model. Information on roadway parameters was obtained from the traffic study. A surface roughness of 321 cm, representing land uses in a central business district (CBD), was used.

Free-flowing traffic links are set up separately from intersection queue links. Free flow links were modeled for a distance of 1,000 feet from the intersection in each direction. The mixing zone for free flow links was equal to the width of the traveled way plus an additional 10 feet (3 meters) on each side of the roadway. For queue links, the mixing zone was limited to the width of the traveled way.

Typical worst case meteorological conditions were also incorporated into the CAL3QHC inputs. These included a mixing layer height of 1,000 meters, a wind speed of 1 meter per second, and an atmospheric stability class of D (neutral stability). Settling and deposition velocities were assumed to be 0. Each computer run covered wind angles from 0 to 360 degrees and identified the worst case wind angle for each receptor point.

Background Concentrations

Mobile source modeling of CO concentrations at receptor locations accounts solely for emissions from vehicles on the nearby streets, but not for overall pollutant levels. Therefore, *background pollutant concentrations* must be added to modeled results to obtain total pollutant concentrations at a given receptor site. The 8-hour averaging period is of primary concern, and is the only one reported in this chapter. The recommended background CO level for the 8-hour averaging period in Manhattan is 2.0 ppm for 2006.

Calculation of Total CO Concentrations

To obtain total 8-hour CO concentrations, the 1-hour modeled CO values were multiplied by a persistence factor of 0.79, then added to the 8-hour background values. The same worst case wind angle would therefore apply to both the 1-hour and 8-hour averaging periods. Only the 8-hour CO and background values are presented in the report. If no violation of the 8-hour standard occurs, no violation of the 1-hour CO standard is likely.

PM 10/2.5 Screening

NYCDEP has developed a screening analysis for potential PM_{2.5} impacts based on the 2002 emissions for 21 diesel-powered vehicles. If the proposed action would add 21 diesel vehicles to an intersection during a peak period, then a more detailed analysis is required to determine whether the emissions would exceed 21 diesel vehicles using 2002 emission factors. In addition, if a proposed project would induce many vehicles of other classes, and the total PM_{10/2.5} emissions from all of the induced vehicles are equivalent to twenty-one 2002 diesel trucks, the screen is exceeded. NYCDEP has not determined a specific number of light duty gasoline vehicles (LDGV) that would be equivalent to

heavy duty diesel vehicles (HDDV), as this ratio would vary with the future year of analysis. Therefore, the ratio must be determined for each project.

The MOBILE6.2 emissions model was run for 2002 and 2006 to determine the number of background vehicles that would have PM2.5 emissions equivalent to 21 diesel vehicles¹. The emission factors included exhaust, brake, tire, and fugitive dust emissions. Based on the vehicular mix for No-Action conditions along Worth Street and St James Place, the 2006 composite exhaust emission factor for PM2.5 would be 0.3906 grams/hour. In 2002, the a worst-case heavy duty diesel truck would generate 5.23 grams per hour of PM2.5. Therefore, 21 diesel vehicles would generate 109.8 grams of PM2.5 ($21 \times 5.23 = 109.8$) during a peak hour. With the lower composite emission factor of 0.3906 grams/hour, the volume of diverted vehicles needed to generate 109.8 grams/hour would be about 333 ($109.8/0.3906=333$).

As stated above, approximately 333 diverted vehicles in 2006 would generate hourly PM2.5 emissions equivalent to 21 heavy duty diesel trucks in 2002. The intersections that exceed this threshold are St. James Place at St. James Street, Baxter Street at Worth Street, and Mulberry Street at Worth Street. The majority of the project-generated volume is on St. James Place and Worth Street, not the cross streets. Since these intersections are not signalized, the arterial links were included in the modeling of the three nearby signalized intersections that were modeled for CO. Therefore, PM10 and PM2.5 were modeled for 1) Park Row @ St. James Place/Chatham Square/Worth Street/Mott Street, 2) Foley Square at Worth St./Center Street, and 3) St. James Place and Madison Street. these intersections.

F. NO-ACTION CONDITION

Under the No-Action condition, the security zone installed by NYPD after 9/11 would not be in place and traffic flow patterns, including all bus routes, would be maintained. These traffic volumes reflect physical and land use changes that have occurred independent of the action. Generally, when compared to the baseline conditions, traffic in much of the network has declined due to lower demand and/or shifted demand due to street configuration changes (e.g. the construction of a unified Foley Square plaza), the absence of portions of Vesey Street, the security plans for 26 Federal Plaza and for the NYSE, and other roadway changes. There have also been traffic demand changes due to loss of office space, and conversion of office to residential space. Under 2006 No-Action conditions, however, all bus routes would be maintained on Park Row as in the baseline condition, except for the M9 which is assumed to remain on its present “diverted” route to/from Battery Park City. The background traffic and speeds associated with No-Action conditions were used to determine CO concentrations for 2006.

¹The selected speed is not important as PM10 and PM 2.5 emissions are independent of speed.

The intersection at Foley Square and Worth Street contains the highest traffic volumes of the three intersections analyzed for No-Action. The worst case receptor point is R42, which is 60 feet south of the southeastern midpoint of the current signalized intersection. The one-hour modeled value of 2.6 ppm is equivalent to an 8-hour average of 2.1 ppm, and the total 8-hour concentration of 4.1 ppm is within the NAAQS. The worst-case wind angle of 1° shows that the highest CO concentrations would occur when the wind is blowing at an angle that captures the CO emissions from northbound queues on Foley Square.

The worst case receptor for the Park Row/Chatham Square intersection is R30, which is 40 feet north of the northeast corner. The 1-hour modeled value of 2.2 ppm is equivalent to an 8-hour value of 1.7 ppm after the 0.79 persistence factor has been applied. The total 8-hour CO level, which includes the background concentration of 2.0 ppm, is 3.7 ppm. This is within the NAAQS of 9 ppm for the 8-hour period. The wind angle of 99° indicates that the primary sources of CO for Receptor 30 are the southwest bound queues on Chatham Square.

As shown in Table 8-3, the worst-case receptor point at the intersection of St. James Place and Madison Street under No-Action Conditions is R41, which is 40 feet south of the southeast corner. The 8-hour modeled value of 0.9 ppm, with the 2.0 ppm background value, translates into an 8-hour average of 2.9 ppm, which is below the NAAQS. The wind angle of 274° for R41 carries CO emissions primarily from the northbound queue.

**Table 9-3
Eight-Hour Carbon Monoxide Concentrations (ppm)**

No-Action Conditions		With-Action Conditions		Difference (With-Action -No-Action)
Foley Square/Worth Street		Foley Square/Worth Street		
Receptor	42	Receptor	42	0.1
Wind Angle	<u>1</u>	Wind Angles	<u>357</u>	
Modeled CO	<u>2.1</u>	Modeled CO	<u>2.0</u>	
Background CO	2.0	Background CO	2.0	
Total CO	<u>4.1</u>	Total CO	<u>4.0</u>	
Chatham Square/Worth Street		Chatham Square/Worth Street		Difference (With-Action -No-Action)
Receptor	30	Receptor	54	
Wind Angle	<u>99</u>	Wind Angle	218	0.8
Modeled CO	1.7	Modeled CO	2.5	
Background CO	2.0	Background CO	2.0	
Total CO	<u>3.7</u>	Total CO	<u>4.5</u>	
St. James Place/Madison Street		St. James Place/Madison Street		
Receptor	41	Receptor	40	
Wind Angle	<u>274</u>	Wind Angle	227	0.6
Modeled CO	<u>0.9</u>	Modeled CO	<u>1.5</u>	
Background CO	2.0	Background CO	2.0	
Total CO	<u>2.9</u>	Total CO	<u>3.5</u>	

Source: Sandstone Environmental Associates, Inc.

Mobile Source PM10

Background Concentrations

The nearest PM10 monitor for the project site is the JHS 126 in Brooklyn. The annual average PM10 concentration for 2004, the most recent year for which data are available, is an annual arithmetic mean of 17 ug/m³. In 2004, the maximum 24-hour concentration at this monitor was 47 ug/m³. Both of these values are within the NAAQS.

PM10 Modeling Inputs

Vehicular emission factors for PM10 were obtained from EPA's MOBILE6.2 model. Inputs for running MOBILE6.2 were obtained from NYCDEP. In contrast to CO emissions, ambient temperature and the thermal states of vehicular engines do not affect the emissions of fine particulates. The MOBILE6.2 emission factors include PM10 from vehicle exhaust, sulfates, and fugitive dust. The fugitive dust component of the emission factors was calculated using formulas in EPA's AP-42 document. The MOBILE6.2 model calculates idle emissions and emissions for moving vehicles. It is not sensitive to vehicular speed or the thermal state of the engine. All speeds have the same emission factor for a given vehicular category.

The vehicular mixes used to obtain composite emission factors from MOBILE6.2 for the CO analysis also were used for the PM10 analysis. However, they were refined to account for different periods of the day. The proportion of trucks and buses from 10 pm to 6 am was reduced to account for the lower volumes of these vehicle types during the nighttime period. The composite emission factors are used in conjunction with link volumes in the CAL3QHCR model to determine pollutant concentrations.

The next step was to run the input data with the CAL3QHCR model, which is used with five years of meteorological data. Data from JFK Airport for 1991 through 1995, which was the most recent data available, was used in the model. CAL3QHCR requires traffic volumes and emission factors for each hour of the day. CAL3QHCR provides two tiers of analysis. In a Tier 1 analysis, the same traffic volumes (typically a peak hour) are used for all 24 hours throughout the day.

For this project, the more refined Tier 2 analysis was run. Traffic volumes for No-Action conditions were calculated for all relevant roadway links for each hour of the 24-hour day. This was a Pattern 1 type of analysis, which assumes that all days of the week have the same traffic pattern.

Calculation of Total PM10 Concentrations

PM10 standards are for annual and 24-hour periods. CAL3QHCR calculates 24-hour and annual concentrations for each year of meteorological data. The modeled results from CAL3QHCR were added to the background concentrations. Table 9-4 shows the projected 24-hour and annual concentrations for PM10 resulting from the CAL3QHCR Tier 2 analysis for the receptors with the highest PM10 concentrations. Since the traffic for each peak period is incorporated into the 24-hour input data, the model does not have to be run separately for individual peak periods. Results are well within the NAAQS of 150 ug/m³ for the 24-hour period for all receptors at all three intersections.

PM 2.5 Intersection Analysis

PM 2.5 was modeled to determine whether the project would be in compliance with both the NAAQS and the NYC de minimis values. Since PM2.5 concentrations are a portion of the PM10 values, the rationale for selecting the intersections is the same as explained under the discussion for PM10.

PM2.5 Background Concentrations

The nearest PM2.5 monitor for the project site is at Canal Street in Manhattan. The average PM2.5 concentration for 2003-2005 is an annual arithmetic mean of 15.1 ug/m³. In 2005, the maximum 24-hour concentration at this monitor was 55.9 ug/m³. The 24-hour concentration exceeds the new NAAQS of 35 ug/m³, and the 3-year annual average slightly exceeds the NAAQS of 15 ug/m³. However, the impact criteria for PM2.5 is based on project-generated increments, so the background values are not used in the analysis of impacts

PM2.5 Modeling Inputs

Emission factors for PM2.5 were obtained from the MOBILE6.2 model as described under the discussion of PM10 modeling inputs. The component for fugitive dust was calculated from the formulas in AP-42 and included in the PM2.5 emission factors used for the analysis.

Table 9-4
No-Action and With-Action PM10 Concentrations (ug/m³)

Intersection	24-Hour PM 10 (ug/m ³)			Annual PM 10 (ug/m ³)		
	No-Action	With-Action	Difference	No-Action	With-Action	Difference
<u>Foley Square/Worth Street</u>						
Receptor	R17	R17		R17	R28	
Modeled Value	<u>8.47</u>	<u>9.25</u>		<u>2.75</u>	<u>3.35</u>	
Background	<u>47.0</u>	<u>47.0</u>		<u>17.0</u>	<u>17.0</u>	
Total	<u>55.47</u>	<u>56.25</u>	<u>0.78</u>	<u>19.75</u>	<u>20.35</u>	<u>0.6</u>
<u>Chatham Square/Worth Street</u>						
Receptor	R28	R28		R50	R50	
Modeled Value	<u>6.09</u>	<u>7.57</u>		<u>2.26</u>	<u>2.84</u>	
Background	<u>47.0</u>	<u>47.0</u>		<u>17.0</u>	<u>17.0</u>	
Total	<u>53.09</u>	<u>54.57</u>	<u>1.48</u>	<u>19.26</u>	<u>19.84</u>	<u>0.58</u>
<u>St. James Place/Madison Street</u>						
Receptor	R18	R39		R39	R39	
Modeled Value	<u>3.82</u>	<u>5.88</u>		<u>1.50</u>	<u>2.33</u>	
Background	<u>47.0</u>	<u>47.0</u>		<u>17.0</u>	<u>17.0</u>	
Total	<u>50.82</u>	<u>52.88</u>	<u>2.06</u>	<u>18.50</u>	<u>19.33</u>	<u>0.83</u>

Source: Sandstone Environmental Associates, Inc.

PM 2.5 No-Action Conditions

The projected 24-hour concentrations for PM 2.5 at the microscale level are shown in Table 9-5. Modeling incorporated the same receptor points and CAL3QHCR Tier 2 analysis described under the CO and PM10 discussions. The highest values for No-Action conditions occurred with the 1991 meteorological data. They include a modeled concentration of 1.35 ug/m³ for the Foley Square/Worth Street Intersection, 0.89 ug/m³ for the Chatham Square/Worth Street intersection, and 0.56 ug/m³ for St James Place/Madison Street

The projected annual intersection concentrations are shown on Table 9-6. The highest modeled value of 0.43 $\mu\text{g}/\text{m}^3$ occurred for the 1995 data at Receptor 40 on Foley Square/Worth Street.

PM2.5 Neighborhood Analysis

The neighborhood scale of analysis models PM2.5 concentrations at receptor points that are 15 meters from the source. Only the annual average is analyzed for the neighborhood scale analysis. Table 9-7 shows the No-Action concentrations modeled for the neighborhood analysis. Under No-Action conditions, the highest modeled value of 0.19 $\mu\text{g}/\text{m}^3$ occurs at Receptor 8 with the 1991 and 1995 meteorological data.

G. WITH-ACTION CONDITION

Mobile Source CO

CO concentrations under With-Action conditions would be in compliance with both the NAAQS and the NYC de minimis standards. Table 9-3 also shows the worst-case receptors for With-Action conditions. The intersection at Foley Square and Worth Street still has the highest overall traffic volume. Under With-Action conditions, some approaches would experience a net increase while others would experience a net decrease. Despite the overall increase in traffic volume, the worse-case receiver (R42) and total 8-hour CO concentration (4.0 ppm) are the same as for No-Action conditions. The wind angle has changed slightly from 1° to 357°.

Table 9-5
24-Hour No-Action and With-Action PM_{2.5} Intersection Concentrations (ug/m³)

Intersection	24-Hour PM 2.5 (ug/m ³)		
	No-Action	With-Action	Difference
Foley Square/Worth Street			
Receptor (highest No-Action and With-Action, 1991)	R17	R17	
Modeled Value	<u>1.35</u>	<u>1.50</u>	<u>0.15</u>
Receptor (highest increment, 1995)	R31	R31	
Modeled Value	<u>0.17</u>	<u>0.36</u>	<u>0.19</u>
Chatham Square/Worth Street			
Receptor (highest No-Action, 1991)	R31	R31	
Modeled Value	<u>0.89</u>	<u>1.11</u>	<u>0.22</u>
Receptor (highest With-Action, highest increment 1991)	R51	R51	
Modeled Value	<u>0.56</u>	<u>1.19</u>	<u>0.63</u>
St. James Place/Madison Street			
Receptor (highest No-Action, 1991)	R28	R28	
Modeled Value	<u>0.56</u>	<u>0.69</u>	<u>0.13</u>
Receptor (highest With-Action, highest increment, 1995)	R40	R40	
Modeled Value	<u>0.40</u>	<u>0.93</u>	<u>0.53</u>

Source: Sandstone Environmental Associates, Inc.

Table 9-6
Annual No-Action and With-Action PM_{2.5} Intersection Concentrations (ug/m³)

Intersection	Annual PM 2.5 (ug/m ³)		
	No-Action	With-Action	Difference
Foley Square/Worth Street			
Receptor (highest No-Action, 1995)	R40	R40	
Modeled Value	<u>0.43</u>	<u>0.43</u>	<u>0.00</u>
Receptor (highest With-Action, 1991)			
Modeled Value	<u>0.35</u>	<u>0.51</u>	<u>0.16</u>
Receptor (highest increment, 1991)			
Modeled Value	<u>0.20</u>	<u>0.39</u>	<u>0.19</u>
Chatham Square/Worth Street			
Receptor (highest No-Action and With-Action, 1995)	R50	R50	
Modeled Value	<u>0.28</u>	<u>0.42</u>	<u>0.14</u>
Receptor (highest increment 1991)			
Modeled Value	<u>0.21</u>	<u>0.42</u>	<u>0.21</u>
St. James Place/Madison Street			
Receptor (highest No-Action and With-Action, 1995)	R39	R39	
Modeled Value	<u>0.20</u>	<u>0.35</u>	<u>0.15</u>
Receptor (highest increment, 1995)			
Modeled Value	<u>0.19</u>	<u>0.35</u>	<u>0.16</u>

Source: Sandstone Environmental Associates, Inc.

Table 9-7

Annual No-Action and With-Action PM2.5 Neighborhood Concentrations (ug/m³)

Intersection	Annual PM 2.5 (ug/m ³)		
	No-Action	With-Action	Difference
Foley Square/Worth Street			
Receptor (highest No-Action and With-Action, 1991)	<u>R 8</u>	<u>R 8</u>	
Modeled Value	<u>0.19</u>	<u>0.23</u>	<u>0.04</u>
Receptor (highest increment, 1991)	<u>R14</u>	<u>R14</u>	
Modeled Value	<u>0.14</u>	<u>0.23</u>	<u>0.09</u>
Chatham Square/Worth Street			
Receptor (highest No-Action and With-Action, 1995)	R18	R18	
Modeled Value	<u>0.13</u>	<u>0.20</u>	<u>0.07</u>
Receptor (highest increment 1991)	R04	R04	
Modeled Value	<u>0.04</u>	<u>0.12</u>	<u>0.08</u>
St. James Place/Madison Street			
Receptor (highest No-Action and With-Action and highest increment , 1995)	R16	R16	
Modeled Value	<u>0.08</u>	<u>0.15</u>	<u>0.07</u>

Source: Sandstone Environmental Associates, Inc.

The intersection at Park Row and Chatham Square has a worse-case receptor at R54, located 80 feet southeast of the western midpoint next to St. James Place. The 8-hour CO level is 2.7 ppm. When added with the background concentration, the overall 8-hour value of 4.5 is 0.8 more than its counterpart for No-Action conditions. The worst-case wind angle shifts from 99° under the No-Action to 218° under With-Action due to a change in the major CO contributor – the westbound queues on St. James Place.

The St. James Place/Madison Street intersection has the highest increase in traffic (312 vehicles) of the three intersections modeled. The worst-case receptor changes from R41 to R40, which is 80 feet southeast of the eastern corner of the intersection. The maximum modeled 8-hour value is 1.5, resulting in a total 8-hour with background CO concentration of 3.5 ppm. The worst-case wind of 227° indicates the influence of project-generated traffic on the St. James Place southbound queue.

PM10 Analysis

Table 9-4 shows the PM10 results for With-Action conditions. Under With-Action conditions, the maximum modeled value for the 24-hour period would be 9.25 ug/m³ which would occur for Receptor 17 at Foley Square/Worth Street. After adding in the background value of 47.0 ug/m³, the maximum total concentration of 56.25 ug/m³ would be within the NAAQS of 150 ug/m³. For the annual period, the maximum value of 3.35 ug/m³ would occur at Receptor 28 at the Foley Square/Worth Street intersection. The total concentration, with the background value, would be 20.35 ug/m³. This is within the NAAQS of 50.0 ug/m³. Thus there are no significant adverse impacts.

PM2.5 Intersection Analysis

Table 9-5 shows the results for the intersection analysis of PM2.5 for the 24-hour period. The highest modeled value of 1.50 ug/m³ would occur at Receptor 17 at Foley Square/Worth Street with the 1991 meteorological data. The greatest increase in PM2.5 would occur at Receptor 51 at the Chatham Square/Worth Street intersection with the 1991 meteorological data. The maximum increment of 0.63 ug/m³ is below the de minimis criterion of 2 ug/m³.

Table 9-6 shows the annual concentrations of PM2.5 for With-Action conditions. Among the three intersections, the highest modeled value would be 0.51 ug/m³, which would occur at Receptor 28 at the Foley Square/Worth Street intersection with the 1991 meteorological data. However, the highest relative increment of 0.21 ug/m³ would occur at Receptor 52 at the Chatham Square/Worth Street intersection with the 1991 data. This is below the de minimis criterion of 0.3 ug/m³.

PM2.5 Neighborhood Analysis

Annual average concentrations also were reviewed for all receptor points for all five years of meteorological data for No-Action and With-Action conditions. As shown in Table 9-7, the highest modeled concentration was 0.23 ug/m³, and the highest increment was 0.09 ug/m³, which occurred at Receptor 14 with the 1991 meteorological data at the Foley Square/Worth Street intersection. This does not exceed the NYC de minimis criterion of 0.1 ug/m³ for the annual average.

H. CONCLUSION

The results of the analyses presented in this chapter demonstrate that the CO, PM10, and PM2.5 concentrations due to the action have not resulted in any violations of NAAQS and the de minimis criterion for the modeled pollutants.

One Police Plaza Security Plan EIS

CHAPTER 10: NOISE

A. INTRODUCTION

Noise pollution in an urban area comes from many sources. Some sources are activities essential to the health, safety, and welfare of the City's inhabitants, such as noise from emergency vehicle sirens, garbage collection operations, and construction and maintenance equipment. Other sources such as traffic, stem from the movement of people and goods, activities that are essential to the viability of the City as a place to live and do business. Although these and other noise producing activities are necessary to a city, the noise they produce is undesirable.

As described in detail in earlier chapters of this EIS, the security measures include the installation of attended security checkpoint booths, planters, bollards and hydraulically operated delta barriers to restrict the access of unauthorized vehicles from the roadways situated adjacent to the civic facilities located near One Police Plaza. The noise analysis presented below addresses the potential for significant increases in noise due to diverted traffic that has resulted from the action.

B. NOISE FUNDAMENTALS

Noise is defined as any unwanted sound, and sound is defined as any pressure variation that the human ear can detect. Human beings can detect a large range of sound pressures ranging from 20 to 20 million micropascals, but only those air pressure variations occurring within a particular set of frequencies are experienced as sound. Air pressure changes that occur between 20 and 20,000 times a second, stated as units of Hertz (Hz), are registered as sound. Human hearing is less sensitive to low frequencies (<250 Hz) than mid-frequencies (500-1,000 Hz). Humans are most sensitive to frequencies in the 1,000 to 5,000 Hz range. Since ambient noise contains many different frequencies all mixed together, measures of human response to noise assign more weight to frequencies in this range. This is known as the A-weighted sound level.

Because the human ear can detect such a wide range of sound pressures, sound pressure is converted to sound pressure level (SPL), which is measured in decibels. The decibel is a relative measure on a logarithmic scale of the sound pressure with respect to a standardized reference quantity. Decibels on the A-weighted scale are termed "dBA." Because the scale is logarithmic, a relative increase of 10 decibels represents a sound pressure level that is 10 times higher. However, humans do not perceive a 10 dBA increase as 10 times louder; they perceive it as twice as loud. The following is typical of human response to relative changes in noise level:

- A 3 dBA change is the threshold of change detectable by the human ear
- A 5 dBA change is readily noticeable
- A 10 dBA increase is perceived as a doubling of noise level

Passenger Car Equivalents (PCEs) are the number of autos that would generate the same noise level as the observed vehicular mix of autos, medium trucks, and heavy trucks. PCEs are useful for comparing the effects of traffic noise on different roadways or for different future scenarios. The *CEQR Technical Manual* uses the following formulas for converting motor vehicles into passenger car equivalents:

- auto and light trucks = 1 passenger car
- medium trucks = 13 passenger cars
- heavy trucks = 47 passenger cars
- buses = 18 passenger cars

C. STANDARDS AND CRITERIA

Prior to the federal Noise Control Act of 1972, most states and municipalities regulated noise under general ordinances for creating a nuisance or disturbing the peace. In 1973, the EPA published a "Criteria Document" that established criteria for assessing the effects of noise on public health and welfare. In 1974, the EPA published the "Levels Document," which set recommended levels to protect public health and welfare. Based on the EPA reports, the Department of Housing and Urban Development published regulations establishing standards for HUD-assisted projects in 1979. These documents provided the basis for states and municipalities to promulgate more detailed statutes and regulations specifying quantitative limits.

In 1983, the New York City Department of Environmental Protection (NYCDEP) adopted the City Environmental Protection Order-City Environmental Quality Review (CEPO-CEQR) noise standards for exterior noise levels. These standards are the basis for the Noise Exposure Guidelines shown in Table 10-1. The Guidelines classify noise exposure into four categories: Acceptable, Marginally Acceptable, Marginally Unacceptable, and Clearly Unacceptable. Exterior noise levels from motor vehicle sources are based on the L_{10} . Table 10-2 shows the required attenuation for residential uses within the last three categories. For example, an L_{10} may approach 80 dBA provided that buildings are constructed of materials that reduce exterior to interior noise levels by at least 35 dBA.

In determining potential impacts to a community from a proposed action, NYCDEP considers a significant impact to be:

- An increase of 3 dBA or more where the no action noise levels is an L_{eq} of 62 dBA or more; or

- An increase of up to 5 dBA where the no action noise L_{eq} is below 62 dBA, providing the total resulting L_{eq} is equal to or less than 65 dBA; or
- A noise level that exceeds the marginally acceptable levels, where the proposed action is a sensitive receptor (see Table 10-1). However, they are applicable only to mobile sources of noise; i.e., tire, wheels, and or engine noise from autos, trucks, rail cars, and aircraft. They are not intended to include emergency sirens on fire trucks and ambulances.

The New York City Noise Control Code defines sound-level standards for motor vehicles, compressors, and pavement breakers; requires that all exhausts be muffled; and prohibits all unnecessary noise adjacent to schools, hospital, or courts. That code further limits construction activities to weekdays between 7:00 am and 6:00pm.

**Table 10-2
Required Attenuation Values To Achieve Acceptable Interior Noise Levels**

	Marginally Acceptable	Marginally Unacceptable		Clearly Unacceptable		
Noise level with proposed action	65<L10<70	70<L10<75	75<L10<80	80<L10<85	85<L10<90	90<L10<95
Attenuation	25 dB (A)	(I) 30dB (A)	(II) 35dB(A)	(I) 40dB (A)	(II) 45dB (A)	(III) 50dB(A)

Source: New York City Department of Environmental Protection

D. NOISE SCREENING ANALYSIS

Based on the discussion of standards and criteria, above, no noise level impacts would occur unless the project causes an increase in noise of at least 3 dBA. If noise levels are not likely to reach or exceed this threshold, then no noise impacts would occur. Therefore, a noise screening analysis was carried out to identify locations where project-generated traffic would have the potential to increase noise levels by 3 dBA or more. The traffic analysis included 40 intersections within the project area. Therefore, traffic volumes for No-Action and With-Action conditions at these 40 intersections were converted to PCEs and compared using logarithmic equations to determine the potential increases in noise level. The vehicular mix (relative proportions of autos, medium trucks, heavy trucks, and buses) was obtained from the traffic study. In calculating the PCEs for the With-Action conditions, the number of buses was assumed to be equal to the number of buses under No-Action conditions except for St. James Place, Worth Street, Centre Street, and Frankfort Street as buses travel along Park Row in the No-Action condition. Otherwise, the traffic increment for With-Action conditions included autos, medium trucks, and heavy trucks in the same relative proportions as for No-Action conditions. Table 10-3 shows the results of the noise level screening.

**Table 10-1
NYC Noise Exposure Guidelines
For Use in City Environmental Impact Review**

Receptor Type	Time Period	Acceptable General External Exposure	Airport ³	Marginally Acceptable General External Exposure	Airport ³	Marginally Unacceptable General External Exposure	Airport ³	Clearly Unacceptable General External	Airport ³
Outdoor area requiring serenity and quiet ²		$L_{10} < 55$ dBA	$L_{dn} < 60$ dBA ↑ ↓	X		X		X	
Hospital, nursing home		$L_{10} < 55$ dBA		$55 < L_{10} < 65$ dBA	$60 < L_{dn} < 65$ dBA ↑ ↓	$65 < L_{10} < 80$ dBA	$60 < L_{dn} < 70$ dBA, (ii) $70 < L_{dn}$	$L_{10} > 80$ dBA	$L_{dn} > 75$ dBA ↑ ↓
Residence, residential hotel or motel	7 AM to 11 PM	$L_{10} < 65$ dBA		$65 < L_{10} < 70$ dBA		$70 < L_{10} < 80$ dBA		$L_{10} > 80$ dBA	
	11 PM to 7 AM	$L_{10} < 55$ dBA		$55 < L_{10} < 70$ dBA		$70 < L_{10} < 80$ dBA		$L_{10} < 80$ dBA	
School, museum, library, court, house of worship, transient hotel or motel, public meeting room, auditorium, out patient public health facility		Same as Residential Day (7AM-11PM)		Same as Residential Day (7AM-11PM)	Same as Residential Day (7AM-11PM)	Same as Residential Day (7AM-11PM)			
Commercial or office		Same as Residential Day (7AM-11PM)		Same as Residential Day (7AM-11PM)	Same as Residential Day (7AM-11PM)	Same as Residential Day (7AM-11PM)			
Industrial, public areas only ⁴	Note 4	Note 4	Note 4	Note 4	Note 4				

Source: New York City Department of Environmental Protection (adopted by DEP for use in CEQR-1983.)

Notes:

(i) In addition, any new activity shall not increase the ambient noise level by 3 dBA or more; (ii) CEPO-CEQR Noise Standards for train noise are similar to the above aircraft noise standards: the noise category for train noise is found by taking the L_{dn} value for such train noise to be an L_{dn}^y (L_{dn} contour) value.

1. Measurements and projections of noise exposures are to be made at appropriate heights above site boundaries as given by ANSI Standards; all values are for the worst hour in the time period.

2. Tracts of land where serenity and quiet are extraordinarily important and serve an important public need and where the preservation of these qualities is essential for the area to serve its intended purpose. Such areas could include amphitheatres, particular parks or portions

of parks or open spaces dedicated or recognized by appropriate local officials for activities requiring special qualities of serenity and quiet. Examples are grounds for ambulatory hospital patients and patients and residents of sanitariums and old age homes.

3. One may use the FAA-approved L_{dn} contours supplied by the Port Authority, or the noise contours may be computed from the federally approved INM Computer Model using flight data supplied by the Port Authority of New York and New Jersey.

4. External Noise Exposure standards for industrial areas of sounds produced by industrial operations other than operating motor vehicles or other transportation facilities are spelled out in the New York City Zoning Resolution, Sections 42-20 and 42-21. The referenced standard apply to M1, M2, and M3 manufacturing districts and to adjoining residence districts (performance standards are octave band standards).

As shown in Table 10-3, future With-Action traffic volumes at some intersections would decrease or remain the same in comparison to No-Action conditions. Among the intersections that would experience an increase in noise levels, two locations are likely to exceed the 3 dBA threshold. They are:

- Mulberry Street @ Worth Street, increase of 4.1 dBA during peak AM period, and
- Baxter Street @ Worth Street, increase of 3.5 dBA during peak AM period

Based on this information, a noise monitoring program was recommended for sensitive receptors along Worth Street.

**Table 10-3
Noise Screening Analysis**

Intersection / Period	Traffic Volume			PCEs		Change in Noise Levels (dBA)	
	No-Action	Project	Action	No-Action	Action		
Park Row @ St James Place @ Chatham Sq. @ Worth St @ Mott St	AM	1,211	241	1,452	5,305	6,019	0.5
Park Row @ St James Place @ Chatham Sq. @ Worth St @ Mott St	MID	1,278	115	1,393	4,267	4,546	0.3
Park Row @ St James Place @ Chatham Sq. @ Worth St @ Mott St	PM	1,375	113	1,488	3,800	3,989	0.2
Chatham Sq @ East Broadway	AM	1,192	-	1,192	5,222	5,222	0.0
Chatham Sq @ East Broadway	MID	1,329	17	1,346	4,437	4,478	0.0
Chatham Sq @ East Broadway	PM	1,411	-	1,411	3,899	3,899	0.0
Chatham Sq @ Catherine St @ Division St @ Bowery @ Dover St	AM	1,212	-	1,212	5,309	5,309	0.0
Chatham Sq @ Catherine St @ Division St @ Bowery @ Dover St	MID	1,348	-	1,348	4,501	4,501	0.0
Chatham Sq @ Catherine St @ Division St @ Bowery @ Dover St	PM	1,729	-	1,729	4,778	4,778	0.0
St. James Place @ James St	AM	424	347	771	1,795	3,378	2.7
St. James Place @ James St	MID	401	191	592	1,302	1,977	1.8
St. James Place @ James St	PM	396	236	632	1,036	1,747	2.3
St. James Place @ Madison St	AM	761	312	1,073	3,222	4,701	1.6
St. James Place @ Madison St	MID	686	191	877	2,227	2,928	1.2
St. James Place @ Madison St	PM	708	193	901	1,852	2,490	1.3
St. James Place @ Pearl St	AM	1,008	2	1,010	4,267	4,425	0.2
St. James Place @ Pearl St	MID	719	100	819	2,334	2,734	0.7
St. James Place @ Pearl St	PM	829	4	833	2,169	2,302	0.3
Pearl St @ Ave of the Finest @ RF Wagner Place	AM	1,915	181	2,096	8,107	9,182	0.5
Pearl St @ Ave of the Finest @ RF Wagner Place	MID	1,390	110	1,500	4,512	5,008	0.5
Pearl St @ Ave of the Finest @ RF Wagner Place	PM	1,689	(80)	1,609	4,419	4,446	0.0
Pearl St @ Frankfort St @ Dover St	AM	1,963	310	2,273	8,599	9,517	0.4
Pearl St @ Frankfort St @ Dover St	MID	1,535	84	1,619	5,125	5,329	0.2
Pearl St @ Frankfort St @ Dover St	PM	2,050	20	2,070	5,665	5,699	0.0
Gold St @ Frankfort St @ Rose St	AM	521	110	631	2,282	2,608	0.6

Gold St @ Frankfort St @ Rose St	MID	647	34	681	2,160	2,243	0.2
Gold St @ Frankfort St @ Rose St	PM	528	125	653	1,459	1,669	0.6
Park Row @ Pearl St	AM	894	(894)	-	3,916	1,269	0.0
Park Row @ Pearl St	MID	635	(635)	-	2,120	576	0.0
Park Row @ Pearl St	PM	830	(830)	-	2,294	901	0.0
Foley Sq @ Pearl St @ Centre St @ Reade St @ Lafayette St	AM	904	297	1,201	3,960	4,840	0.9
Foley Sq @ Pearl St @ Centre St @ Reade St @ Lafayette St	MID	802	176	978	2,678	3,106	0.6
Foley Sq @ Pearl St @ Centre St @ Reade St @ Lafayette St	PM	1,058	184	1,242	2,924	3,233	0.4
Centre St @ Chambers St	AM	1,773	297	2,070	7,767	8,646	0.5
Centre St @ Chambers St	MID	1,545	176	1,721	5,158	5,586	0.3
Centre St @ Chambers St	PM	2,067	184	2,251	5,712	6,021	0.2
Broadway @ Duane St	AM	981	-	981	4,298	4,298	0.0
Broadway @ Duane St	MID	968	-	968	3,232	3,232	0.0
Broadway @ Duane St	PM	868	-	868	2,399	2,399	0.0
Broadway @ Thomas St	AM	910	-	910	3,986	3,986	0.0
Broadway @ Thomas St	MID	859	-	859	2,868	2,868	0.0
Broadway @ Thomas St	PM	753	-	753	2,081	2,081	0.0
Broadway @ Worth St	AM	1,469	56	1,525	6,435	6,601	0.1
Broadway @ Worth St	MID	1,437	148	1,585	4,798	5,158	0.3
Broadway @ Worth St	PM	1,433	32	1,465	3,960	4,014	0.1
Lafayette St @ Worth St	AM	<u>1,132</u>	<u>153</u>	<u>1,285</u>	<u>4,959</u>	<u>5,412</u>	<u>0.4</u>
Lafayette St @ Worth St	MID	<u>1,064</u>	<u>182</u>	<u>1,246</u>	<u>3,552</u>	<u>3,995</u>	<u>0.5</u>
Lafayette St @ Worth St	PM	<u>1,273</u>	<u>99</u>	<u>1,372</u>	<u>3,518</u>	<u>3,684</u>	<u>0.2</u>
Foley Square @ Worth St@ Centre	AM	<u>1,227</u>	<u>271</u>	<u>1,498</u>	<u>5,194</u>	<u>6,562</u>	<u>1.0</u>
Foley Square @ Worth St@ Centre	MID	<u>1,065</u>	<u>233</u>	<u>1,298</u>	<u>3,457</u>	<u>4,334</u>	<u>1.0</u>
Foley Square @ Worth St@ Centre	PM	<u>1,261</u>	<u>178</u>	<u>1,439</u>	<u>3,299</u>	<u>3,977</u>	<u>0.8</u>
Baxter St @ Hogan Place	AM	<u>27</u>	-	<u>27</u>	<u>114</u>	<u>118</u>	0.1
Baxter St @ Hogan Place	MID	<u>43</u>	-	<u>43</u>	<u>140</u>	<u>144</u>	0.1
Baxter St @ Hogan Place	PM	<u>67</u>	-	<u>67</u>	<u>175</u>	<u>185</u>	0.2
Baxter St @ Worth St @ Worth St	AM	<u>352</u>	<u>444</u>	<u>796</u>	<u>1,542</u>	<u>3,487</u>	<u>3.5</u>
Baxter St @ Worth St @ Worth St	MID	<u>441</u>	<u>327</u>	<u>768</u>	<u>1,472</u>	<u>2,564</u>	<u>2.4</u>
Baxter St @ Worth St @ Worth St	PM	<u>520</u>	<u>331</u>	<u>851</u>	<u>1,437</u>	<u>2,352</u>	<u>2.1</u>
Mulberry St @ Worth St	AM	<u>352</u>	<u>546</u>	<u>898</u>	<u>1,542</u>	<u>3,934</u>	<u>4.1</u>
Mulberry St @ Worth St	MID	541	334	875	1,806	2,921	2.1
Mulberry St @ Worth St	PM	548	443	991	1,514	2,739	2.6
Barclay @ Broadway	AM	1,984	(13)	1,971	8,691	8,653	0.0
Barclay @ Broadway	MID	1,744	(99)	1,645	5,823	5,582	-0.2
Barclay @ Broadway	PM	1,675	(102)	1,573	4,629	4,458	-0.2
Barclay @ Church	AM	1,394	190	1,584	6,107	6,669	0.4
Barclay @ Church	MID	1,264	(59)	1,205	4,220	4,077	-0.2
Barclay @ Church	PM	947	51	998	2,617	2,703	0.1
Beekman @ Park Row	AM	1,301	(136)	1,165	5,699	5,297	-0.3
Beekman @ Park Row	MID	1,342	(99)	1,243	4,481	4,240	-0.2
Beekman @ Park Row	PM	1,320	(110)	1,210	3,648	3,463	-0.2
Broome @ Bowery	AM	2,187	-	2,187	9,581	9,581	0.0
Broome @ Bowery	MID	1,561	-	1,561	5,212	5,212	0.0
Broome @ Bowery	PM	1,883	-	1,883	5,204	5,204	0.0
Canal @ Bowery	AM	4,866	-	4,866	21,317	21,317	0.0
Canal @ Bowery	MID	3,495	-	3,495	11,669	11,669	0.0
Canal @ Bowery	PM	4,025	-	4,025	11,123	11,123	0.0
Canal @ Broadway	AM	3,415	-	3,415	14,960	14,960	0.0
Canal @ Broadway	MID	2,583	-	2,583	8,624	8,624	0.0
Canal @ Broadway	PM	2,547	-	2,547	7,039	7,039	0.0
Canal @ Centre	AM	<u>2,660</u>	-	<u>2,660</u>	<u>11,653</u>	<u>11,653</u>	0.0

Canal @ Centre	MID	<u>2,068</u>	-	<u>2,068</u>	<u>6,904</u>	<u>6,904</u>	0.0
Canal @ Centre	PM	<u>2,363</u>	-	<u>2,363</u>	<u>6,530</u>	<u>6,530</u>	0.0
Canal @ Lafayette	AM	<u>2,665</u>	-	<u>2,665</u>	<u>11,675</u>	<u>11,675</u>	0.0
Canal @ Lafayette	MID	<u>2,015</u>	-	<u>2,015</u>	<u>6,727</u>	<u>6,727</u>	0.0
Canal @ Lafayette	PM	<u>2,180</u>	-	<u>2,180</u>	<u>6,024</u>	<u>6,024</u>	0.0
Canal @ Mulberry	AM	2,252	-	2,252	9,865	9,865	0.0
Canal @ Mulberry	MID	1,990	-	1,990	6,644	6,644	0.0
Canal @ Mulberry	PM	2,139	-	2,139	5,911	5,911	0.0
Chambers @ Broadway	AM	2,011	-	2,011	8,810	8,810	0.0
Chambers @ Broadway	MID	1,791	-	1,791	5,980	5,980	0.0
Chambers @ Broadway	PM	1,824	14	1,838	5,041	5,064	0.0
Chambers @ Church	AM	2,171	120	2,291	9,511	9,866	0.2
Chambers @ Church	MID	1,894	-	1,894	6,323	6,323	0.0
Chambers @ Church	PM	2,161	-	2,161	5,972	5,972	0.0
Division @ Pike	AM	1,521	-	1,521	6,663	6,663	0.0
Division @ Pike	MID	1,425	-	1,425	4,758	4,758	0.0
Division @ Pike	PM	1,819	-	1,819	5,027	5,027	0.0
East Broadway @ Forsyth	AM	807	-	807	3,535	3,535	0.0
East Broadway @ Forsyth	MID	845	-	845	2,821	2,821	0.0
East Broadway @ Forsyth	PM	893	-	893	2,468	2,468	0.0
Frankfort @ Gold	AM	521	110	631	2,282	2,608	0.6
Frankfort @ Gold	MID	647	34	681	2,160	2,243	0.2
Frankfort @ Gold	PM	528	125	653	1,459	1,669	0.6
Frankfort @ Pearl	AM	1,963	310	2,273	8,599	9,517	0.4
Frankfort @ Pearl	MID	1,535	84	1,619	5,125	5,329	0.2
Frankfort @ Pearl	PM	2,050	20	2,070	5,665	5,699	0.0
Fulton @ Broadway	AM	1,219	80	1,299	5,340	5,577	0.2
Fulton @ Broadway	MID	1,043	-	1,003	3,482	3,385	-0.1
Fulton @ Broadway	PM	908	7	915	2,509	2,521	0.0
Fulton @ Church	AM	1,200	70	1,270	5,257	5,464	0.2
Fulton @ Church	MID	1,102	(75)	1,027	3,679	3,497	-0.2
Fulton @ Church	PM	791	40	831	2,186	2,523	0.1
Fulton @ Pearl	AM	1,105	<u>69</u>	<u>1,174</u>	4,841	<u>5,045</u>	0.2
Fulton @ Pearl	MID	1,247	(84)	1,163	4,163	3,959	-0.2
Fulton @ Pearl	PM	1,475	-	1,475	4,076	4,076	0.0
Bowery @ Grand	AM	<u>2,291</u>	-	<u>2,291</u>	<u>10,036</u>	<u>10,036</u>	<u>0.0</u>
Bowery @ Grand	MID	<u>1,685</u>	-	<u>1,685</u>	<u>5,626</u>	<u>5,626</u>	<u>0.0</u>
Bowery @ Grand	PM	<u>1,962</u>	-	<u>1,962</u>	<u>5,422</u>	<u>5,422</u>	<u>0.0</u>
Bowery @ Kenmare	AM	3,297	-	3,297	14,443	14,443	0.0
Bowery @ Kenmare	MID	2,815	-	2,815	9,398	9,398	0.0
Bowery @ Kenmare	PM	3,200	-	3,200	8,843	8,843	0.0
Spruce @ Park Row	AM	1,369	(236)	1,133	5,997	5,298	-0.5
Spruce @ Park Row	MID	1,194	(99)	1,095	3,986	3,746	-0.3
Spruce @ Park Row	PM	1,314	(120)	1,194	3,631	3,430	-0.2
Tryon Row @ Centre	AM	706	97	803	3,093	3,380	0.4
Tryon Row @ Centre	MID	650	34	684	2,170	2,253	0.2
Tryon Row @ Centre	PM	983	20	1,003	2,716	2,750	0.1
Vesey @ Broadway	AM	1,764	(133)	1,631	7,728	7,334	-0.2
Vesey @ Broadway	MID	1,534	(115)	1,419	5,122	4,842	-0.2
Vesey @ Broadway	PM	1,457	(103)	1,354	4,026	3,854	-0.2
Vesey @ Church	AM	1,217	70	1,287	5,331	5,539	0.2
Vesey @ Church	MID	1,102	(75)	1,027	3,679	3,497	-0.2
Vesey @ Church	PM	781	50	831	2,158	2,242	0.2
Worth @ Church	AM	<u>1,791</u>	<u>116</u>	<u>1,907</u>	<u>7,846</u>	<u>8,189</u>	<u>0.2</u>

Worth @ Church	MID	1,687	148	1,835	5,632	5,992	0.3
Worth @ Church	PM	1,756	32	1,788	4,853	4,906	0.0

Note: Numbers in bold type exceed the 3dBA screening threshold.

Source: Sandstone Environmental Associates, Inc., and Philip Habib & Associates, Inc.

E. NOISE MONITORING PROGRAM

Sensitive receptors are land uses such as schools, homes, hospitals, parks, etc., that would be sensitive to a noisy environment. Based on Table 10-3, noise monitoring was recommended for Worth Street during the peak AM period. Since the land uses on Worth Street are primarily commercial, the park area at Worth Street/Baxter Street was selected for noise level monitoring. Noise levels the intersection of St. James Place and Madison Street also were monitored during the peak AM period due to nearby residences and the St. James School. Figure 10-1 shows the noise monitoring locations. The following field procedures were observed:

- microphone mounted approximately 5 feet (1.5 meters) high and at least 4 feet (1.2 meters) from any reflecting surfaces
- wind screen used on microphone
- noise analyzer calibrated before and after each monitoring period
- battery checked before and after each monitoring period
- traffic counts taken concurrently
- field notes documented:
 - ▶ monitoring period,
 - ▶ site and roadway characteristics,
 - ▶ general weather data and time of day,
 - ▶ unusual occurrences (e.g., aircraft flyovers),
 - ▶ traffic counts and vehicle classifications,
 - ▶ relevant descriptions of monitored values (e.g., Leq).
- no monitoring during periods of precipitation, wet pavement, or snow or ice cover
- no monitoring during winds of 15 mph (24 kph) or more

Figure 10-1
Noise Monitoring Locations

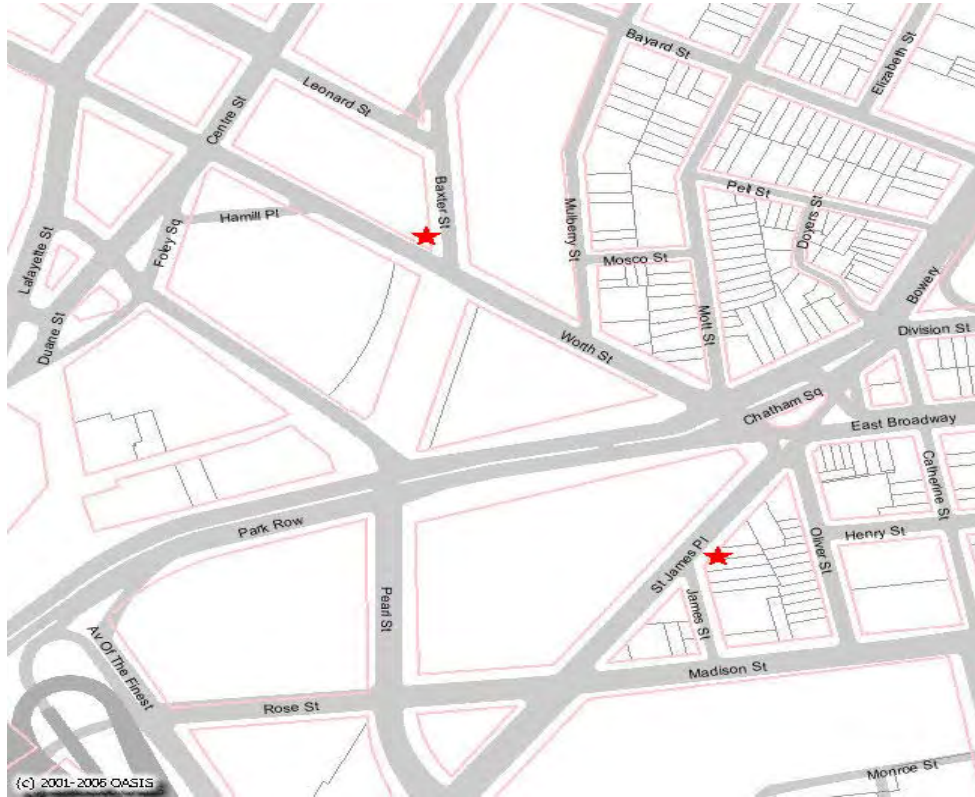


Table 10-4 shows the results of the noise monitoring, and Table 10-5 shows the traffic observed during the monitoring periods.

Table 10-4
Noise Monitoring Results (dBA)

Street	Date	Time of Day	Leq	L10	MinL	MaxL	L01	L90
Madison @ St. James Street	1/12/06	8:02-8:22 am	73.3	76.0	59.3	93.3	81.0	62.0
Worth @ Baxter Street	1/12/06	8:49-9:09 am	72.7	76.5	59.3	88.8	76.5	62.0

Source: Sandstone Environmental Associates, Inc.

Table 10-5
Traffic Observed during Noise Monitoring (1-hour equivalent)

Location	Date	Time of Day	Autos	Medium Trucks	Heavy Trucks	Buses	Total Vehicles	PCEs
Madison @ St. James Street	1/12/06	8:02-8:22 am	819	57	3	36	915	2,349
Worth @ Baxter Street	1/12/06	8:49-9:09 am	882	102	12	84	1,080	4,284

Source: Sandstone Environmental Associates, Inc.

F. NO-ACTION CONDITION

For analysis purposes, under the No-Action condition, it is assumed that the One Police Plaza Security Plan is not in place, that the roadways are open with the 1999 NYPD street closures and municipal garage closure in place, and that transportation services would continue as they were prior to September 11, 2001.

Table 10-6 shows the projected noise levels under No-Action conditions. The observed traffic and noise levels have been adjusted to reflect the traffic volumes and PCEs established for No-Action conditions. This was done by applying the logarithmic proportionality equation to the PCEs for the monitored traffic volumes. At both sites, the observed traffic volumes during the noise monitoring periods were higher than the traffic established for No-Action conditions. This is due in part to the fact that the Action has been implemented, and the monitored noise levels are more typical of With-Action conditions than No-Action conditions. Under No-Action conditions, the L₁₀ noise levels would place both intersections in the Marginally Unacceptable I category. Because the projected

Leq noise levels exceed 62 dBA, an impact would occur if the action causes noise levels to increase by 3 dBA or more.

**Table 10-6
No-Action Noise Levels (dBA) at Monitored Sites (Peak AM)**

Location	Observed Conditions				No-Action Conditions				
	Monitored Noise		Observed Traffic		Projected Traffic		Noise Increment	No-Action Values	
	Leq	L10	Volume	PCEs	Volume	PCEs		Leq	L10
St. James/Madison	73.3	76.0	1,083	4,323	761	3,222	-1.3	72.0	74.7
Baxter/Worth Street	72.7	76.5	918	2,388	352	1,542	-1.9	70.8	74.6

Source: Sandstone Environmental Associates, Inc., and Philip Habib & Associates, Inc.

G. WITH-ACTION CONDITION

Currently, roadways within the vicinity of One Police Plaza are closed due to security measures. As shown in Table 10-3, the traffic has been diverted to other traffic links, especially St. James Place and Worth Street. The diverted traffic on these two streets would include 18 additional buses during the peak AM period, 10 during the peak Midday period, and 15 during the peak PM period.

In comparison to No-Action conditions, traffic at the two intersections selected for monitoring and analysis would increase. Table 10-3 showed the projected noise levels at the monitored sites under With-Action conditions. Based on the information in the table, a potential noise level impact would occur at the intersection of Baxter Street and Worth Street, because the noise level is protected to increase by 3.5 dBA, and at Mulberry Street and Worth Street where the noise level would increase by 4.1 dBA. These increases would constitute an impact because they exceed 3.0dBA.

Table 10-7 shows the projected noise levels at the monitored intersections under With-Action conditions. The L₁₀ noise levels at both intersections would place them in the Marginally Unacceptable II category. As was shown in Table 10-3, the location along Worth Street at Mulberry Street at Worth Street and Baxter Street at Worth Street would experience a noise level impact of 4.1 dBA and 3.5 dBA, respectively. Nearby sensitive receptors include a park, Chatham Towers, and several low-rise mixed use residential/commercial buildings. The potential noise impact occurs only during the peak AM hour. No impacts are projected during the peak midday and PM periods.

**Table 10-7
With-Action Noise Levels (dBA) at Monitored Sites (Peak AM)**

Location	No-Action Conditions				With-Action Conditions				
	Projected Traffic		No-Action Values		Projected Traffic		Noise Increment	With-Action Values	
	Volume	PCEs	Leq	L10	Volume	PCEs		Leq	L10
St. James/Madison	761	3,222	72.0	74.7	1,073	4,701	1.6	<u>73.6</u>	<u>76.4</u>
BaxterWorth Street	<u>352</u>	<u>1,542</u>	<u>70.8</u>	<u>74.6</u>	<u>796</u>	<u>3,487</u>	<u>3.5</u>	<u>74.3</u>	<u>78.1</u>

Source: Sandstone Environmental Associates, Inc., and Philip Habib & Associates, Inc.

Another source of noise under the With-Action condition is the mechanical raising and lowering of hydraulically operated barriers, particularly the barriers located at the north and south ends of Park Row. The barriers are raised and lowered sporadically throughout the 24-hour period, depending on the frequency of vehicles entering the security zone area. Although this creates additional noise in the area, the raising and lowering of barriers happens sporadically and the noise only lasts for a very short duration. In addition, the frequency that the barriers are raised and lowered during the evening and late night hours, when it would be most disturbing to residential uses, is far less than during the day.

H. CONSTRUCTION NOISE

No construction noise is associated with the action. All of the roadway barriers are in place, and none involved construction or demolition activities.

I. CONCLUSIONS

Project-generated increases in noise exceed the impact criterion of 3.0 dBA between two intersections during the peak AM period: 1) Worth Street at Baxter Street and 2) Worth Street at Mulberry Street. The projected noise level increases are 3.5 and 4.1 dBA respectively, at the two intersections under With-Action conditions. Rerouting the M103, M15, and B51 bus routes back onto Park Row has been proposed as a mitigation measure. Table 10-8 shows the increase in noise levels that would be anticipated with this proposed mitigation measure. This would reduce the level of impact by about 0.4 dBA, with resulting noise level increments of 3.1 on the sidewalk at Worth Street at Baxter Street and 3.7 on the sidewalk at Worth Street at Mulberry Street. While this mitigation measure would reduce the impacts along Worth Street slightly, it would not eliminate them.

**Table 10-8
Mitigation Noise Levels (dBA) at Monitored Sites (Peak AM)**

Location	No-Action Conditions				Mitigation Conditions				
	Projected Traffic		No-Action Values		Projected Traffic		Noise	With-Action Values	
	Volume	PCEs	Leq	L10	Volume	PCEs	Increment	Leq	L10
St. James/Madison	761	3,222	72.0	74.7	1,055	4,377	<u>1.3</u>	<u>73.3</u>	<u>76.0</u>
BaxterWorth Street	<u>352</u>	<u>1,542</u>	<u>70.8</u>	<u>74.6</u>	788	3,163	<u>3.1</u>	<u>73.9</u>	<u>77.7</u>

Source: Sandstone Environmental Associates, Inc., and Philip Habib & Associates, Inc.

No other method of mitigation is feasible. Due to the needs for pedestrian access and the distance between intersections, noise barriers would not be a feasible solution along these roadways. Project-diverted traffic in the midday and PM peak hours would not cause noise level impacts. Portions of Chatham Towers and other residential buildings at the intersections of Worth/Baxter Streets and Worth/Mulberry Streets, as well as Columbus Park, are affected by this increase in noise levels. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not be considered practical or cost effective at these locations. Therefore, these impacts would remain unmitigated.

One Police Plaza Security Plan EIS

CHAPTER 11: MITIGATION

A. INTRODUCTION

The preceding chapters of the EIS discuss the significant adverse impacts that have resulted from the action. Where such impacts have been identified – in the areas of traffic, urban design, noise, and transit and pedestrians – measures are examined to minimize or eliminate the anticipated impacts. These mitigation measures are discussed below.

B. URBAN DESIGN

As discussed in Chapter 5, "Urban Design and Visual Resources," the action has caused significant adverse urban design impacts. The closure of public streets and the addition of the security elements has introduced a forbidding and unaesthetic quality to the area. The action has created a disconnect between the security zone area and the surrounding neighborhood. The temporary quality of the security elements has created a haphazard, inconsistent look that does not fit with the existing urban design context. This alteration of streetscape elements has resulted in a significant adverse impact on urban design.

The *CEQR Technical Manual* states that "mitigation for impacts related to streetscape elements would involve changing those elements that are incompatible."

The City could mitigate the urban design impacts caused by the action by enhancing the streetscape within the security zone, particularly along Park Row, to create a more aesthetic, inviting and pedestrian-friendly environment. The Lower Manhattan Development Corporation (LMDC) issued a report in 2004 entitled *Chinatown Access and Circulation Study* which included recommendations for improving Park Row. These recommendations are intended to address the closure of Park Row by making City-owned areas more pedestrian-friendly and aesthetically pleasing. Some of these recommendations relating to streetscape improvements include the following:

- Reduce most of Park Row's right-of-way to two lanes, one in each direction.
- Realign the northern end of Park Row to conform to the Chatham Square reconfiguration (see Traffic mitigation measures below).
- Install a landscaped esplanade along Park Row, including attractive paving, trees, shrubs, planters, etc.

- Install improved street fixtures, including benches, lighting, and barriers. Attractive trash receptacles may be placed at appropriate locations away from security sensitive areas.
- Improve pedestrian wayfinding signage along Park Row and other routes through the area.

Coordination with NYPD and the U.S. Marshals Service regarding security measures for the Police Headquarters building and the federal court buildings would be required. The implementation of this plan would significantly improve the streetscape of the security zone thereby enhancing the urban design. In addition, although the action has not resulted in indirect socioeconomic impacts, these streetscape enhancements would improve pedestrian conditions which may increase the number of patrons to study area businesses. While it is expected that these mitigation measures would fully mitigate urban design impacts caused by the action they should be reassessed when the Chatham Square reconfiguration is complete and the Park Row improvements are in place (see below).

C. TRAFFIC

As discussed in Chapter 7, "Traffic and Parking" and shown in Table 7-7, the number of vehicles being diverted as a result of the action diversions has resulted in significant adverse traffic impacts at 4 signalized intersections in one or more peak periods. A traffic mitigation plan was therefore developed to address these impacts. The paragraphs below discuss the measures that would be included in the traffic mitigation plan, and the effects of these measures on each of the impacted intersections. Table 11-1 summarizes the measures contained in the mitigation plan.

According to the *CEQR Technical Manual*, a significant traffic impact is considered mitigated if measures implemented return projected future conditions to what they would be if a proposed action were not in place, or to acceptable levels. For a No-Action level of service (LOS) D, E or F, mitigating back to the No-Action condition is required; for No-Action LOS A, B or C, mitigating to mid-LOS D is required (45 seconds of delay for signalized intersections, and 30 seconds of delay for unsignalized intersections). Table 11-2 shows the effectiveness of the proposed traffic mitigation measures during the weekday AM, midday and PM peak periods based on these criteria. As shown in the table, these measures fully mitigate the traffic impacts due to this action, with the exception of the intersection of Robert F. Wagner Sr. Place and Pearl Street.

**TABLE 11-1
Proposed Traffic Mitigation Measures**

Intersection	Approach	Period	Build Signal Timing (Seconds) (1)	Mitigation Signal Timing (Seconds) (1)	One Police Plaza Proposed Mitigation Measures Description of Mitigation
Chatham Square (N-S) @ Worth Street (E-W)	NB Only NB/SB EB/WB	AM/MD/PM		20/20/10 35/35/42 35/35/38	Reconfigure Chatham Square Intersection into two signalized intersections and pedestrian plazas (see Figure 11-1)
Mott Street/Park Row (N-S) @ Worth Street (E-W)	NB/SB EB/WB	AM/MD/PM		35/35/35 55/55/55	
Pearl Street (N-S) @ Frankfort Street (E-W)	NB/SB EB/WB	AM/MD/PM	59/59/59 31/31/31	58/59/59 32/31/31	Modify the striping of the Frankfort Street approach to provide 1 L, 1LT and 1R lane configuration on the EB approach. Transfer 2 sec of green time from the NB/SB to EB/WB in all peak hours.

Signalized Intersections

Pearl Street/Robert F. Wagner Sr. Place

At this intersection, the action has resulted in impacts to the westbound Robert F. Wagner Sr. Place left-turn movement in the AM peak hour and the eastbound approach in the midday peak hour. Measures were therefore evaluated to address these impacts. However, signal timing adjustments to return this approach to its No-Action condition would be impractical as they would result in new or worsened impacts on other approaches and a reduction in pedestrian crossing times. Increasing capacity of roadways through changes to curbside regulations or modifications to lane striping was also found to be ineffective, as was widening the approach to achieve an additional lane. The action's impact to westbound Robert F. Wagner Sr. Place left-turn movement and eastbound at Pearl Street in the AM and midday peak hours, respectively, would therefore remain unmitigated.

Pearl Street/Frankfort Street

Traffic diverted by the action has impacted eastbound Frankfort Street left-turn movement in the AM, midday, and PM peak hours. To address all of the peak hour impacts, it is proposed to re-stripe the eastbound approach to accommodate an exclusive left-turn lane, a through-left-turn lane, and an exclusive right-turn lane. Each of these lanes would be 9 feet in width. In addition, a total of 2 seconds were transferred from the northbound/southbound Pearl Street signal to the Frankfort Street phase. As shown in Table 11-2a, during the AM peak hour this measure would reduce delay on the eastbound left-turn approach to 65.1 seconds as compared to 69.7 seconds in the No-Action, returning the LOS back to E fully mitigating the AM impact at this approach.

Under the mitigation measures, the MD peak hour impact, the eastbound left-turn approach would operate under an approach delay of 56.8 seconds (LOS E) as compared to the No-Action delay of 59.1 seconds (LOS E). During the PM peak hour, the proposed mitigation would result in a delay of 65.6 seconds for the eastbound left-turn approach. Compared with the No-Action delay of 67.3 seconds, the impact becomes fully mitigated and the LOS returns to E. Also, the delay for the eastbound through-right-turn approach becomes 43.0 seconds compared to 50.7 seconds under the No-Action. The level of service at this approach would return to D, fully mitigating the impact due to the action.

Chatham Square/Worth Street

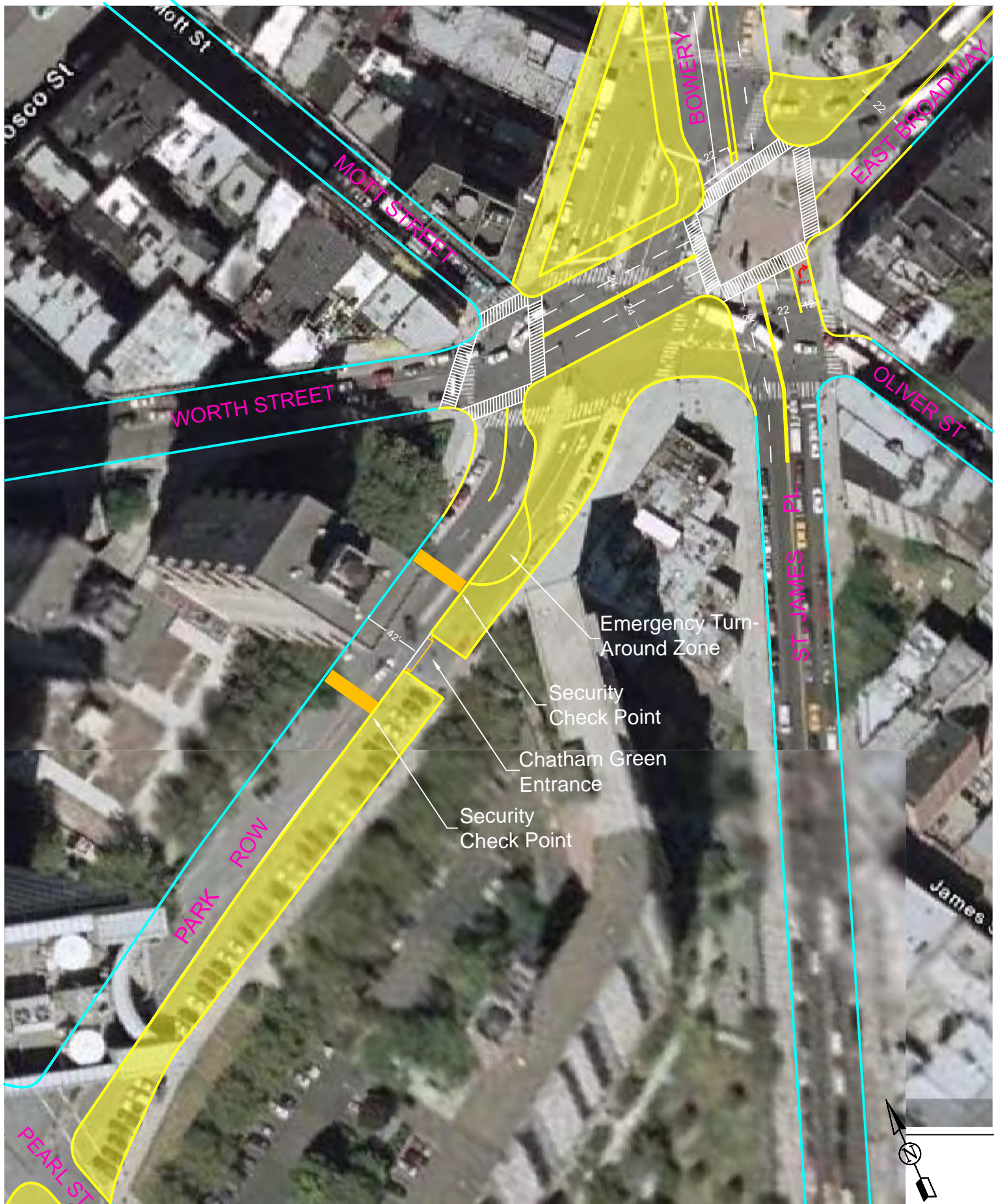
Traffic diverted by the action has impacted the right-turn movement of southbound Chatham Square and the right-turn movement of westbound St. James Place in all three peak hours. In addition, the eastbound Worth Street left-turn movement is shown to be impacted in all three peak hours while the Mott Street approach was impacted in the PM Peak hour. To address these impacts it is proposed to entirely redesign Chatham Square to recognize the closure of Park Row as a through

artery and to maintain functionality of this location. The design creates two separate intersections at Chatham Square. As shown in Figure 11-1, the western intersection would consist of Mott Street and Park Row as the north-south approaches with Worth Street as the east-west street. The eastern intersection would be designed with Bowery and St. James Place serving as the north-south alignment corridor with East Broadway and Worth Street as the east-west streets. The Bowery and St. James Place would be aligned to form a continuous north-south corridor while East Broadway would be realigned to intersect where Bowery and St. James Place would meet.

Joining the two intersections would be a 48' wide Worth Street, while Park Row would be redesigned (narrowed) to have one 21' travelway in each direction. However, the north end of Park Row would be slightly more narrow with a width of 36' (see Figure 11-1). The proposed width of Park Row would accommodate and allow for movement of emergency vehicles within the security zone. The redesign would also include a jug-handle turnaround with a 60' diameter for emergency vehicle turnaround as well as for vehicles that are not authorized to enter the security zone (see Figure 11-1). The jug-handle turnaround could be designed with elements such as attractive pavers so that it would fit with the proposed urban design components. Through the realignment of Bowery, a new plaza area would be created on the northwest corner of Worth Street and Bowery. Similarly, plaza areas would be created on the northeast corner of East Broadway and Bowery and along the southern side of Worth Street between the two proposed intersections. A redesigned intersection would replace right turns from St. James Place to northbound Chatham Square with a through movement and a right turn lane to East Broadway. Figure 11-2 shows the resulting traffic volumes at the reconfigured Chatham Square area.

As shown in Table 11-2b, under the mitigation measures proposed, all approaches will function at LOS D or better during all peak periods. For the intersection consisting of Bowery, St. James Place, Worth Street, and East Broadway, the intersection delay is 28.5 seconds (LOS C) during the AM peak hour, 29.0 seconds (LOS C) during the midday peak hour, and 37.0 seconds (LOS D) during the PM peak hour. The western intersection, including Mott Street, Park Row, and Worth Street, operates at an overall AM peak period delay of 15.1 seconds (LOS B), 15.1 seconds (LOS B) in the midday peak hour, and 14.0 seconds (LOS B) in the PM peak hour. These projected mitigation conditions fully address the project's traffic impact at Chatham Square while creating substantial new pedestrian and plaza space.

In summary, as shown in Tables 11-1 through 11-2, the proposed traffic mitigation plan would fully address all traffic impacts in all peak hours with the exception of Robert F. Wagner Sr. Place and Pearl Street. The reconfiguration of Chatham Square as well as all other traffic mitigation plans would be implemented by the New York City Department of Transportation and/or through the New York City Department of Design and Construction.



Legend:
 Cyan line: Curbline to Remain
 Yellow line: Future Curbline
 Yellow shaded area: Landscaped Area

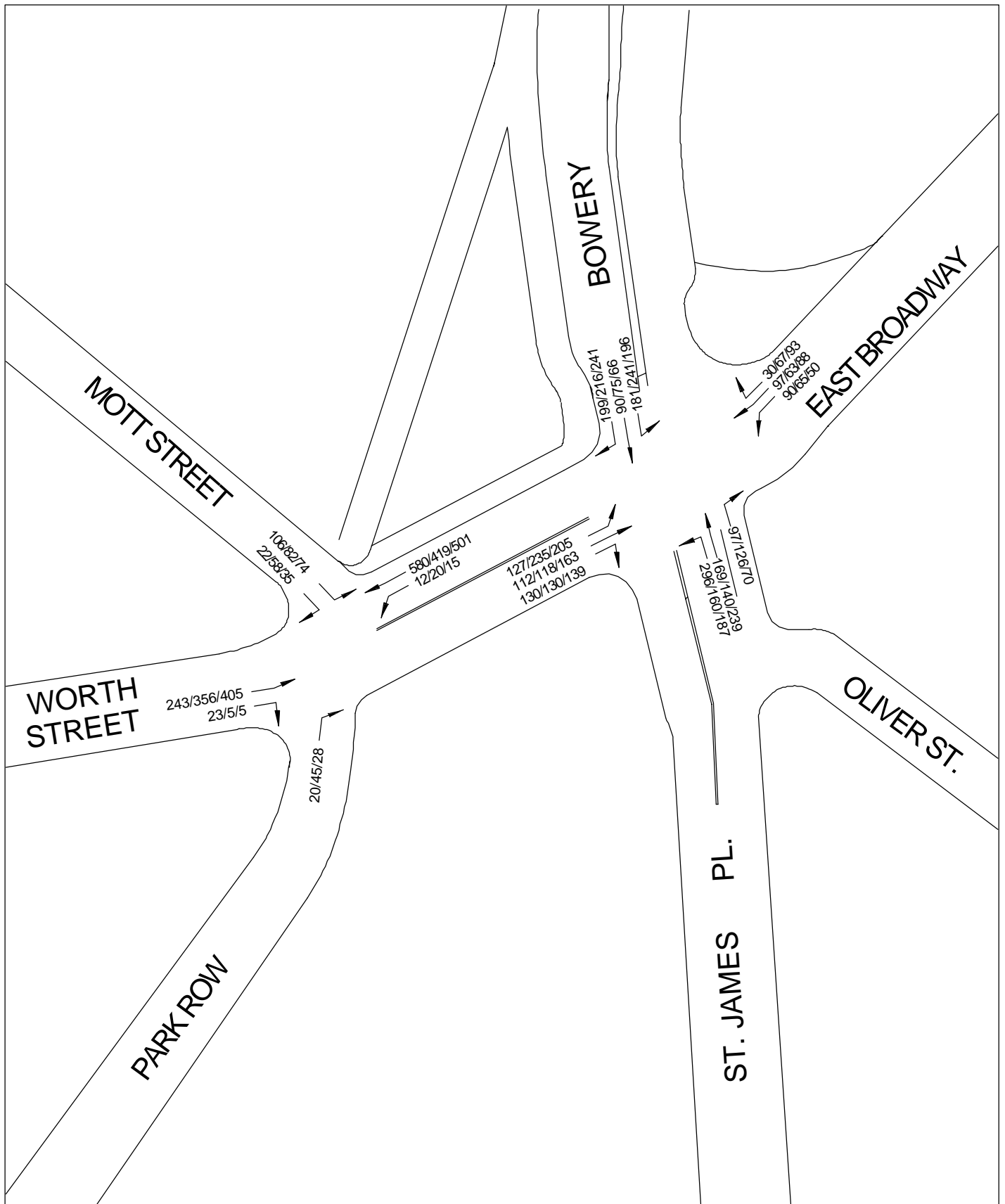


Table 11-2a: Mitigation

SIGNALIZED INTERSECTION	Lane Group	2006 No-Action AM Peak Hour			2006 Action AM Peak Hour			Mitigation AM			Lane Group	2006 No-Action Midday Peak Hour			2006 Action Midday Peak Hour			Mitigation MD			Lane Group	2006 No-Action PM Peak Hour			2006 Action PM Peak Hour			Mitigation PM							
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS					
Chatham Square (N-S) @ Worth Street (E-W)	NB-TR	0.28	21.9	C	0.03	20.3	C				NB-TR	0.37	24.4	C	0.07	20.7	C				NB-TR	0.41	24.9	C	0.04	20.4	C								
	SB-L	1.00	95.1	F	0.89	66.4	E				SB-L	0.83	62.9	E	0.70	43.4	D				SB-L	0.75	53.9	D	0.57	35.5	D								
	SB-TR	0.93	63.8	E	0.98	76.3	E	*			SB-TR	0.98	77.1	E	1.01	86.7	F	*			SB-TR	0.96	68.8	E	1.03	86.9	F	*							
	EB-DefL				0.88	68.7	E	*			EB-DefL	0.46	27.4	C	0.90	59.1	E	*			EB-DefL	0.55	31.1	C	1.04	92.8	F	*							
	EB-LTR	0.29	25.1	C					See Table 11-2b		EB-LTR	0.23	22.1	C	0.23	22.1	C		See Table 11-2b		EB-LTR	0.26	22.6	C	0.26	22.6	C		See Table 11-2b						
	WB-LT	0.10	22.7	C	0.61	29.7	C				WB-LT	0.11	20.5	C	0.32	23.4	C				WB-LT	0.10	20.5	C	0.38	24.4	C								
Mott Street (E-W)	WB-R	0.60	35.8	D	0.93	65.1	E	*			WB-R	0.76	45.9	D	0.91	61.4	E	*			WB-R	0.66	35.7	D	1.04	92.8	F	*							
	EB-LTR	0.71	58.3	E	0.74	61.9	E				EB-LTR	0.87	78.6	E	0.88	80.9	F	*			EB-LTR	0.65	51.8	D	0.70	58.1	E	*							
Pearl Street (N-S) @ Frankfort Street (E-W)	NB-DefL				0.83	44.9	D	NB-DefL	0.83	44.6	D	NB-DefL								NB-DefL	0.97	62.4	E	0.93	53.6	D	NB-DefL	0.97	64.3	E					
	NB-TR				0.60	14.6	B	NB-TR	0.63	16.4	B	NB-TR								NB-TR	0.52	12.3	B	0.52	12.3	B	NB-TR	0.54	13.8	B					
	NB-LTR	0.62	14.2	B							NB-LTR	0.44	11.0	B	0.45	11.1	B	NB-LTR	0.47	12.5	B	NB-LTR	0.55	12.3	B	0.51	11.7	B	NB-LTR	0.53	13.1	B			
	SB-LTR	0.46	11.0	B	0.64	13.6	B	SB-LTR	0.66	15.3	B	SB-LTR	0.35	9.8	A	0.39	10.1	B	SB-LTR	0.4	11.3	B	SB-LTR	0.55	12.3	B	0.51	11.7	B	SB-LTR	0.53	13.1	B		
	EB-L	0.92	69.7	E	0.99	83.8	F	*	EB-L	0.92	65.1	E	EB-L	0.89	59.1	E	0.96	72.0	E	EB-L	0.89	56.8	E	EB-L	0.92	67.3	E	0.99	84.1	F	*	EB-L	0.92	65.6	E
	EB-TR	0.80	54.1	D	0.83	58.0	E	EB-TL	0.61	36.9	D	EB-TR	0.71	41.1	D	0.75	43.8	D	EB-TL	0.60	33.6	C	EB-LTR	0.79	50.7	D	0.95	79.1	E	*	EB-TL	0.71	43.0	D	
Pearl Street (N-S) @ Robert F Wagner Sr. Place (E-W)	WB-LTR	0.85	52.3	D	0.85	52.3	D	WB-LTR	0.82	46.2	D	WB-LTR	0.11	24.0	C	0.12	24.1	C	WB-LTR	0.11	22.5	C	WB-LTR	0.16	24.6	C	0.32	26.7	C	WB-LTR	0.30	24.9	C		
	NB-LTR	0.63	24.0	C	0.70	26.0	C	0.74	29.1	C	NB-LTR	0.30	18.0	B	0.33	18.4	B	0.35	19.9	B	NB-LTR	0.30	17.9	B	0.32	18.2	B	0.32	18.2	B					
	SB-TR	0.53	22.1	C	0.38	19.0	B	0.43	21.0	C	SB-TR	0.33	18.5	B	0.37	19.0	B	0.44	21.5	C	SB-TR	0.37	18.8	B	0.38	19.0	B	0.37	19.1	B					
	EB-LTR	0.88	55.9	E	0.88	55.9	E	0.88	55.9	E	EB-LTR	0.71	43.6	D	0.83	52.9	D	0.75	44.2	D	EB-LTR	1.04	88.7	F	1.04	88.7	F	1.04	88.7	F					
	WB-L	0.79	44.3	D	1.05	86.1	F	*	0.79	42.3	D	WB-L	0.74	43.1	D	0.74	43.1	D	0.59	37.9	D	WB-L	0.72	41.5	D	0.58	37.2	D	0.53	36.1	D				
WB-RT	0.12	31.1	C	0.12	31.1	C	0.48	36.1	D	WB-RT	0.05	30.2	C	0.05	30.2	C	0.33	34.4	C	WB-RT	0.04	30.0	C	0.04	30.0	C	0.13	31.2	C						
WB-R	0.31	16.2	B	0.28	15.7	B	0.26	14.4	B	WB-R	0.29	15.9	B	0.29	15.9	B	0.28	14.6	B	WB-R	0.19	14.7	B	0.15	14.2	B	0.15	13.6	B						

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
 L-Left, T-Through, R-Right, DefL-Analysis considers a Defacto Left Lane on this approach .
 V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
 LOS - Level of service
 * -Denotes Congested Location in the 2005 No-Action Condition
 -Denotes Impacted Location in the 2005 With-Action Condition
 Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).

Table 11-2b: Mitigation Results for Chatham Square

SIGNALIZED INTERSECTION	Lane Group	Mitigation AM			Lane Group	Mitigation MD			Lane Group	Mitigation PM		
		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS		V/C Ratio	Delay (sec/veh)	LOS
Worth Street (E-W) @ Park Row (NB)/Mott St (SB)	NB-LT	0.09	21.3	C	NB-LT	0.21	23.7	C	NB-LT	0.13	22.2	C
	SB-LR	0.53	31.8	C	SB-LR	0.56	32.9	C	SB-LR	0.44	28.8	C
	EB-TR	0.21	10.4	B	EB-TR	0.26	10.8	B	EB-TR	0.30	11.2	B
	WB-LT	0.48	13.4	B	WB-LT	0.36	11.9	B	WB-LT	0.42	12.6	B
Worth Street (E-W) @ St. James. Pl. (N-S)/ Bowery (N-S)	NB-DefL	0.58	19.8	B	NB-DefL	0.28	12.4	B	NB-DefL	0.57	22.3	C
	NB-T	0.40	25.6	C	NB-T	0.36	25.1	C	NB-T	0.45	21.7	C
	NB-R	0.27	23.6	C	NB-R	0.30	24.1	C	NB-R	0.25	19.5	B
	SB-DefL	0.63	34.8	C	SB-DefL	0.72	38.5	D	SB-DefL	0.80	45.9	D
	SB-TR	0.72	36.5	D	SB-TR	0.65	32.2	C	SB-TR	0.90	52.1	D
					EB-DefL	0.71	38.1	D				
	EB-LTR	0.55	27.5	C	EB-TR	0.51	27.7	C	EB-LTR	0.91	45.2	D
	WB-DefL	0.49	32.3	C	WB-TR	0.27	22.9	C	WB-LTR	0.45	24.3	C

NOTES:

EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound

L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .

V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle

LOS - Level of service

* -Denotes Congested Location in the 2005 No-Action Condition

* -Denotes Impacted Location in the 2005 With-Action Condition

Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).

D. TRANSIT AND PEDESTRIANS

Bus Service

The results of the analysis of local bus conditions in the With-Action condition show that the street closures significantly impacted bus service. With the rerouting of the M103, M15, M9, B51, X25, X90, BM1, BM2, BM3, and BM4 bus routes, there have been substantial increases in overall travel time, which has resulted in significant adverse impacts on bus operations, especially in the AM peak hour and in the southbound direction for all peak hours.

In May 2005, the M103 bus returned to its original route via Park Row as a 90-day trial. The test was expanded in November 2005 when the M15 and B51 buses also returned to their original routes via Park Row to/from City Hall. Buses passing through the security zone along Park Row are stopped at the checkpoint momentarily which results in minimal delays in travel time. The re-introduction of the M15, M103, and B51 buses to Park Row would mitigate the increases in travel times these bus routes have experienced due to the action. The re-routing of the buses along Park Row has restored bus service within the area so that it is close to what it was in the baseline condition, prior to the streets being closed. As such, the re-routing of the buses along Park Row has therefore mitigated all bus service impacts. In addition, it should be noted that the proposed Chatham Square reconfiguration mitigation measure discussed above would not adversely impact bus service in the area.

Pedestrians

The security plan has not generated any new pedestrian trips nor will it generate any pedestrian congestion on sidewalks. Pedestrian activity continues uninterrupted except for the immediate area around One Police Plaza that is closed to pedestrians. Traffic diversions associated with these vehicular restrictions have resulted in an increase in the numbers of vehicle turning movements at some crosswalks, while decreasing or eliminating all such movements at other crosswalks within the security zone. As discussed in Chapter 8, "Transit and Pedestrians," the results of the analysis of high accident locations indicate that the action may have created a high pedestrian accident location at the intersection of Worth Street and Broadway that was not identified as such a location in the year 2000 (as reported in the 2001 *CEQR Technical Manual*).

In coordination with DOT, it was determined that a leading pedestrian interval will be implemented at the intersection of Worth Street and Broadway to improve pedestrian conditions at this intersection. The leading pedestrian interval would change the signal phasing at this intersection that would allow for the pedestrian phase to begin before the green phase for motor vehicle traffic traversing east-west on Worth Street. This signal timing modification will allow pedestrians a head start to cross in the crosswalk of the intersection.

E. NOISE

Project-generated increases in noise exceed the impact criterion of 3.0 dBA between two intersections during the peak AM period: 1) Worth Street at Baxter Street and 2) Worth Street at Mulberry Street. The projected noise level increases are 3.5 and 4.1 respectively, at the two intersections under With-Action conditions. Rerouting the M103, M15, and B51 bus routes back onto Park Row has been proposed as a mitigation measure. This would reduce the level of impact by about 0.4 dBA, with resulting noise level increments of 3.1 dBA at Worth Street at Baxter Street and 3.7 dBA at Worth Street at Mulberry Street. While this mitigation measure would reduce the impacts along Worth Street slightly, it would not eliminate them. No other method of mitigation is feasible. Due to the needs for pedestrian access and the distance between intersections, noise barriers would not be a feasible solution along these roadways. As mentioned previously, the peak AM hour is not a peak period for park utilization. Project-diverted traffic in the midday and PM peak hours would not cause noise level impacts. Portions of Chatham Towers and other residential buildings at the intersections of Worth/Baxter Streets and Worth/Mulberry Streets are affected by these noise increases. However, the overall noise levels would decrease with distance from Worth Street. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not be considered practical or cost effective at these locations. Therefore, these impacts would remain unmitigated.

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CHAPTER 12: ALTERNATIVES

A. INTRODUCTION

This chapter considers alternatives to the action. According to the *CEQR Technical Manual*, alternatives considered should reduce or eliminate impacts of an action while substantively meeting the goals and objectives of the action. The range of alternatives to be considered, which include a No-Action Alternative, is determined by the nature of the specific action, its potential impacts, the objectives and capabilities of the project sponsor, and feasibility.

In addition to considering the No-Action Alternative, this chapter also considers 3 other alternatives, 2 of which were suggested by the community during the public scoping process and community meetings. Four alternatives are considered in this chapter: (1) a No-Action Alternative; (2) No Unmitigable Traffic Impacts Alternative; (3) Community-Suggested Alternative #1: Relocation of Police Headquarters, in which NYPD headquarters would move from its current location at One Police Plaza to another location in the City; and (4) Community-Suggested Alternative #2: Chatham Green Access Alternative, in which the current checkpoint on Park Row would be moved approximately 125 feet to the south to establish a free-flowing vehicle entrance/exit to Chatham Green.

The chapter discusses the likely environmental effects of each of the four alternatives, and compares them to the action, where applicable.

B. NO-ACTION ALTERNATIVE

The No-Action Alternative assumes that the security plan would not have been implemented and all streets that were closed to unauthorized traffic after September 11, 2001 would be open. The 1999 security street closures and elements as well as the municipal garage closure would be present under the No-Action Alternative. This alternative is discussed and analyzed as the “No-Action Condition” in each of the technical areas of Chapters 2 through 10. This analysis compares conditions under the No-Action Alternative to conditions with the action. The No-Action Alternative assumes that the streets that were closed after September 11, 2001 would be open and none of the security elements would be in place. The No-Action Alternative would not require any discretionary actions. The effects of this alternative are summarized below and compared to those of the action.

Land Use, Zoning, and Public Policy

Under the No-Action Alternative, the current land use trends would continue in the area. Any change in land use that has occurred since the baseline year has occurred independent of the security plan. As with the Action, no significant adverse land use, zoning, and public policy impacts would occur under the No-Action Alternative.

Community Facilities and Services

Under the No-Action Alternative, the streets that were closed after September 11, 2001 would be open to all vehicles. Under the No-Action Alternative, health care facilities in the study area would continue to operate at the same capacity and utilization as they would in the existing or With-Action condition. As emergency service vehicles are currently permitted through the security zone, the No-Action Alternative would not affect emergency service vehicle access to NY Downtown hospital and other healthcare facilities in the area. However, it has been reported, but not verified, that in some instances, emergency service vehicles are delayed by the barriers, although overall response times are not above standard. In addition, under the No-Action Alternative, all commercial and private vehicles would have access through all streets that were closed after September 11, 2001. Furthermore, under the No-Action Alternative, police and fire service vehicles would continue to have access through the streets that are currently closed as a result of the security zone as both are authorized to enter the security zone.

Socioeconomic Conditions

Under the No-Action Alternative, it is generally anticipated that existing economic activities within the study area would remain the same. Although the action has limited accessibility to some parts of the study area, there is no evidence that the limit in accessibility has resulted in any secondary business displacement. The security zone has also not adversely affected the viability of the Chinatown retail and restaurant sectors, which continue to be a major draw for both residents and tourists. No direct or indirect residential or business displacement impacts or adverse effects on specific industries would occur under either the No-Action Alternative or with the Action. Therefore, as with the action, no significant adverse socioeconomic impacts would occur under the No-Action Alternative.

Urban Design and Visual Resources

Under the No-Action Alternative, the urban design in the security zone area would not substantially change from the pre-September 11, 2001 baseline condition. The 1999 security street closures and elements would be present under the No-Action Alternative. Without the action, all streets that were closed after September 11, 2001 would be open and the resulting security elements would not be in place. As such, it is expected that the urban design would not substantially change from the baseline condition under the No-Action Alternative.

Unlike the No-Action Alternative, the action has resulted in significant adverse urban design impacts within the security zone. However, with the implementation of the proposed mitigation plan described in Chapter 11, there would be no significant unmitigated adverse urban design impacts from the action.

Neighborhood Character

In the No-Action condition, without the street closures in place, no significant changes in neighborhood character would have occurred within the security zone from the baseline 2001 year. Although the security zone around NYPD headquarters would not be in place under this alternative, security measures implemented throughout the study area at City Hall and various government and office buildings after September 11, 2001 would continue to be in place. These additional security measures are not part of the baseline condition. However, unlike the action, the No-Action Alternative would not result in the closure of the streets and the security plan elements, which have resulted in a negative alteration of neighborhood character within the security zone. Neighborhood character within the larger study area would remain the same under the No-Action Alternative as under the With-Action condition.

Traffic and Parking

In the No-Action Alternative, traffic and parking demand levels in the study area would increase as a result of general background growth and new developments in the area. Under the No-Action Alternative, 15 signalized intersections would experience congestion on one or more approaches in the AM peak hour, 8 in the midday, and 13 in the PM peak hour. Under the No-Action Alternative, it is anticipated that demand for on-street parking would be similar to With-Action conditions, as the action has not increased demand for public parking.

Unlike the No-Action Alternative, the action has resulted in significant adverse traffic impacts at four (4) signalized intersections in one or more peak periods. The implementation of the proposed mitigation plan described in Chapter 11 would eliminate all of the identified traffic impacts with the exception of those at the intersection of Pearl Street and Robert F. Wagner Sr.

Place. No significant adverse impacts to on- or off-street parking conditions have resulted from either the action or the No-Action Alternative.

Transit and Pedestrians

Under the No-Action Alternative, transit and pedestrian facilities in the study area would remain as they were in the pre-September 11, 2001 baseline condition. In the 2006 No-Action condition, the local bus system within the study area would remain unchanged from the baseline condition. However, as a result of the terrorist attacks on September 11, 2001, millions of square feet of office space in Lower Manhattan were lost. This loss of office space resulted in some loss of ridership on local bus routes. Under the No-Action Alternative, local and express buses would not be diverted around the security zone, with the exception of the M9 which would be diverted under the No-Action Alternative.

Under the No-Action Alternative, pedestrian corridors within the study area would remain unchanged from the baseline condition. The 1999 street closures would be in place, but pedestrian access within the security zone would continue to be uninterrupted. Unlike the No-Action Alternative, the action has resulted in the closure of the pedestrian corridor along police headquarters. However, this single low-volume closure has not resulted in congested conditions on other sidewalks in the area. Unlike the No-Action Alternative, the action has resulted in a significant adverse pedestrian impact by creating a high pedestrian accident located at the intersection of Worth Street and Broadway. The implementation of the proposed mitigation plan described in Chapter 11 would eliminate the identified pedestrian safety impact.

Air Quality

No violations of the National Ambient Air Quality Standards (NAAQS) or significant increases in mobile source pollutants are predicted to occur under the No-Action Alternative. As with the action, no significant adverse air quality impacts would occur under the No-Action Alternative.

Noise

No significant adverse noise impacts are expected to occur at the noise receptor locations under the No-Action Alternative. Unlike the action, noise levels at the intersections of Worth Street and Baxter Street and Worth Street and Mulberry Street would not exceed the impact criterion of 3.0 dBA under the No-Action Alternative. Therefore, there would be no significant adverse noise impacts under the No-Action Alternative.

Conclusion

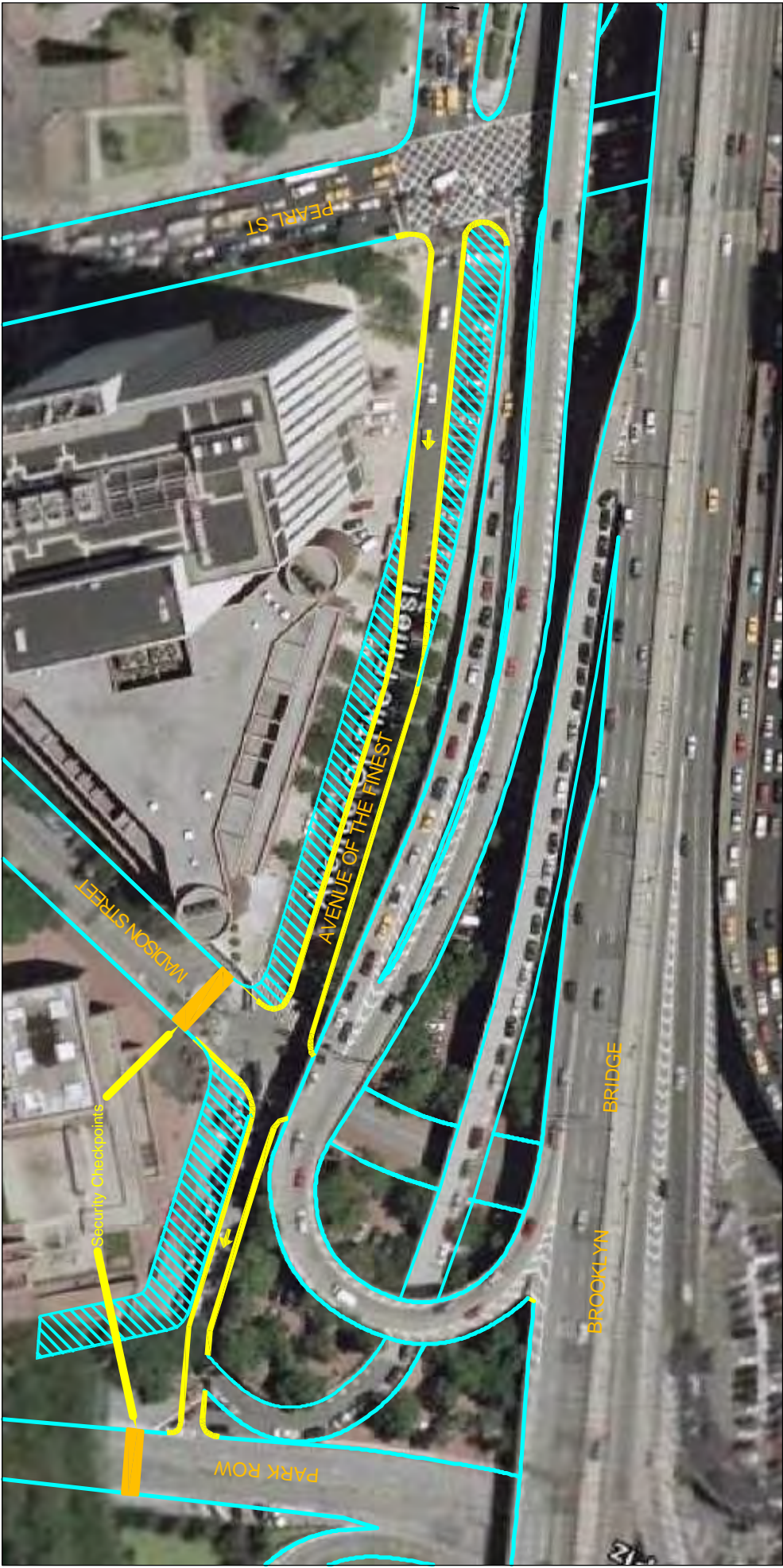
The necessary security measures needed to protect potential terrorist targets such as NYPD headquarters would not be implemented under this alternative. As such, in the absence of the action, unscreened vehicles would be able to travel within close proximity of potential terrorist targets. Moreover, the No-Action Alternative would not achieve the objectives of NYPD's Counter Terrorism Bureau to protect government facilities in the "civic center" portion of Lower Manhattan that continue to be considered potential terrorist targets. This alternative is not feasible, as it would not meet the goals and objectives of the action.

C. NO UNMITIGABLE TRAFFIC IMPACTS ALTERNATIVE

As discussed in Chapter 11, "Mitigation," all significant adverse impacts that have resulted from the action would be fully mitigated with the exception of the unmitigated traffic impact at the intersection of Pearl Street and Robert F. Wagner Sr. Place. As discussed in the chapter, measures were therefore evaluated to address this impact. However, signal timing adjustments to return this approach to its No-Action condition would be impractical as they would result in new or worsened impacts on other approaches and a reduction in pedestrian crossing times. Increasing capacity through changes to curbside regulations or modifications to lane striping was also found to be ineffective, as was widening the approach to achieve an additional lane.

Therefore, to mitigate traffic impacts at the intersection of Pearl Street at Robert F. Wagner Sr. Place, this alternative would re-open Avenue of the Finest between Pearl Street and Park Row. This would ease congestion focused at Pearl Street and Robert F. Wagner Sr. Place by allowing vehicles destined to the City Hall area to access it more directly without having to detour around the security zone. As seen in Figure 12-1, vehicles traveling along this proposed right-of-way would only be able to travel westbound on Avenue of the Finest. A line of bollards would be installed along the northern edge of the proposed right-of-way as a means to maintain security to the Police Plaza area. Security checkpoints would be moved north on Park Row to allow vehicles to travel freely onto Park Row from Avenue of the Finest.

Approximately 160, 120, and 80 vehicles would be diverted to the proposed right-of-way in the respective AM, midday, and PM peak hours. To further address the project's AM peak hour impact to the westbound left turn movement at Pearl Street and Robert F. Wagner Sr. Place, it is proposed to also transfer 2 seconds of green time from the northbound phase to the westbound phase during the AM peak hour as part of this alternative. As shown in Table 12-1, the AM peak hour westbound left-turn movement would operate at an approach delay of 42.3 (LOS D) as compared to 44.3 (LOS D) in the No-Action. To address the midday peak hour impact to the eastbound approach, transferring 2 seconds of green time from northbound/southbound Pearl



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Figure 12-1

Avenue of the Finest No Unmitigable Traffic Impacts Alternative

Table 12-1: Mitigation

SIGNALIZED INTERSECTION	Lane Group	2005 No-Action AM Peak Hour			2005 Action AM Peak Hour			Mitigation AM			2005 No-Action Midday Peak Hour			2005 Action Midday Peak Hour			Mitigation MD			2005 No-Action PM Peak Hour			2005 Action PM Peak Hour			Mitigation PM				
		V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS	V/C Ratio	Delay (sec/veh)	LOS		
Pearl Street (N-S) @ Robert F. Wagner Sr. Place (E-W)	NB-LTR	0.63	24.0	C	0.70	26.0	C	0.74	29.1	C	NB-LTR	0.30	18.0	B	0.33	18.4	B	0.35	19.9	B	NB-LTR	0.30	17.9	B	0.32	18.2	B	0.37	21.2	C
	SB-TR	0.53	22.1	C	0.38	19.0	B	0.43	21.0	C	SB-TR	0.33	18.5	B	0.37	19.0	B	0.44	21.5	C	SB-TR	0.37	18.8	B	0.38	19.0	B	0.39	21.8	C
	EB-LTR	0.88	55.9	E	0.88	55.9	E	0.88	55.9	E	EB-LTR	0.71	43.6	D	0.83	52.9	D	0.75	44.2	D	EB-LTR	1.04	88.7	F	1.04	88.7	F	1.04	88.7	F
	WB-L	0.79	44.3	D	1.05	86.1	F	0.79	42.3	D	WB-L	0.74	43.1	D	0.74	43.1	D	0.59	37.9	D	WB-L	0.72	41.5	D	0.58	37.2	D	0.61	41.0	D
	WB-RT	0.12	31.1	C	0.12	31.1	C	0.48	36.1	D	WB-RT	0.05	30.2	C	0.05	30.2	C	0.33	34.4	C	WB-RT	0.04	30.0	C	0.04	30.0	C	0.15	34.0	C
	WB-R	0.31	16.2	B	0.28	15.7	B	0.28	14.4	B	WB-R	0.29	15.9	B	0.29	15.9	B	0.28	14.6	B	WB-R	0.19	14.7	B	0.15	14.2	B	0.15	13.6	B

NOTES:

- EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
 - L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach .
 - V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
 - LOS - Level of service
 - * -Denotes Congested Location in the 2005 No-Action Condition
 - -Denotes Impacted Location in the 2005 With-Action Condition
- Analysis is based on the 2000 Highway Capacity Manual Methodology (HCS 2000 4.1f).

Street signal phase to the eastbound Brooklyn Bridge off-ramp phase is proposed as part of this alternative. With the addition of green time, the eastbound level of service would operate under an approach delay of 44.2 (LOS D) as compared to the No-Action delay of 43.6 (LOS D).

The proposed opening of Avenue of the Finest to one-way westbound traffic was reviewed and evaluated by NYPD's Counter Terrorism Bureau. The result of this evaluation determined that the opening of Avenue of the Finest to passenger vehicles would not provide sufficient stand-off distance from NYPD headquarters. This alternative would not achieve the objectives of NYPD's Counter Terrorism Bureau to protect government facilities in the "civic center" portion of Lower Manhattan that continue to be considered potential terrorist targets. Therefore, this alternative is not feasible, as it would not meet the goals and objectives of the action.

D. COMMUNITY-SUGGESTED ALTERNATIVE #1: RELOCATION OF POLICE HEADQUARTERS

This alternative was developed in response to suggestions during the public scoping process to explore alternative locations for police headquarters. No specific site has been identified for this possible relocation, although Randall's Island or Governor's Island have been suggested because their placement in the East River is thought to provide a natural fortress.

This alternative assumes that police headquarters would be relocated from One Police Plaza to another facility at an undetermined location somewhere in the City. Concurrently, this alternative assumes that the existing One Police Plaza building would be reused for other suitable purposes, such as office or institutional use. It should be noted that, should such a relocation be undertaken, it would also likely require discretionary approvals. Therefore, both the relocation itself as well as the possible re-use of the existing building would be subject to their own site-specific environmental reviews in accordance with applicable laws and regulations.

One Police Plaza, the New York City Police Department's current 16-story headquarters building, was constructed in 1973. Prior to its construction, police headquarters was located at 240 Centre Street (between Grand and Broome Streets). The current building contains approximately 1 million square feet of floor area, and serves as the NYPD's central command. It contains most of the department's administrative functions, and serves as the headquarters for several bureaus/divisions, such as Crime Stoppers, the Criminal Justice Bureau, the Narcotics Division, Organized Crime Control Bureau and the Vice Enforcement Division, among others.

As described in Chapter 2, "Land Use, Zoning, and Public Policy," One Police Plaza is located in close proximity to a unique concentration of civic and governmental land uses. Several of these are located within the security zone itself, namely, the Municipal Building, the United States Courthouse, containing the U.S. Court of Appeals, the New York County Courthouse, home to

the New York State Supreme Court, and a second U.S. Courthouse containing the U.S. District Court, as well as the Metropolitan Correctional Center, which is located on the northwestern corner of Park Row and Pearl Street.

One Police Plaza is also in the immediate vicinity of the Civic Center, which is characterized by a high concentration of government and government-related uses, including several courthouses, and City and state government office buildings. These include the City Hall complex, which includes City Hall Park, City Hall, the Surrogate's Court/Hall of Records building, and several additional government office buildings including the Jacob Javits Federal Building and the U.S. Court of International Trade.

Given the functions hosted by One Police Plaza, and the close coordination required between the NYPD and the criminal justice system, it is essential for the police headquarters to be located within close proximity to the court facilities and detention centers, as well as the seat of government. For example, the Criminal Justice Bureau acts as the operational liaison between the New York City Police Department and other agencies involved in the criminal justice community, including the five county District Attorney's Offices, the New York State Office of Court Administration, the Division of Criminal Justice Services, and the Mayor's Criminal Justice Coordinator's Office. Given this synergistic relationship, proximity to the court system's facilities is very important. Although other sites in the city could offer similar or better benefits in terms of floor area or more modern facilities, none can offer a similar or near equal advantage in terms of proximity to the court system and the City's administrative heart.

Although Randall's Island and Governor's Island have been suggested as possible locations, because their placement in the East River is thought to provide a natural fortress, neither of them represents a suitable location for police headquarters in a major city. Governor's Island in particular, which is only accessible by water, lacks the basic transportation infrastructure that would be essential for linking police headquarters to other court and government facilities in the City as well as to the general public. Randall's Island, while easily accessible from three of the five boroughs via the Triborough Bridge, is so far removed from the facilities in Lower Manhattan (approximately more than seven miles away), rendering it not easily accessible, especially by transit, to the public, the employees who currently work at One Police Plaza, or other city agencies and government organizations. Such a location would add substantial time and cost to the daily interactions that would be required for New York City's police headquarters to function properly.

In addition, the relocation of police headquarters would be an expensive undertaking, that would require the City to spend large sums of money to acquire an appropriate site (if no suitable City-owned sites are available), and to construct a new facility and the necessary physical and operational infrastructures that would be required for such a facility.

It should also be noted that, should police headquarters be relocated from the area, the current security measures would not be entirely eliminated. NYPD's Counter Terrorism Bureau seeks

to protect government facilities in the “civic center” portion of Lower Manhattan, which continue to be considered potential terrorist targets. Given the presence of a number of other sensitive facilities within the security zone (such as the Municipal Building, the United States Courthouse, the New York County Courthouse, the U.S. District Court, and the Metropolitan Correctional Center), all of which would still remain if police headquarters are relocated, it would be necessary to maintain some, if not all, of the current security measures in the area.

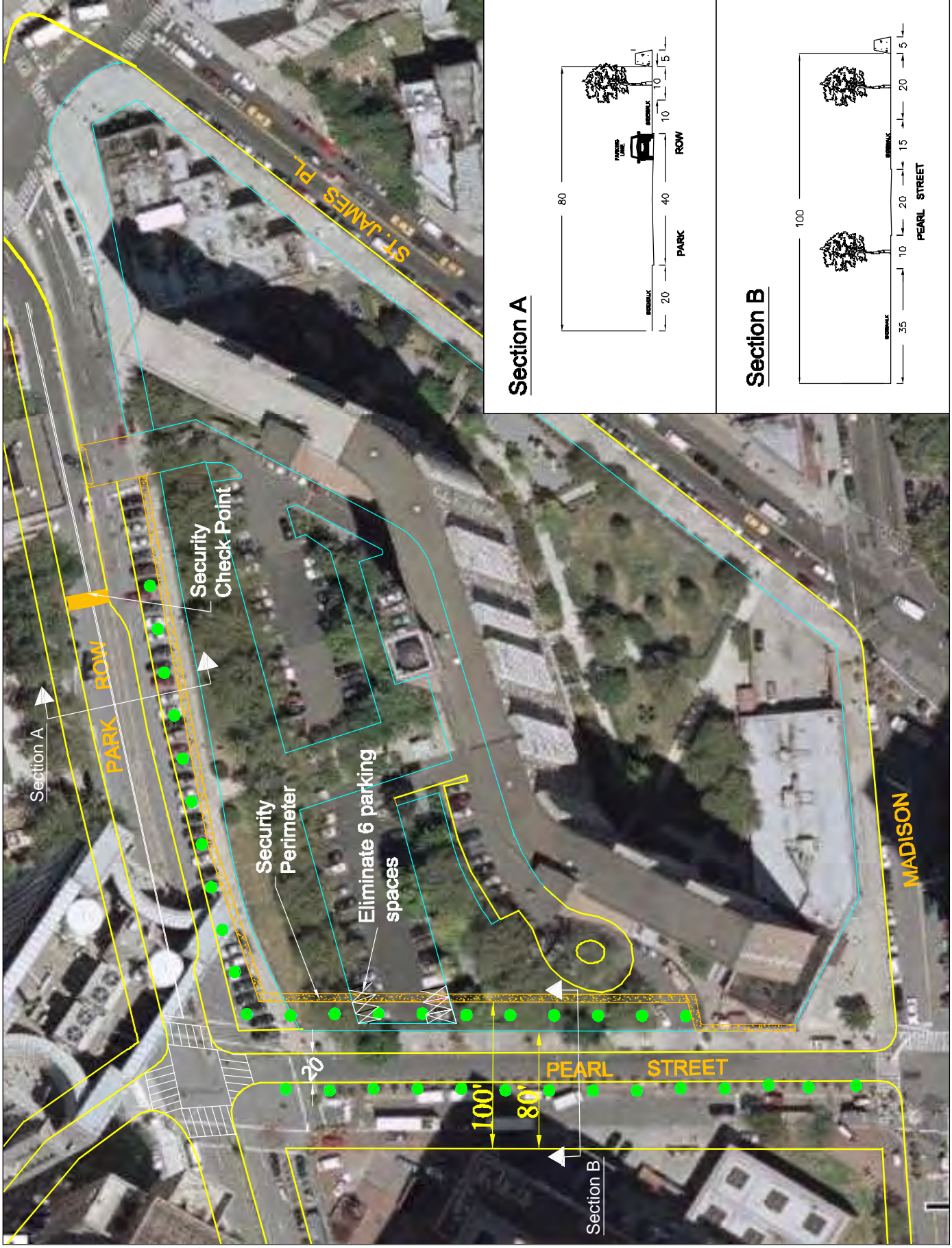
Conclusion

The Relocation Alternative would fall far short of the objectives of the action. Moreover, given the concentration of other government facilities in the “civic center” portion of Lower Manhattan which continue to be considered potential terrorist targets, security measures would have to be maintained, and as such the adverse impacts resulting from the action may not be entirely avoided should police headquarters be relocated from One Police Plaza. As such, this alternative is not feasible, as it would not meet the goals and objectives of the action.

E. COMMUNITY-SUGGESTED ALTERNATIVE #2: CHATHAM GREEN ACCESS ALTERNATIVE

Under this alternative, the existing security checkpoint would be moved south on Park Row to establish a free-flowing vehicle entrance/exit to the Chatham Green parking lot. Currently, the security checkpoint is located just south of the corner of Park Row and Chatham Square. All vehicles wishing to access the Chatham Green parking lot must pass through this checkpoint, before entering the parking lot via Park Row. This procedure allows screening of vehicles before they enter the security zone, as control of these vehicles within the zone is not feasible. Vehicles can currently exit the parking lot via either the same location on Park Row, or Pearl Street (northbound).

Under this alternative, the current checkpoint on Park Row would be moved approximately 125 feet to the south in an effort to establish an unscreened free-flowing entrance/exit to the Chatham Green parking lot. As illustrated in Figure 12-2, a 30-foot-wide two-lane access point to the parking lot would be provided at the current location on Park Row. The current parking lot exit along Pearl Street would be sealed off and a turnaround would be established at the southeast corner of the parking lot (refer to Figure 12-2), so that all vehicles would have to exit the parking lot via Park Row. This would be necessary in order to maintain a buffer zone around One Police Plaza. It should be noted that Figure 12-2 shows the Chatham Green Parking Lot Access Alternative together with some of the urban design mitigation measures described in Chapter 11, “Mitigation,” such as the narrowing of Park Row and Pearl Street.



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Figure 12-2

As noted above, in conjunction with the improved access to the Chatham Green parking lot, a physically secured buffer zone around One Police Plaza would be established to maintain stand-off to the police headquarters, as illustrated in Figure 12-2. At the edge of the buffer, a security perimeter would be constructed around the Chatham Green parking lot. The security perimeter would consist of a security wall of approximately 36 to 42 inches in height. This security perimeter would also extend along Park Row from Pearl Street to the proposed Chatham Green parking lot entrance.

This alternative would result in the elimination of approximately 6 dedicated parking spaces in the parking lot along Pearl Street. However, those spaces could be replaced with some minor modifications to the parking lot's layout, particularly given the extra space that would be available to the east of the security perimeter along Park Row.

Like the action, this alternative would also result in significant adverse traffic, urban design, transit and pedestrians, and noise impacts. As such, the mitigation measures for the action described in Chapter 11 would also be required for this Chatham Green Access Alternative.

This proposed alternative was reviewed and evaluated by NYPD's Counter Terrorism Bureau and it was determined that this alternative would not allow sufficient stand-off distance between NYPD headquarters and the Chatham Green Houses parking lot. This proposed alternative would allow all types of vehicles into the parking lot (cars, vans, trucks) and there would be no feasible way to mitigate against a possible threat with the proposed stand-off distance. As this stand-off distance would be substantially reduced to an unsafe level, this alternative would not reach the objectives of NYPD's Counter Terrorism Bureau to protect government facilities in the "civic center" portion of Lower Manhattan that continue to be considered potential terrorist targets. This alternative is not feasible, as it would not meet the goals and objectives of the action.

One Police Plaza Security Plan EIS

CHAPTER 13: UNAVOIDABLE ADVERSE IMPACTS

A. INTRODUCTION

Unavoidable adverse impacts occur when a proposed action would result in significant adverse impacts for which there are no reasonably practicable mitigation measures, and for which there are no reasonable alternatives.

As described in previous chapters of this EIS, most of the significant adverse impacts of the action could be avoided or mitigated by implementing a broad range of measures. However, there are significant adverse impacts for which there are no reasonably practical mitigation measures or reasonable alternatives that would eliminate the impacts and meet the purpose and need of the action. These include unavoidable adverse effects on traffic and noise.

B. TRAFFIC

As discussed in Chapter 11, “Mitigation,” the action would result in impacts to the westbound Robert F. Wagner Sr. Place left-turn movement in the AM peak hour and the eastbound approach in the midday peak hour. Measures were therefore evaluated to address these impacts. However, signal timing adjustments to return this approach to its No-Action condition would be impractical as they would result in new or worsened impacts on other approaches and a reduction in pedestrian crossing times. Increasing capacity through changes to curbside regulations or modifications to lane striping was also found to be ineffective, as was widening the approach to achieve an additional lane. The action’s impact to westbound Robert F. Wagner Sr. Place left-turn movement and eastbound at Pearl Street in the AM and midday peak hours, respectively, would therefore remain unmitigated

C. NOISE

Project-generated increases in noise exceed the impact criterion of 3.0 dBA between two intersections during the peak AM period: 1) Worth Street at Baxter Street and 2) Worth Street at Mulberry Street. The projected noise level increases are 3.5 dBA and 4.1 dBA respectively, at the two intersections under With-Action conditions. Rerouting the M103, M15, and B51 bus routes back onto Park Row has been proposed as a mitigation measure. This would reduce the level of impact by about 0.4 dBA, with resulting noise level increments of 3.1 dBA at Worth Street at Baxter Street and 3.7 dBA at Worth Street at Mulberry Street. While this mitigation

measures would reduce the impacts along Worth Street slightly, it would not eliminate them. No other method of mitigation is feasible. Due to the needs for pedestrian access and the distance between intersections, noise barriers would not be a feasible solution along these roadways. Project-diverted traffic in the midday and PM peak hours would not cause noise level impacts. Portions of Chatham Towers and other residential buildings at the intersections of Worth/Baxter Streets and Worth/Mulberry Streets are affected by these noise increases. However, the overall noise levels would decrease with distance from Worth Street. Other than rerouting of traffic, no mitigation measures are feasible since the impacts occur outdoors, and noise barriers would not be considered practical or cost effective at these locations. Therefore, these impacts would remain unmitigated.

One Police Plaza Security Plan EIS
CHAPTER 14: GROWTH-INDUCING ASPECTS
OF THE ACTION

As set forth in the *CEQR Technical Manual*, growth-inducing aspects of a proposed action generally refer to “secondary” impacts of a action that trigger further development. Proposals that add substantial new land use, new residents, or new employment could induce additional development of a similar kind or support uses (e.g., stores to serve new residential uses). Actions that introduce or greatly expand infrastructure capacity (e.g., sewers, central water supply) might also induce growth, although this could be an issue only in limited areas of Staten Island and perhaps Queens, since in most areas of New York City infrastructure is already in place and its improvement or expansion is usually proposed only to serve existing or expected users.

As the action has not added a new land use, new residents, or new employment, there are no growth-inducing aspects associated with the action.

One Police Plaza Security Plan EIS
CHAPTER 15: IRREVERSIBLE AND IRRETRIEVABLE
COMMITMENT OF RESOURCES

Resources, both natural and man-made, have been expended in the construction and operation of the security plan elements. These resources include the building materials used during construction of checkpoint booths; energy in the form of gas and electricity consumed during the construction and operation of these security elements; and human effort to develop, construct and operate various elements of the security plan. These are considered irretrievably committed because their reuse for some other purpose would be highly unlikely.

One Police Plaza Security Plan EIS
CHAPTER 16: RESPONSE TO COMMENTS (New Chapter to the EIS)

I. INTRODUCTION

This chapter summarizes and responds to all substantive comments on the Draft Environmental Impact Statement (DEIS) for the One Police Plaza security plan made during the public review period. These consist of comments made at the public hearings held by the New York City Police Department (NYPD) on September 14, 2006 and October 4, 2006, and written comments submitted to the NYPD. The period of public review remained open until October 24, 2006.

Section II below lists the individuals who commented on the DEIS, and summarizes and responds to comments made at the public hearing and received in writing. Written comments received on the DEIS are included in Appendix B to the FEIS.

II. DEIS COMMENTS AND RESPONSES

The Notice of Completion for the DEIS was issued on July 28, 2006. Comments were accepted on the Draft Environmental Impact Statement (DEIS) for the One Police Plaza Security Plan during a period commencing with the NYPD public hearings held at the Department of Health's auditorium on September 14, 2006 and October 4, 2006, and extending through October 24, 2006. Written comments received on the DEIS are included in Appendix B.

This section lists and responds to comments on the DEIS. The comments are organized by subject area, following the organization of the DEIS document. Where comments on the same subject matter were made by more than one person, a single comment summarizes those individual comments. The organization/individual that made the comment is identified next to each comment, using a numerical reference keyed to the list of comments below. Comments on the DEIS were received from the following individuals and organizations:

1. Jim Quent, representing Assembly Speaker Sheldon Silver (oral statement and written statement submitted 9/14/06)
2. Council Member Alan Gerson (oral statement at public hearing and written statement dated 9/14/06)
3. Scott Stringer, Manhattan Borough President (oral statement at public hearing and written statement submitted 10/24/06)

4. Jimmy Yan, representing Manhattan Borough President Scott Stringer (oral statement at public hearing and written statement submitted 9/14/06)
5. State Senator Martin Connor (oral statement at public hearing)
6. Jeannie Chin, Resident and Civic Center Residents Coalition (CCRC) (oral statement at public hearing, and written statement submitted 10/24/06)
7. John Ost, CCRC (oral statement at public hearing and written statement submitted 10/22/06)
8. Toby Turkel, President, Chatham Towers Co-op (oral statement at public hearing, and written statement submitted on 9/14/06)
9. Anna Goldstein, Resident (oral statement at public hearing, and written statement submitted on 9/14/06)
10. Dave Cheng, Resident (oral statement at public hearing, and written statement submitted on 10/10/06)
11. Rocky Chin, Resident (oral statement at public hearing, and written statement submitted on 10/23/06)
12. Paul J.Q. Lee on Behalf of Deborah Katz, Resident (oral statement at public hearing)
13. Paul J.Q. Lee on Behalf of Richard and Mae Wong, Oliver Street Block Association (oral statement at public hearing)
14. Linda McCall, Resident (oral statement at public hearing)
15. Graham Beck, Transportation Alternatives, (oral statement at public hearing, and written statement submitted on 9/14/06)
16. Albert Hom, Resident (oral statement at public hearing)
17. Paul J.Q. Lee, Resident (oral statement at public hearing)
18. Martin Torelli, Resident (oral statement at public hearing)
19. Laura Leigh Davidson, Resident (oral statement at public hearing)
20. Joanne Chernow, Resident (oral statement at public hearing)
21. Cynthia Gardner-Brim, Mariners' Temple Baptist Church (oral statement at public hearing)
22. Nancy Linday, Resident (oral statement at public hearing)
23. Richard Scorce, Resident (oral statement at public hearing, and written statement submitted 10/23/06)
24. Wai-Mon Chan, Resident (oral statement at public hearing)
25. Marian Lizzio, Resident (oral statement at public hearing)
26. Danny Chen, Resident (oral statement at public hearing, and written statement submitted 10/04/06)
27. Jan Lee, Resident and Business Owner (oral statement at public hearing)
28. Rev. Dr. Henrietta Carter, Mariner's Temple Baptist Church (oral statement at public hearing)
29. Wellington Z. Chen, CPLDC (oral statement at public hearing)
30. Susan Stetzer, Community Board 3 (oral statement at public hearing, and written statement submitted 10/23/06)
31. Bruce Martin, Mariner's Temple Baptist Church (oral statement at public hearing)

32. Charles Komanoff, Resident (oral statement at public hearing)
33. Richard Wong, Mae Wong, Oliver Street Block Association (oral statement at public hearing, and written testimony submitted 9/12/06)
34. Bergo Lee, Representing Peter Chui, President Chatham Green Co-op Board (oral statement at public hearing, written statement submitted October 4, 2006)
35. Arlyne Wishner, SBT (oral statement at public hearing)
36. Stephanie Pinto, Resident (oral statement at public hearing)
37. Cara Lucy, The Mariner's Temple Baptist Church (oral statement at public hearing)
38. Anne K. Johnson, Community Board 3, Smith Houses (oral statement at public hearing and written statement submitted 10/14/06)
39. Irving Zuckerman, Resident (oral statement at public hearing)
40. Minerva Chin, Resident (oral statement at public hearing and written statement submitted 10/4/06)
41. Elizabeth Lee, Resident (oral statement at public hearing)
42. Geoffery Lee, Resident (oral statement at public hearing and written statement submitted 10/04/06)
43. Maureen Albanese, Resident (oral statement at public hearing)
44. Shane Yamane, Resident (oral statement at public hearing)
45. Ora Gelberg, Resident (oral statement at public hearing)
46. Roy Taub, Dewey Ballantine LLP (oral statement at public hearing, and written statement dated 10/24/06)
47. Benjamin Langford, Resident (written statement dated 10/3/06)
48. Robert Killi, Resident (written statement dated 09/08/06)
49. Maria Zatuchney, Resident (written statement dated 09/11/06)
50. Eugene Falik, (written statement submitted 10/23/06)
51. Aldo Bandini, Dewey Ballantine LLP, (written statement dated 10/24/06)
52. Kenneth Kimmerling, Asian American Legal Defense and Education Fund (AALDEF) (written statement dated (10/24/06)
53. Civic Center Residents Coalition (CCRC) (petition and written statement submitted 10/23/06, signed by 65 people)
54. Asian Americans for Equality (written statement dated 10/20/06)
55. Betty Lee Sung & Charles Chia Mous Chung, Residents (written statement dated 9/15/06)
56. Mary Ann Jung, Resident (written statement dated 9/14/06)
57. Fai Cheng, Resident (written statement, unknown date)
58. Ronald D. Bruce, Resident (written statement dated 10/02/06)
59. Irving Howard, Resident (written statement dated 9/26/06)
60. Chuck Lee, Resident (written statement dated 9/15/06)
61. Lawrence F. Hughes, AICP (written statement dated 9/16/06)
62. Wayne Wong, Resident (written statement dated 9/10/06)
63. Vita Sabella, Resident (written statement dated (9/15/06)

66. Carol Towbin, Resident (written statement dated 9/17/06)
67. Mariana James, Resident (written statement dated 9/13/06)
68. Daniel Levine, Resident (written statement, unknown date)
69. Raymond Cheung, Resident (written statement dated 9/13/06)
70. Wai-Mon Chan, Resident (written statement dated 9/14/06)
71. Theodore J. May, Resident (written statement dated 9/9/06)
72. Joyce West, Resident (written statement dated 9/9/06)
73. Roberta Singer, Resident (written statement dated 9/10/06)
74. Karen Glasser, Resident (written statement dated 9/11/06)
75. Concerned Residents of St. James Church & School (written statement form letter submitted by 81 people dated 10/15/06)
76. May Lee, President, PS 1 PTA (written statement, date unknown)
77. Oliver Street Block Association (written statement and petition submitted, date unknown, signed by 282 people)
78. Fay Lee, Resident (written statement dated 10/20/06)
79. Cindy Ma, Resident (written statement dated 10/21/06)
80. John Hung, Resident (written statement dated 10/22/06)
81. Philip Seid, Chinatown Ice Cream Factory (written statement dated 10/22/06)
82. Tracy Chan, Bayard LC Pharmacy Corp. (written statement, date unknown)
83. United Health Pharmacy, local business (written statement dated 10/22/06)
84. Joe's Shanghai Restaurant, local business (written statement dated 10/22/06)
85. Mr. Tang of Mott Street, local business (written statement dated 10/22/06)
86. Happy Time Café, local business (written statement dated 10/22/06)
87. New Wonton Garden, local business (written statement dated 10/22/06)
88. AX Cell Phone Makeup Inc., local business (written statement dated 10/22/06)
89. Green Tea Café, local business (written statement dated (10/22/06)
90. Manhattan Florist & Gifts, Ltd., local business (written statement dated 10/3/06)
91. Kevin Chin, Resident (written statement dated 10/3/06)
92. Thomas Lee, Jr., Resident & business owner (written statement dated 10/3/06)
93. Jade Garden Arts and Crafts Co., local business (written statement dated 10/3/06)
94. Chanoodle, local business, (written statement dated 10/3/06)
95. Mark's Wine and Spirits Inc., local business (written statement dated 10/3/06)
96. Damon Leong, Long Life Pharmacy Inc. (written statement dated 10/3/06)
97. HPT Gift Shop, local business (written statement dated 10/1/06)
98. Bradford Kwong, Asia Market Corporation (written statement dated 10/3/06)
99. Cwong B. Ly, Resident (written statement dated 10/3/06)
100. Wong Fashion Outlet Inc, local business (written statement dated 10/3/06)
101. New Bo Ky Restaurant Inc, local business (written statement dated 10/3/06)
102. Danny Lee, Luck Shing Corp., local business (written statement, unknown date)
103. Wong Fashion Outlet, local business (written statement dated 10/3/06)
104. Top Ten Hair Design, local business (written statement dated 9/29/06)

105. Michael Lam, Canalberry Pharmacy (written statement dated 10/3/06)
106. Carol Tsao, Resident (written statement dated 9/29/06)
107. Robert Yee, New Beef King Corp (written statement dated 10/3/06)
108. Victor Theung, Fay Da Bakery (written statement dated 10/3/06)
109. David Nguyen, Haagen Daz (written statement dated 10/1/06)
110. Shirley Lou, local business owner (written statement dated 10/1/06)
111. Kang Chen, Hong Xhun Inc. (written statement dated 10/1/06)
112. Nancy Seid, Resident (written statement dated 9/29/06)
113. Sai Hung Lam, Hop Lee Restaurant (written statement dated 10/1/06)
114. Linda Ng, Ming Fay (written statement dated 10/1/06)
115. Billy (last name unknown), Golden Labe Corp. (written statement dated 10/1/06)
116. Bok Lei Po Inc., local business (written statement dated 10/1/06)
117. Lou Young Inc, local business (written statement dated 10/1/06)
118. Ying Cheung Wong, local business owner (written statement dated 9/29/06)
119. Name Unknown, local business (written statement dated 9/29/06)
120. Winnie Yee, Resident (written statement dated 9/29/06)
121. Juan Tsao, Resident (written statement dated 9/29/06)
122. Name Illegible, Resident (written statement dated 10/1/06)
123. Dorothy Thom, Resident (oral statement at public hearing, written statement dated 10/17/06)
124. Eric Ng, President, Chinese Consolidated Benevolent Association (written statement, date unknown)
125. Michael Leon, Resident (written statement dated 10/13/06)
126. Herman Philips, Resident (written statement dated 9/31/06)
127. Gloria Gallowitz, Resident (written statement dated 9/11/06)
128. Name Unknown, Resident (written statement dated 9/9/06)
129. Michael Cham, representing Assembly Speaker Sheldon Silver (oral statement and written statement submitted 9/14/06)
130. Cynthia Lee, Resident (oral statement at public hearing)
131. Marty Rosenblatt, Resident (oral statement at public hearing, written statement, date unknown)
132. Mariners' Baptist Church, (written statement and petition submitted, date unknown, signed by 141 people).

A. Project Description

Comment A1: Re-open Park Row (1,6, 9, 11, 31, 32, 44, 53, 54, 55, 57, 60, 62, 75, 77, 81, 93-122, 124, 129)

Response: As discussed in the DEIS, in the wake of the September 11, 2001 terrorist attacks, NYPD's Counter Terrorism Bureau conducted security assessments of numerous potential terrorist targets within

New York City, including government and law enforcement facilities. Experience and research demonstrate that terrorists avoid “hardened” targets, which are targets that have been reinforced with barriers and other deterrents that make the target less vulnerable and accessible to attack. In assessing the security of One Police Plaza, the Counter Terrorism Bureau concluded that the “secure zone” created around the building immediately following the terrorist attacks should be maintained to prevent the possibility of a vehicle bomb attack on NYPD Headquarters. As such, Park Row and the other streets located within the security zone will continue to remain closed to general vehicular traffic for the foreseeable future. Authorized NYPD and government personnel and emergency vehicles are permitted through the checkpoints after displaying valid identification. Residents of Chatham Green seeking vehicular access to the Chatham Green parking lot along Park Row are permitted through the checkpoint at Park Row at Worth Street after displaying valid identification, but are not permitted into the security zone through any other checkpoint. In 2005, three bus routes (M103, M15, and B51) that had previously been rerouted around Park Row due to the security plan, were restored to their original routes down Park Row.

Comment A2: Closing Park Row is the easy answer to One Police Plaza’s security needs, but it is neither the most practical nor the most just solution. (1)

Response: **Comment noted. See response to Comment A1.**

Comment A3: I recognize and respect the need for strong security measures that enable the NYPD to continue its great work keeping New Yorkers safe from terrorism and crime. But we owe it to the people of Lower Manhattan to ensure that these security measures do not degrade the quality of life and economic vitality of the very community that was most directly affected by the 9/11 attacks. (3, 4)

Response: **The DEIS took a hard look at the effects of the action and provided a detailed analysis of various technical areas; it was found that the action has resulted in several significant adverse impacts. Mitigation measures are proposed within the EIS include a major reconfiguration of Chatham Square, a redesign of Park Row and the return of three bus routes to Park Row.**

Comment A4: It is hard for me and for anyone in this community and for anyone to accept that Park Row is the only street, which has to be closed permanently beyond bus traffic for security purposes. (2) It’s time to come

up with a more feasible plan than this. (20)

Response: In addition to Park Row (between approximately Worth Street and the Brooklyn Bridge) being closed to general vehicular traffic, Pearl Street between Foley Square and St. James Place, Madison/Rose Streets, between Frankfort Street and St. James Place, and Avenue of the Finest are also closed to general vehicular traffic. After September 11, 2001, the Counter Terrorism Bureau concluded that the secure zone created around One Police Plaza immediately following the terrorist attacks be maintained to prevent the possibility of a vehicle bomb attack on NYPD headquarters and adjacent government facilities. The security zone ensures a safe standoff distance from potential terrorist attacks.

Comment A5: With all the modern technology available, there should be no reason why we cannot apply this technology and figure out a way, whether it's detection technology, reinforcement of certain walls or sidings, additional surveillance. We could have adequate protection and allow traffic to flow through this important street [Park Row]. (2)

Response: The Counter Terrorism Bureau has determined that the current physical standoff distance is presently necessary in order to protect the buildings within the security zone from potential terrorist attacks.

Comment A6: The DEIS does not take into consideration of other planned projects in the area. (2,7,23, 30, 46, 51, 52)

Response: As the security plan (the action) has already been implemented, this represents an atypical situation as proposed actions are usually assessed prior to being implemented. As such, as discussed above, the With-Action condition would be the security plan currently in place in 2006 as the action has already been implemented. According to the *CEQR Technical Manual*, predictions for future growth are made for the year that the action would be completed. As the action is currently in place, the action has already been completed and therefore the analysis year is 2006. Under the No-Action condition, the security plan is not in place in 2006 and takes into account changes in the study area that have occurred since the security plan has been in place.

Comment A7: Provide increased and greater and indeed full pedestrian access to Park Row. (3)

Response: With the exception of one corridor, the streets in the security zone are fully accessible to pedestrians. The pedestrian corridor running between NYPD headquarters to the intersection of Madison Street

and Pearl Street was closed to pedestrians as part of the security plan. With this route closed, pedestrians must travel along the south side of the headquarters building along Avenue of the Finest and Madison Street. This alternate route increases walking distance for pedestrians by approximately 240-feet or about one average city block, which does not constitute as a significant adverse impact.

Comment A8: There is a failure to address the totality of the NYPD security program. The security zone implemented in 1999 and closure of the municipal garage should be considered part of the Action. (6, 30, 46, 51, 52)

Response: Certain streets proximate to One Police Plaza were closed in 1999, as indicated in an EAS, dated April 2, 1999, prepared by the New York City Department of Transportation at the request of the NYPD (CEQR No. 99DOT011M). Following the issuance of the EAS in 1999, a negative declaration was issued on May 13, 1999. These pre-September 11, 2001 street closures, listed below are not part of the action but are considered as part of the No-Action condition in this EIS:

- Madison Street between Avenue of the Finest and Pearl Street (full closure)
- Avenue of the Finest between Madison Street and Park Row (full closure except for motor vehicles destined to the municipal garage)
- Pearl Street between Park Row and Madison Street (partial closure - southbound direction only)

As part of another unrelated action, in early 2001, an EAS was prepared for the Public Safety Answering Center II (CEQR No. 01NYP002M), to be located in an existing building at 109-113 Park Row. The EAS analyzed the closure of the 400-space municipal garage to the public, and a negative declaration was issued on June 12, 2001. The garage was then officially closed to the public on June 30, 2001. However, following the events of September 11, 2001, the NYPD decided not to go forward with the above-mentioned project and the building remained vacant. The municipal garage was rehabilitated and re-opened to NYPD authorized vehicles in April 2004. As the closure of the municipal garage occurred prior to the post-9/11 security plan, it is also included in this EIS as part of the No-Action condition. Therefore, potential combined impacts of the action in conjunction with the 1999 closures and the municipal garage closure, if any, are revealed by the analyses conducted of the action and disclosed in the DEIS.

Comment A9: The refusal of the NYPD to examine all elements of the NYPD security plan is an example of illegal segmentation. (6, 30, 46, 51, 52)

Response: See response to Comment A8. As the closures of the 400-space municipal garage and the 1999 street closures occurred previous to and independent of the post-9/11 security plan, these previous actions are not part of the With-Action condition.

Comment A10: The idea of NYPD decentralizing is, in and of itself, an excellent security measure. Many companies now decentralize and encourage telecommuting. (7)

Response: One Police Plaza is located in close proximity to a unique concentration of civic and governmental land uses. Several of these are located wholly or partially within the security zone itself, namely, the Metropolitan Correction Center and a United States District Courthouse, as well as the Municipal Building, the United States Courthouse, containing the U.S. Court of Appeals, and the New York County Courthouse, home to the New York State Supreme Court. Given the functions hosted by One Police Plaza, and the close coordination required between the NYPD and the criminal justice system, it is essential for all of the functions within police headquarters to be located within close proximity to the court facilities and detention centers, as well as the seat of government. As such, the decentralization of NYPD headquarters is not a feasible option.

Comment A11: Park Row is a major artery for the Chinatown community and it has been cut off. (9)

Response: Comment noted.

Comment A12: Street closures of more than five years are not temporary. (9)

Response: The security zone will be in effect consistent with the Counter Terrorism Bureau's current threat assessment.

Comment A13: The objective of the DEIS is not to provide greater access through Park Row, but to keep the area locked down. (1, 129)

Response: The objective of the DEIS is to analyze the effects of the action, pursuant to the *CEQR Technical Manual*, which is the security plan that was implemented after September 11, 2001 to restrict unauthorized vehicles from the roadways adjacent to the civic facilities located near One Police Plaza, including NYPD headquarters, the New York State Supreme Court, and the United

States Courthouse.

Comment A14: Although the DEIS is more comprehensive than the previous EAS, the NYPD should do additional air quality, traffic, and economic impact studies and present their findings to the community before finalizing the EIS. (1, 129)

Response: The air quality, traffic, and socioeconomic scope of work were established in the Final Scope of Work (dated June 26, 2006) for this EIS. However, in response to comments on the DEIS, additional surveying and analysis for the socioeconomic analysis has been undertaken.

Comment A15: Police headquarters is a terrorist target not from the buses or people driving cars who might be a terrorist bomb, the real terror is beneath the ground because you have an extensive system of subways that go underneath Police Plaza. (133)

Response: Comment noted. The NYPD and Counter Terrorism Bureau continuously conduct threat assessments and undertake actions accordingly.

Comment A16: Pearl Street between Park Row and Madison Street is not southbound. It runs east-west. It is supposed to be one-way but there is always two-way traffic on it. (18, 24)

Response: Pearl Street between Park Row and Madison Street runs north-south. It is closed to southbound traffic and is considered a one-way northbound roadway. Consideration of violations of traffic regulations on this roadway is not within the scope of work for this EIS.

Comment A17: The study refers to Park Row as a north-south route, but it was actually a major vehicle conduit between the east and west sides of Lower Manhattan for the past 20 years. (20)

Response: Comment noted. The DEIS states in Chapter 6, "Neighborhood Character" that Park Row was an active through street connecting the Financial District to Chinatown and the Civic Center area prior to September 11, 2001. The geographic orientation of the streets makes it more logical to describe it as north-south versus, say, Worth Street which is east-west oriented.

Comment A18: There is no logic that indicates that Park Row is in need of a security hardening process. The claims of the police department that this is necessary must be analyzed instead of taken as a given. (20, 50)

Response: See response to Comment A1.

Comment A19: Why does the buffer around police headquarters extend 700 feet to the north, but only 300 feet on the Brooklyn Bridge FDR ramp, 500 feet from St. James Place, and 300 feet from Park Row south exit of the Brooklyn Bridge? Shouldn't it be 700 feet in all directions from the center of One Police Plaza? (23)

Response: In the wake of the September 11, 2001 terrorist attacks, NYPD's Counter Terrorism Bureau conducted a security assessment of Police Headquarters and the other adjacent civic facilities. It was determined that the current standoff distance in the security zone is necessary to protect these facilities from a potential terrorist threat.

Comment A20: Relocate the northern barriers so that they would be south of the Chatham Green driveway. (23)

Response: As discussed in Chapter 12, "Alternatives," an analysis of relocating the current checkpoint on Park Row approximately 125 feet to the south in an effort to establish a free-flowing entrance/exit to the Chatham Green parking lot was performed. However, this proposed alternative was reviewed and evaluated by NYPD's Counter Terrorism Bureau and it was determined that this alternative would not allow sufficient stand-off distance between NYPD headquarters and the Chatham Green parking lot.

Comment A21: The choice of 2006 as a study year ignores the effects of the action over the past 5 years. (26)

Response: The DEIS analyzes the baseline condition (pre-9/11 street closures), the No-Action condition (2006 without the post-9/11 street closures in place), and With-Action condition (2006 with the post-9/11 street closures in place). In each chapter of the DEIS, a discussion of pre-9/11 conditions and post-9/11 conditions within the study area, which includes changes in the study area between the baseline condition and the action condition, is included. Therefore, the choice of 2006 as the analysis year includes discussion of the effects of the action over the past 5 years.

Comment A22: Madison Street and Avenue of the Finest were not closed in 1999. Both streets were used as approaches to the municipal garage until it was closed in 2001. (26)

Response: The EAS for the 1999 street closures, dated April 2, 1999 (CEQR# 99DOT011M), indicated that Madison Street between Avenue of the Finest and Pearl Street was fully closed, while Avenue of the Finest

between Madison Street and Park Row was closed to traffic with the exception of vehicles destined to the municipal parking garage. This information is included within the DEIS.

Comment A23:

The DEIS fails to comply with State law in letter and intent. (30)

Response:

The DEIS was prepared in accordance with Article 8 of the New York State Environmental Conservation Law and the regulations promulgated pursuant thereto at 6 NYCRR Part 617 (State Environmental Quality Review Act or “SEQRA”), Executive Order 91 of 1977, as amended, and the Rules of Procedure for City Environmental Quality Review, found at Title 62, Chapter 5 of the Rules of the City of New York (“CEQR”). In addition, the EIS is being prepared in satisfaction of requirements for community reassessment, impact and amelioration (CRIA) pursuant to Local Law 24 of 2005. The CEQR process, which includes public review and hearings, will fully satisfy the CRIA requirements including the public forum requirement.

Comment A24:

I prefer to have Park Row closed. (46)

Response:

Comment noted.

B. Land Use, Zoning, and Public Policy

No Comments

C. Community Facilities

Comment C1:

Ambulance response times for residents who live in and around the security zone have gone up. I am concerned that emergency response vehicles have to navigate through standstill traffic to reach New York Downtown Hospital (1,3,4,6, 9, 55, 60, 66, 68, 73, 90, 124, 129)

Response:

The subject of ambulance response times were analyzed in detail in Chapter 3, “Community Facilities,” of the DEIS. Response times are generally the same throughout the study area when compared to Manhattan and Citywide. As stated in Chapter 3 of the DEIS, although response times within the study area have increased slightly between 2000 and 2005, the same is true for Manhattan as a whole as well as Citywide. As further stated in the DEIS, emergency service vehicles dispatched from and destined to New York Downtown

hospital, if necessary, are granted access through the security zone at the barrier locations after displaying proper identification.

Comment C2: For the health and safety of those who live and work in Lower Manhattan, it is imperative that the effect of the street closures on emergency response time is accurately measured and that appropriate mitigations are carried out. (3, 4)

Response: Data on emergency response times for the study area, Manhattan, and Citywide were provided by the FDNY. Although response times within the study area have increased slightly between 2000 and 2005, the same is true for Manhattan as a whole as well as Citywide. As such, no impacts to emergency facility access have occurred as a result of the street closures and no mitigation is warranted. In addition, although response times in the study area are comparable to response times in Manhattan and City wide, the proposed traffic mitigation plans described in the DEIS would improve traffic flow in the area which may improve EMS response times in the area.

Comment C3: We have seen and we have had confirmed by experts, including the director of the emergency room of our local hospital, New York Downtown Hospital, that there is a delay in ambulance response times as a direct result of the closure and the way the closure is maintained, and this does jeopardize lives of people within the security area and without because of the difficulty in transversing, as well as reaching the victims of cardiac arrest or other life-threatening situations. (2, 42)

Response: Comment noted. As discussed in Chapter 3 of the DEIS, several interviews were conducted with New York Downtown Hospital emergency department staff. While all interviewees provided anecdotal information regarding the effect of the street closures on emergency response times, none could provide actual data as emergency response times are kept by the FDNY and not by the hospital. Although there were differences in the opinions of New York Downtown Hospital emergency room and emergency medical service staff on whether access to the hospital's emergency room has been affected by the street closures, FDNY response times, which are detailed and quantitative, indicate that response to emergencies in the study area have not been affected by the street closures.

Comment C4: The DEIS does not explain why the increase for the study area is more than twice the increase for the rest of the city. Further research must be conducted. Interviewing emergency medical technicians could provide invaluable insight as to why there has been an increase in response times.

- Response:** (3)
A more important indicator to examine whether response times in the study area have been affected by the street closures is to compare response times before and after the security zone was in place. Between 2000 and 2005, response times increased by 13 seconds, 22 seconds, and 21 seconds in the study area, Manhattan, and Citywide, respectively. As stated above, response times are generally the same throughout the study area when compared to Manhattan and the Citywide. Therefore, the increases and decreases in response times cannot only be directly attributed to the street closures, but can be attributed to various factors that can affect response times.
- Comment C5:* The DEIS concludes that the increase in emergency response time is not due to the street closures in the security zone and therefore no mitigation is offered. This conclusion has not been adequately justified. (3, 46, 51, 52) A potential mitigation worthy of study is to have EMS units posted inside of the barricades 24 hours a day. (3)
- Response:** See response to Comment C2 and C4.
- Comment C6:* Despite EIS claims to the contrary, FDNY vehicles do not traverse the secure zone. Likewise, ambulances from NY Downtown Hospital do not enter the secure zone. (7)
- Response:** Comment noted. While FDNY vehicles and ambulance destined to NY Downtown Hospital are permitted through the security zone, an ambulance or FDNY vehicle may re-route around the security zone at the discretion of the operator.
- Comment C7:* Data on ambulance response times pre- and post-9/11 should be included. (6, 11, 46, 51, 52) Anecdotal information/data should be provided from Downtown Hospital's staff. (6)
- Response:** Ambulance response times pre- and post-9/11 were included in the DEIS for the quarter-mile study area, Manhattan, and Citywide. This data was provided by the New York City Fire Department. Anecdotal information from New York Downtown Hospital's staff is also included in the DEIS in Chapter 3, "Community Facilities" (see response to Comment C3)
- Comment C8:* The average emergency vehicle response time stated in the DEIS is 4 minutes. But it takes longer than four minutes for ambulances to arrive to an emergency. (29)
- Response:** Comment noted. The average emergency response times stated in the DEIS provided by the FDNY, range between 4:29 and 5:02 between

the years 2000-2005 for the study area. As these times reflect average response times, it may sometimes take more or less time to respond to a specific emergency in the study area.

Comment C9: The emergency response times in the DEIS are based on off-hour statistics. (68)

Response: The emergency response times listed in the DEIS are averages times of responses to emergencies that occur at all hours of the day and night, weekdays and weekends, and therefore represents conditions in the field.

Comment C10: There is a mesh wire fence that encircles a fire hydrant in front of Murray Bergtraum HS which cannot be accessed. (6)

Response: Comment noted. As discussed in the DEIS, the FDNY stated that they are able to respond and operate within the security zone.

D. Socioeconomic Conditions

Comment D1: I am gravely concerned that businesses are closing their doors because they have lost customers due to increased traffic and decreased accessibility. (1,6, 44, 129)

Response: As discussed in Chapter 4, “Socioeconomic Conditions,” the observed vacancy rate within the Chinatown Historic District was approximately 1.7% and the overall study area had an observed vacancy rate of approximately 8% based on field surveys conducted in 2005. As discussed further in Chapter 4, the vacancy rate for the overall study area appears to be lower than the vacancy rate in the Downtown area below Canal Street (23.3% vacancy rate), while the vacancy rate in Historic Chinatown is significantly lower. The low vacancy rate in the Historic Chinatown District and the study area as a whole indicates a low number of vacant storefronts/buildings.

Comment D2: The methodology for the selection of businesses and business areas surveyed is not adequately explained and to the extent that it is explained, it does not comport or conform to normal scientific statistical sampling methodologies. (2, 10, 27)

Response: As explained in Chapter 4 of the DEIS, in order to assess whether proximity to the security zone has a direct correlation to business patterns, field surveys were conducted within the Historic Chinatown sub-area and other portions of Chinatown north of Canal Street and east of the Bowery/Catherine Street. A random sample of

approximately 20 businesses in each of those three geographic areas was selected, and an attempt was made to divide the surveys equally between restaurants and retail businesses (gifts, jewelry, clothing, supermarket, etc.) in each area.

The business surveys included questions regarding business conditions in 2005 compared to the previous year (2004), whether the security zone has affected the business, and if so, in what way. Other questions related to business category, number of employees, and duration of time each business has been at the current location. Comments and suggestions for improving business conditions were also noted.

However, as a response to comments, a new survey has been conducted and the methodology and results of the survey have been included in the FEIS in Chapter 4, “Socioeconomic Conditions” and in Appendix A.

Comment D3: Need to recognize the impact of the closure of Park Row in curtailing business, visitation and tourism. (2, 46, 51, 52)

Response: The socioeconomic chapter includes a detailed analysis of indirect business displacement and tourism, which concluded that the action has not resulted in indirect business displacement or in impacts to the tourism industry.

Comment D4: There are several flaws in the execution of the [socioeconomic] assessment. Many Chinatown small business owners and workers speak Chinese as their first or only language. The DEIS states that a translator was present when necessary for the surveys, but there is no detail provided on precisely how the surveys/interviews were conducted. The DEIS does not indicate any degree of cultural sensitivity outside the need to have a translator “present when necessary.” There is no information provided as to exactly which businesses were surveyed. The DEIS only covers generally the types of questions asked, but does not include a copy of the survey instrument, nor all the collected responses. (3, 11, 27, 46, 51, 52)

Response: As a response to comments, an expanded survey was conducted. All of the surveyors for the new survey spoke both English and Chinese. A description of the methodology for the survey is discussed in detail in Chapter 4, “Socioeconomic Conditions” and a copy of the survey is included in Appendix A.

Comment D5: *The DEIS relies heavily upon vacancy rates and rents to gauge the economic vitality of the study area. These are important measures, but they must be assessed in conjunction with other data such as turnover rates and the types of tenants the succeeded the previous tenants. (3)*

Response: **As per the *CEQR Technical Manual*, and discussed in Chapter 4 of the DEIS, field observations were made during peak business times to determine level of activity, condition of buildings, and presence or absence of vacant properties – all of which can be indicators of economic conditions. The retail corridors throughout the Historic Chinatown sub-area and the study area are very active, with a low observed vacancy rate. Field observations also indicate that the majority of businesses within the study area are neighborhood services such as personal care, travel services, and cleaning and tailoring; shopping goods such as apparel, jewelry, and gift stores; and eating and drinking places. As illustrated in Table 4-12 of Chapter 4, the Historic Chinatown sub-area represents the retail heart of the study area with 80% of the study area’s eating and drinking places, 78% of its neighborhood services, and 68% of its food stores. This data indicates that these types businesses (eating and drinking places, retail, food stores, neighborhood services), which have always been predominate within the study area, continue to be the predominate businesses.**

Comment D6: *The [business] survey results support the conclusion that the street closings directly impacted nearby businesses and warrant mitigation. One possible mitigation could be hosting a forum or a series of forums for small business owners in the area that inform them of various financial resources available to them a how they can apply to those programs. (3)*

Response: **The results of the business survey are, at most, inconclusive. While registering individual beliefs, the survey results show that respondents in the study area are almost evenly split regarding that the barriers have had on local businesses. While most respondents in Historic Chinatown attributed the barriers to a decline in business than in other neighboring areas, businesses east of the Bowery, which also borders the barriers, largely indicated that the barriers have not had an impact. The survey results are also not supported by objective economic measures identified in the *CEQR Technical Manual* such as property values and vacancy rates. The security zone has not significantly adversely affected the viability of the Chinatown retail and restaurant sectors, which continue to be a major draw for both residents and tourists. As such, no mitigation is required.**

- Comment D7:* The DEIS uses a generic research model to determine economic health and does not consider indicators of detrimental impact on the character and local sustainability of the community. There must be collaboration with local organizations in order to obtain a more accurate assessment of business activity. (3, 27)
- Response:** The DEIS followed the guidelines within the *CEQR Technical Manual* in preparing the socioeconomic analysis.
- Comment D8:* The Asian American Federation of New York conducted surveys from it's two reports on the economic impacts of 9/11 on Chinatown. The data from those reports could be utilized for the EIS and the methodology for the survey research could be adopted and tailored to the needs of this study. (3)
- Response:** The data presented in these reports do not directly relate to the socioeconomic analysis conducted in the EIS. In addition, these reports analyzed the overall effect of 9/11 on the Chinatown community, whereas the EIS analysis tries to isolate the effects of the security plan on Chinatown from the overall effects of 9/11. However, these reports were utilized in the socioeconomic analysis in the discussions of the garment and tourism industry. Also, see response to Comment D4.
- Comment D9:* The economic effects of 9/11 are still being felt in the study area. The DEIS uses that fact to conclude that any decline in economic activity is most likely due to the 9/11 aftermath and not the street closures. (3)
- Response:** See response to Comment D6.
- Comment D10:* The closure of Park Row and barricading One Police Plaza have not only brought great inconvenience to residences and businesses, but there has been an economic loss, and proper survey of the Chinatown community would indicate that there has been a lot of lost business. (5,9)
- Response:** See response to Comment D4.
- Comment D11:* Since the closure of Park Row, my extended family prefers not to come to Chinatown to dine and have family get-togethers. (9) The street closures have an effect on people who want to shop and dine in the area. (6, 7, 130)
- Response:** Comment noted.
- Comment D12:* An overwhelming majority of the merchants disagree with the DEIS report's conclusion that the Park Row closure has had little impact on the local business community. (10)
- Response:** Comment noted. See response to Comment D6.

- Comment D13:* *These apartments [Chatham Green and Chatham Towers] are susceptible to changes in property values dues to market forces. (10, 33) Chatham Green is not a Mitchell-Lama housing development. (12,14,18,19, 23,24,25,26, 34, 46, 51, 52, 57,66, 68,71)*
- Response:** **The EIS has been revised to clearly state that Chatham Green and Chatham Towers are are susceptible to changes in property values.**
- Comment D14:* *The claim that the street closures do not have effect on the City’s tourism industry has little bearing on the local problems addressed by this DEIS. This is an example of inappropriate use of data made by the investigators to support NYPD’s claims. (10)*
- Response:** **The DEIS presents an overview of the City’s overall tourism industry in addition to a detailed analysis of how the action has affected Chinatown’s tourism industry, specifically. The comparison of the tourism industry in Chinatown and the City shows that the effects of 9/11 were felt throughout the entire tourism industry and these negative effects seemed to have lessened with time in both Chinatown and the City as a whole.**
- Comment D15:* *The question is not whether the 9/11 attacks affected the decline of the tourist activities, but how to separate the impact of the Park Row closure from other contributing factors to the recovery of the 9/11 attacks. The report made no attempt to separate the effect of these contributing factors. (10)*
- Response:** **This statement is incorrect. The DEIS does attempt to isolate the effects of the street closures from the overall effect of 9/11. As stated in Chapter 4, “Socioeconomic Conditions,” in order to isolate the effects of the action, from the overall effects of the 9/11 attacks, the study area patterns were compared to all of Lower Manhattan as well as another geographic area to the west of Broadway (Tribeca), all of which were affected by the events of September 11, 2001. This comparative analysis identified whether there were any trends that are applicable to the study area that are not evident in Lower Manhattan as a whole and/or in a sampled area to the west of the study area (Tribeca). The DEIS concluded that study area patterns are consistent with trends throughout Lower Manhattan and that there is no evidence that the limit in accessibility has resulted in any secondary business displacement.**
- Comment D16:* *A careful reading of Chapter 4 reveals that the presented data are either not directly relevant to the issue discussed or totally inadequate to justify*

these conclusions. (10)

Response: Chapter 4, “Socioeconomic Conditions,” was prepared following the guidelines presented in the *CEQR Technical Manual*. Per CEQR guidelines, the chapter included a detailed analysis of indirect residential displacement, indirect business displacement, and adverse effects on specific industries (in this case, tourism). The methodological approach developed for the analysis (see Chapter 4 for detailed methodology) did provide a relevant and meaningful analysis, while adhering to the CEQR guidelines. The conclusions found in the DEIS were supported by extensive relevant and reputable data sources such as the U.S. Census, The New York City Department of Finance, and the New York State Department of Labor, for example (see Chapter 4 for detailed sources).

Comment D17: There is no indication that the consultant consulted with any of the several scholars that have conducted studies about Chinatown. (11)

Response: The socioeconomic analysis utilized relevant studies, articles, and data sources such as *Chinatown One Year After September 11th: An Economic Impact Study* by the Asian American Federation of New York and the U.S. Census for example (see Chapter 4 for complete data sources). In addition, field survey and business interviews were conducted. The findings and conclusions of this detailed analysis were documented in the EIS.

Comment D18: The DEIS took an incomplete “snap-shot” of Chinatown businesses, which does not tell the story of how the closure of Park Row has impacted the Chinatown business community. (11)

Response: The socioeconomic analysis examined employment, business, and commercial real estate trends between 2000 and 2005 within the study area, which includes Chinatown. By looking at trends from the past 5 years, this provides a picture of how the street closures have affected businesses within the area.

Comment D19: Churches were not considered in this survey. (21)

Response: As churches are not businesses, they are not considered in the socioeconomic analysis.

Comment D20: Property values at Chatham Green have gone down since the streets have been closed. (25, 26, 57,71)

Response: As discussed in Chapter 4 of the FEIS, although specific data on average and median sales prices for Chatham Green co-ops, which is located within the security zone, are not available, recent real estate

listings in the *New York Times* and on real estate firms' websites indicate that asking prices for Chatham Green co-op apartments are comparable to the average and median sale price in the Financial District for the 3rd Quarter 2005. Therefore, as the sales values of the Chatham Green co-ops are comparable to other co-op sales values within Lower Manhattan, it appears that the street closures have not affected property values at Chatham Green.

Comment D21: No interviews were conducted with residents or businesses inside the security zone. (26)

Response: Interviewing residents is not part of a CEQR socioeconomic analysis and therefore not within the scope of work for this socioeconomic analysis. Businesses were surveyed as part of the DEIS, and since it was issued additional interviews with businesses in the study area have been conducted including businesses within the security zone.

Comment D22: The conclusion of no measurable impact on businesses does not match up with actual experiences. (26)

Response: Comment noted. However, the data presented in the socioeconomic analysis supports the conclusion the action has not resulted in any significant adverse impacts to indirect residential displacement, indirect business displacement, and tourism.

Comment D23: The sample size for the survey was too small. (6, 27, 46, 51, 52)

Response: As presented in Chapter 4 of the DEIS, a random sample of approximately 20 businesses from three geographic areas (Historic Chinatown, Chinatown north of Canal Street east of the Bowery/Catherine Street) to determine whether the security zone has affected business in those areas. As a response to comments, an additional survey was conducted between the DEIS and FEIS with approximately 300 businesses surveyed in those three geographic areas.

Comment D24: There was no commentary expressing the anger, frustration of anyone who was interviewed. (27)

Response: The questions asked were very specific and the interviewer recorded the responses. Emotional commentaries, if any, were not considered as the state of mind of the interviewee is not relevant to the analysis.

Comment D25: The closer you get to Park Row and Mott Street, the more times a storefront has changed hands in the last 5 years. (27) The street closures have had a negative impact on Mott Street. (132)

Response: See response to Comment D5. As discussed in the EIS, the median rate of property values increased on Mott Street (between Worth Street and Canal Street) between tax years 2001/02 and 2005/06, with the median rate of increase actually highest in the section of Mott Street closest to the security zone (between Worth and Mosco Streets). Therefore, with increased property values, the findings do not support that there has been a negative impact on Mott Street.

Comment D26: The street closures have affected the economic vitality of our neighborhood and have negatively impacted businesses. (6, 45, 56, 60, 81-90, 93-122,124, 125) The street closures have dampened Chinatown's economic recovery effort (130).

Response: Although the action has limited traffic accessibility to some parts of the study area, there is no evidence that this limit in accessibility has resulted in any secondary business displacement, and as such, no significant adverse impacts have occurred.

Comment D27: The section of the socioeconomic analysis in the DEIS that deals with property values on Mott Street did not use any actual data to arrive at conclusions but instead provided some estimates of property values over a period of time. No sales figures were provided which would have shown the true measure of what property values would have been. (131)

Response: The property value analysis on Mott Street that was included in the DEIS utilized the New York City Department of Finance's 5-year Market Value History Reports for Tax Years 2001/02 through 2005/06 for each tax lot fronting on Mott Street.

Comment D28: The conclusions in the DEIS about property values on Mott Street is contrary to what has actually happened. A walk down Mott Street and discussions with storeowners would have painted a different picture. (131)

Response: See response to Comment D25.

Comment D29: New York City Department of Finance assessment information and year-to-year changes are measured by percentage changes to arrive at data and not median calculations in any measure. This fact was missing in the DEIS. (131)

Response: The DEIS reports the Department of Finance data for year-to-year changes in percentages for property values along Mott Street. However, in order to provide a more accurate basis for assessment, the median rate of property value increase was calculated for each portion of Mott Street analyzed. The median is more appropriate as a measure of central tendency in this case because, unlike the average, it

is not sensitive to abnormally high or low values.

Comment D31: The following tables should have been included in the Mott Street property value analysis in the DEIS (see tables prepared by commenter in Appendix B):

- *Comparing tax assessments of Mott Street with Manhattan for fiscal years 2005-2006*
- *Comparing Mott Street tax assessment changes by sections of Mott Street for fiscal years 2005-2006*
- *Comparing Mott Street tax assessments arranged by median numbers by sections of Mott Street for fiscal years 2005-2006*
- *Table showing tax assessments for all of Mott Street by section and side of Mott Street. (131)*

Response: The DEIS does include a comparison of property values on Mott Street between tax years 2001/02 to 2005/06. A comparison of property values pre-street closures to post-closures provides a better indicator for evaluating whether the security plan has had an adverse impact on property values than comparing property values and tax assessments between 2005 and 2006. Also, see response to Comment D25.

E. Urban Design and Visual Resources

Comment E1: The DEIS readily acknowledges that the features of the security zone have had significant adverse impacts on urban design. (3)

Response: Comment noted. See response to Comment E2.

Comment E2: The closure of the public walkways and extensive security features and fences makes the area aesthetically unpleasant. (6, 7, 40)

Response: The security plan has altered the urban design of the security zone area, yielding a significant adverse impact. Chapter 11, "Mitigation," provides a description of measures to be developed to mitigate the urban design impacts. These recommendations are intended to address the closure of Park Row by making it more aesthetically pleasing and pedestrian and bicycle friendly.

F. Neighborhood Character

Comment F1: The residents of Chatham Green and Chatham Towers will forever feel as though they live in a lock-down barricaded zone, making simple tasks and arduous and complicated procedure. (1, 40, 41, 43, 50, 129)

Response: Although Chatham Towers is partially located within the security zone, vehicular and pedestrian access is not restricted into this building. At Chatham Green, also partially located in the security zone, vehicle access is controlled for residents destined to the parking lot. Pedestrian access is not restricted for pedestrians destined to Chatham Green.

Comment F2: Chinatown and other neighborhoods of Lower Manhattan should not be forced to bear an undue burden nor do they want their communities turned into fortresses. (11)

Response: As stated in the DEIS, the terrorist attacks on the World Trade Center on September 11, 2001 resulted in greater security measures being implemented all over the City, particularly in Lower Manhattan due to the large number of government offices and financial institutions located there. Security devices such as, delta barriers, French barriers, bollards, and concrete planters, although typically not aesthetically pleasing, have become part of the landscape of the City after September 11, 2001. The street closures are necessary security measures and will continue to stay in place, while the threat remains.

Comment F3: The closure of Park Row is trampling upon the Chinatown community. (32)

Response: Although the action has resulted in increases in traffic and noise around the perimeter of the security zone, this has not altered the defining neighborhood characteristics of the study area, and in particular Chinatown, which has always been heavily trafficked. However, as discussed in Chapter 11, "Mitigation," the urban design impacts that have occurred as a result of the action has affected neighborhood character (within the security zone) will be mitigated to enhance the streetscape and make the area more aesthetically pleasing.

Comment F4: The NYPD has created a police state in the neighborhood that is very off-putting to residents and visitors. (45)

Response: Comment noted. See response to Comments F2 and F3.

Comment F5: The surrounding neighborhood was bustling with activity now it looks like a parking lot for NYPD and court officials. (6)

Response: As stated in the DEIS, after conducting a detailed Neighborhood Character analysis, the action was found not to have altered the defining neighborhood characteristics of the study area surrounding the security zone. Also, see response to Comments to F3 and G13.

Comment F6: Chatham Green seems to have been closed off from the rest of the community. (67)

Response: The DEIS recognizes that the action has created a disconnect between the security zone area (where Chatham Green is located) and the surrounding neighborhood. Despite this negative alteration, the security features are considered necessary to protect potential terrorist targets and these features will remain in place as long as a potential terrorist threat exists.

G. Traffic and Parking

Comment G1: The most obvious impact of the closure of Park Row has been bottleneck traffic on the streets surrounding Park Row causing delays. (1,21,55, 56, 60, 62, 63, 67, 79, 92, 126, 127, 128, 129)

Response: A detailed analysis of traffic has found that the action has resulted in significant adverse impacts at 4 locations (see Chapter 7, “Traffic and Parking” for list of impacted intersections). Full mitigation is proposed for all impacted locations; however, one impacted location (Robert F. Wagner Sr. Place and Pearl Street) will remain unmitigated.

Comment G2: The NYPD needs to maintain and expand its commitment of prevent the parking abuse in the surrounding community and that includes the use of Park Row as a parking lot for civilian vehicles by either uniformed or civilian employees of the police department. (2,8, 53, 54)

Response: Currently, there is no parking permitted on Park Row for anyone, including City employees. In addition, as stated in the DEIS, while illegal parking by both government employees and civilians is prevalent in the study area, the security plan has not resulted in this condition.

Comment G3: There needs to be a plan including the full reopening of the Police Plaza garage and full utilization of the federal garage on Hester Street, which is currently underutilized. (2)

Response: The 400-space garage located at 109-133 Park Row is currently open to NYPD authorized vehicles and is fully utilized. The EIS has been updated to clearly state this. The federal parking garage is not under City control, and therefore the City cannot take any steps to insure that it is more fully utilized.

Comment G4: The security zone did not create the traffic congestion and parking shortage, but it has exacerbated those problems. (3, 74)

Response: Comment noted.

Comment G5: The DEIS partially relies upon traffic data from the 2004 One Police Plaza Security Plan EAS. This is inappropriate considering that New York State Supreme Court judgment against the NYPD specifically mentioned the need to re-examine the traffic and parking analysis in the 2004 EAS. (3)

Response: The traffic analysis in the EIS relies on multiple sources to construct a baseline pre-9/11 condition. The 2004 One Police Plaza Security Plan EAS was utilized for pre-9/11 traffic volumes at some study area intersections in addition to the 1993 *Foley Square FEIS*, the 2004 *World Trade Center Memorial and Redevelopment Plan GEIS* and additional source material provided by NYCDOT to construct a baseline traffic network. In addition, traffic data was collected in the field in 2005 that was utilized for With-Action traffic analysis.

Comment G6: In order to provide the fairest assessment for the community, conservative traffic data should be used for the baseline and no-action conditions. Additionally, there should be extensive and thorough fieldwork conducted to determine the current conditions, and less reliance on the traffic modeling software. (3)

Response: Extensive fieldwork was conducted within the traffic study area. Traffic counts were conducted in 2005 at 28 intersections in addition to vehicle classification counts, parking surveys, physical inventories of intersections, and speed runs to record existing conditions. It was found that several significant adverse traffic impacts have resulted as a result of the action. Traffic simulation was utilized to provide a visual representation of how the street closures have affected congestion and traffic queuing within the immediate vicinity of the security zone and to help test mitigation measures.

Comment G7: The DEIS does not divulge whether or not the municipal garage is being fully utilized [by NYPD-authorized vehicles]. (3, 50, 74)

Response: See response to Comment G3.

- Comment G8:* Under-reporting of vehicles calls into question the air/noise pollution data. (6,30)
- Response:** **No-Action and With-Action traffic volumes in the EIS have not been under-reported. With-Action traffic volumes are based on actual field counts and therefore provide an actual measure of traffic in the study area. The air quality and noise analyses which also include actual field measurements, are accurate and reflect the effects of the street closures.**
- Comment G9:* The Park Row exit ramp from the Brooklyn Bridge that was closed formerly processed 500 to 700 vehicles an hour onto Park Row north. Its closure in 2001 diverted them somewhere. Nowhere in the DEIS is this discussed. (6, 11, 30)
- Response:** **All vehicles that formerly traveled on streets within the security zone, including the now closed Brooklyn Bridge off-ramp, were diverted elsewhere within the immediate surrounding network to streets such as Pearl Street/St. James Place, Centre Street and Worth Street. This is shown in the With-Action traffic volume diagrams. In addition, the baseline traffic volumes description in Chapter 7, “Traffic and Parking,” includes a discussion of vehicles that formerly entered the security zone from Park Row, Pearl Street, and the Brooklyn Bridge Manhattan bound exit ramp to Park Row.**
- Comment G10:* Conditions beyond 2006 are totally ignored in the DEIS. No mention of the redevelopment of Lower Manhattan and Downtown Brooklyn. (6, 30, 35, 46, 51, 52, 56) The EIS must examine conditions at least 10 to 20 years into the future, not simply the present year. (11, 30)
- Response:** **See response to Comment A6.**
- Comment G11:* With Park Row closed, narrow Worth Street has been transformed into one of Downtown’s few cross-town streets. (6) The closure of Park Row has resulted in a high volume of traffic on Worth Street. (9) Park Row was an essential connector for Lower Manhattan neighborhoods. (54)
- Response:** **Based on field counts conducted for this EIS, traffic volumes have increased substantially along Worth Street partially as a result of the street closures, which have resulted in traffic impacts at the intersection of Worth Street at Chatham Square. Proposed mitigation for this impact, which include the reconfiguration of Chatham Square is required to fully mitigate these impact.**
- Comment G12:* Back-ups are caused by NYPD taking out a lane in each direction on the

*Brooklyn Bridge that results in noise, air pollution and traffic congestion.
(7)*

Response: **Comment noted. The NYPD actions on the Brooklyn Bridge, on Broadway south of Vesey Street, and at other locations are on-going security measures that are independent of the security zone analyzed in this EIS.**

Comment G13: All the parking that once existed for the residents and visitors of Chinatown prior to 9/11 has become almost nonexistent. Parking has been usurped by not only court personnel, but by private cars bearing police placards. (6, 9, 40, 42, 44, 69, 130)

Response: **As stated in the DEIS, out of the approximately 1,217 illegally parked cars observed within the study area, approximately 1,120 of those vehicles displayed City placards. However, while illegal parking by both City employees and civilians is prevalent in the study area, the security plan has not caused this condition.**

Comment G14: Illegal parking and the lack of legal parking has had a negative impact on Chinatown retail and wholesale businesses. (11)

Response: **While illegal and lack of legal parking is a recognized problem in Chinatown and elsewhere in Manhattan, the security plan has not caused this condition. See response to Comment G13.**

Comment G15: The closing of the 400 space municipal garage has severely reduced parking opportunities in the area. (7,38)

Response: **The closure of the municipal garage was a separate action and not part of this action. See response to Comment A8.**

Comment G16: Because of the street closures, traffic is much heavier on St. James Place. (12, 75) However, the DEIS shows that St. James Place at Madison Street has a satisfactory level of service. We do not want additional lanes of traffic and no parking on St. James Place. (75)

Response: **The DEIS showed that traffic volumes have increased along St. James Place/Pearl Street partially as a result of the street closures, which have resulted in traffic impacts at the intersections of Pearl Street/Robert F. Wagner Place, Pearl Street/Frankfort Street, and Chatham Square. However, the HCS analysis showed a satisfactory level of service at the intersection of St. James Place and Madison Street. Proposed mitigation for these impacts, which include the reconfiguration of Chatham Square in addition to signal timing adjustments, and lane striping adjustments fully mitigate these impacts at Pearl Street/ Frankfort Street and Chatham Square.**

However, the impacted intersection of Pearl Street/Robert F. Wagner Sr. Place will remain unmitigated. Nowhere in the DEIS is it stated that St. James Place is proposed to be widened and have no parking lanes.

Comment G17: There is no rationale for reversing the traffic direction on Oliver Street provided in the DEIS. It will invite trucks and buses into the street from Chatham Square. Access to the church and school on this street will be hampered by this. (13, 28, 31, 38, 46, 51, 52, 75, 77) If the traffic is reversed parking will be a problem and very unsafe. It does not take into consideration children or seniors. (28, 75, 76)

Response: Comment noted. The reversal of Oliver Street is no longer being proposed. See response to Comment K16.

Comment G18: Cars and trucks are constantly looking for parking which slows traffic and adds to the congestion in the area. (15, 123)

Response: Curbside space in this portion of Manhattan is fully utilized. However, this is not a consequence of the security zone.

Comment G19: During rush hours Water Street is a huge traffic jam and not a feasible alternative to Park Row. (20)

Response: The traffic and parking analysis of the EIS shows that Water Street traffic has increased as a result of the action. Significant adverse impacts were identified at Pearl Street at Frankfort Street and Robert F. Wagner Sr. Place.

Comment G20: The inventory of available parking garage parking spaces presented in the DEIS seems to include parking lots that are no longer available. (26)

Response: The off-street parking survey was conducted in early 2006 as a snapshot of parking conditions in the study area. A new survey was conducted in early 2007 and the updated parking survey results have been included in the FEIS.

Comment G21: The traffic study area is very limited and does not include the Brooklyn Bridge. (30, 46, 51, 52)

Response: The study area analyzed intersections that includes vehicles directly entering/exiting the Brooklyn Bridge. In addition, see response to Comments G12 and G40.

Comment G22: The DEIS shows With-Action volumes at sites close to the security zone 30-40% lower than in 1993. The difference indicates the magnitude of the impact of the closures. 30,000 to 40,000 vehicles a day are no longer

moving through the security zone. (30)

Response: As noted in the DEIS, actual field counts were conducted to measure the With-Action conditions. As also discussed, in the EIS, there have been several changes in the network in the No-Action conditions that affect the circulation in the study area. These include street closures at Foley Square, the 1999 security plan, Vesey Street between 9A and Church Street, Duane Street east of Broadway, and at the New York Stock Exchange. In addition, the loss of millions of square feet of office space in Lower Manhattan has also resulted in a decrease of vehicles moving through the area. These No-Action changes have caused a decrease in traffic in the study area.

Comment G23: The DEIS underestimates the 2000 traffic volume within the limited study area by 21% to 22%. It is improper to use 2000 as the baseline traffic year for traffic because it is an artifice that provides a shaky foundation upon which the DEIS is built. The analysis ignores volumes reported in the 1993 Foley Square EIS and the official annual bridge and tunnel counts. (30)

Response: The DEIS used various sources in addition to the 1993 Foley Square EIS to construct the 2000 baseline traffic network. The baseline traffic network is utilized as a reference in the discussion of pre-9/11 traffic conditions in the study area. Determining significant adverse traffic impacts was based on comparing No-Action conditions to With-Action conditions. In addition, see response to Comment G22.

Comment G24: The NYPD has occupied many of the permissible public street spaces on St. James Place and in the rest of the area. They park at metered spots for longer than permitted and do not put money in the meter. This is not mentioned in the EIS. (34, 42, 74, 94)

Response: Chapter 7, "Traffic and Parking," provides in depth documentation of parking conditions within the study area. See response to Comment G13.

Comment G25: Traffic along Canal Street on the weekend should be examined. (30)

Response: An analysis of weekend traffic along Canal Street is not within the scope of work for this EIS. Weekday peak period conditions that were analyzed are adequate. Due to the distance between Park Row and Canal Street, the EIS did not identify measurable traffic flow changes along Canal Street resulting from the action.

Comment G26: The EIS must provide a worst-case condition for baseline conditions. (30)

Response: In compliance with the *CEQR Technical Manual*, the EIS compares

No-Action condition with the With-Action condition to assess impacts. It should be noted, however, that the FEIS does provide additional documentation of the historical data available prior to 2001.

Comment G27: Clarify this statement in the DEIS: "...as long as the increase in delay is 10 seconds or more."(30)

Response: The text in Chapter 7, "Traffic and Parking," of the DEIS has been revised to more clearly indicate that CEQR impact criteria was utilized in the traffic analysis. Using the impact criteria in the *CEQR Technical Manual*, if a No-Action LOS A, B or C condition deteriorates to unacceptable mid-LOS D, or a LOS E or F in the With-Action condition, then a significant traffic impact has occurred. The *CEQR Technical Manual* further states that for a No-Action LOS A, B or C, which declines to mid-LOS D or worse under the With-Action condition, mitigation back to mid-LOS D is required.

Comment G28: The DEIS does not discuss the benefits of opening the municipal garage to NYPD vehicles. (30)

Response: See response to Comment G3.

Comment G29: The Synchro traffic model the consultant created needs to be released for review. It was requested through the FOIL process, but the request has not been answered yet. (30)

Response: The Synchro traffic model was provided on 2/15/07.

Comment G30: LOS calculation sheets were not included with the on-line DEIS (30) Data sheets were not provided with the DEIS to permit checking No-Action traffic volume assumptions. (30)

Response: LOS calculation sheets are not typically provided with the published DEIS. The sheets are considered back-up data for the traffic analysis and when requested by NYC DOT are submitted to NYC DOT for review and comment. The back-up data is also available for public review and can be accessed through the Freedom of Information Law process.

Comment G31: The With-Action AM peak period traffic diagram shows more than a 1,000 vehicles in the westbound right turn lane at the intersection of Canal Street at the Bowery. This is not shown in the LOS summary. (30) Traffic did not get diverted to Canal Street and the Bowery as a result of the street closures as it shown in the DEIS. (30)

Response: At the intersection of Canal Street at the Bowery, the westbound right turn lane is controlled by a separate signal as it is a channelized right

turn lane. A footnote has been added to Table 7-6 of the FEIS to further clarify this.

Comment G32: The CEQR Technical Manual's approach for determining traffic impacts is not appropriate for this traffic analysis. A traffic simulation model would be more appropriate in this situation. (30)

Response: The guidance provided in the *CEQR Technical Manual* does not address this situation. The particular methodology that was used in this analysis was reviewed by NYC DOT and approved for use in connection with this project. While simulation is not a substitute for this type of traffic analysis, it does provide an effective tool to test improvements such as those proposed for Chatham Square.

Comment G33: The DEIS must disclose the effect of Park Row and other closures that reduced travel within Chinatown by increasing traffic elsewhere in Lower Manhattan. The displacement of tens of thousands of vehicles daily must be analyzed under CEQR. (30, 46, 51, 52) The shifting demand in regard to traffic as it relates to Chinatown discussed in the DEIS is not explained clearly. (30)

Response: The DEIS discloses the change in traffic patterns and identifies several significant adverse traffic, transit, and pedestrian impacts as a result of the number of vehicles being diverted by the action as discussed in Chapter 11, "Mitigation."

Comment G34: By using CEQR traffic methods, the DEIS fails to disclose actual unacceptable delays that are characteristic of Chinatown corridors. (30)

Response: See response to Comment G32.

Comment G35: The DEIS fails to account for the actual effect of the street closures on traffic. (46, 51, 52)

Response: This statement is not correct. While action conditions are rarely measured in the field, for this action, the transportation effects of the security plan have been accurately documented with detailed data collection and are presented in the DEIS.

Comment G36: The DEIS fails to monitor and measure the traffic congestion on St. James Place. (46, 51, 52)

Response: The DEIS included an analysis of six intersections along St. James Place/Pearl Street between Chatham Square and Fulton Street. The DEIS disclosed significant adverse traffic impacts at two of the six intersections: at Peal Street and Robert F. Wagner Place and Pearl Street at Frankfort Street. While the impact at Pearl Street and

Frankfort Street would be fully mitigated, the impact at Robert F. Wagner Sr. Place and Pearl Street will remain unmitigated.

Comment G37: The DEIS says that there is a parking lot at 130 Duane Street with 126 spaces, yet this is outside the study area. In addition, this parking lot does not exist. (46, 51, 52)

Response: Typically for off-street parking surveys, off-street parking facilities located within the study area or in close proximity to the study area are included. A recent off-street parking survey was conducted to update the list of off-street parking facilities included in the DEIS. It was found that the parking garage at 130 Duane Street does not exist; possibly closing between the time the first survey and second survey were performed. The FEIS has been updated to reflect this new information.

Comment G38: The DEIS does not explain why the earlier study (PSAC II EAS) found that the loss of the municipal garage would cause an impact and yet the current study finds no shortage of parking. (46, 51, 52)

Response: Please see response to Comment A8. The Public Safety Answering Center II EAS (CEQR#01NYP002M) stated that the closure of the municipal garage to all vehicles (both civilian and NYPD) would create a maximum shortfall of 88 parking spaces in the area. However, the EAS also acknowledged that the *CEQR Technical Manual* provides that for proposed actions within the Manhattan CBD (area south of 61st Street), the inability of the proposed action or surrounding area to accommodate projected future parking demands would generally be considered a parking shortfall, but would not be deemed a significant adverse impact.

Comment G39: The DEIS failed to include news articles regarding illegal parking in Chinatown. (42)

Response: News articles are typically not included in EIS traffic and parking analysis. Detailed field data collection of parking conditions, including supply and demand, are provided in the EIS.

Comment G40: The entire area south of Canal Street, including the primary replacement routes of South Street and Water Street, should have been included in the study. (20)

Response: The study area for the traffic analysis includes major corridors with readily identifiable diverted traffic from the closure of Park Row and other streets within the security area. The portion of Water Street

between Dover Street/Frankfort Street and John Street is in fact included in the traffic study area.

H. Transit and Pedestrians

Comment H1: Worth Street has five lanes of traffic converging on two narrow west-bound lanes and makes it a congested area, particularly hazardous for children, seniors and disabled to navigate. There is not a single crosswalk from Park Row to Centre Street. (6, 8, 9, 22, 44, 62) It is difficult to cross the street in the area surrounding the security zone. (6, 21, 38, 56,67, 71, 74)

Response: The segment of Worth Street noted above has more than doubled its traffic volume due to the action. NYC DOT has stringent requirements for “warrants” for mid-block traffic signals. The DEIS did not identify this segment as a high-accident location caused by the action.

Comment H2: Those who live on the eastern side of police headquarters lost the use of a wide stairway and were relegated to a steep and narrow staircase that lies by the side of police headquarters. This staircase can only accommodate one person walking in each direction. The alternative is to use the staircase or navigate an extra two blocks around it. (8)

Response: As disclosed in the EIS, for security purposes, this staircase connecting Madison Street to the pedestrian corridor along police headquarter is currently closed and will remain closed as part of this action. With the exception of this one corridor, the streets in the security zone are fully accessible to pedestrians. With this route closed, pedestrians must travel along the south side of the headquarters building along Avenue of the Finest and Madison Street. As discussed in Chapter 8, “Transit and Pedestrians,” this alternate route increases walking distance for pedestrians by approximately 240-feet or about one average city block.

Comment H3: Between Pearl Street and St. James Place there are no shelters at the bus stops. (12)

Response: Comment noted.

Comment H4: In the vicinity of the barriers, the sidewalks and roadway are broken up and bumpy. (12)

Response: Comment noted. As discussed in Chapter 11, “Mitigation,” as part of the mitigation for urban design and traffic impacts, improvements to

Park Row and Chatham Square will be made. Some of the recommendations relating to streetscape improvements include the following:

- **Reduce most of Park Row’s right-of-way to two lanes, one in each direction.**
- **Realign the northern end of Park Row to conform to the Chatham Square reconfiguration.**

- **Install a landscaped esplanade along Park Row, including attractive paving, trees, shrubs, planters, etc.**
- **Install improved street fixtures, including benches, lighting, and barriers. Attractive trash receptacles may be placed at appropriate locations away from security sensitive areas.**
- **Improve pedestrian wayfinding signage along Park Row and other routes through the area.**

Comment H5: The closure of Park Row will block us without a pedestrian walkway to the new transit hub. (17)

Response: Park Row is currently open to pedestrian traffic. The planned World Trade Center Transit Hub and the planned Fulton Street Transit Center, will both be located approximately half a mile from Park Row and Worth Street. With the exception of one corridor along NYPD headquarters, pedestrian access in the security zone is not restricted.

Comment H6: It is much less convenient to get to Chinatown from Battery Park City due to the rerouting of the M9 bus. (20)

Response: As detailed in the DEIS, the current rerouting of the M9 bus to its new route is somewhat independent of the With-Action condition as Vesey Street, which is adjacent to the World Trade Center, has been closed. As a result, the M9 has stayed on its post-9/11 route even though the M103, M15, and B51 have returned to Park Row.

Comment H7: There are now bicycles all over the sidewalks because the streets are too dangerous for them. Bicycles have access to all sorts of areas. That is a security concern. (22)

Response: Comment noted.

Comment H8: The cement blocks on Park Row make it difficult to walk down the street. (24, 57)

Response: The cement barriers on the sidewalk along Park Row and other deterrents that make the target less vulnerable and accessible to attack are necessary security features. Also, see response to Comment

H4.

- Comment H9:* No plan was presented to re-establish pedestrian access up to Police Plaza from Madison Street. (26)
- Response:** See response to Comment H2.
- Comment H10:* The DEIS needs to secure more recent bus ridership characteristics. (30)
- Response:** The most recent bus ridership data available is from 2005 and the FEIS has been updated accordingly.
- Comment H11:* It is not clear if bus route lengths discussed in the DEIS are for the entire route. (30)
- Response:** The bus route lengths discussed in the DEIS are for the entire route length, round trip. This has been clarified in the FEIS.
- Comment H12:* The cost in wasted time and lost productivity due to bus delays should be analyzed. (30)
- Response:** This type of analysis is not within the scope of work for the EIS. As noted in the FEIS, New York City Transit bus routes that had been rerouted around Park Row (with the exception of the M9) are now operating on Park Row as part of the mitigation plan.
- Comment H13:* Delays in bus travel time as a result of having to pass through the barriers on Park Row should be discussed. (30)
- Response:** The EIS has been updated to provide a discussion of the minimal delays encountered by buses as they enter the security zone.
- Comment H14:* Chinatown bus services located in the area should be described and their routes and ridership reported in the EIS. (30)
- Response:** NYCT bus routes and other express bus routes that travel through Chinatown are discussed in Chapter 8, "Transit and Pedestrians," which also includes a discussion of ridership statistics. A separate analysis of Chinatown private bus services located in the study area is not within the scope of work for the EIS.
- Comment H16:* The community needs more detail about numbers and types of pedestrian accidents covering more years. (30)
- Response:** The pedestrian accident analysis presented in the DEIS provides pedestrian high accident locations pre-street closures (year 2000) and post-street closures (2002-2005). The pedestrian accident tables in the DEIS presented the number of accidents at intersections within the study area. The years 2000-2005 provide an adequate representation

of how the street closures have affected pedestrian/vehicle conflicts at intersections in the study area. By comparing these years and data, it was determined that a high accident pedestrian location appears to have been created at Worth Street and Broadway as result of the security zone.

Comment H17: The diversion of traffic will increase vehicle miles of travel (VMT) in the area and traffic accidents grow in number in proportion to VMT. This is ignored in the DEIS. (30)

Response: The DEIS provides a detailed evaluation of potential high accident locations and discloses a significant adverse impact.

Comment H18: The DEIS ignores the effect of the street closures have had on disabled persons. The security plan measures do not comply with the American with Disabilities Act. (46, 51, 52, 56,78)

Response: The closure of Park Row has created essentially a pedestrian mall, and reduced pedestrian/vehicle conflicts. Vehicle access to Chatham Green and Chatham Towers is maintained for handicapped vehicle drop-off/pick-up.

Comment H19: The bus stops for the M15, M9, M22, B51, and M103 are constantly shifting. (55)

Response: Comment noted. The M103, M15, and B51 bus routes have now returned to their original routes along Park Row resulting in a shift in bus stops from their “temporary” route.

Comment H20: The DEIS does not consider the NYCDOT express bus service in the transit analysis, particularly the BM1, BM2, BM3, and BM4 bus routes. (61)

Response: A discussion of the rerouting of the BM1, BM2, BM3, and BM4 bus routes has been included in the FEIS.

Comment H21: The barriers to foot traffic have increased the time it takes to get to Chinatown. (54)

Response: As discussed in the DEIS, with the exception of one corridor, the streets that are closed to vehicular traffic as a result of the security plan are open to pedestrian activity. The pedestrian corridor running between Police Headquarters to the intersection of Madison Street and Pearl Street was closed as part of the security plan. This corridor connects the plaza in front of Police Headquarters to the intersection of Madison and Pearl Streets. The distance through this corridor from the edge of the plaza to the intersection is approximately 540'.

There is a staircase along this corridor and, it is therefore not a handicapped accessible route. With this route closed, pedestrians must travel along the south side of the headquarters building along Avenue of the Finest and Madison Street. The distance for this alternate route from the edge of the plaza to the intersection of Madison and Pearl Streets is approximately 780'. There is a staircase along this route as well. The increase in walking distance for pedestrians equals 240' or about one average city block and an approximate walking time of an additional 60-90 seconds.

Comment H22:

There is no M22 bus stop going west at South Bridge Towers. (67)

Response:

The M22 bus route was not analyzed in the EIS as it was not affected by the action.

Comment H23:

It takes longer to walk to the subway at the Municipal Building. (55)

Response:

As discussed in Chapter 8, the pedestrian corridor running between Police Headquarters to the intersection of Madison Street and Pearl Street was the only pedestrian corridor closed as part of the security plan. With this route closed, pedestrians must travel along the south side of the headquarters building along Avenue of the Finest and Madison Street. This increase in walking distance is approximately 240' or an average city block. While this pedestrian detour does represent an increase in walking distance, the increase is not considered a significant adverse impact.

I. Air Quality

Comment 11:

The amount of toxins in the air from trucks and cars idling in traffic as they make their way down Worth Street or St. James Place has increased. (1, 24, 56, 125, 129) The air quality in the area has gone down. (3, 25, 66, 126, 128)

Response:

The DEIS identified significant adverse air quality impacts at Worth Street and Foley Square and Worth Street at Chatham Square. As discussed in Chapter 11, "Mitigation" of the DEIS, the rerouting of the M103, M15, and B51 from their "temporary" route along Worth Street back to Park Row has mitigated these air quality impacts. However, with revisions to the air quality analysis for the FEIS based on revised standards for fine particulates, slight changes in the traffic network, and updated information on modeled pollutant concentrations, the With-Action condition has not result in significant adverse air quality impacts.

- Comment I2:* *The heavy traffic makes me concerned about the levels of pollution surrounding Columbus Park. (9)*
- Response:** **Vehicular pollutant concentrations are highest at intersections due to vehicles idling at traffic signals. If no air quality impacts are projected for the worst-case intersections, then none are likely at other locations. Since no air quality impacts are anticipated for the modeled intersections, none are likely for Columbus Park.**
- Comment I3:* *The DEIS fails to give quantitative measurements as to the level of vehicular exhaust as well as its impact on young children. (33) I am gravely concerned about the increased levels of asthma in our community, which has high rates among our children. (1, 38, 75, 129)*
- Response:** **The CAL3QHC and CAL33HCR models provide quantitative values for worst-case concentrations of carbon monoxide, PM10, and PM2.5. The action routes traffic formerly on Park Row to St. James Place and Worth Street. Therefore, the regional emissions of pollutants are the same for both No-Action and With-Action conditions.**
- Comment I4:* *More can be done to improve air quality than rerouting three buses. (3)*
- Response:** **The DEIS disclosed that significant adverse air quality impacts have resulted from the action. The rerouting of the three bus routes back onto Park Row has mitigated this impact. Also, see response to Comment I1. No additional air quality improvement measures are required as part of the action.**
- Comment I5:* *The carbon monoxide and particulate matter analysis should be performed for 2026. (30, 46, 51, 52) The DEIS fails to consider the 20-year time frame required by the National Ambient Air Standards (“NAAQS”) in making it’s determination. (51,52)*
- Response:** **The analysis of air quality is typically done for the year of analysis, or build year, which has been defined as 2006. The action resulted in diverted traffic due to the security plan and therefore has not generated additional traffic. Highway improvement projects often project traffic and air quality 20 years into the future because the improvements to the highway's capacity result in induced traffic. That is, drivers are attracted to the highway due to the improved traffic flow. For this action, the traffic has been diverted to other streets. This does not constitute an incentive for drivers to use these streets that would result in induced traffic over the next 20 years. Therefore, a 20-year future analysis year is not carried out for these types of projects. In addition, pollutant emissions decrease with future years**

due to changes in technology and the fleet mix. Therefore, the worst case for this action is considered to be the analysis year, when the diverted traffic volume would be added and when the vehicular emission factors would be higher than in the future. Therefore, no analysis of air quality in 2026 is necessary to demonstrate that no impacts would occur.

Comment I6: Table 9-2 appears to be mislabeled as providing intersection volumes for 2005. (30)

Response: The table has been revised in the FEIS.

Comment I7: The results of the vehicle classifications are not included in the DEIS. (46, 51, 52) The percentage of SUV's accounted for in this analysis seems very low. (30)

Response: The vehicle classification counts were conducted as part of the traffic data collection. The vehicle classification count sheets are considered back-up data for the traffic analysis and air quality analysis and when requested by NYC DOT and/or NYC DEP are submitted to NYC DOT and/or NYC DEP for review and comment. The back-up data is also available for public review and can be accessed through the Freedom of Information Law process.

Comment I8: It is not clear what "free-flowing" links are being described in the air quality analysis. (30)

Response: The EIS has been revised to clearly state that for the intersection air quality analyses, free-flowing links are the roadway segments that extend 1,000 feet from each leg of a modeled intersection.

Comment I9: Background concentrations were not measured at ground level and therefore not representative of what people actually breathe. (30)

Response: The background concentrations were provided by NYCDEP, and are considered to be representative of the air quality experienced by a person who is six feet tall.

Comment I10: The DEIS introduces 1991 meteorological data for Foley Square/Worth Street analysis. The analysis year is 2006. Please clarify. (30)

Response: This was the most recent data available in a format suitable for running CAL3QHCR. The CAL3QHCR model uses five years of meteorological data. A five-year period is considered to provide a good range of potential meteorological conditions, and no significant differences would be likely with a different set of years.

Comment I11: The air quality analysis is missing so much information that the analysis cannot be fully reviewed for accuracy and completeness. (30)

Response: The mobile air quality analysis was prepared pursuant to the *CEQR Technical Manual* and utilized the traffic data provided in Chapter 7, “Traffic & Parking.” Also, see response to Comment I7.

Comment I12: There is no indication of what the air quality impacts would be if the closed Brooklyn Bridge off ramp were to open. (46, 51, 52)

Response: The DEIS analyzed the action, which does not include the opening of the Brooklyn Bridge off-ramp that is currently closed. Therefore, an analysis of such air quality impacts would not be warranted and is not included within the EIS.

J. Noise

Comment J1: Most offensive [noise] is the loud banging mechanical barriers erected on Park Row last fall located just a few yards from the residents’ windows. It is loudest when an articulated bus rolls over them. (8, 25, 44)

Response: As discussed in Chapter 10, “Noise,” the mechanical raising and lowering of hydraulically operated barriers is a source of noise. The barriers are raised and lowered sporadically through the 24-hour period, depending upon the frequency of vehicles entering the security zone area. The FEIS has been updated to reflect this.

Comment J2: The noise pollution has been terrible as a result of the street closures. (25, 58, 66, 71, 72, 73, 126, 128)

Response: The DEIS discloses a significant adverse noise impact Worth Street and Baxter Street and Worth Street and Mulberry Street in the AM peak hour. Although, the rerouting of the M103, M15, and B51 buses back to Park Row from Worth Street have lessened these impacts slightly, it did not eliminate them. No other method of mitigation is feasible, and therefore, these impacts will remain unmitigated.

Comment J3: Noise monitoring was not conducted during normal rush hour. (26)

Response: As discussed in the DEIS, based on the screening analysis presented in Table 10-3 of Chapter 10, noise monitoring was recommended for Worth Street and St. James Place during the AM peak period. As shown in Table 10-4 of Chapter 10, noise monitoring was conducted between 8:02-8:22 AM and 8:49-9:09 AM, which is considered the AM rush hour.

- Comment J4:* Three noise measurements should have been taken and two of the three should have been within 2 dBA of each other. (30, 46, 51, 52)
- Response:** Noise measurements were carried out according to the guidelines in the *CEQR Technical Manual*, which does not specify the number of measurements or a required range between them.
- Comment J5:* No details of precisely where noise measurements were taken. (30)
- Response:** As shown in Table 10-4 of Chapter 10 of the DEIS, noise monitoring was conducted at Madison Street and St. James Place and Worth Street at Baxter Street. A graphic showing the noise monitoring locations has been added to the FEIS.
- Comment J6:* No details are provided about the vehicle classification. (30)
- Response:** As shown in Table 10-5 of Chapter 10 of the DEIS, a vehicle classification count was conducted during the same period of the noise monitoring at the selected intersections. Table 10-5 shows the number and type of vehicles observed during that period.
- Comment J7:* There are no details about the diversion of buses by time of day due to the closing of Park Row. (30)
- Response:** A discussion of bus diversion by time of day has been added to the EIS. As shown in Chapter 10, "Noise," the traffic has been diverted to other traffic links, especially St. James Place and Worth Street. The diverted traffic on these two streets would include 18 additional buses during the peak AM period, 10 during the peak Midday period, and 15 during the peak PM period.
- Comment J8:* Table 10-3 in the Noise chapter implies huge traffic impacts due to project traffic diversion. (10)
- Response:** Based on guidelines in the *CEQR Technical Manual*, the noise level impact threshold is an increase of 3 dBA. Table 10-3 shows that noise levels at most intersections would be the same, lower, or slightly higher. Only two intersections are projected to experience impacts, and these would occur only during the peak AM period. Mitigation measures have been proposed to reduce these potential impacts. See response to Comment J2.
- Comment J9:* There is no indication of what the noise impacts would be if the closed Brooklyn Bridge off-ramp were to open. The DEIS fails to consider the return of commercial traffic to the Brooklyn Bridge (46, 51, 52)
- Response:** The DEIS analyzed the action, which does not include the opening of the Brooklyn Bridge off-ramp that is currently closed. Therefore, an

analysis of such noise impacts would not be warranted and is not included within the EIS. Also, see response to Comment G12.

K. Mitigation

Comment K1: The post-9/11 security plan for One Police Plaza, and in particular the closing of Park Row, has had a serious negative impact on the residential and commercial communities of Lower Manhattan. (3) The DEIS fails to adequately identify and provide solutions for problems created by the closure of Park Row. (1, 3) It is impossible to design appropriate mitigation strategies if the impact of the security measures and the needs of the community are not thoroughly and accurately studied. It necessary to undertake significant mitigations, beyond signal changes and lane striping. (3)

Response: The DEIS disclosed significant adverse urban design, traffic, transit and pedestrian, air quality, and noise impacts. Mitigation measures beyond signal changes and lane striping are proposed within the EIS, including a major reconfiguration of Chatham Square, a redesign of Park Row and the return of three bus routes to Park Row.

Comment K2: Mitigation [for urban design] is a good start, but more research must be conducted to determine the best way to balance safety and aesthetics. (3)

Response: Comment noted. As the design advances in coordination with the community, different alternative strategies will be put forward by the designer.

Comment K3: The DEIS relies solely upon the LMDC report to provide possible mitigations and it primarily focuses on Park Row. However, Pearl Street, Madison Street and Avenue of the Finest should be addressed as well. (3)

Response: Comment noted. Currently, the City is focusing the redesign of Park Row in conjunction with the reconfiguration of Chatham Square. This plan would mitigate the significant adverse urban design impact.

Comment K4: One proposed mitigation - way-finding signs - should be erected only after there has been sufficient community input on the issue. The size, location, content and language of such signs will be of critical importance. Trees should be planted in a way that will provide shade to seating areas and not obscure signage. The proposed seat furniture should be arranged in an inviting manner and the lighting should be environmentally responsible and provide a sense of security. All of the urban design mitigation should be executed with environmental sustainability in mind. (3)

Response: Comment noted. Also see response to Comment K2.

- Comment K5: The DEIS states that more specific mitigation measures will be researched before the FEIS is completed and those mitigation measures should include a thorough analysis of the possibility of opening the closed streets or at least creatively rerouting traffic. (3)*
- Response: See response to Comment K2. See response to Comment A1 regarding opening the closed streets.**
- Comment K6: The proposed mitigation would achieve air quality that is just barely good enough to sidestep any further required mitigation. Surely more can be done to improve air quality than merely rerouting three buses. (3)*
- Response: The DEIS determined that Worth Street was significantly impacted due mainly to the temporarily relocated buses. As such, the return of the buses to Park Row has mitigated the air quality impact. Also, see response to Comment I1.**
- Comment K7: The DEIS does not explain how the air quality on Park Row has been affected by placing three buses back onto it. (3)*
- Response: Under No-Action conditions, Park Row carried autos, trucks, and buses. The removal of the autos and trucks (with buses remaining) due to the action, has substantially improved air quality. Such a substantial reduction in volume at a “receptor” is not typically analyzed for potential impacts.**
- Comment K8: Forty parking spaces for city employees translates into 40 spaces of the NYPD. (11) Restoring parking to government employees behind the barricades is not mitigation. (28)*
- Response: Comment noted. This portion of the proposed mitigation is no longer being proposed and has been deleted from the EIS.**
- Comment K9: Widening St. James Place and reducing the sidewalk would increase the volume of vehicles and therefore encourage more traffic, pollution, and noise. (26, 58, 57, 66, 68, 123)*
- Response: The widening of St. James Place is not being proposed as part of any mitigation plan in the EIS. Nowhere in the EIS is it stated that St. James Place is proposed to be widened.**
- Comment K10: The DEIS makes insufficient mitigation recommendations to deal with increased traffic and completely skirts the central issue of enforcing illegal permit parking by government workers. The DEIS must include a plan to mitigate the abuse of permit parking placards enforcing existing parking laws. (15, 42)*

Response: See response to Comment G13. As illegal parking within the study area is not the result of the action, no mitigation is proposed as part of this project.

Comment K11: The DEIS should offer mitigations to all the adversely affected intersections, not just three of the five. (15)

Response: The DEIS analyzed mitigation measures at all traffic-impacted intersections. All intersections have been mitigated with the exception of Pearl Street and Robert F. Wagner Sr. Place. Mitigation measures analyzed for this impacted intersection resulted in new or worsened impacts on other approaches at this intersection and a reduction in crossing pedestrian crossing times. As such, this impact will remain unmitigated.

Comment K12: The mitigation in the report are not mitigating me back to a life I once had living in the area of Park Row. (17)

Response: Comment noted.

Comment K13: No local residents or small businesses were consulted about real mitigations that might offset the effects of the street closures. (26)

Response: The mitigation measures presented in the DEIS were developed to directly address the impacts to various technical areas. These comments on the DEIS provided the opportunity to respond to the proposed mitigation. As shown in response to Comment K8 and K16 such comments are carefully reviewed.

Comment K14: The reversal of Oliver Street is not going to gain anything. (33)

Response: See response to Comment K16.

Comment K15: If you are worried about traffic mitigation, just open up Park Row. (33)

Response: For security purposes, Park Row is currently closed to unauthorized vehicular traffic and will remain closed as part of this action. See response to Comment A1.

Comment K16: We the community oppose the reversal of Oliver Street. (33, 132) It is not mitigation. (26)

Response: The reversal of the traffic direction along Oliver Street is no longer being proposed as part of the mitigation measure of reconfiguring Chatham Square. The FEIS has been updated to reflect this change.

Comment K17: It is a brilliant move as mitigation to align St. James Place with the Bowery from a purely traffic point of view, but it is a disaster when you

look at it when you consider the effect of widening it and adding additional vehicles on St. James Place and on the school located there. (36, 57)

Response: **It is proposed to align the Bowery and St. James Place, as stated in the DEIS, however, it is not proposed to widen St. James Place.**

Comment K18: *By creating a major truck route down St. James Place, property values at Chatham Green will decrease. (36)*

Response: **St. James Place is not being proposed as a truck route. Mitigation measures for Chatham Square include aligning St. James Place with the Bowery.**

Comment K19: *The DEIS does not discuss other alternatives (such as that proposed by LMDC) for Chatham Square nor does it report the community's reaction to another complete redesign. (30) Residents, business owners, employees and local organizations should be contacted to determine exactly how these street closures and barriers have affected their quality of life and what mitigations would be appropriate. (3)*

Response: **As stated in the DEIS, and in coordination with NYCDOT, the mitigation for the traffic impacts at Chatham Square incorporates some of the recommendations from LMDC's *Chinatown Access and Circulation Study* for the reconfiguration for Chatham Square. The community was able to comment on the entire DEIS, including the reconfiguration of Chatham Square, during the public comment period. The totality of the comments are presented in Comments K1-K26.**

Comment K20: *If the traffic analysis were done to reflect the huge growth in traffic anticipated over the next two decades, a great deal more mitigation would be needed. (30)*

Response: **See response to Comment A6.**

Comment K21: *Mitigation proposed in the DEIS is not appropriate for our community. Measures that would benefit the community would be appropriate mitigation. (26)*

Response: **The mitigation measures identified in the DEIS were developed to reduce or eliminate a significant impact. See responses to Comments K2 and K13.**

Comment K22: *The mitigation to adjust the traffic light by one second at Chatham Square is not acceptable. (6)*

Response: **The DEIS includes a proposed reconfiguration of Chatham Square to**

mitigate the significant adverse traffic impacts at this location. Adjusting the signal timing by one second is not proposed mitigation for the traffic impact at Chatham Square.

Comment K23: Consideration of traffic officers needs to be accounted for in the suggested mitigation and alternative proposals. (46, 51, 52)

Response: The provision of NYPD traffic control officers are coordinated with each precinct. However, if the physical makeup of an artery is inadequate to handle vehicle flow, then physical or operational (signal) changes are needed. These can be supplemented by on-site control as determined by each precinct.

Comment K24: The opening of Park Row to buses has had a negative effect on the location of bus stop locations. It has become inconvenient to walk to the bus stop. (63)

Response: The NYCTA determines the location of bus stops. Putting the M103, M15, and B51 buses back on their original route improves travel time and also improves traffic.

Comment K25: The Park Row closures have not had any adverse impacts. (48)

Response: The DEIS discloses several impacts in the technical areas. The EIS includes proposed mitigation for these impacts as required by CEQR.

L. Alternatives

Comment L1: If we were today to put our police headquarters somewhere, we'd never put it in downtown Manhattan. We have to go back to the drawing boards and start right now planning for the new police headquarters in a hardened site in a place that's not near residents and businesses and that's not in Lower Manhattan where it's a prime target. Let's move it and find another use for that building that doesn't require this [security]. (5)

Response: As discussed in Chapter 12, "Alternatives," One Police Plaza is located in close proximity to a unique concentration of civic and governmental land uses. Several of these are located wholly or partially within the security zone itself, namely, the Metropolitan Correction Center and a United States District Courthouse, as well as the Municipal Building, the United States Courthouse, containing the U.S. Court of Appeals, and the New York County Courthouse, home to the New York State Supreme Court. Given the functions hosted by One Police Plaza, and the close coordination required between the

NYPD and the criminal justice system, it is essential for the police headquarters to be located within close proximity to the court facilities and detention centers, as well as the seat of government.

Although other sites in the city could offer similar or better benefits in terms of floor area or more modern facilities, none can offer a similar or near equal advantage in terms of proximity to the court system and the City's administrative heart.

It should also be noted that, should police headquarters be relocated from the area, the current security measures would not be entirely eliminated. NYPD's Counter Terrorism Bureau seeks to protect government facilities in the "civic center" portion of Lower Manhattan, which continue to be considered potential terrorist targets. Given the presence of a number of other sensitive facilities within the security zone (such as the Municipal Building, the United States Courthouse, the New York County Courthouse, the U.S. District Court, and the Metropolitan Correctional Center), all of which would still remain and it would be necessary to maintain some, if not all, of the current security measures in the area.

Comment L2: Police Headquarters claims that it must have a buffer zone that no other terrorist target in the city has. Move Police Headquarters to a site where they can have all the buffer distance and parking they want. (6, 11, 20, 131)

Response: See response to Comment L1. Please note that police headquarters is not unique in having a security buffer surrounding the building. The New York Stock Exchange, for example, also requires a security buffer zone in which roads have been closed to unauthorized vehicular traffic.

Comment L3: Thinking about moving computers, telephones, file cabinets etc., to a decentralized location could not (when compared to the cost of all this "super security") be that expensive. (7)

Response: Comment noted. The relocation of police headquarters would be an expensive undertaking, that would require the City to spend large sums of money to acquire an appropriate site (if no suitable City-owned sites are available), and to construct a new facility and the necessary physical and operational infrastructures that would be required for such a facility. Also, see response to Comment L1.

Comment L4: If it is necessary to keep a safe perimeter around Police Plaza, it is time to

move police headquarters somewhere else, perhaps Governors Island or Randall's Island. (9, 25)

Response:

See response to Comment L1. As discussed in Chapter 12, "Alternatives," although Randall's Island and Governor's Island have been suggested as possible locations, because their placement in the East River is thought to provide a natural security barrier, neither of them represents a suitable location for police headquarters in a major city. Governor's Island in particular, which is only accessible by water, lacks the basic transportation infrastructure that would be essential for linking police headquarters to other court and government facilities in the City as well as to the general public. Randall's Island, while easily accessible from three of the five boroughs via the Triborough Bridge, is so far removed from the facilities in Lower Manhattan (approximately more than seven miles away), rendering it not easily accessible, especially by transit, to the public, the employees who currently work at One Police Plaza, or other city agencies and government organizations. Such a location would add substantial time and cost to the daily interactions that would be required for New York City's police headquarters to function properly.

Comment L5:

On the alternative of relocating police headquarters, the report reiterated all the claims made by the NYPD, without any critical analysis on whether those claims are appropriate to the situation. (10) The Mayor should commission an independent study to examine whether police headquarters should be located in Lower Manhattan or relocated, and hold public hearings to discuss findings of that study. (11, 53)

Response:

An analysis of relocating police headquarters was provided in Chapter 12 of the DEIS. It was found that the relocation of police headquarters would not be feasible. According to the NYPD, there are no plans to relocate police headquarters from its current location. Regardless of where police headquarters is located, however, security measures would still be required for the Federal facilities in the immediate vicinity of Park Row.

Comment L6:

On the alternative for the Chatham Green parking lot, a third party, such as a counter terrorism bureau from a federal agency, make an independent assessment whether the long standoff distance is justified in light of the severe impacts it has on the neighborhood. (10)

Response:

The NYPD Counter Terrorism Bureau reviewed the Chatham Green Access Alternative and determined that that this alternative would not allow sufficient standoff distance between NYPD headquarters

and the Chatham Green Houses parking lot, which would become accessible to trucks. In addition, this alternative would also result in significant adverse traffic, urban design, transit and pedestrians, and noise impacts. As such, the mitigation measures for the action described would also be required for this Chatham Green Access Alternative.

Comment L7: By refusing to fund the move of the police headquarters, the government is making Chinatown bear the cost of their inactions. If funding is a real issue, the NYPD should have applied for funds from the state and federal governments as part of the war on terrorism. (10) The protective measures needed after the relocation of the NYPD would not be anywhere as drastic to Chinatown and would not require the closure of Park Row. (10)

Response: Comment noted. However, funding for the relocation is not the only concern for this alternative. Please see response to Comment L1, L4, and L5.

Comment L8: There is no detailed explanation of why Community Suggested Alternative Plan #2 is not feasible. This alternative would have permanently closed our exit onto Pearl Street and increased the buffer space from 80 to 100 feet. (23)

Response: See response to Comment L6.

Comment L9: Relocate police headquarters. (23, 28, 39, 41, 42, 45, 54, 56, 71, 73, 125, 127, 128) OEM and FDNY moved operations out of Lower Manhattan to the waterfront in Brooklyn. There is no reason why the NYPD cannot do the same. (23)

Response: See response to Comments L1 and L4.

Comment L10: An actual analysis of the best location for police headquarters was not performed in the DEIS. (26)

Response: See response to Comment L5.

Comment L11: The DEIS did not take a “hard look” at alternatives to the action. (46, 51, 52)

Response: According to the CEQR Technical Manual, alternatives considered should reduce or eliminate impacts of an action while substantively meeting the goals and objectives of the action. The range of alternatives to be considered, which include a No-Action Alternative, is determined by the nature of the specific action, its potential impacts, the objectives and capabilities of the project sponsor, and

feasibility. Based on this criteria, in addition to the No-Action Alternative, three other alternatives were considered in the DEIS.

However, the proposed four alternatives analyzed in the DEIS were found to be infeasible as none of them met the goals and objectives of the action which is to protect government facilities in the “civic center” portion of Lower Manhattan that continue to be considered potential terrorist targets.

Comment L13: Do not move police headquarters. (46-48)

Response: Comment noted. According to the NYPD, there are no plans to relocate police headquarters from its current location.

M. Miscellaneous

Comment M1: We want an environmental impact statement that speaks to the community, the people that live there and work there. (5, 131)

Response: Comment noted. The DEIS included a detailed analysis of various technical areas, while also taking into account the communities concerns as much as possible.

Comment M2: The DEIS is an insult to our intelligence and common sense. It demonstrates no understanding of the cumulative effect of changes that have transformed our communities with street closures that encompass a larger area than the WTC site. (6)

Response: Comment noted. See response to Comment M1.

Comment M3: Insurance companies view Chatham Towers as a high-risk area. Our insurance has gone up 600 percent. (8,9)

Response: Comment noted.

Comment M4: The DEIS made use of data to support conclusions favorable to the NYPD. (10,11)

Response: The objective of the DEIS is to analyze the effects of the action, pursuant to the *CEQR Technical Manual*. The DEIS utilized data to determine whether the action has resulted in significant adverse impacts - which it has - in several technical areas including urban design, traffic, transit, pedestrians, and noise. These impacts are disclosed and mitigation measures identified in the DEIS.

Comment M5: The barriers on Park Row close to Worth Street and St. James Place never

- seem to work right. (12, 55)*
- Response:** **Comment noted.**
- Comment M6: It is difficult to get a taxi or get picked up by a car service from Chatham Green. (14, 19, 55, 72) Car service ridership statistics pre- and post-9/11 in the neighborhood should be included in the EIS. (6)*
- Response:** **An analysis of car service and taxi ridership is not within the scope of work for this EIS. Although vehicular access is controlled into the Chatham Green parking lot along Park Row, there are no vehicular restrictions on taxis or any other vehicles along St. James Place, where Chatham Green also has frontage.**
- Comment M7: Police headquarters has 40,000 gallons of diesel fuel under the building. (131). Eliminate the fuel tank that sits 100 feet from Chatham Green property. (6, 23)*
- Response:** **Comment noted.**
- Comment M8: The sirens that go off when there are traffic jams at Confucius Plaza are very disruptive. (16)*
- Response:** **Comment noted.**
- Comment M9: Nothing has changed since the streets have been closed. (17)*
- Response:** **The DEIS discloses significant adverse urban design, traffic, transit and pedestrian, air quality, and noise impacts. Mitigation measures that are proposed within the EIS include a major reconfiguration of Chatham Square, a redesign of Park Row and the return of three bus routes to Park Row.**
- Comment M10: The report is way too limited in its assumptions about who uses Chinatown and how they use it. (20)*
- Response:** **The DEIS took a hard look and analyzed numerous technical areas to determine whether the action had resulted in significant adverse impacts. See response to M9.**
- Comment M11: This report makes no mention of how many people in the police department actually need to make physical contact with the justice system over any period of time. (20)*
- Response:** **Given the functions hosted by One Police Plaza, and the close coordination required between the NYPD and the criminal justice system, it is essential for the police headquarters to be located within close proximity to the court facilities and detention centers, as well as the seat of government. For example, the Criminal Justice Bureau**

acts as the operational liaison between the New York City Police Department and other agencies involved in the criminal justice community, including the five county District Attorney's Offices, the New York State Office of Court Administration, the Division of Criminal Justice Services, and the Mayor's Criminal Justice Coordinator's Office. Given this synergistic relationship, proximity to the court system's facilities is critical. No statistics on how many or how frequently members of the NYPD have to appear at the above mentioned facilities are available.

Comment M12: There should be a daily protocol for the police officers on duty around the security zone to make people's lives a little easier. (18)

Response: Comment noted.

Comment M13: Even if Park Row re-opened, Chinatown would still be in bad shape. (29)

Response: Comment noted.

Comment M14: It is upsetting that the Mariner's Temple Baptist Church and school would be on a street that would now have trucks weighing tons going down it and it seems like we are being ignored. (37)

Response: See response to Comment K18.

Comment M15: The following should be incorporated to improve the conditions in Chinatown:

- *Pedestrian access to Park Row*
- *An ambulance posted within the Park Row area that will provide immediate service to Downtown Hospital, or a shifting of the present barricade*
- *Establishment of a free shuttle from the Seaport to Chinatown so that residents can be linked to the Downtown Alliance Shuttle.*
- *A new drop-off area for sight-seeing buses for easy access to Chinatown shops and restaurants*
- *A commitment from NYPD to utilize their nearly 1,000 parking spaces in 1 Police Plaza and to end the blatant police parking abuses.*
- *A trolley line on Fulton Street to better connect Chinatown with the rest of Lower Manhattan.*

Response: Pedestrian access is not restricted on Park Row. Ambulance operations are determined by the FDNY and New York Downtown Hospital. Any service changes or additions to the Downtown Alliance Shuttle would be decided on and created by the Downtown Alliance.

As discussed in the DEIS, Chinatown currently has one tour bus drop-off location. As the action has not resulted in any impacts to Chinatown's tourism, no mitigation plan is proposed as such. The 400-space (not 1,000 space) former municipal garage is fully utilized by the NYPD. The M1, M6, M9, and M15 buses provide service from Chinatown to Lower Manhattan.

Comment M16: Many cars have been damaged and drivers injured by the delta barriers. (125)

Response: Comment noted. Claims for damage to vehicles resulting from the delta barriers can be filed through the New York City Office of the Comptroller. Automobile property damage claim forms can be accessed through their website at www.comptroller.nyc.gov.

Comment M17: It is difficult to receive deliveries at Chatham Green. The police officers do not let them through. (66)

Response: Trucks represent a severe threat and therefore require extensive screening procedures before they can be permitted into Chatham Green.

Comment M23: I was affected economically after September 11, 2001. (59)

Response: Comment noted.

Comment M24: Developments under construction in the South Street Seaport area has increased construction vehicles, construction workers, noise, and congestion to the surrounding area. (6)

Response: Comment noted. Consideration of construction of new developments in the South Street Seaport area is not within the scope of work for this EIS.

Comment M25: Mayor Bloomberg should do something about the street closures because we are losing businesses and making residents want to leave. (43)

Response: Comment noted.

APPENDIX A

Final Report on Chinatown Business Surveys

Prepared by SIS International Research
February 2007

FINAL REPORT ON CHINATOWN BUSINESS SURVEYS



PREPARED FOR: PHILIP HABIB &
ASSOCIATES

PREPARED BY:
SIS International Research
February 20, 2007

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Objective:

The primary objective of this study was to conduct interviews with owners of businesses in the downtown/Chinatown area of New York City in order to provide a socioeconomic analysis for an environmental impact statement. An important goal of the project was to ask the target respondents about their views on the Security Zone set up at 1 Police Plaza. Another focus was to evaluate whether or not business had stayed the same, gone up, or gone down in the past year [2005-2006].

Project Methodology:

In order to achieve the above objectives, we employed a face-to-face interview methodology. For a three week period, we had a team of 4-6 bi-lingual interviewers [Mandarin and Cantonese] span out across Chinatown business districts and speak with owners and managers of the stores within those areas. Stores were segmented by type and by the district they fell into. A total of N=306 interviews were completed. Please find below, the questionnaire administered to elicit the required feedback:

Chinatown Business Survey

Date: _____

Business District: _____

Surveyor: _____

Good morning/afternoon. We are conducting a survey of businesses in Chinatown as part of a study of the effects of the street closures at Park Row. In coordination with the Chinese Chamber of Commerce, your business has been selected to participate in this survey. We would appreciate it if you could answer a few quick questions.

1. Business Surveyed: _____

Name _____

Address _____

Type of Business _____

Person Surveyed _____ Title _____

2. How long has this business been at this location? _____ years

3. Approximately how many people are employed here?

Full time _____ Part
time _____

4. Has business been improving, declining, or staying the same this year (2006) compared to last year (2005)?

No change _____

Minimal change _____

Declined by more than 10%? _____ by less than 10% _____

Improved by more than 10%? _____ by less than 10% _____

5. Do you intend to relocate within the next:

0-3 years? _____ 3-6 years? _____ 6+ years? _____

6. Has the security zone around 1 Police Plaza affected your business?

If yes, in what way? _____

7. Do you have any suggestions for improving your business conditions?

8. Any other suggestions you'd like to make?

Results:

Table 1 - Business District*	COUNT	PERCENTAGE
North of Canal Street	128	41.8 %
Historic Chinatown	74	24.2 %
East of Bowery	100	32.7 %
Security Zone	4	1.3 %
Total	306	100.0 %

* Please see attached map for areas designated as North of Canal Street, Historic Chinatown, East of Bowery and Security Zone.

A sample of N=300⁺ businesses and an even spread across the different districts suggests that our findings based on these interviews are statistically representative of the general Chinatown area.

Table 2 - Type of Business	COUNT	PERCENTAGE
Retail [clothes, sports goods, etc.]	94	30.7 %
Restaurants	57	18.6 %
Food Stores	25	8.2 %
Herbal/Plant Store	14	4.6 %
Aquarium	1	0.3 %
Jewelers	12	3.9 %
Hair Salon	29	9.5 %
Bank	0	0.0 %
Small office [Doctor, Lawyer, etc.]	5	1.6 %
Other	69	22.5 %
Total	306	100.0 %

Table 2 above shows that we achieved a reasonable spread across various business types, as well. A note should be made that despite the high percentage of interviews completed with restaurant Owners & Managers, a large majority of the restaurants were reluctant to provide time to be interviewed. Later tables seek to verify whether we witnessed any patterns between the type of business interviewed and their relative financial success during the past year.

Table 3 - No. of years at this location	COUNT
Less than a year	10
1-5 years	114
6-10 years	80
11-15 years	50
16-20 years	9
More than 20 years	43
Total	306

Below is a graphical representation of the previous table. A majority of businesses [64%] in Chinatown remained at their respective locations for somewhere between 1 and 10 years. A third of businesses interviewed have existed there for 10+ years.

Figure 1

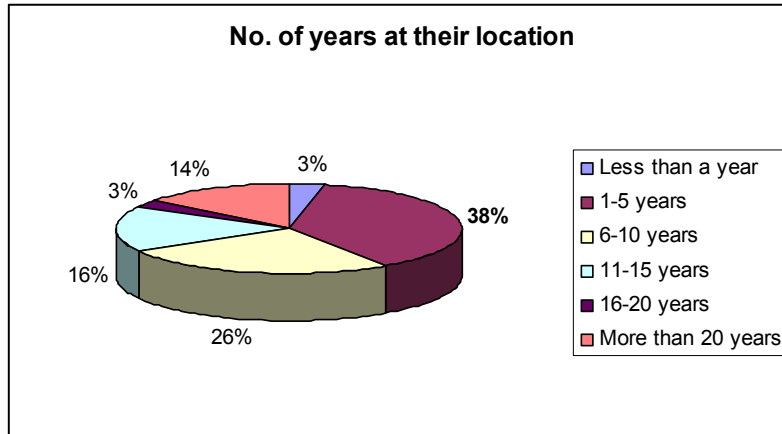


Table 4 - Employed Full time

	COUNT	PERCENTAGE
1	25	8.2 %
2	66	21.6 %
3	51	16.6 %
4	28	9.2 %
5	21	6.9 %
6 to 10	70	23%
11 to 20	35	11.4 %
21 to 40	6	1.9 %
More than 40	4	1.3 %
Total	306	100.0 %

Table 5 - Employed Part time

	COUNT	PERCENTAGE
None	216	70.6 %
1	33	10.8 %
2	22	7.2 %
3	10	3.3 %
4	6	2.0 %
5	6	2.0 %
6 to 20	12	4.0 %
21 to 40	1	0.3 %
More than 40	0	0.0 %
Total	306	100.0 %

Tables 4 and 5 illustrate the employment figures as shared by the owners and managers of the stores that were interviewed. It should be noted that these figures may not be completely accurate as many store owners were hesitant to talk about the number of people working at the store. To work around this, interviews sometimes prompted a response from the interviewee, e.g. “Are there approximately 5 full time employees, 10 employees, etc.

Table 6 - Security Zone effect	COUNT	PERCENTAGE
Yes	147	48.0 %
No	159	52.0 %
Total	306	100.0 %

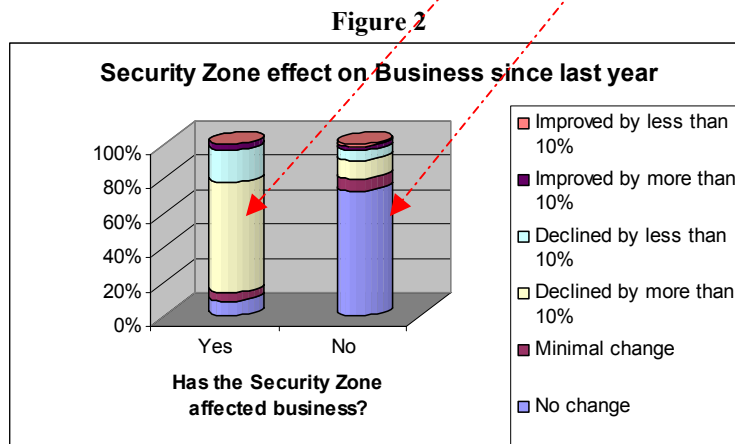
Table 6 suggests the view that the Security Zone set up at 1 Police Plaza has adversely affected business in the Chinatown area is almost an even split between those interviewed for this study.

Table 7 - Business since last year	COUNT	PERCENTAGE
No change	129	42.2 %
Minimal change	18	5.9 %
Declined by more than 10%	111	36.3 %
Declined by less than 10%	37	12.1 %
Improved by more than 10%	9	2.9 %
Improved by less than 10%	2	0.7 %
Total	306	100.0 %

Additionally, Table 7 suggests that respondents were also equally split as to whether business had gone down in the past year or simply stayed the same. These “even rifts” in business outlook necessitate cross-tabulation of our results to identify any existing factors that affect the type of response given by those interviewed.

A cross-tabulation to verify whether those respondents who felt the Security Zone has had an affect also felt that business had gone down in the past year, resulted in Table 8 and the corresponding graph below [Figure 2]. The evidence suggests that these perceptions are consistent with each other.

Table 8 - Business since last year	Security Zone Affect	
	Yes	No
No change	13	116
Minimal change	7	11
Declined by more than 10%	94	17
Declined by less than 10%	28	9
Improved by more than 10%	5	4
Improved by less than 10%	0	2
Total	147	159



One possibility was that these responses depended on which geographical district businesses were located in.

Table 9 - Business since last year	Business Districts			
	North of Canal Street	Historic Chinatown	East of Bowery	Security Zone
No change	45	22	61	1
Minimal change	12	5	1	0
Declined by more than 10%	47	32	30	2
Declined by less than 10%	17	12	8	0
Improved by more than 10%	5	3	0	1
Improved by less than 10%	2	0	0	0
Total	128	74	100	4

Business Districts

Table 10 - Security Zone effect	North of Canal Street	Historic Chinatown	East of Bowery	Security Zone
Yes	67	45	32	3
No	61	29	68	1
Total	128	74	100	4

Tables 9 and 10 above suggest that businesses in the North of Canal Street district were once again, split regarding their views on the affect of the Security Zone and the change in business prospects since last year. Respondents in the Historic Chinatown area tended to oppose the Security Zone set up and those in the East of Bowery district were not as affected by the Security Zone. However, we believe a weak correlation exists between location and the affects of the Security Zone or changes in business since last year.

Table 11 - Business since last year

	Retail		Restaurants		Food Stores		Herbal/ Plant Store		Hair Salon		Other	
No change	34	36.2 %	25	43.9 %	16	64.0 %	2	14.3 %	13	44.8 %	33	47.8 %
Minimal change	6	6.4 %	4	7.0 %	0	0.0 %	0	0.0 %	1	3.4 %	6	8.7 %
Declined by more than 10%	40	42.6 %	17	29.8 %	6	24.0 %	8	57.1 %	9	31.0 %	23	33.3 %
Declined by less than 10%	9	9.6 %	8	14.0 %	3	12.0 %	3	21.4 %	5	17.2 %	6	8.7 %
Improved by more than 10%	4	4.3 %	2	3.5 %	0	0.0 %	1	7.1 %	1	3.4 %	1	1.4 %
Improved by less than 10%	1	1.1 %	1	1.8 %	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	94	100.0 %	57	100.0 %	25	100.0 %	14	100.0 %	29	100.0 %	69	100.0 %

Business Type

Table 12 - Business location expectation

	Retail		Restaurants		Food Stores		Herbal/Plant Store		Hair Salon		Other	
0-3 years	19	20.2 %	10	17.5 %	3	12.0 %	5	35.7 %	8	27.6 %	12	17.4 %
3-6 years	16	17.0 %	13	22.8 %	7	28.0 %	0	0.0 %	5	17.2 %	20	29.0 %
6+ years	59	62.8 %	34	59.6 %	15	60.0 %	9	64.3 %	16	55.2 %	37	53.6 %
Total	94	100.0 %	57	100.0 %	25	100.0 %	14	100.0 %	29	100.0 %	69	100.0 %

Business Type

Table 13 - Security Zone effect

	Retail		Restaurants		Food Stores		Herbal/Plant Store		Hair Salon		Other	
Yes	43	45.7 %	31	54.4 %	9	36.0 %	11	78.6 %	16	55.2 %	29	42.0 %
No	51	54.3 %	26	45.6 %	16	64.0 %	3	21.4 %	13	44.8 %	40	58.0 %
Total	94	100.0 %	57	100.0 %	25	100.0 %	14	100.0 %	29	100.0 %	69	100.0 %

Tables 11, 12 and 13 illustrate responses cross-tabulated against various business types [we have omitted business types that did not have statistically significant samples]. Other than retail stores, all other business types generally did not find drastic affects on business due to the Security Zone at 1 Police Plaza. Moreover, these businesses did not find reason to leave their current location of business within the near future.

Our quantitative findings suggest there is a weak relationship at best, between where businesses are located or the type of business interviewed and their respective views of the Security Zone or how business has changed over the past year. However, feedback from our interviewing team suggested that those who did feel that the Security Zone was affecting their business prospects were very vocal and felt strongly about their opinions. Below are some examples of feedback that respondents provided when asked how the Security Zone had affected their businesses.

Retail:

"Parking is too hard to find, so less customers."
"Rent goes up, business goes down every year. People go the WTC, come here at lunch, no more events. Weekdays are dead."
"Less customer, parking and tourist bus parking is a problem."
"Less people. Traffic is inconvenient. Area is quieter. Traffic blockage affects customers' choice to come to area."
"Difficult to get parking and people get tickets a lot."
"No tourist buses can park."
"Hard to get downtown, bad for deliveries."
"Less security, a lot of shoplifting."
"Sunday parking spots are taken up by residents."
"People from New Jersey and Brooklyn have difficulty coming here."
"No loading areas."
"Fewer sales, no tourists. Makes travel time more than 45 minutes."

Restaurants:

"Caused loss in business by blocking roadways, making it hard for consumers to access area. Caused low profit and numerous changes in staff and management."
"Less business and clients down by Park Row Area."
"Many Chinese used to park often in that area on the weekends. Old customers do not come due to inconvenience."
"No buses pass by, less customers."
"People can't come conveniently."
"No parking at Park Row creates parking violations to customers."
"No parking for customers (municipal parking.) New Jersey customers go to Queens now."
"Fewer customers. Not enough parking spaces."
"Fewer tourists, less customers. North of Canal has much fewer customers since traffic is directed to areas around Grand Street. Those businesses around there will grow whereas, around here, it's dead."

Jewelers:

"Chinatown is dead now. No parking, people don't come here, tourists don't come, not even from CT and NJ."
"Traffic restriction resulted in lass business."
"Traffic restriction decreases business and it has affected commute time."
"No parking, customers suffer from parking tickets."

Across business types, the main complaint from respondents was against the new traffic regulations that had been imposed since the set up of the Security Zone. There was a general consensus [even among those who did not feel that business had been strongly affected] that less parking space and traffic congestion made it difficult and less attractive to enter the Chinatown area.

Respondents were also asked what could be done to improve the situation. Below is a list of some of the suggestions provided by respondents separated by business district:

North of Canal Street:

"Not allowing trucks parking there."
"Bring factories back."
"Lower the rent!"
"Stop the counterfeiting. More public events and more booths for tourists."
"Better parking, better use of traffic, more traffic officers."
"Improve parking; reopen public parking in park row."
"Less littering by tourists, lower rents, less counterfeiting."
"More promotions, maybe."
"More promotions attract more people."
"Clean up Chinatown."
"More parking in this area."
"More parking."
"Decrease real estate percentage."
"Build a big parking like, like Flushing."
"The whole problem is the area. People have to be drawn down here, not just one person. A joint promotion will help."
"Attract more people here."
"More festivities in Chinatown to bring back customers."
"Better traffic and more parking."
"Improve tourist attractions in lower Manhattan."
"Control gridlock traffic patterns on Canal and Bowery intersection."
"Stop filming around the area. Losing money."
"More focus on Chinatown businesses above Canal Street."
"Less traffic, more tourists."
"Increase funding for struggling businesses."
"Spread the word about businesses in Chinatown."
"Open up road blocks allowing big buses access."
"Biggest problem is parking. Compared to Flushing, which has more space that allow for more customers."
"No reason to close to Park Row. Don't know why they did it."
"Open up sidewalk finish construction."

"Open up the sidewalk."
"More parking and no tickets."
"Parking lot or temp parking."
"More funding for stores that are hit hard."
"Let tourist buses park on Mott."
"No pushcarts, no building hotels next door."
"Keep streets clean."
"Ease restrictions in the security zone."
"Don't close Park Row."
"More parking and get rid of the peddlers."
"No, but it's up to the government."
"Cleaner. No honking around Bowery."
"Better security as in less crime around area."
"Streets should be cleaner."
"Opening Park Row would lead to more tourists."
"Lower rents because restaurants are closing."
"More people should come by, we depend on tourists."
"Municipal funding to improve aesthetics."
"Make more promotions and cleaner streets."

Historic Chinatown:

"More parking."
Change street to park at certain time
"Open back up the streets."
"More parking, less construction."
"More business promotion for Chinatown."
"Open parking again, more parking."
"Open them back. They've taken over a municipal parking lot, so they do not need that space now."
"Less parking space after 9/11."
"Do not restrict zones."

""Inconvenient for residents. Too many meetings, no change.

"Attract more people to come. Metered parking should be cheaper. Should not allow truck parking in the area."

"Release the security zone and improve the traffic."

"Open Park Row."

"Opening Park Row will create hundreds of parking spaces."

"Less cop cars, more parking."

"Less tax, more promotion."

"Follow street signs according to parking. More parking meters."

"We need a parking lot like in Queens."

"Make Chinatown more commercial-friendly."

"If Park Row is open, it will make the area better."

"Better security and government support."

"Best for community to open Park Row. Don't let terrorism be a reason."

"Open Park Row. Tourists have no place to park therefore they do not come here."

East of Bowery:

"Open park row to allow direct access to our store."

"Eliminate the 4 other salons on the block."

"More exposure and advertising for living in Chinatown to attract new tenants."

"Open up park row so people can do laundry here."

"Allow park row to open up for roadway to the school easier and less hectic."

"Release the security zone and more promotion."

"1. more parking spaces 2. more promotion 3. release the security zone"

"More parking, less cops giving tickets."

"Cheaper rent."

"Less ticketing."

"Better timing on meters."

"More parking space and improve parking in the area."

"Improve security around area."

"Cheaper rent and taxes."

"A lot of crime in area, shop theft; want more police in area."
"More parking spaces for loading/delivery."
"Attract more customers. More police to secure the area. More parking spaces."
"More parking spaces. Attract more customers."
"Just release the security zone."
"More promotion about Chinatown. More parking spaces."
"Attract more tourists to the area."
"More parking spaces. Provide allowances for investing businesses."
"More attractions/activities to promote Chinatown."
"Attract more customers. More parking spaces for loading."
"More customers. More activities."
"More parking spaces. More attractions in Chinatown to bring more business."
"More promotion of East of Bowery area and tour bus stops here."
"Increase the number of customers."

A review of the above responses supports our quantitative data. The majority of businesses in the North of Canal Street area seem to be more concerned with removing traffic congestion, increasing parking spaces and reducing the number of parking tickets handed out. In addition to similar complaints, the East of Bowery area focuses much more on increased promotion of Chinatown and related activities [festivities] and lowering rent than on the traffic problem. This illustrates a clear division in opinions across business district.

APPENDIX B

Written Comments Received on the DEIS



THE ASSEMBLY
STATE OF NEW YORK
ALBANY

SHELDON SILVER
Speaker

TESTIMONY FROM ASSEMBLYMAN SHELDON SILVER
TO THE NEW YORK CITY POLICE DEPARTMENT
REGARDING THE DRAFT ENVIRONMENTAL IMPACT STUDY OF THE IMPACT OF
THE CLOSURE OF PARK ROW AFTER SEPTEMBER 11TH 2001
SEPTEMBER 14, 2006

Thank you for the opportunity to express my thoughts concerning the New York City Police Department's (NYPD) Draft Environmental Impact Study (DEIS), which examines and seeks to address how the closure of Park Row has effected the surrounding neighborhoods of my Lower Manhattan community. I was dismayed by the fact that the DEIS does not provide a plan for a fully re-opened Park Row, but instead contains pages of excuses why it will remain closed and continue to choke the growth of downtown.

As we all know, the Park Row DEIS was prepared because of the hard work and diligence of the Civic Center Residents Coalition and their efforts in working towards a fully re-opened Park Row. On behalf of all of Lower Manhattan, I thank them for their persistence and will continue to work with them, side by side, until the needs of the community have been met.

Before I address the DEIS, I would like to say that today's hearing is not an attack on Police Department security or their need to fortify and appropriately secure One Police Plaza. This is about the NYPD's refusal to take into account the needs of, or make any accommodations in favor of the communities surrounding Park Row, without a court order.

As one of the original litigants along with elected officials, community leaders and residents, I was very pleased when we succeeded in getting Park Row partially re-opened to three bus routes and pedestrian traffic. Along with community residents, I felt that it was a step in the right direction and a sign of more to come. However, this feeling of victory was stifled when I read that the objective of the DEIS is not to provide greater access through Park Row, but to keep the area locked down.

Although the DEIS is more comprehensive than the previous Draft Environmental Assessment Study (DEAS), it still does not go far enough in analyzing the conditions that have been thrust upon the residential and business communities surrounding Park Row. Throughout the study, there are many conclusions that are not supported by the facts presented, as well as conditions that are pervasive in the area surrounding Park Row which have not been fully analyzed. It is my hope that after today's hearings, the NYPD will do additional air quality, traffic, and economic impact studies, and present their findings to the community before finalizing the DEIS.

The most obvious impact of the closure of Park Row has been the bottleneck traffic on the streets surrounding Park Row. Worth Street, Saint James Place, and The Bowery are just a few of the streets that have shouldered the burden of additional vehicular traffic beyond their capacities since the closure of Park Row. As a result: it takes longer to get Downtown or to Chinatown, New York residents and tourists alike are much more likely to avoid the area, ambulance response times for residents who live in and around the frozen zone have gone up, the amount of toxins in the air – from trucks idling in traffic as they make their way down Worth Street or Saint James Place – has increased, and the quality of life of those who live in the frozen zone has been treated as an afterthought.

The DEIS fails to adequately identify and provide solutions for problems created by the closure of Park Row. I am gravely concerned about the increased levels of asthma in our community, which already has high rates among our children. I am gravely concerned that emergency response vehicles have to navigate through standstill traffic to reach New York Downtown Hospital, the only emergency room in Lower Manhattan. I am gravely concerned that small businesses, which have been a part of this once thriving neighborhood for so many years, are closing their doors because they have lost customers due to increased traffic and decreased accessibility. I am also gravely concerned that the residents in Chatham Towers and Chatham Green will forever feel as though they live in a lock-down barricaded zone, making the simplest tasks - such as getting deliveries or entertaining guests - an arduous and complicated procedure.

These problems that the Park Row closure has caused to the surrounding neighborhoods are real and grave and are not going to get better or alleviated in any way based on the superficial responses that are listed in the DEIS. Every day of the last five years, this community has dealt with the reality of a post-9/11 world, but it does not have to. The NYPD can make the necessary changes and build whatever kind of barrier it deems necessary. Closing Park Row is the easy answer to One Police Plaza's security needs, but it is neither the most practical nor most just solution. The NYPD must truly take its neighbors to the north into consideration and Park Row must and should be fully re-opened.

Again, thank you for this opportunity to speak on behalf of my Lower Manhattan community.



THE ASSEMBLY
STATE OF NEW YORK
ALBANY

SHELDON SILVER
Speaker

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Although the DEIS is more comprehensive than the previous Draft Environmental Assessment Study (DEAS), it still does not go far enough in analyzing the conditions that have been thrust upon the residential and business communities surrounding Park Row. Throughout the study, there are many conclusions that are not supported by the facts presented, as well as conditions that are pervasive in the area surrounding Park Row which have not been fully analyzed. It is my hope that after today's hearings the NYPD will do additional air quality, traffic, and economic impact studies, and present their findings to the community before finalizing the DEIS.

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These problems that the Park Row closure has caused to the surrounding neighborhoods are real and grave and are not going to get better or alleviated in any way based on the superficial responses that are listed in the DEIS. Every day of the last five years, this community has dealt with the reality of a post-9/11 world, but it does not have to. The NYPD can make the necessary changes and build whatever kind of barrier it deems necessary. Closing Park Row is the easy answer to One Police Plaza's security needs, but it is neither the most practical nor most just solution. The NYPD must truly take its neighbors to the north into consideration and Park Row must and should be fully re-opened.

Again, thank you for this opportunity to speak on behalf of my Lower Manhattan community.



THE CITY OF NEW YORK
OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN

**Testimony by Manhattan Borough President Scott M. Stringer
On the Draft Environmental Impact Statement
On The One Police Plaza Security Plan
September 14, 2006**

The post-9/11 security plan for One Police Plaza, and in particular the closing of Park Row, has had a serious negative impact on the residential and commercial communities of Lower Manhattan. I recognize and respect the need for strong security measures that enable the NYPD to continue its great work keeping New Yorkers safe from terrorism and crime. But we owe it to the people of Lower Manhattan to ensure that these security measures do not degrade the quality of life and economic vitality of the very community that was most directly affected by the 9/11 attacks.

The DEIS contains very technical information that deserves an equally technical response. My land use, planning and development staff is preparing detailed technical comments addressing all of the relevant chapters of the DEIS, which I will submit for the record at a later date. For today's hearing, I will briefly discuss my main areas of concern regarding the DEIS' methodology and proposed mitigations.

Community Facilities

The security zone has literally created a barrier between EMS units and residents and workers in Lower Manhattan. EMS units are required to provide identification before being allowed beyond the barricades, adding to their response time. For the health and safety of those who live and work within the security zone, it is imperative that the effect of the street closures on emergency response time is accurately measured and that appropriate mitigations are executed.

Socioeconomic Conditions

Lower Manhattan, and in particular the area within and near the security zone, has tremendous cultural, ethnic, and linguistic diversity. The DEIS does not indicate any degree of cultural sensitivity in the handling of surveys to Chinatown businesses, outside of the need to have a translator "present when necessary." In addition, only 61 businesses were polled, a questionable sample size that may not be statistically significant. The DEIS relies heavily upon vacancy rates and rents to assess the economic vitality of the study area, but the final EIS should consider other important data such as turnover rates and the types of tenants that succeeded the previous tenants. The DEIS uses a generic research model to determine economic health and does not consider indicators of detrimental impact on the character and local sustainability of the community. In preparing the final EIS, the drafters should collaborate closely with local organizations in order to undertake a culturally sensitive survey of the area's business community that can accurately assess the impacts of the street closings.

Urban Design

The DEIS acknowledges that features of the security zone such as the street closures, bollards, delta barriers and security booths have made the area forbidding and unappealing to pedestrian traffic. In addition, the added security features directly impact Chatham Towers and Chatham Green Houses, which are within the security zone. Residents, business owners, employees and community organizations should be contacted to determine exactly how these street closures and barriers have affected their quality of life and what mitigations would be most appropriate. All of the urban design mitigations should be executed with environmental sustainability in mind. The amount of energy required and the amount of maintenance required should be important factors in determining what types of materials will be used.

Traffic and Parking

Lower Manhattan has always had traffic and parking problems and the closure of Park Row, Pearl Street, Madison Street and the Avenue of the Finest has only made those situations worse. Park Row in particular was a main artery for connecting Chinatown to the Downtown area. Now that only authorized vehicles are allowed within the security zone, traffic has been rerouted onto neighboring streets and has created even greater congestion at several intersections. On-street parking spaces were lost due to the security zone and the DEIS acknowledges the alarming number of illegally parked cars (many of them being city cars) in the area. The security zone did not create the traffic congestion and parking shortage, but it has exacerbated those problems, and it is necessary to undertake significant strong mitigations, beyond signal changes and lane striping.

Air Quality

Re-routed traffic has adversely impacted air quality at intersections near the security zone. Since the original plan was enacted, three city buses have been placed back on their original route through the security zone, reducing the air quality impact to a level that is just barely short of the minimum standard requiring mitigation. This community is already battling traffic congestion, illegal parking, increased emergency response times and intrusive security measures – and, of course, the devastating air quality impacts of the 9/11 attacks. Surely more can be done to improve air quality than merely rerouting three buses.

Conclusion

As drafted, the DEIS does not present an adequate framework to examine the study area and determine appropriate mitigations and alternatives for the security plan. I urge the NYPD to work closely and respectfully with the community to draft a final EIS that responds to the community's legitimate concerns about the environmental impacts of the security plan.

We must protect ourselves from the world's terrorists while still providing our citizens with functional, healthy communities in which to live and work. We should not be satisfied with just the minimal initiatives identified in the DEIS, because Chinatown, the Seaport, the Civic Center and all the other communities in Lower Manhattan should not have to settle for simply "good enough." Let this review process serve as a launching pad for an increased interest and investment in initiatives that will improve the quality of life and the economic well-being of Lower Manhattan. Thank you for the opportunity to testify.



THE CITY OF NEW YORK
OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN

SCOTT M. STRINGER
BOROUGH PRESIDENT

October 24, 2006

Inspector Anthony Tria
NYPD Capital Construction
620 Circle Drive
Fort Totten, NY 11359

Re: One Police Plaza Security Plan DEIS

Dear Inspector Tria:

Enclosed, please find my comments on the NYPD's Draft Environmental Impact Statement (DEIS) for the One Police Plaza Security Plan.

The post-9/11 security plan for One Police Plaza, and in particular the closing of Park Row, has had a serious negative impact on the residential and commercial communities of Lower Manhattan. I recognize and respect the need for strong security measures that enable the NYPD to continue its great work keeping New Yorkers safe from terrorism and crime. But we owe it to the people of Lower Manhattan to ensure that these security measures do not degrade the quality of life and economic vitality of the very community that was most directly affected by the 9/11 attacks.

My land use, planning and development staff has analyzed and commented on the DEIS's methodology and conclusions, and proposed alternate methodologies and mitigations where necessary. I look forward to working with the NYPD, other city agencies, and the community, to address the impacts of the security zone and improve living and working conditions in Lower Manhattan. As the NYPD moves forward to prepare a Final Environmental Impact Statement, I hope that every comment received at the two public hearings and in writing will be thoroughly investigated and, where appropriate, incorporated in the final analysis.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott M. Stringer".

Scott M. Stringer
Manhattan Borough President

**One Police Plaza Security Plan Draft Environmental Impact Statement
Analysis and Comments
by Manhattan Borough President Scott M. Stringer**

Introduction

The post-9/11 security plan for One Police Plaza, and in particular the closing of Park Row, has had a serious negative impact on the residential and commercial communities of Lower Manhattan. I recognize and respect the need for strong security measures that enable the NYPD to continue its great work keeping New Yorkers safe from terrorism and crime. But we owe it to the people of Lower Manhattan to ensure that these security measures do not degrade the quality of life and economic vitality of the very community that was most directly affected by the 9/11 attacks.

An October 7, 2006 *New York Times* article by Carol Buckley notes that 30 of the estimated 50 to 70 buildings in New York City that have installed jersey barriers within the past five years have removed them. According to the article, counter-terrorism experts have stated that planters and barriers can sometimes make the impact of a speeding vehicle or explosive device worse by splintering into dangerous shards. Jersey barriers are one way to protect against terrorism, but other options that are less intrusive to the everyday lives of the community must also be thoroughly explored.

While alternate counter-terrorism measures are explored, we have to address the impact of the existing security plan, which is detailed in the DEIS. However, the methodology utilized for the creation of the DEIS is faulty in several chapters. It is impossible to design appropriate mitigation strategies if the impact of the security measures and the needs of the community are not thoroughly and accurately studied. This statement addresses the technical errors of the DEIS, offers alternative methodology, and suggests alternative mitigations.

Community Facilities

The security zone surrounding the One Police Plaza area arose out of the need to protect against terrorist activities. However, it has literally created a barrier for EMS units to respond to residents and workers who are in its perimeter. Currently, police and fire units call ahead to the barricade operators and are able to bypass the checkpoints without interruption, but EMS units must provide identification before being allowed beyond the barricades (NYPD, One Police Plaza Security Plan EIS, 3-7). Undoubtedly this adds to the response time of EMS units. Additionally, all emergency vehicles (police, fire and EMS) must grapple with the increased traffic that surrounds the security zone as a result of the closed streets and rerouted traffic, adding to emergency response time. For the health and safety of those who live and work in Lower Manhattan, it is imperative that the effect of the street closures on emergency response time is accurately measured and that appropriate mitigations are carried out.

Alternate Methodology

Although there has been an increase in emergency response times in Manhattan and the city as a whole between 2000 and 2005, the increase from 2004 to 2005 in the study area is much higher than the increase for the rest of Manhattan and the rest of the city. From 2004 to 2005, emergency response time increased by 14 seconds citywide, by 16 seconds in Manhattan and by 33 seconds within the study area (NYPD 3-5). The DEIS does not explain why the increase for the study area is more than twice the increase for the rest of the city. Further research must be conducted. Interviewing emergency medical technicians could provide invaluable insight as to why there has been an increase in response times.

The DEIS concludes that the increase in emergency response time is not due to the street closures in the security zone and therefore no mitigation is offered. This conclusion has not been adequately justified.

Alternate Mitigation

A potential mitigation worthy of study is to have EMS units posted inside of the barricades 24 hours a day instead of just 8:00 a.m. to midnight as currently provided (NYPD 3-7).

Socioeconomic Conditions

The economic impact of 9/11 is still being felt throughout Manhattan, especially in the tourist-dependent Chinatown area abutting the One Police Plaza security zone. Accurately determining economic vitality is a difficult task anywhere and it is further complicated by the deeply rooted linguistic and cultural traditions of Chinatown. The DEIS approaches the task of providing a socioeconomic assessment through surveys, data research and analysis.

There are several flaws in the execution of the assessment. Many Chinatown small business owners and workers speak Chinese as their first or only language. The DEIS states that a translator was present when necessary for the surveys (NYPD 4-5), but there is no detail provided on precisely how the surveys/interviews were conducted. Some fluent English-speakers may be able to express themselves more articulately in Chinese. The manner in which people were approached could have had a significant impact on the responses to the surveys. The DEIS does not indicate any degree of cultural sensitivity outside of the need to have a translator "present when necessary." There is no information provided as to exactly which businesses were surveyed. The DEIS only covers generally the types of questions asked, but does not include a copy of the survey instrument, nor all the collected responses.

A mere 61 businesses were polled (NYPD 4-32). There are approximately 486 active retail establishments in Chinatown alone, according to the DEIS (NYPD 4-31). The businesses included in the survey were chosen randomly within the restaurant and retail industries. On Mott Street, arguably the most central street in Chinatown, it appears that only five surveys were conducted (NYPD Figure 4-4). More thorough, culturally sensitive surveys should be conducted with a statistically significant number of businesses that represent the full range of industries in the area.

According to the survey results, 65.8% of businesses south of Canal Street, near the security zone, said their businesses have declined since the previous year, and 61.5% said their businesses were affected by the street closures. North of Canal Street, further away from the security zone, the results were 50% and 18.2% respectively (NYPD, Table 4-13). From these figures, the DEIS concludes that any decline in business "may be attributable to general economic trends rather than the proximity to the security zone" (NYPD 4-33). This conclusion ignores the difference between 65% and 50%. While there was a general area-wide decline, the number of businesses reporting a decline was significantly higher near the security zone than further away. The survey results support the conclusion that the street closings directly impacted nearby businesses and warrant mitigation.

Alternate Methodology

The DEIS relies heavily upon vacancy rates and rents to gauge the economic vitality of the study area. These are important measures, but they must be assessed in conjunction with other data such as turnover rates and the types of tenants that succeeded the previous tenants. A low vacancy rate does not necessarily indicate economic prosperity if there are new tenants every year or if traditional community-based businesses have been replaced by other types of businesses. There are many small businesses in Chinatown that may not have extensive financial records, so traditional research alone will not be sufficient. The DEIS uses a generic research model to determine economic health and does not consider indicators of detrimental impact on the character and local sustainability of the community. There must be collaboration with local organizations in order to obtain a more accurate assessment of business activity.

Data research and the surveys should be conducted in collaboration with local organizations that are well-connected to the local business community. The Asian American Federation of New York conducted surveys for its two reports on the economic impacts of 9/11 on Chinatown. The data from those reports could be utilized for the EIS and the methodology for the survey research could be adopted and tailored to the needs of this study.

Alternate Mitigation

As stated before, the economic effects of 9/11 are still being felt in the study area. The DEIS uses that fact to conclude that any decline in economic activity is most likely due to 9/11 aftermath and not the street closures. However, it is quite possible that the street closures have exacerbated any economic decline in the area and that possibility should be addressed by conducting thorough research and suggesting appropriate mitigations. One possible mitigation could be hosting a forum or a series of forums for small business owners in the area that inform them of various financial resources available to them and how they can apply to those programs.

Urban Design

Prominent features of the security zone are the street closures, bollards, delta barriers and security booths, which have made the area forbidding and unappealing to pedestrian traffic

Additionally there are two residential developments inside the security zone, Chatham Towers and Chatham Green Houses, and the added security features directly impact their immediate surroundings. The DEIS readily acknowledges that the features of the security zone have had significant adverse impacts on urban design (11-1). The suggested mitigation is a list of streetscape improvements to Park Row compiled by the Lower Manhattan Development Corporation (LMDC) for the 2004 Chinatown Access and Circulation Study. These mitigations include trees, shrubs, planters, improved street furniture and pedestrian way finding signage. The proposed mitigations are a good start, but more research must be conducted to determine the best way to balance safety and aesthetics.

Alternate Methodology

The DEIS relies solely upon the LMDC report to provide possible mitigations and it primarily focuses on Park Row. However, Pearl Street, Madison Street and Avenue of the Finest should be addressed as well. Additionally, there has been no community outreach on this issue. Residents, business owners, employees and local organizations should be contacted to determine exactly how these street closures and barriers have affected their quality of life and what mitigations would be appropriate.

Alternate Mitigation

Suitable mitigations can only truly be determined after sufficient research has been conducted on exactly how the community in the study area has been impacted by the security zone. However, there are several urban design measures that can be explored for the security zone. One proposed mitigation – way-finding signs – should be erected only after there has been sufficient community input on the issue. The size, location, content and language of such signs will be of critical importance. Trees should be planted in a way that will provide shade to seating areas and not obscure signage. The proposed street furniture should be arranged in an inviting manner and the lighting should be environmentally responsible and provide a sense of security. All of the urban design mitigations should be executed with environmental sustainability in mind. The amount of energy required and the amount of maintenance required should be important factors in determining what types of materials will be used.

Traffic and Parking

The closure of Park Row, Pearl Street, Madison Street and the Avenue of the Finest has significantly impacted traffic in the study area. Park Row in particular was a main artery for connecting Chinatown to the Downtown area. Now that only authorized vehicles are allowed within the security zone, traffic has been rerouted onto neighboring streets and created congestion at several intersections. The DEIS determined that the following intersections have been negatively impacted by the security zone: Pearl Street at Frankfort Street, Pearl Street at Robert F. Wagner Sr. Place, Chatham Square at Worth Street, Chatham Square at Mott Street and Church Street at Worth Street (NYPD 7-13). Mitigations such as signal changes and lane striping are offered for all of the intersections

except Pearl Street and Robert F. Wagner Sr. Place, which was determined to have unmitigatable impacts (NYPD 11-3).

The determination that five intersections have been negatively impacted was reached by comparing baseline pre-9/11 data with estimated no-action 2006 data, and with-action 2006 data that was generated from a computer software program. Various EAS and EIS documents, including the 2004 One Police Plaza Security Plan EAS were used to determine the pre-9/11 baseline (NYPD 7-3).

On-street parking spaces were lost due to the security zone and the DEIS acknowledges the alarming number of illegally parked cars in the area (NYPD 7-17). The majority of the illegally parked cars in the area were city cars. The security zone did not create the traffic congestion and parking shortage, but it has exacerbated those problems, and it is necessary to undertake significant mitigations, beyond signal changes and lane striping.

Alternate Methodology

The DEIS partially relies upon traffic data from the 2004 One Police Plaza Security Plan EAS. This is inappropriate considering that a New York State Supreme Court judgment against the NYPD specifically mentioned the need to re-examine the traffic and parking analysis in the 2004 EAS (NYPD S-1). The security zone has been in place for five years and it is difficult to determine accurate with-action and no-action conditions. A number of factors influence traffic patterns including construction, such as temporary street closures, time of year, commercial activity, etc. Undoubtedly, the street closures for the creation of the security zone have interacted with all of these variables over the past five years. In order to provide the fairest assessment for the community, conservative traffic data should be used for the baseline and no-action conditions. Additionally, there should be extensive and thorough field work conducted to determine the current conditions, and less reliance on the traffic modeling software.

In various sections, the DEIS states that the street closures did not create certain conditions and therefore the street closures bear no responsibility for the current situation. However, the street closures have in many cases exacerbated several undesirable impacts in the study area. Outside of re-opening Park Row, thorough research and the execution of adequate mitigations are the only ways to address the needs of study area residents and workers.

Alternate Mitigation

The 400-space municipal garage within the security zone is now open only to NYPD-authorized vehicles. The DEIS does not divulge whether or not the municipal garage is being fully utilized. Given the shortage of parking in the study area, any and all available off-street parking facilities should be fully exploited. Even if the municipal garage is open only to NYPD or other authorized vehicles, using all 400 spaces could possibly have a significant impact on the amount of illegal parking in the study area.

The increased number of pedestrian accidents at the intersection of Worth and Broadway (NYPD 11-6), congestion, noise and air pollution are all negative impacts of increased traffic on the streets surrounding the security zone. No amount of lane striping or signal changes will have a significant effect on these negative impacts. Only effective traffic rerouting or street reopening will truly mitigate these impacts. The DEIS states that more specific mitigation measures will be researched before the FEIS is completed (NYPD 11-6) and those mitigation measures should include a thorough analysis of the possibility of opening the closed streets or at least creatively rerouting traffic.

Air Quality

Re-routed traffic has adversely impacted air quality at Foley Square/Worth Street and Chatham Square/Worth Street, intersections near the security zone (NYPD 9-23). The increase in particulate matter known as PM2.5 exceeded the de minimis criterion under CEQR of .1 ug/m (NYPD 11-7). Since the original plan was enacted, three city buses have been placed back onto their original routes on Park Row through the security zone, reducing the air quality difference to .09 ug/m and .08 ug/m at the respective intersections (NYPD 11-7). The proposed mitigation would achieve air quality that is just barely good enough to sidestep any further required mitigation. This community is already battling traffic congestion, illegal parking, increased emergency response times and intrusive security measures – and, of course, the devastating air quality impacts of the 9/11 attacks. Surely more can be done to improve air quality than merely rerouting three buses.

Alternate Methodology

The DEIS does not explain how the air quality on Park Row has been affected by placing three buses back onto it. If this mitigation merely removes particulate matter from one location in the study area and moves it to another location in the study area, then it is unacceptable..

Alternate Mitigation

Air quality is directly connected to traffic in the study area. Idling vehicles create air pollution that impacts all of the residents, workers and visitors. Outside of planting more trees in the area, the only way to improve the air quality is to remove or significantly reduce the main source of pollution, which is traffic. Decreasing the number of cars at key intersections in the study area will require rerouting cars and/or the reopening the closed streets.

Conclusion

As drafted, the DEIS does not present an adequate framework to examine the study area and determine appropriate mitigations and alternatives for the security plan. Traffic is at the heart of the security plan and without a thorough examination of traffic, the impact on community facilities, urban design, parking and air quality can not be adequately measured. We must carefully explore all options that will provide appropriate safety measures as well

as a high quality of life for the residents, workers and visitors in the study area. We must protect ourselves from the world's terrorists while still providing our citizens with functional, healthy communities in which to live and work.

We should not be satisfied with just the minimal initiatives identified in the DEIS, because Chinatown, the Seaport, the Civic Center and all the other communities in Lower Manhattan should not have to settle for simply "good enough." Let this review process serve as a launching pad for an increased interest and investment in initiatives that will improve the quality of life and the economic well-being of Lower Manhattan.

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WATERFRONTS

September 14, 2006

**TESTMONY OF CITY COUNCIL MEMBER ALAN JAY GERSON
REGARDING ENVIRONMENTAL IMPACT STUDY ON PARK ROW AND
CHINATOWN BEFORE THE NEW YORK CITY POLICE DEPARTMENT**

I am encouraged by the New York Police Department's holding a Public Hearing regarding the Environmental Impact Statement on Park Row and Chinatown. But at the same time, I am discouraged at the NYPD's findings through their EIS process. As most of you know, I am the Council Member who represents this area and I have throughout my tenure been a proponent of quality of life issues and small business development. I call on you today to reverse your position on the closure of Park Row and further study the overall impact of the closure after September 11, 2001. The businesses in this area have been negatively impacted and any stance that leaves the community closed off from the public, whether it be pedestrian or automotive, will continue to hinder the economic development of Chinatown and the surrounding area.

The NYPD's Environmental Impact Study gives short shrift to the financial, health, and quality of life issues in Chinatown. This study seems to be created to provide justifications for keeping Park Row closed, rather than being an honest assessment of the reality that affects those who live and work in the area.

The study claims that there have been minimal financial hardships to the businesses in Chinatown. These results were based on a small sampling of businesses, which were selected at the behest of the NYPD to yield the results desired. In fact, we all know that an area with minimal parking, overly congested traffic, and limited access for delivery trucks has suffered financially since Park Row closed.

Residents of Chatham Green, many of whom are seniors, have found that the police barricade in front of their building has slowed ambulance response time by 3 to 5 minutes, a time frame that can spell the difference between life and death. Dr. David Goldschmitt, Director of Emergency Medicine at NY Downtown Hospital, has asked that the barricade be moved by twenty feet to the other side of the driveway where it was originally erected to allow ambulances to freely move between Chatham Green and his hospital, but this request has been denied. Given the potential delays, Dr. Goldschmitt

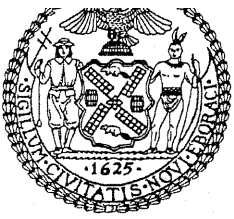
estimates it is often quicker for a patient to be transported 50 blocks to Beth Israel Hospital than to go a few blocks to NY Downtown Hospital.

We need an honest, realistic EIS to help us provide for the needs of this community. We have to figure out how to re-open Park Row, rather than continuing the inertia that leaves it barren and desolate. We need to find ways to compensate the businesses that have suffered here with creative programs and state funding, but we can't initiate programs for Chinatown if our police department issues reports saying that this area is doing just fine. We know better.

Therefore, on behalf of the Chinatown community, a community, which has patiently borne much of the brunt of post 9/11 hardship, I insist on the following:

1. Pedestrian access to Park Row.
2. An ambulance posted within the Park Row area that will provide immediate service to the Downtown hospital, or a shifting of the present barricade, which currently prevents ambulances from going to the Downtown hospital in a timely fashion.
3. Establishment of a free shuttle from the Seaport to Chinatown so that residents can be linked with the Downtown Alliance shuttle.
4. A new drop-off area for sight-seeing buses that will enable tourists to easily access Chinatown shops and restaurants.
5. A commitment from the NYPD to utilize their nearly 1000 parking spaces in 1 Police Plaza before parking on Chinatown streets, and further, a commitment to end the blatant police parking abuses.
6. A trolley line on Fulton Street to better connect Chinatown with the rest of lower Manhattan.

These are only some small steps in helping Chinatown to regain its vitality and livability, but we need to start somewhere.



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David McWater, Board Chair

Susan Stetzer, District Manager

**Community Board 3 Testimony for
DEIS for 1 Police Plaza Security Plan**

My name is Susan Stetzer and I am testifying on behalf of Community Board 3. Community Board 3 will be submitting a much longer technical analysis of the DEIS faults by the October 24th deadline. We have commissioned an analysis by an expert and it is currently being finalized. In the limited time allowed tonight I will highlight a few points from the longer analysis. Overall, Community Board 3 finds the DEIS incomplete and inaccurate. It fails to fully report the impact of closing Park Row and other nearby roads that provided substantial roadway capacity for vehicles entering and leaving Chinatown. As it stands, the DEIS masks the full impact of the Police Department action. The DEIS is incomplete and is not a "hard look" at the matter and must be redone.

Primarily, the DEIS fails to comply with State law because of three substantial and interrelated flaws: illegal segmentation of various elements of the whole NYPD security plan; arbitrary limitation of the traffic study area to a quarter mile of Police Headquarters; and misleading choices of 2000 for the baseline year and 2006 for the impact analysis year.

The written testimony will explain these flaws and others in detail. To summarize here today:

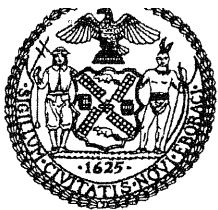
- (1) One of the strongest prohibitions for a DEIS is not to attempt to evade impacts by Segmenting an Action. The refusal of the NYPD to examine all elements of the NYPD security plan together is an irrefutable example of illegal segmentation. The DEIS omits the following actions:
 - (a) The 1999 closure of Pearl Street, which was moving as much traffic as Park Row, is omitted by choice of 2000 as the baseline year. The security zone implemented in 1999 is part of the action and cannot be ignored.
 - (b) The 2001 closure of the westbound off-ramp off the Brooklyn Bridge onto Park Row is not discussed, because the study area does not include the Brooklyn Bridge itself. Prior to 9-11, this ramp was processing 500 to 700 cars onto Park Row north. What happened to these cars after 9-11 and the closure of Park Row?
 - (c) The impacts of all of the street closures in the NYPD security plan must examine conditions at least 10 years into the future, not simply in the present year. The DEIS cannot be allowed to ignore the forecasted growth of traffic volumes of the redevelopment of Lower Manhattan and Downtown Brooklyn during the coming decade -- impacts that should be well understood by the NYPD engineering consultant, Philip Habib Associates, since they also prepared traffic and transit work for EISs on projects in Downtown Brooklyn. The failure to study the environmental impact of these 3 large-scale developments presents an incomplete picture of traffic congestion due to the closure of Park Row after 9-11. The thousands of construction trucks and traffic associated with these developments will contribute to pollution and congestion and must be addressed in the DEIS.

(2) The DEIS fails to examine area-wide dispersal of traffic into other locations in Lower Manhattan because of the arbitrary restriction of the Study Area Street Network. There is plenty of evidence that a huge amount of traffic has been diverted to other parts of Lower Manhattan outside the study area as a consequence of the NYPD street closings. The DEIS ignores the official annual bridge and tunnel counts for access/egress routes feeding Lower Manhattan, which obviously show that 30,000 to 40,000 vehicles per day are no longer moving through the Civic Center/Chinatown area. This displacement of tens of thousands of vehicles daily must, under CEQR, be analyzed.

(3) The choice of 2000 as the baseline year allows the NYPD to estimate baseline traffic volumes. The DEIS ignores volumes reported in the 1993 Foley Square FEIS, as well as the annual bridge and tunnel counts. As a result, the DEIS dramatically under-reports 2000 Baseline and 2006 No Build conditions, probably under-estimating the 2000 traffic volume within the limited study area by 21% to 22%.

Community Board 3 will present our detailed analysis of the DEIS flaws by October 24. We will show in detail that this DEIS is faulty because it fails to comply with State law in three substantial and interrelated ways: illegal segmentation, arbitrary limitation of the traffic study area, and misleading choices of 2000 for the baseline year and 2006 for the impact analysis year.

I will close by also listing flaws in this process. First, three minutes to respond to a 15-chapter DEIS does not allow for full public education and participation. Speaking just for the Community Board, we represent and advocate for 164,000 people impacted by this DEIS. We should be able to publicly and fully discuss how this plan fails to meet the legal criteria as well as the needs of the community. Also, the public notification was extremely inadequate. It became the responsibility of the community to notify people. The number of people, including media, who called the Community Board to find out details of this hearing and the location proves the inadequacy of notification. When the city wants to promote information—it does so very well. It did not do so for this DEIS. Finally, we need to say that trying to make members of this community feel that something was gained as a mitigation of this security plan – such as enforcing parking laws that should be enforced and creating court-ordered pedestrian ramps and other actions that are already as of right for the community will not mitigate the burden of this faulty security plan.



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David McWater, Board Chair

Susan Stetzer, District Manager

October 23, 2006

This summary and the attached analysis comprises the Community Board 3, Manhattan testimony regarding the DEIS for One Police Plaza Security Plan.

Community Board 3 calls upon the Mayor and the New York Police Department (NYPD) to consider relocating Police Headquarters to a site where the threat of attack can be properly mitigated. All New Yorkers deserve to have a Police Headquarters fully secured without putting ten of thousands of civilians at risk. The Draft Environmental Impact Study (DEIS) concerning the impact of the closure of Park Row after September 11, 2001 mentioned and immediately dismissed the obvious answer to the NYPD's security needs: the relocation of its headquarters. CB3 calls for an independent study to examine whether the central headquarters of the NYPD should be located outside of Lower Manhattan.

CB3 submits the attached written testimony on the DEIS. This testimony was prepared by an engineering consultant, Brian Ketcham of Community Consulting Services. Overall, CB3 finds the DEIS incomplete and inaccurate. It fails to fully report the impact of closing Park Row and other nearby streets that provided substantial roadway capacity for vehicles entering and leaving Chinatown. The DEIS is not a "hard look" at the matter and must be redone.

The failure of the DEIS to examine all elements of the NYPD security plan comprehensively and simultaneously evades an accurate assessment of its true impacts. The State regulations specifically prohibit this "Segmenting an Action." The segmentation in the DEIS is twofold: it limits the traffic study area to within a quarter mile of Police Headquarters; and it only studies impacts between 2000 and 2006.

Some of the flaws detailed in our testimony are summarized below:

- The 1999 closure of Pearl Street, which was moving as much traffic as Park Row, is omitted by choice of 2000 as the baseline year. The security zone implemented in 1999 is part of the action and cannot be ignored.
- The 2001 closure of the westbound off-ramp off the Brooklyn Bridge onto Park Row is omitted because the traffic study area does not include the Brooklyn Bridge itself. This ramp prior to closure was processing 500 to 700 cars per hour onto Park Row North.
- The DEIS underestimates the 2000 traffic volume within the limited study area by 21% to 22%. Baseline traffic volumes could not be directly measured because the baseline year was chosen as 2000. The analysis ignores volumes reported in the 1993 Foley Square FEIS, and the official annual bridge and tunnel counts for access/egress routes feeding Lower Manhattan.
- The DEIS ignores a huge amount of traffic diverted to other parts of Lower Manhattan outside the arbitrarily restricted Study Area Street Network. Since the growth in vehicles entering Lower Manhattan has continued unabated, the 30,000 to 40,000 vehicles that are no longer moving through the Civic Center/Chinatown area must be somewhere else.
- Street closure impacts must examine conditions at least 10 years into the future – not simply ending in the current year. The DEIS has irresponsibly ignored the forecasted growth of traffic volumes into Lower Manhattan due to the massive reconstruction around Ground Zero in Manhattan, the Atlantic Yards and the Brooklyn Waterfront. These impacts should have been better incorporated by the NYPD engineering consultant, Philip Habib Associates, which also prepared traffic and transit work for EISs on Downtown Brooklyn projects.

The attached written testimony from CB3 explains the DEIS flaws summarized above, as well as others. It explains in detail why the DEIS fails to comply with State regulations in three substantial and interrelated ways: illegal segmentation, arbitrary limitation of the traffic study area, and misleading choice of the time period to be assessed.



**COMMUNITY
CONSULTING
SERVICES INC.**

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Assessment of Traffic-Related Issues of One Police Plaza Security Plan EIS

The Importance of an Environmental Impact Statement

Under the New York State Environmental Quality Review Act, discretionary actions of agencies must be examined to assess their potential for producing a significant social, economic or environmental impact. State regulations for implementing the law delegate the authority for making the assessment to agencies taking the actions, in this case, the New York City Police Department (NYPD) with the intent that assessing the consequences of their actions will build environmental awareness into "lead agencies" decision making. City agencies perform this assessment according to the City Environmental Quality Review Technical Manual, notable for the specificity of its procedures. Compliance may be accomplished through preparation of an Environmental Assessment Statement (EAS) or an Environmental Impact Statement (EIS)—the latter being a more comprehensive and detailed analysis to respond to public comment on the scope, assumptions and methodology of a draft EIS. The purpose of the EIS is to fully and accurately disclose all effects of the action on future conditions without the action and to mitigate them to the extent feasible. The adequacy of a Final EIS may be judged by the courts on the degree that a "hard look" was taken to make the determination of impacts and feasible mitigation.

In 2004, the NYPD submitted an EAS to support making permanent actions it took in the prior year as an emergency response to the events of 9/11, primarily the closure of Park Row which runs under the NYPD HQ." The EAS was challenged by civic leaders of Chinatown as being inadequate in both the extent of the area analyzed and the definition of related security actions. The court ordered preparation of a responsive EIS, subject to full public review. The Civic Center Residents Coalition retained Community Consulting Services to continue its critique that persuaded the court of the need for an EIS. In addition, Manhattan's Community Board #3 retained Community Consulting Services to do a full analysis of the draft EIS. The effort of CCS and the community to negotiate a scope of the draft EIS that adequately addressed community concerns was largely dismissed. The predictable result is the draft EIS's undocumented assertions of limited impacts of narrowly defined actions that no genuine effort has been made to mitigate. And thus, in spite of the good faith effort by the community, the draft EIS fails to comply with State law in both letter and intent.

Summary of CCS Findings on draft EIS (hereinafter, DEIS)

We find the DEIS incomplete and inaccurate, failing to fully report the impact of closing Park Row and other nearby roads that provided substantial roadway capacity for vehicles entering and leaving Chinatown. The central issues in the community's suit over the inadequacy of the Environmental Assessment Statement that led the Court to order the NYPD to undertake preparation of a full EIS were the failure to assess the totality of the NYPD security program and the arbitrary limitation of the traffic study area.

Wrong Basis of Analysis

As we have stated in the past, we disagree with the definition of the so called Action that excludes closures prior to September 11, 2001.

- The closure of Pearl Street in 1999 as part of the NYPD security has had nearly the same impact as closing Park Row. Data from 1993 show that Pearl Street was moving as much traffic as Park Row.
- The westbound off-ramp off the Brooklyn Bridge onto Park Row was processing 500 to 700 or more vehicles an hour onto Park Row North. Its closure in 2001 diverted them somewhere but nowhere in the DEIS is this closure discussed nor is the diversion of traffic explained.

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Our comments on the scope for this DEIS made clear that “the loss of the 400 car parking lot must be considered as part of the Action condition now that its closure is caused by NYPD security concerns.”

- The refusal of the NYPD to examine all elements of the NYPD security plan together is an irrefutable example of illegal segmentation, as demonstrated below.
- To this we want to add one more: The need to look beyond 2006. If the intent of this DEIS is that the NYPD security measures are permanent, it is woefully inadequate to limit the analysis to the year we are in. This ignores the redevelopment of Lower Manhattan and Downtown Brooklyn, trips from which will surely affect travel in the study area.

These omissions distort both the analysis of the effect of limiting access to Chinatown and the analysis of the true area wide impact of closing Park Row. The baseline condition in the DEIS for the 2001 closure of Park Row is the year 2000, eclipsing the 1999 closures. Judging from the only published data prior to 2000, data collected in 1993, about 10% more traffic was moving through and around the study than estimated for 2000 in the DEIS. Using 2000 as the baseline is tricky since 2000 volumes are a construct, an artifice, a professional guess of what might have occurred. On that shaky foundation, the entire DEIS is built.

Incorrect Volumes Used

The significance of the 1993 data is that they are the only available representation of the pre-9/11 conditions to which Lower Manhattan is likely to return. Indeed, traffic counts taken for the entrances and exits to Lower Manhattan across the Hudson and East Rivers show that vehicle entries in 2006 have not only returned to pre-9/11 conditions but are likely to exceed 1993 levels by about 15%.

In contrast, the DEIS analysis of the impact of the Action in 2006 is based on measurements in 2006 with the NYPD closures that show volumes at sites close to the closures 30-40% lower than in 1993. The difference indicates the magnitude of the impact of the closures. The exception is on Canal Street and the Bowery, where volume in 2006 was 10% higher than in 1993, reflecting a shift of traffic to the Manhattan Bridge from the Brooklyn Bridge, due partly to the NYPD closure of the ramp onto Park Row North and probably more to the completion of construction on the Manhattan Bridge. There are no pre-2001 data at more distant 2006 measurement sites to determine whether there was any growth commensurate with the reduction in Chinatown.

Unsolved Case of Missing Vehicles

Since the growth in vehicle entries into Lower Manhattan has continued unabated, the 30,000 to 40,000 vehicles a day that are no longer moving through the Civic Center/Chinatown area must be somewhere else. Where are they? Are they all west of Church Street, outside the study area? If so, what streets did they traverse to get there? In the DEIS, these vehicles appear to have evaporated. It reports only 2% more vehicles along Worth Street through the Church Street and Broadway intersections in 2006 with the Park Row closure. Diverted vehicles are ignored in the text of the DEIS, and they don't show up in the re-assignment of traffic from closed streets to other routes, but they are somewhere else in Lower Manhattan causing unreported significant impacts. This displacement of tens of thousands of vehicles daily must, under CEQR, be analyzed. The Action is adding more than 100 vehicles an hour to a number of intersections, exceeding the CEQR threshold of 50 added vehicles that requires a full analysis. The DEIS must disclose the effect of the Park Row and other closures that reduced travel within Chinatown by increasing traffic elsewhere in Lower Manhattan.

All Impacts Under-reported

Our traffic consultant predicted a year ago at the scoping hearing just what has happened in the DEIS: If you look for those potentially significant impacts just in Chinatown you won't find many.” Due to a combination of under-reported conditions, the DEIS reports only five intersections in all of

Lower Manhattan are impacted, four in Chinatown impacted and one outside--Worth and Church Street.

In addition to not properly accounting for the impact of displaced trips, the DEIS fails to describe conditions along key streets. On some streets congestion is so bad, they come off looking good in the DEIS. For example, St. James Place has one moving lane in each direction (north and southbound) with parking on both sides. For trucks to make deliveries, they must double park, blocking all traffic. This happens often and creates severe delays. As a result of the closure of Park Row the street now handles 30 to 40 buses an hour that alone bring St. James to gridlocked conditions. Yet, the DEIS shows at St. James and Madison, good to satisfactory level of service. Ironically, this is because when movement is so greatly impeded that the few vehicles that make it to the intersection get through in one signal cycle, the simplistic CEQR traffic methods reports a good level of service. Thus, by slavishly following the CEQR focus on isolated intersections, the DEIS fails to disclose actual unacceptable delays that are characteristic of Chinatown corridors.

Traffic Model Not Released

The representation of actual conditions does not appear to be helped by introducing, as a concession to our demands, a computer model that more accurately simulates traffic behavior in the corridors between intersections. Because our Freedom of Information Law request to obtain the model has not been answered, we don't know if the model meets our specifications. We don't know if the curbside activities along St. James Place, or any street, were entered into the model or whether it even included St. James and the entire traffic study area. The model like most traffic analyses relies on the engineer's *judgment* to assign the displaced traffic to surrounding streets. The DEIS only reports that the model shows long traffic queues built up at the five intersections that were found to be impacted. That's why we asked for the model to cover the entire road network of Lower Manhattan. So far, the development of a model has done nothing to inform us. However, since the model is an integral part of the DEIS, but has not yet been released, we will require a month extension of the comment period from the date we receive it.

Parking Entirely Shortchanged

The Comments by Petitioners on the 2005 scope of this DEIS made clear that: "The loss of parking is critical to the social and economic life of the communities adjacent to the NYPD headquarters. These communities are impacted by the loss of the 400 car municipal lot, the loss of street parking within the secure zone, and the loss of street parking to cars with City permits within the commercial areas of Chinatown."

- In spite of our comments on the scope for this DEIS that "the loss of the 400 car parking lot must be considered as part of the Action condition now that its closure is caused by NYPD security concerns," the DEIS cavalierly dismisses any consideration of the issue on the transparently false assertion that "the security plan has not resulted in changes to off-street parking." This is unacceptable.
- Although the DEIS documents the intense on-street parking demand "exacerbated by the demand by police and court officers who have special parking privileges, and the extensive illegal parking by government employees, no attempt is made to mitigate the situation on the specious premise that "these conditions did not result from the Action." This makes a mockery of the CEQR process.

Transit Distorted

- The effect of closing Park Row on local bus routes is misleadingly based on comparisons to the entire length of the bus route instead of the change of route lengths in the study area. For example, the M9 had a round trip length of 10 miles. With the closing of Park Row and the diversion of the route its route length was increased by 20% to 12 miles. Was all of this within the study area? Was there a doubling or even a tripling of route length within the study area? It is not reported. What is reported misrepresents project impacts.

- The impacts on travel time resulting from the closing of Park Row and the diversion of routes, at least, considers shorter travel distances, although the sample routes overly long (the M15, for example, goes all the way to St. Marks Place and 3rd Avenue). The results, for the M15 in the southbound direction, a 33% increase in travel time in the AM peak hour, a 47% increase in the midday peak and a 38% increase in the PM peak hour, all very significant impacts. What is the cost in wasted time and lost productivity due to these delays from the closure of Park Row?
- Missing from the analysis is the Chinatown bus services, both local connecting Chinese communities in Brooklyn and Queens, and intercity operations connecting Manhattan's Chinatown with Boston, etc. These services should be described and their routes and ridership reported in the DEIS.

Inadequate Mitigation

Even with the under estimate of conditions in the study area, the DEIS reports impacts that cannot be mitigated, conditions that the community will simply have to live with. By narrowly defining the Action and arbitrarily limiting impacts to only the increments attributable to the Action, the NYPD has evaded any responsibility for the havoc its security plan is causing. And, it is not only traffic, parking and transit impacts that will not be mitigated, but noise and air quality impacts as well. Air quality and noise impacts are completely dependent on the accuracy of the traffic estimates. Since the traffic estimates are wrong, the air quality and noise analyses are equally wrong.

Case for Segmentation

One of the strongest prohibitions for a DEIS is not to attempt to evade impacts by Segmenting an Action. Under State regulations for implementing the State Environmental Quality Act, there are eight criteria in determining whether agency actions should be considered together. A review of the following criteria, excerpted from, the CEQR Technical Manual, indicate the DEIS is guilty of segmentation and that all elements of the NYPD security plan must be assessed as a whole. The criteria are:

1. Is there a common purpose or goal for each action?
2. Is there a common reason for each action being completed at about the same time?
3. Is there a common geographic location involved?
4. Do any of the activities being considered contribute toward significant cumulative or synergistic impacts?
5. Are the different actions under the same ownership or control?
6. Is a given action a component of an identifiable overall plan?
7. Can the interrelated phases of various projects not be considered "functionally independent?"
8. Does the approval of one phase or action commit the agency to continuing with other phases?

As mentioned above, segmented review may be permissible in limited instances if the lead agency believes it is warranted under the circumstances, the reasons for proceeding in a segmented manner are clearly stated, a demonstration is made that the segmented review is no less protective of the environment than an unsegmented review and the related actions are identified and discussed fully. In addition, each of the segments must have independent utility and not commit the agency to continuing with the remaining segments.

Chapter 7: B. Ketcham Comments on Traffic and Parking

The DEIS dramatically under reports 2000 Baseline and 2006 No Build conditions without the closure of Park Row

A comparison of the traffic volumes assumed in the analysis for 2000 Baseline conditions, 2006 with the Action and 2006 without the Action show that the Police Department is under reporting the effects of the project and the surrounding community. A comparison of the DEIS traffic volumes for baseline conditions with volumes reported in the 1993 Foley Square FEIS reinforces this finding and shows that the Police Department has not been responsive to community concerns raised in the scoping process and in the legal actions that precipitated the preparation of the EIS.

Attached are two tables that compare 2000 Baseline conditions with 2006 without Action and 2006 With Action (Tables 1 and 2). In addition, volumes presented in the Foley Square 1993 FEIS are compared with volumes presented in the Police Department DEIS. What is immediately apparent is the similarity between the 2000 Baseline conditions and those reported for 1993 in the Foley Square FEIS. Overall, however, there is a 10% to 11% under count for the 2000 data versus the 1993 data. Table 3 presents bridge and tunnel counts for access/egress routes feeding Lower Manhattan. It shows that traffic in Lower Manhattan grew by about 11% between 1993 and 2000. The result is a 21% to 22% under reporting of volume for 2000.

And the under reporting continues with estimates for conditions without the Action in 2006. For example, in moving from 2000 Baseline conditions to 2006 conditions without the project, the DEIS reports losses of more than 2,800 vehicle trips from the study area in the AM peak hour and more than 3,800 trips from the study area in the PM peak hour (based on a comparison of just six of the major intersections analyzed). Much of this would be expected to be due to the affects of the 9/11 disaster. And, the Police Department does explain it as follows: "...when compared to the baseline conditions, traffic in much of the network has declined due to lower demand and/or shifted demand due to street configuration changes..." None of this is explained clearly in the traffic section and no attempt is made to understand let alone report on the shifting "demand" mentioned in the DEIS on page 7-7 as it relates to Chinatown.

However, since September 2001 travel into and leaving lower Manhattan has been growing, especially over the Brooklyn and Manhattan Bridges. Yet, the Police Department is expecting the community to believe traffic in Lower Manhattan continues to remain at the post 9/11 levels. It is not true, it is not believable and it is not acceptable.

Moreover, in comparison to conditions in the mid-1990's (see the 1993 Foley Square FEIS data) and according to the DEIS, a great deal more traffic was moving through the area in the mid-1990's than is reported in the DEIS for 2000. Data available for the Brooklyn and Manhattan Bridges suggests the reverse should be true. Traffic in Lower Manhattan appears to have returned to pre 9/11 conditions. What is going on? If the traffic is not in the study area then it has been displaced to other locations in Lower Manhattan due, at least in part, by the closing of Park Row and other roads in proximity to Police Headquarters. None of these differences are discussed in the Police Department DEIS. Yet the entire analysis rests on the integrity of the assumptions for Baseline conditions as well as for No Build and Build conditions. Tens of thousands of missing weekday vehicle trips does not imbue the DEIS with the integrity needed to make a convincing case that this project will have little impact on the host community.

The question not answered, and raised by the community during scoping, is where has this traffic gone to? This too is not revealed in the DEIS because the study area has been arbitrarily limited to a quarter mile of Police Headquarters.

The matter of traffic exiting from the Brooklyn Bridge north onto Park Row is not explicitly addressed. Prior to 9/11 traffic volumes exiting the Bridge onto NB Park Row totaled between 500 and 700 vehicles an hour during peak hours. The DEIS reports volumes less than half this number before the Police Department closed the westbound off ramp. Presumably, some of this traffic would have diverted to St. James Place. However, a comparison of volumes estimated before and after the Action (2006) show no impact eastbound along the Avenue of the Finest left onto St. James Place northbound. So where did the Brooklyn Bridge traffic go? Some would have been diverted onto Centre Street northbound but certainly some traffic would have moved to St. James Place northbound.

It appears much of the diversion is redirected to Centre Street northbound. However, approx. a third of the diversion is assigned to Park Row southbound. This is traffic that was originally heading north. Why the change? What justification is there for redirecting traffic originally heading to the north to now head south? The only reasonable explanation is to move traffic away from the impact areas in Chinatown itself. The Police Department must explain such assumptions. They are not reasonable on their face.

Similar questions should be raised about the diversion of traffic moving through the intersection of Park Row and Pearl Street. The DEIS reports 2000 volumes in the AM peak hour of 1,539 and in the PM peak hour of 1,364. These volumes decline to 894 in 2006 for the AM peak hour and to 830 in 2006 without the proposed action, a loss of 645 and 534 trips, respectively, for the AM and PM peak hours. Where did these trips go? With the Action no vehicles move through this intersection, a loss of 1,539 trips in the AM peak hour and 1,364 in the PM peak hour—to where? And the question becomes even more important when comparing trips through this intersection in the mid-1990's reported in the Foley Square FEIS—1,831 in the AM peak hour and 1,622 in the PM peak hour. Where did all this traffic go to? Especially when traffic in Lower Manhattan is approximately 16% greater than what occurred in 1993. The answer is not included by the Police Department in the DEIS.

Traffic did not get diverted to Canal Street and the Bowery. Tables 1 and 2 show no change in volumes between No Build and Build conditions. One would expect, with the reduction of capacity around the Police headquarters, and the diversion of Brooklyn Bridge trips that some diversion would occur from the Brooklyn Bridge to the Manhattan Bridge. However, the DEIS reports no evidence of this, at least between the 2006 No Action and With Action conditions. What is curious is that along Canal Street at the Bowery, westbound right turns increase by 924 vehicles in the AM peak hour and by 319 in the PM peak hour between the 2000 Baseline and 2006 No Action and 2006 Action. This may have occurred right after 9/11 and the traffic was blocked from the westbound Brooklyn Bridge and may have been diverted to the Manhattan Bridge. But these restrictions were lifted several years ago. Plus, we believe Brooklyn Bridge and Manhattan Bridge traffic has largely returned to pre-9/11 conditions. This change in behavior needs to be explained.

The entire analysis of the closure of Park Row rests on the answers to these questions. The DEIS reports traffic impacts at a number of locations that cannot be mitigated even with the under reported Baseline and No Action conditions. But the noise and air quality analyses also rest on the integrity of these numbers. Noise impacts reportedly cannot be mitigated at some locations based on the reported traffic data.

Correcting for the missing data, however, presents a problem. If we take the 2006 With Action data as correct, and the Baseline and therefore the 2006 No Action traffic volumes are increased then the differential between 2006 No Action and With Action will be reduced and the project impacts likewise reduced. Baseline conditions, and therefore 2006 No Action conditions, need to be adjusted. But this problem goes will beyond the DEIS study area.

Failure to account for diverted trips.

The DEIS asserts that demand in the immediate vicinity of Chinatown is the cause of what they report as a 20% decrease in traffic (2000 Baseline to 2006 No Action). A comparison with NYCDOT bridge and tunnel counts for the period analyzed suggests some modest growth in traffic into and out of Lower Manhattan from 2000, the Police Department's baseline, and 2006, their analysis year. While no bridge and tunnel counts are yet available for 2005 or 2006, the data for 2000 to 2004 show that the post-2001 fall-off in volume was reduced from 20% to 3.7%. Based on this trend, it is estimated that by 2006, bridge counts will be approximately 4.6% *greater* than in 2000.

The DEIS, however, assumes the reduction that occurred right after 9/11 in vehicular travel in their study area continues into 2006. If this were so, then traffic that originally moved through the Chinatown community has been forced to other areas in Lower Manhattan. As this amounts to tens of thousands of daily trips dispersed through Lower Manhattan outside the Chinatown community, much of it because of the closure of Park Row and other nearby roads, including the exit ramp from the Brooklyn Bridge onto northbound Park Row, the displacement of traffic constitutes a huge impact that must be accounted for in the DEIS. This issue is not new to the NYPD..

The issue of area wide dispersal of traffic was raised in legal actions that forced the NYPD to prepare a full EIS and it was raised by the community and their consultants in the EIS scoping process. The issue has been ignored in the DEIS. It must not be permitted to be ignored. If traffic has been reduced by more than 20% in Chinatown while traffic into and out of Lower Manhattan is up by some amount from baseline conditions, then the closure of Park Row and nearby roads has created serious impacts on other communities west of the study area that must be accounted for in the DEIS. The NYPD must prepare a supplemental DEIS to correct for these errors and omissions prior to any further action on the environmental review process. As it stands the DEIS masks the full impact of the Police Department action; the DEIS is incomplete and is not a "hard look" at the matter and must be redone.

Conditions beyond 2006—ignored in the NYPD DEIS

The Police Department limits their impact analysis to 2006. The DEIS claims that traffic in and around the Chinatown community has declined since 2000 for a variety of reasons—none of which is well documented (all speculation at best). As explained above, the evidence in the form of bridge and tunnel counts contradicts this assertion—so important to the case made by the Police Department—specious. Of equally great consequence is what happens after 2006 as development grows in Manhattan and across the river in Brooklyn.

Over the next 20 years Manhattan is expected to add 300,000 more jobs and 100,000 more residents (NYMTC estimates). A very substantial proportion of jobs will be claimed by residents outside Manhattan. All new workers and residents will place increased pressure on available transportation capacity—subways and our roads will be more crowded. Traffic will grow in Lower Manhattan including in Chinatown. By removing roadway capacity, closure of Park Row has exacerbated the problem. What is happening across the East River in Brooklyn will add significantly to this problem.

Downtown Brooklyn is undergoing a building boom with the potential for major effects on Chinatown. The Empire State Development Corporation is sponsoring the Atlantic Yards project, a 10 million sq. ft. mega-development that is planned for the eastern edge of Downtown Brooklyn.

While huge, this is the tip of the iceberg in Brooklyn development. Another 30 million sq. ft. has already been approved for Downtown and an additional 20 million sq. ft. has been approved for areas within two miles of Downtown. All will impact traffic and transit. Much of the increase in traffic—about 100,000 cars a day—will flow across the Manhattan and Brooklyn Bridges.

And it is not just traffic that gets hammered. Brooklyn development will add more than 400,000 trips to Brooklyn's subway ridership and much of this will be heading for Manhattan, right through Chinatown.

Very little has been said about the effects of this development outside of Brooklyn. Nothing has been officially reported in the many environmental impact statements that have been produced in support of Brooklyn development. However, if Chinatown residents think congestion is bad now, they will find it hard to imagine what it will be like in 2016 when much of Brooklyn's development is completed. Tens of thousands of additional cars and trucks will daily move through Chinatown streets; hundreds of thousands more subway riders daily will travel on trains moving through the area.

How this growth impacts conditions in Manhattan and, in particular, in Chinatown, has not even been mentioned let alone studied. The effects on the Chinatown community could be huge.

The draft environmental impact statement prepared for the Police Department closure of Park Row does not consider impacts beyond 2006. That is the limit of the Police Department concern about the future. However, the greater impacts of the closure of Park Row and other nearby streets will occur in the decade from 2006-2016 and in the decades that follow.

About half of the westbound traffic exiting the Brooklyn Bridge goes directly to the FDR Drive northbound. The rest goes to Centre Street or to St. James Place or the Park Row south, two of which are already clogged with traffic. Development in Brooklyn will add between 300 and 500 vehicles per hour to these roads, day in and day out. The PD DEIS already reports severe impacts from traffic diverted around Park Row (albeit, under reported). What impact will the Brooklyn traffic have on the Chinatown community? The DEIS says nothing.

And there is more. The FEIS for the Brooklyn Bridge Park shows in 2013 Brooklyn-bound traffic backing up across the Brooklyn Bridge onto the FDR Drive and into nearby Chinatown communities. Again, what effect will this have on Chinatown traffic and what effect does the Park Row closure have on this spillback? No one has even looked at the issue.

The requisite "hard look" necessitates that the DEIS of actions that are intended to be in place long after 2006, the year assumed in the DEIS, examine conditions at least 10 years into the future, when the forecast growth of traffic and transit use will have great bearing on the commitment noted in the DEIS to maintain air quality standards for 20 years.

The NYPD DEIS must be supplemented with an analysis of these effects. It is not as though the City and State's consultant does not know of the problem. The same engineering consultant, Philip Habib Associates, that prepared the PD DEIS has also done all of the traffic and transit work for EISs on projects in Downtown Brooklyn. One has to question the integrity of authoring a DEIS that ignores impacts that are reported in a parallel DEIS for a different lead agency. Consultants have the professional responsibility to report these problems to the State and City review agencies which are largely dependent on outside professionals for safeguards to protect the public interest.

**TABLE 1: COMPARISON OF TRAFFIC VOLUMES
ONE POLICE PLAZA SECURITY PLAN EIS
AM PEAK HOUR**

		2006 With NO Action	2000 Baseline	Difference	2006 With Action	2006 With NO Action	Difference
PARK ROW AT WORTH STREET/BOWERY							
Worth Street EB	Left	51	75	-24	151	51	100
	Through	92	37	55	92	92	0
	Right	23	122	-99	23	23	0
Worth Street WB	Left	0	0	0	0	0	0
	Through	47	70	-23	296	47	249
	Right	160	195	-35	266	160	106
Park Row NB	Left	0	0	0	0	0	0
	Through	224	450	-226	18	224	-206
	Right	10	12	-2	2	10	-8
Bowery SB	Left	180	229	-49	180	180	0
	Through	192	339	-147	12	192	-180
	Right	104	142	-38	284	104	180
Mott Street SB	Left	106	180	-74	70	106	-36
	Through	17	26	-9	30	17	13
	Right	5	10	-5	22	5	17
	TOTAL	1211	1887	-676	1446	1211	235
AVENUE OF THE FINEST AT ST. JAMES PLACE							
Ave. of the Finest EB	Left	63	55	8	63	63	0
	Through	201	169	32	201	201	0
	Right	77	105	-28	77	77	0
R.F.Wagner Pl. WB	Left	479	470	9	638	479	159
	Through	33	122	-89	33	33	0
	Right	190	214	-24	170	190	-20
Pearl St. NB	Left	33	17	16	33	33	0
	Through	404	395	9	434	404	30
	Right	84	117	-33	104	84	20
St. James Place SB	Left	172	54	118	74	172	-98
	Through	156	289	-133	246	156	90
	Right	23	11	12	23	23	0
	TOTAL	1915	2018	-103	2096	1915	181
CHAMBERS STREET AT CENTRE STREET							
Chambers Street EB	Left	0	0	0	0	0	0
	Through	0	0	0	0	0	0
	Right	512	502	10	512	512	0
Centre Street NB	Left	586	935	-349	586	586	0
	Through	450	547	-97	650	450	200
	Right	0	0	0	0	0	0
Chambers Street SB	Left	0	0	0	0	0	0
	Through	194	278	-84	291	194	97
	Right	31	80	-49	31	31	0
	TOTAL	1773	2342	-569	2070	1773	297
WORTH STREET AT CHURCH STREET							
Worth Street EB	Left	30	35	-5	30	30	0
	Through	166	293	-127	166	166	0
	Right	0	0	0	0	0	0
Worth Street WB	Left	0	0	0	0	0	0
	Through	192	331	-139	220	192	28
	Right	179	136	43	177	179	-2
Church Street NB	Left	58	61	-3	58	58	0
	Through	1076	1914	-838	1136	1076	60
	Right	60	188	-128	120	60	60
	TOTAL	1761	2958	-1197	1907	1761	146
WORTH STREET AT BROADWAY							
Worth Street EB	Left	0	0	0	0	0	0
	Through	108	391	-283	168	108	60
	Right	118	90	28	118	118	0
Worth Street WB	Left	80	133	-53	80	80	0
	Through	365	425	-60	361	365	-4
	Right	0	0	0	0	0	0
Broadway SB	Left	50	135	-85	50	50	0
	Through	712	717	-5	712	712	0
	Right	36	42	-6	36	36	0
	TOTAL	1469	1933	-464	1525	1469	56

CANAL STREET AT THE BOWERY

Canal Street EB	Left	0	0	0	0	0	0
	Through	1017	1080	-63	1017	1017	0
	Right	130	147	-17	130	130	0
Canal Street WB	Left	0	0	0	0	0	0
	Through	1085	1127	-42	1085	1085	0
	Right	1047	123	924	1047	1047	0
Bowery NB	Left	0	0	0	0	0	0
	Through	402	522	-120	402	402	0
	Right	493	204	289	493	493	0
Bowery SB	Left	360	303	57	360	360	0
	Through	244	376	-132	244	244	0
	Right	88	170	-82	88	88	0
	TOTAL	4866	4052	814	4866	4866	0

TOTAL VEHICLES MOVING THROUGH PEARL STREET AND PARK ROW	894	1539	-645	0	894	-894
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EXITING BROOKLYN BRIDGE NB ON PARK ROW	137	Not Reported		0	137	-137
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EXITING BROOKLYN BRIDGE SB ON PARK ROW	422	Not Reported		467	422	45
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TOTAL MOVEMENTS ACCOUNTED FOR (Excluding Brooklyn Bridge)	13889	16729	-2840	13910	13889	21
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TOTAL MOVEMENTS ACCOUNTED FOR (Excluding Brooklyn Bridge St. James Pl./Ave. of Finest)	11974	14711	-2737	11814	11974	-160
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1993 Foley Sq. FEIS vs. 2000 Baseline

PEAK HOUR TRAFFIC ON BROOKLYN BRIDGE (EB+WB)	8000		8700	9% Increase
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Est.

Est.

PEAK HOUR TRAFFIC ON MANHATTAN BRIDGE (EB+WB)	4330		4800	11% Increase
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Est.

Est.

**TABLE 2: COMPARISON OF TRAFFIC VOLUMES
ONE POLICE PLAZA SECURITY PLAN EIS
PM PEAK HOUR**

		2006 With NO Action	2000 Baseline	Difference	2006 With Action	2006 With NO Action	Difference
PARK ROW AT WORTH STREET/BOWERY							
Worth Street EB	Left	156	77	79	293	156	137
	Through	112	246	-134	112	112	0
	Right	5	184	-179	5	5	0
Worth Street WB	Left	0	0	0	0	0	0
	Through	52	85	-33	187	52	135
	Right	198	228	-30	309	198	111
Park Row NB	Left	5	0	5	0	5	-5
	Through	273	352	-79	25	273	-248
	Right	10	18	-8	3	10	-7
Bowery SB	Left	116	250	-134	116	116	0
	Through	190	148	42	15	190	-175
	Right	139	139	0	314	139	175
Mott Street SB	Left	74	189	-115	50	74	-24
	Through	30	22	8	24	30	-6
	Right	15	17	-2	35	15	20
	TOTAL	1375	1955	-580	1488	1375	113
AVENUE OF THE FINEST AT ST. JAMES PLACE							
Ave. of the Finest EB	Left	80	59	21	80	80	0
	Through	246	220	26	246	246	0
	Right	140	98	42	140	140	0
R.F.Wagner Pl. WB	Left	429	551	-122	345	429	-84
	Through	11	98	-87	11	11	0
	Right	132	165	-33	102	132	-30
Pearl St. NB	Left	10	7	3	10	10	0
	Through	281	432	-151	312	281	31
	Right	24	106	-82	24	24	0
St. James Place SB	Left	129	90	39	129	129	0
	Through	201	256	-55	194	201	-7
	Right	6	5	1	16	6	10
	TOTAL	1689	2087	-398	1609	1689	-80
CHAMBERS STREET AT CENTRE STREET							
Chambers Street EB	Left	0	0	0	0	0	0
	Through	0	0	0	0	0	0
	Right	596	745	-149	596	596	0
Centre Street NB	Left	522	739	-217	522	522	0
	Through	532	572	-40	896	532	364
	Right	0	0	0	0	0	0
Chambers Street SB	Left	0	0	0	0	0	0
	Through	387	608	-221	407	387	20
	Right	30	68	-38	30	30	0
	TOTAL	2067	2732	-665	2451	2067	384
WORTH STREET AT CHURCH STREET							
Worth Street EB	Left	30	38	-8	30	30	0
	Through	141	263	-122	140	141	-1
	Right	0	0	0	0	0	0
Worth Street WB	Left	0	0	0	0	0	0
	Through	252	292	-40	243	252	-9
	Right	130	169	-39	130	130	0
Church Street NB	Left	89	96	-7	89	89	0
	Through	1049	1269	-220	1049	1049	0
	Right	65	139	-74	107	65	42
	TOTAL	1756	2266	-510	1788	1756	32
WORTH STREET AT BROADWAY							
Worth Street EB	Left	0	0	0	0	0	0
	Through	160	330	-170	201	160	41
	Right	46	72	-26	46	46	0
Worth Street WB	Left	55	103	-48	55	55	0
	Through	343	431	-88	334	343	-9
	Right	0	0	0	0	0	0
Broadway SB	Left	138	159	-21	138	138	0
	Through	652	757	-105	652	652	0
	Right	39	30	9	39	39	0
	TOTAL	1433	1882	-449	1465	1433	32

CANAL STREET AT THE BOWERY

Canal Street EB	Left	0	0	0	0	0	0
	Through	986	1316	-330	986	986	0
	Right	167	151	16	167	167	0
Canal Street WB	Left	0	0	0	0	0	0
	Through	580	472	108	580	580	0
	Right	436	117	319	436	436	0
Bowery NB	Left	0	0	0	0	0	0
	Through	276	598	-322	276	276	0
	Right	706	896	-190	706	706	0
Bowery SB	Left	691	793	-102	691	691	0
	Through	107	275	-168	107	107	0
	Right	76	89	-13	76	76	0
	TOTAL	4025	4707	-682	4025	4025	0

TOTAL VEHICLES MOVING THROUGH PEARL STREET AND PARK ROW

		830	1364	-534	0	830	-830
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EXITING BROOKLYN BRIDGE NB ON PARK ROW

		220	Not Reported		0	220	-220
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EXITING BROOKLYN BRIDGE SB ON PARK ROW

		151	Not Reported		317	151	166
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TOTAL MOVEMENTS ACCOUNTED FOR (Excluding Brooklyn Bridge)

		13175	16993	-3818	12826	13175	-349
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TOTAL MOVEMENTS ACCOUNTED FOR (Excluding Brooklyn Bridge St. James Pl./Ave. of Finest)

		10779	13909	-3130	10478	10779	-301
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1993 Foley Sq. FEIS vs. 2000 Baseline

PEAK HOUR TRAFFIC ON BROOKLYN BRIDGE (EB+WB)

		8100		8300	2% Increase
				Est.	

PEAK HOUR TRAFFIC ON MANHATTAN BRIDGE (EB+WB)

		4240		4700	11% Increase
				Est.	

Community Consulting Services, 9-13-06

TABLE 3. ANNUAL AVERAGE TRAFFIC VOLUMES INTO/OUT OF LOWER MANHATTAN CROSSINGS

	Estimated Avg. 2003/2004 Growth					
	1993	2000	2001	2002	2003	2004
Holland Tunnel	92685	101137	43377	92557	101097	96171
Brooklyn Battery Tunnel	57561	63242	13762	56976	56271	54488
Brooklyn Bridge	134793	147767	95586	121145	134444	137563
Manhattan Bridge	74526	75684	73064	66152	73767	79129
Williamsburg Bridge	86591	108376	82202	103364	100243	110528
TOTALS	446156	496206	307991	440194	465822	477879
Growth from 1993		11.2%	-31.0%	-1.3%	4.4%	7.1%
					1.058	1.026
					11.6%	16.3%
					1.042	1.042

Community Consulting Services, Sept. 13, 2006

B. Ketcham page by page Comments on Traffic and Parking

1. Page 7-1. "The study area was selected to encompass those roadways *most likely* to be used by the majority of vehicles traveling through the area..." Emphasis added. Excludes those vehicles diverted outside the area.
2. Study area does not include the Brooklyn Bridge itself.
3. "Potential impacts from trips diverted as a result of the security plan are identified based on criteria defined in the CEQR Technical Manual." Criteria suggest any location where 50 or more vehicles are diverted. There are dozens of intersections not investigated that probably meet the criteria but are ignored because of the very limited study area imposed on the project. Catch 22.
4. "some portions of the security zone were implemented in 1999 and are not part of the action..." This is the problem. The security zone implemented in 1999 is part of the action and cannot be ignored. Moreover, attempting to "estimate" traffic in 2001 after 9/11 is rough guessing at best using the procedures reported in the DEIS.
5. "the principal circulation effect of the action has been the closure of Park Row..." This may not be true. Data for 1993 suggest the Pearl Street was moving more traffic than Park Row. CHECK records.
6. Page 7-2. Need to check earlier data for Park Row re 65%/35% direction distribution reported.
7. '(b) traffic exiting from the inbound Brooklyn Bridge destined to Chinatown and points north/northeast...' Yet the closure of the Brooklyn Bridge exit ramp is ignored. Moreover, diverted traffic is actually directed to the south (without explanation).
8. "Westbound Pearl Street was also the main connector..." Reinforces points made above.
9. "This parking (in the security zone) has since been displaced." To where? "Lost" would be a better descriptive.
10. "the analysis year is 2006." OK, but the PD should then look twenty years into the future when 60 million sq. ft. of new development has been completed, generating more than 100,000 more car and trucks trips, 20% or more of which will travel across the Manhattan and Brooklyn Bridges into Chinatown.
11. "the existing conditions are defined as the transportation network existing prior to September 11, 2001..." Again, very hard to estimate 2001 traffic volumes. We have a much better idea of volumes from earlier work prior to any street closings around the PD headquarters. The PD would not have this problem had they prepared an impact analysis for the original street closings.
12. Page 7-3. Study Area Street Network. As noted above, the study area is too small; fails to cover intersections where large numbers of vehicles will/have been diverted.
13. AM, midday, PM peak hours covered. Traffic along Canal Street on weekends is bad if not worse on weekends. This too should be examined.
14. Page 7-4. "Vesey Street is likely to remain closed for several additional years while the WTC site is being constructed." Another example of actions outside study that are likely to have an affect on travel through the study area.
15. Surface Transit Network. Brief discussion of bus diversion but no quantification other than "25 to 30 buses per hour in each direction" diverted to Worth and St. James Place.
16. "Buses that traverse the security zone are subject to inspection..." No discussion of resulting delays nor of affect on bus travel time once diverted buses restored to Park Avenue.
17. Figure 7-3 shows the estimated baseline traffic volumes...network represents pre-2001 historical data and does not reflect the loss of millions of square feet of office space." If so, who so much less than recorded in 1993?
18. "...all three of the above flows no longer exist...due to actions independent of the proposed security zone and their absence, and other changes in Lower Manhattan *make a comparison of baseline traffic volumes with the 2006 No-Action conditions a difficult one.*" Emphasis added. The bottom line is the 2000 and 2006 no build conditions reported in the DEIS are guesses at best. Again, volumes are lower than reported in the mid-1990's.

19. Page 7-6. Parking. Data "was assembled from various sources..." In other words, all secondary sources. No original data collection. "...on-street parking regulations was also obtained from the studies mentioned above..." Again, secondary sources. Parking analysis speculative at best.
20. Page 7-7. No mention about Police Department and other agency vehicle violations taking up valuable street parking spaces.
21. Page 7-7. Vehicular Traffic. "...when compared to the baseline conditions, traffic in much of the network has declined due to lower demand and/or shifted demand due to street configuration changes..." Etc. Other changes are mentioned but no details are provided on how these affect traffic nor why the reductions are so much lower than estimated for 2000 or reported for 1993. Nothing is mentioned about the effects of Sept. 11, 2001. No attempt is made to contrast the assumed changes with bridge and tunnel counts. Lots of assertions but nothing conclusive. As noted on the bottom of page 7-5, guestimating past traffic volumes with no documentation is hard to do and if fraught with inaccuracies. The DEIS must provide a worst case condition not a very rough guesstimate.
22. Page 7-9. Statement "...as long as the increase in delay is 10 seconds or more." What is meaning and context?
23. Bottom of Page 7-9 notes signal timing used for No-Action same as for with Action. What should be done is to optimize both set of conditions. This provides a more honest evaluation of the differences between conditions with Park Row open and closed. It is an artifice to utilize the same signal timing for both conditions that works in the interest of the Police Department and, in general, makes it easier for them to mitigate their project impacts. It is standard practice but the results are misleading. Just one of many flaws in the CEQR Manual.
24. Page 7-11, Parking. DEIS reports no impact from closing Park Row compared to No-Action conditions other than the closing of the municipal facility next to the PD Headquarters. Not discussed is the benefits of opening this facility to PD vehicles and any effect of getting PD vehicles off of nearby streets. Essentially, the DEIS reports that, while the community loses 70 on-street spaces, there is plenty of off-street capacity to make up for these losses so no big deal.
25. Items we need from the PD/PHA
 - a. Synchro model used for nearby roads
 - b. LOS calculation sheets not included with on-line DEIS
 - c. Diagram for Canal Street at Bowery; how they handle westbound right turns totaling more than a 1,000 an hour against heavy pedestrian traffic; not even shown in LOS summary.

Chapter 8: Transit and Pedestrians

1. Focus is on comparing ridership for buses and pedestrian/auto conflicts (accidents) at select locations. While the DEIS reports a very significant increase in bus travel time with the closing of Park Row and the diversion of buses around the area, the overall conclusion is the Park Row closure has had little effect on transit or pedestrian activities.
2. Subways are assumed not to have been effected by the closure of Park Row.
3. Reduction in bus ridership between 2002 and 2004 is reported suggesting this "trend" demonstrates that the closure of Park Row is not the only thing effecting travel in the Chinatown community.
4. Recent NY Times article suggests transit ridership in NYC has been growing rapidly in recent years. The DEIS needs to secure more recent ridership characteristics.
5. Table 8-5, page 8-6, reports a 2.63 reduction in local bus ridership. However, most of this reduction is due to changes in ridership for the M15 bus route (73% of total). Eliminating the M15 shows a 16% increase in local bus ridership. The M15 provides service up to 126th Street in Manhattan so most of its ridership occurs outside the Chinatown area.
6. Table 8-6, page 8-7, reports the effect of closing Park Row on the length of local bus routes. The table is misleading since more of the route lengths are not in the study area and it is the closing of Park Row and the diversion of routes in the immediate area that is causing these changes. For example, the M9 had a round trip length of 10 miles. With the closing of Park Row and the diversion of the route its route length was increased by 20% to 12 miles. Was all of this within the study area? Was there a doubling or even a tripling of route length within the study area? It is not reported. What is reported misrepresents project impacts.
7. Table 8-7, page 8-8, reports impacts on travel time resulting from the closing of Park Row and the diversion of routes. Here, at least, shorter travel distances are considered (although the M15, for example, goes all the way to St. Marks Place and 3rd Avenue). The results, for the M15 in the southbound direction, a 33% increase in travel time in the AM peak hour, a 47% increase in the midday peak and a 38% increase in the PM peak hour, all very significant impacts. What is the cost in wasted time and lost productivity due to these delays from the closure of Park Row?
8. While opening Park Row to most of the bus routes forced to divert by the closing of Park Row is mentioned, no effort is made in Chapter 8 or in the Mitigation Section to describe the time required to move north and southbound along Park Row through various barriers. How does the resulting travel time for traversing the blocked Park Row take compared to the post-Action diversion around the Park Row area take? This is nowhere discussed. Is there, in fact, a relative benefit to reopening Park Row to buses or is this a pirick victory?
9. Missing from the analysis is the Chinatown bus services, both local connecting Chinese communities in Brooklyn and Queens, and intercity operations connection Manhattan's Chinatown with Boston, etc. These services should be described and their routes and ridership reported in the DEIS.
10. Page 8-10 re the "pedestrian corridor running between Police Headquarters to the intersection of Madison Street and Pearl Street was closed as part of the security plan." The DEIS claims this has had no effect on pedestrian movement. I have no idea but it would appear it could have done so. Someone should check this.
11. Table 8-9, page 8-11, re comparing the number of pedestrian accidents for 2000 with 2005 for CEQR Manual identified high accident locations. The table suggests closing Park Row has had a very significant impact making the area much safer for pedestrians. Table 8-10, page 8-12, suggests some of these impacts may have been shifted to Worth Street and Broadway. The community needs more detail about numbers and types of accidents covering more years to many any such assessment.
12. However, as with the increase in the length of bus routes, the diversion of traffic will increase vehicle miles of travel (VMT) in the area and traffic accidents grow in number in proportion to VMT. This problem is ignored in the DEIS. Moreover, as the congestion increases on

diversion routes, the opportunity for vehicle/pedestrian conflicts increases even if there is no increase in pedestrian traffic as asserted in the DEIS.

13. Page 8-13, Conclusion. "The security plan has not generated any new pedestrian trips nor has it interrupted existing pedestrian activity and no significant adverse impacts on pedestrian flow conditions have occurred or are anticipated as a result of the action." This appears to be an exaggeration but it must be confirmed by members of the community who have daily experience of the area.

Chapter 9: Air Quality Comments from B. Ketcham

The obligation of an air quality analysis is to determine whether or not a project meets the National Ambient Air Quality Standards (NAAQS). By definition, as pointed out in the DEIS, the NAAQS require a demonstration of maintenance of the standards 20 years into the future. Thus, the carbon monoxide analysis should be performed for 2026 as standard procedure as they are done on State Department of Transportation projects, not for 2006 as in the DEIS.

The 20 year time frame should be performed for particulate matter (PM10 and PM2.5) as well. The larger time frame for PM is even more essential than for CO because of the doubling of truck travel that is projected to occur by 2026. The inadequacy of looking at 2006 as a basis for determining compliance with NAAQS is the most powerful example of the necessity of the 20 year time frame in determining long range compliance as demonstrated by the predicted growth of population and employment in Manhattan and Downtown Brooklyn.

The greater challenge in meeting PM NAAQS, which is 1000 times more important than for CO in terms of health effects, requires a well documented description of vehicle classification. This is entirely absent in the DEIS.

The following are detailed comments by page for the air quality analysis.

1. Page 9-1. Bullets summarizing CEQR criteria for doing an air quality analysis: "Actions resulting in 100 or more trips through an intersection" and "Actions resulting in a substantial number of local or regional diesel vehicle trips". Both are satisfied in ways not fully evaluated in the air quality analysis.
2. As we have demonstrated in our critique of the traffic analysis, there is plenty of evidence that a huge amount of traffic has been diverted to other parts of Lower Manhattan outside the study area as a consequence of the NYPD street closings that will suffer far more than 100 additional vehicles during peak hours. They have been ignored.
3. Moreover, the growth of traffic in Lower Manhattan and in areas north of the study area plus in Downtown Brooklyn will produce a huge number of additional trips that will impact areas in and around the NYPD study area in future years, all exacerbated by the closure of Park Row and other nearby roads including the westbound off-ramp from the Brooklyn Bridge. All will have huge air quality impacts in future years, ignored in the DEIS.
4. The diversion of diesel buses to roads paralleling Park Row meets the criteria for a PM2.5 analysis. (However, ignored is the huge increase in diesel powered trucks described above.) Over the next two decades the number of heavy trucks using New York's roads will double. The Manhattan Bridge and Canal Street will continue to be the conduit for many of these truck trips. This fact has been completely ignored by the DEIS. We have asked that the DEIS project at least 10 years into the future to report the real effects that closing Park Row will have on the Chinatown community (and better, 20 years as also explained above).
5. Page 9-1, Scope of Work, mentions analysis of carbon monoxide. This may be a requirement of CEQR but New York City has been in attainment for CO for a very long time. PM is a thousand times more damaging to public health and should now be the focus of such analyses. The rationale for why CO has been analyzed is discussed on page 9-5 of the DEIS. Also inferred in this discussion is the implicit need to project CO 20 years into the future to insure the maintenance of CO NAAQS standards.
6. Page 9-7, Table 9-2 appears to be mislabeled as providing intersection volumes for 2005. The analysis year is 2006.
7. Page 9-11. "The emission factors for project-generated vehicles also reflect the average relative proportions of 97% autos and 3% SUVs that were observed in the field." As a third to 40% of vehicles sold in New York State over the last decade have been SUV's and observations in and around the study area suggest a far greater proportion of these vehicles

- are SUVs than 3%, and since SUVs are considered light trucks with higher emissions factors, this matter needs clarification.
8. Page 9-11 under modeling: "Free-flowing traffic links are set up separately from intersection queue links. Free flow links were modeled for a distance of 1,000 feet from the intersection in each direction." Since no supporting documentation is provided with the DEIS it is not clear what "free-flowing" links are being described. Is free flowing 5 MPH as along St. James Place and 10 MPH along Worth Street or is it the posted 30 MPH? Does it include the stop and start operation along St. James Place with trucks double parked making deliveries blocking all traffic in one or in both directions? We don't know because supporting documentation is not provided nor are descriptions of the details of the analysis.
 9. Page 9-12, under background concentrations. Again, 2005 is reported for background conditions whereas 2006 is the analysis year.
 10. PM 10/2.5 Screening. Very interesting point here that 207 passenger cars is equivalent to 21 diesel-powered vehicles (trucks) in terms of their contribution to PM emissions. The DEIS demonstrates how they estimated this relationship and the fact that they will evaluate passenger car PM project impacts. This is the first time a DEIS has admitted there is a relationship between diesel power and gasoline power in the production of fine particulate emissions. It is important because diesel particulate emissions produce a thousand times the health consequences of carbon monoxide emissions. It becomes even more important when you consider the future growth in traffic through the Chinatown community over the next two decades not just because of the huge development occurring in Brooklyn but because of the doubling of diesel powered trucks predicted by various agencies over the next two decades. And the Manhattan Bridge will continue to be the main connection to the Brooklyn Queens Expressway and its heavy truck traffic directing thousands of additional trucks through Chinatown. All of this will be made worse by the closing of Park Row and the diversion of traffic around the NY Police Dept. headquarters. Future project impacts cannot be left out of the DEIS. They will be a problem in Chinatown forever.
 11. Page 9-13, No-Action Condition. Again we read the analysis was undertaken for 2005 not 2006 as stated on page 9-1. This needs to be checked and, if 2005 was the date analyzed then all air quality analysis needs to be redone for 2006. Plus, as stated repeatedly, it should also be done for 2016 when traffic conditions will be more severe and conditions created by the closure of Park Row more severe yet (or better, for 2026 to conform with CO maintenance requirements as described above).
 12. Page 9-15. Background Concentrations. Measured at JHS 126 in Brooklyn. Not at ground level and therefore not representative of what people actually breathe.
 13. Bottom of page. "For this project, the more refined Tier 2 analysis was run. Traffic volumes for No-Action conditions were calculated for all relevant roadway links to each hour of the 24-hour day." Data sheets were not provided with the DEIS to permit checking on assumptions. However, the DEIS does report that hourly turning movements were assumed to remain constant (in terms of the proportion of total turning movements). This, by itself, is a very crude assumption and does not account for directional differences or for trip purposes. The PM analysis then goes on to utilize five years of meteorological data for estimating PM concentrations. Page 9-15 goes on to describe how truck volumes were manipulated. The result is a very rough approximation of PM concentrations no more accurate than plus or minus 30% or more.
 14. Page 9-21, PM2.5 Intersection Analysis, the DEIS introduces 1991 meteorological data for the Foley Square/Worth Street analysis. The analysis is for 2006. Is this a typo (if so, it occurs in several locations) or is the NYPD forced to use 15 year old data to convince the community they have no air quality impacts? This must be explained.
 15. On the whole, the reviewer must have the supporting documentation to evaluate the assertions about air quality results. The DEIS moves from one location to another without explanation; throws out figures without support and, in general, asserts no project impacts. Except at Worth Street at Foley Square and Worth Street at Chatham Square, where PM 2.5 impacts would exceed the CEQR de minimis criterion.

16. Were the analysis to be conducted for 2016 with all the new development expected described elsewhere it would show even more locations with exceedances of even greater magnitude in spite of anticipated cleaner emissions characteristics from new cars and trucks.
17. In general, as with the traffic and parking analyses, the air quality analysis is missing so much information that the analysis cannot be fully reviewed for accuracy and completeness. The information listed above must be provided and sufficient time allocated for its review before any action is taken on this project.

Chapter 10: Noise

1. Noise measurements taken only one time. Should have taken 3 measurements. Two of the three should have been within 2 dBA of each other. Table 10-4, page 10-9.
2. No details of precisely where noise measurements were taken.
3. Other than for the AM peak hour at the noise measurement intersections, no details are provided about the vehicle classification (i.e., number of cars, trucks, buses, etc.) so no of checking estimate of pce's (passenger car equivalents) reported in Table 10-3, screening for 40 intersections.
4. No details about the diversion of buses by time of day due to closing of Park Row. Buses have a noise equivalent of 18 passenger cars (page 10-2).
5. Table 10-3 implies huge traffic impacts due to project traffic diversion (even assuming under reporting of baseline conditions).
6. Analysis concludes impacts at two locations in AM peak hour only (neither of which can be mitigated). However, reported noise impacts in midday and PM peak hours are marginally close to what CEQR criteria reports as impacts. Unfortunately, no details are provided to check the accuracy of this assertion.

Chapter 11: Mitigation Comments by B. Ketcham 9-17-06

1. Page 11-2, Traffic. "According to the CEQR Technical Manual, a significant traffic impact is considered mitigated if measures implemented return projected future conditions to what they would be if a proposed action were not in place." The problem with this is that the City permits projects that add traffic to locations that are severely congested, taking two even three light cycles to progress through an intersection and simply adjust green time to restore an intersection approach to a still severely congested conditions. The practical reality is that the City permits actions that will add traffic to streets that everyone knows cannot process any more traffic. That is the problem we get with the CEQR directive. The State, instead, requires a return to a LOS D for all new actions.
2. Moreover, this analytic approach does not account for conditions approaching an intersection. On two lane roads like St. James Place, when trucks double park to make deliveries, they block all traffic in the direction they are parked, forcing vehicles to enter the opposing lane to try to pass by. The CEQR Manual approach does not recognize these conditions, evident throughout the study area. These conditions would be accounted for were the DEIS to base its analysis on using a traffic simulation model. The community has asked for this. There is evidence the NYPD's consultant used such a model. This model must be made a part of the public record.
3. Table 11-1 shows that most mitigation has been accomplished by shifting slightly approach green time. They generally do so at the expense of competing intersection approaches.
4. Page 11-3. Still, the traffic impacts at this intersection of Pearl Street/Robert F. Wagner Sr. Place cannot be mitigated.
5. Pearl Street/Frankfort Street. The approach to mitigating this intersection is to create a very narrow two-lane eastbound approach to accommodate a dedicated left-turn. The lanes would be 9 feet wide. What effect does a 9-foot lane have on the efficient movement of left turning buses that have been diverted through this intersection? We don't know because LOS calculation sheets have not been shared with the community for review.
6. Chatham Square/Worth Street. Mitigation involves the complete redesign of this intersection. The resulting design, which is reported to accommodate diverted traffic, is very different from that recommended in earlier studies. The DEIS does not discuss other alternatives (such as that proposed by LMDC) for this intersection nor does it report the communities reaction to another complete redesign.
7. Obviously, were the traffic analysis done to reflect the huge growth in traffic anticipated over the next two decades, a great deal more mitigation would be needed. And, because of the expected high traffic volume, mitigation would more difficult.

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: MICHAEL LEON

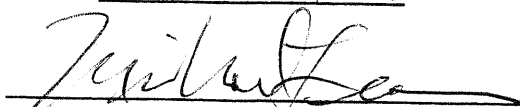
I live at: 165 PARK ROW, APT. 19A
NEW YORK NY 10038

Contact information:
Telephone(s): _____ email: _____

I wish to state: SEE ATTACHED.

Date: OCT. 13, 2006

Attach additional sheet[s] if necessary)


Signed:

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
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You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

It has been more than 5 years since the tragedy of 9-11. Yet, I am still a prisoner of my own home at Chatham Green where I've been living for over 30 years. This is all because the NYPD wants to take over the streets around my home to park their personal cars.

Since 9-11, our mayor and other politicians have been telling citizens that they should go on with their NORMAL lives. Is it normal for ordinary citizens to must go through police barricades to enter and leave their own homes? Having a valid parking sticker on my car is not enough, I must have other identifications as proof that I live in Chatham Green before I am allowed to cross the barricades just to go home. My friends and relatives are not allowed to enter the parking lot to come visit me. Visitors of prisoners in the Metropolitan Correctional facility across the street get more freedom. Prisoners in that facility get more visitors. Is this NORMAL?

Whether it was human errors or mechanical failures, many cars have been damaged and drivers injured by the pop-up barricades on Park Row over the years. Additionally, the street directly north of Police Plaza is the street that Chatham Green residents must travel on when leaving their homes. The street sign says that it is a one way street. I have had at least three closed calls of collisions with police personnel's unmark cars because they ignore traffic signals and street signs and travel in the wrong direction.

The closing of Park Row and other streets around Police Plaza created not just personal inconveniences and hazardous conditions for the residents in the areas, but it also has tremendous negative impacts of quality of life, health, and economics for the neighborhood. The street closings caused major traffic back ups in the neighborhood. I must breathe in exhaust fumes from vehicles sitting in congested traffic. Honking of horns and vehicles' engine noise has kept me up many a nights. The street closings around Police Plaza have directly caused the closing of many restaurants, gift shops, and other businesses in the neighborhood. The Metropolitan Improvement Restaurant has been a part of the Chatham Green community for many years and was patronized by many police officers. This restaurant on Madison Street north of Police Plaza has been out of business due to the street closings. The closing of this restaurant is testament that any business will not survive with only patrons from across the street. The street closings do not help in any way to attract customers from outside of the immediate neighborhood.

The streets around City Hall are not closed. The streets around Gracie Mansion are not closed. The FDR Drive runs directly under the United Nations building and other streets around the landmark are not closed. Does this mean that our police commissioner is more vulnerable and more susceptible to terrorist attacks than our mayor and other high ranking city officials? Is the NYPD implying that it's more important to protect Police Plaza than other landmarks where high ranking federal government officials and international leaders work and housed?

The reality is that having parking spaces for police officers' cars takes priority over everything!

Chatham Green, Chatham Towers, Alfred Smith Housing, and other residential buildings have been in the neighborhood long before Police Plaza was build. If the NYPD and the Police Commissioner are so concerned about their safety and security in the area, PLEASE MOVE AWAY.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Herman Phillips

I live at: 180 Park Row, #21D, New York, NY 10038

Contact information: Telephone(s): 212/962-6360 email: _____

I wish to state: _____

As a resident of Chatham Square, I must stress that there are significant negative environmental impacts from the closing of Park Row. A few examples are the traffic jams and resulting air pollutants, especially particulate matter and dust; noise from vehicles and metal barrier machinery; and increased dangers to pedestrians trying to cross the Square. The police department insists the closure is necessary for security. However, the security measures taken are inconsistent and were really about parking initially, and continue to be about misguided ego-tripping and paranoia.

Date: 31 September 2006

Attach additional sheet[s] if necessary)

Signed: _____

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: BENJAMIN LANGFORD

I live at: 183 PARK ROW
NY NY 10038

Contact information:

Telephone(s): 212 732-3859 email: LANGBEN@MINDSPRING.COM

I wish to state: I PREFER TO HAVE PARK ^{ROW} CLOSED
AND ~~PARK~~ ENJOY THE INCREASED
SECURITY AND TRANQUILITY.

Date: 10/3/06, 2006

Attach additional sheet[s] if necessary)

Signed: Benjamin Langford

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
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kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: Robert Kilke

I live at: 77 Fulton St. NY 10038

Contact information:

Telephone(s): _____ email: _____

I wish to state: The Park Row closure has not had any adverse impact on me or anyone that I know of. Those who advocate the moving of Police Headquarters out of Manhattan, or for that matter anywhere but where it now is, are out of touch with reality. We could not have a better neighbor than the NYPD

Date: 9/8 2006

Attach additional sheet[s] if necessary)

Signed: Robert Kilke

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria

Capital Construction

NYPD

620 Circle Drive, Suite B

Fort Totten, NY 11359

Fax 718 281 1593 atria@nypd.org

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99 Hudson Street, 12th Floor

New York, New York 10013

Fax 212-966-4303

kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.

We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

DO NOT MOVE NYPD #19!

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: MARIA E. ZATUCHNEY @South Bridge

I live at: 100 BECKMAN ST 16th towers
NYE. NY 10038

Contact information: Telephone(s): 212 571 1909 or 646-283-1367 email:

I wish to state: "DO NOT MOVE NYPD

Headquarters OUT of where

it is, WE need all the

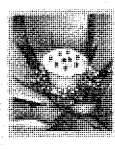
Protection, there is need

move clean up (circled)

Date: 9.11.2006

Attach additional sheet[s] if necessary)

Signed: Maria E. Zatuchney



Ms Maria Zatuchney
100 Beekman St Apt 5A
New York NY 10038-1845

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
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You can also email your written testimony to: ctownissues@gmail.com. We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

WISH for additional cleaning of apt. and streets. due to the Dex and Power (white) in the area.

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: Gloria Gallowitz

I live at: 90 Gold St.
NY NY 10038

Contact information:

Telephone(s): 212-571-7672 email: _____

I wish to state: We travel by automobile - Since 9-11 we
find it very difficult to drive home. The streets are
all clogged because of street closings and barriers.
Move City Hall and Police plaza to more
secure headquarters. Please give us back our
breathing room. We downtowners have suffered
enough.

Date: 9-11, 2006

Attach additional sheet[s] if necessary)

Signed: Gloria Gallowitz

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

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kkimerling@aaldef.org

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We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

關於 2006年 10月 4日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會.

如此, 我在此加上該書面證言.

我的姓名是: Fay Lee, GB

我居住在: Chatham Towers 180 Park Row
ny ny 10038

聯絡:

電話: _____ 電信地址: _____

我願意表明: My husband and I are longtime residents
of Chatham Towers. He uses a wheel chair. The police
at the Park Row barricades has repeatedly refused to
allow us to drop my husband and his wheelchair off at
the door of 180 Park Row where the handicap ramp is
located. We must use the North Street side of our building where
he must be pushed around the corner manually no matter the weather
-heat, rain or snow! My husband and I are in our 80's. Our home aide
is in her 70s. This is a hardship for us.

日期: 10/20, 2006年

(如需要, 請附加紙件)

Fay Lee /jc as described to me

簽名

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Cindy Ma

I live at: 32 Monroe Street Apt 66-4
NYC NY 10002

Contact information:

Telephone(s): 917 892-0231 email: cn_ma@yahoo.com

I wish to state: For the past 5 years after park run
has been close I have had to change alternate
route for my commute and I often still believe
that the police headquarters in Park Run is a
target for terrorist. It definitely puts me
in danger and fear. I am
hoping this will change very soon

Date: 10/24, 2006

Attach additional sheet[s] if necessary)

Cindy Ma
Signed:

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and ~~I cannot~~^{did} attend the Public Hearing in person on October 4, 2006. I am therefore submitting this ^{additional} written testimony.

My name is: John Ost

I live at: 333 Pearl St.

N.Y. NY 10038

Contact information:

Telephone(s): _____ email: _____

I wish to state: See attached sheets

Date: 10/22, 2006

Attach additional sheet[s] if necessary)

Signed: John Ost

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

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Comments on DEIS John Ost

Land use, zoning, community facilities and public policy

There are effects on the neighborhoods that the EIS does not, and cannot measure. What effect, for example, do the street closures have on people who might otherwise travel into the area to shop or dine? Travel into the area is impacted not only by the longer bus transit times/traffic jams; but, how about the driver who decides he/she does not want to be stuck in traffic because the police have blocked a lane of traffic on the Brooklyn Bridge or permanently closed off the northbound Park Row Exit (off the Brooklyn Bridge) to use as a parking lot for their commuter vehicles? What about those who do not come into the area because the NYPD, by seizing the 400 space Municipal parking garage, has severely reduced parking opportunities in the neighborhood? How about those who find the area aesthetically unpleasant (even threatening) by the closure of public walkways and the extensive security and fences in the area? What about the extensive air pollution, noise (sirens and horns), traffic and their effect upon the thousands who live in the area? What effect does the continued closure of a large part of City Hall Park have on the character of the neighborhood?

Community Facilities Schools, day care, police and fire services

To be sure motorized travel throughout the surrounding area is impacted. As a result those using schools and day care are severely inconvenienced. What is the psychological effect upon young children (and adults) subject to seeing all the security in their neighborhood? Despite EIS claims to the contrary, FDNY vehicles do not traverse the secure (or frozen) zone. Intuitively, extensive traffic jams, caused by the security MUST increase response times for engine Company #6. Likewise, ambulances from NYU Downtown Hospital do not enter the secure zone. Some crews have reported longer response times to certain locations. When the WTC site reconstruction begins, as well as construction of the 75 story building next to NYU Downtown, all these problems will worsen. The EIS omits any discussion of these projected events.

The problem: security. The answer: move and decentralize police headquarters.

I recall at the recent meeting, the response to my relocation suggestion was it would be too expensive. Don't all the NYPD security salaries, maintaining barricades, etc. cost money? Not to mention the cost to the community--health, time, inconvenience, psychological stress. Don't these have a value?

The question is who is paying the price for the NYPD's incompetent handling of security issues--it is US, the neighborhood. Money is available, don't forget there is City/State funding for the Yankee and Mets stadiums plus the Javits center.

Coming home one night and looking at PP, I realized that it is not that large a building. Thinking about moving computers, telephones, file cabinets etc. to decentralized locations could not (when compared to the cost of all this "super security") be that expensive.

Police Commissioner Kelly's comments of creating "hardened targets", as related to the 7WTC collapse, makes one wonder why he is not concerned about making Chatham Towers, Chatham Green AND Murry Bergtraum endangered by NYPD's making its headquarters a "hardened target".

Actually, the idea of NYPD being decentralized is, in and of itself, an excellent security measure. When Police Headquarters was built the electronic age was in its infancy and telecommuting was virtually unknown. Many companies now decentralize and encourage telecommuting. There is no reason for centralization of NYPD now, unless it is for "posterity".

I also have mentioned the back-ups caused by NYPD taking out a lane in each direction on the Brooklyn Bridge and the resultant noise, air pollution and traffic congestion. Likewise the permanent closure of the northbound Park Row exit off the bridge.

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: Mariama James

I live at: 90 Gold Street Apt #6L
New York, NY 10038

Contact information: (212) 791-8134
Telephone(s): (917) 841-5094 email: Jamessam@msn.com

I wish to state: I feel the worst for the residents of Chatam in that they seem to have been closed off from the rest of the community but I am also very much concerned about the dangerous traffic condition that has been created for both motorists and pedestrians at the cross of ~~Spruce~~ ^{Spring} Park under the Bklyn Br. There is no more stop going W at SBT. Traffic & travel time have increased causing delays & potential safety issues due to the closures & changes to Bklyn Br & ~~W~~ drive exits.

Date: 9/13, 2006 Attach additional sheet[s] if necessary

Mariama James
Signed

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: WAI-MON CHAN

I live at: 165 Park Row

New York NY 10038

COPY

Contact information:

Telephone(s): 212-384-2486 email: wchan52@hotmail.com

I wish to state: THE FOLLOWING IS CONTRARILY TO THE DEIS
I WOULD LIKE TO POINT OUT THAT
CHATHAM GREEN IS A PRIVATELY OWNED CO-OPERATIVE
THE STREET CLOSURES AND THE INCREASED TRAFFIC,
POLLUTION HAVE A DIRECT NEGATIVE EFFECT ON
MY INVESTMENT AND HEALTH

Date: 9/14/, 2006

Attach additional sheet[s] if necessary)

W. Chan

Signed:

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

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Fax 212-966-4303
kkimerling@aaldef.org

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We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: Karen Glasser

I live at: 333 Pearl St
NY, NY 10038

Contact information:
Telephone(s): 212-358-1320 email: Karenpearl@aol.com

I wish to state: Please see attached

Date: 9/11, 2006
Karen Glasser
Signed

Attach additional sheet[s] if necessary)

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

I have resided at Southbridge Towers for 35 years (Pearl and Frankfort St). The police parking and city car parking situation has always been bad, however since 9/11 it has become unbearable. Police workers park their private vehicles at every meter in the neighborhood, thereby costing the city money, since they never fill the meters.

City cars and private police vehicles also park directly in our bus stops regularly. They park on corners in crosswalks making it almost impossible to cross a street or get on or off a bus safely.

When I first moved here there was a municipal parking garage along side Police Headquarters. What is that building being used for? Why aren't police employees REQUIRED to park in that facility, even if it were for free? If the garage is filled, then I suppose they should be forced to do what I would have to do if I were to drive to work and not find a parking space - I would have to pay \$30 or more to park my car for 8 hours.

NY Downtown Hospital has NO parking available to visitors of patients. Every meter is taken by a "private police vehicle".

I have complained many many times to the Mayor however this topic apparently does not even deserve a response. Also, since these same cars were "forced" to stop parking on Mott Street, there are now double the amount of cars as was before 9/11.

I think I will try to get a little "police parking" sign to place in my windshield in case I need a parking space in my neighborhood.

Karen glasser
333 Pearl St - 23K
New York, NY 10038

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:


I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: Raymond Cheung
 I live at: 21 Monroe St
NY NY 10002

Contact information:
 Telephone(s): _____ email: ray16899@yahoo.com

I wish to state: open up more parking spaces
for visitor. So, it will help bring more
business to Chinatown. NYPD should not
use our community for parking.

Date: 9/13, 2006 Attach additional sheet[s] if necessary)

Signed: 

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
 We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: Theodore J. May

I live at: 215 Park Row Apt. 11E

New York, N.Y. 10038

Contact information:

Telephone(s): 212 227 8537 email: _____

I wish to state: that if this plan goes through as it is written, my quality of life will be diminished. As it is now St. James Place is extremely hard to cross, especially for my young daughter. It is also very difficult to sleep because of the rumblings of trucks and car horns. Chatham Green and Chatham Towers are not Mitchell-Llama as your extremely poor investigations indicated and this will drive the value of our homes down. The impact study never thought enough of the people of Chatham Green or Chatham towers to even check if we were free market cooperatives, and only stated the conveniently false. Since we were here first maybe it would be better to move Police Headquarters to the unused Gracie Mansion.

Date: Sept. 9, 2006

Attach additional sheet[s] if necessary)

Theodore J. May
Signed:

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: IRVING HOWARD

I live at: 333 PEARL ST. Apt 21E
NEW YORK, NY 10038-1655

Contact information:
Telephone(s): 212 285 1256 email: _____

I wish to state: I am a consultant who works for a company that performs Compliance Reviews for all types of companies. I had earned at least \$100 to 150.00 an hour. When 9/11 tragedy occurred I was unable to work - could not leave the grounds where I live - no telephone service including cell phone. My wife developed respiratory problems. I lost a considerable amount of money. My job was to fly to different companies throughout the U.S.A. I was unable to do

Date: 9/26, 2006

Attach additional sheet[s] if necessary that fee could

Signed: Irving Howard

I live 4 blocks away from the towers!

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
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You can also email your written testimony to: ctownissues@gmail.com. We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: CHUCK LEE

I live at: 165 PARK ROW # 19C

NEW YORK NY 10038

Contact information:

Telephone(s): (212) 226 0505 email: _____

I wish to state: Please re-open Park Row. The closing of Park Row has damaged businesses in the lower Eastside of Manhattan, created heavy traffic on St. James and Worth streets, and caused the delaying of ambulances to the NYU Downtown hospital. The closing of Park Row has not significantly lightened security and proves to be more of an inconvenience to the community than a relief.

Date: Sept. 15, 2006

Attach additional sheet[s] if necessary)

Chuck Lee

Signed:

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
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Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. I am therefore submitting this written testimony.

My name is: Vita Sabella

I live at: 333 Pearl St. (Southbridge Towers), # 13 H
New York, NY 10038

Contact information:

Telephone(s): 212-806-6563 email: vsabella@stroock.com

I wish to state: It is the "opening" of Park Row that had a negative effect. Before the re-opening, The 103 bus stopped at the corner of Frankfort and Pearl Sts., making it easy for my 90 yr. old mother to get to her dentist on the Bowery and Hester Sts., where the 103 stopped directly in front of the office. Then it was moved to Wagner Pl. which wasn't that bad, considering the 1-1/2 block walk. Now, the nearest bus stop for the 103 is at Park Row. My mother, as well as other seniors, aren't able to walk that distance. Not all seniors have Access-A-Ride. If Park Row remains opened, consideration should be given to the elderly and physically impaired to either have the 103 re-routed along Water/Pearl Sts. or add a bus stop along this route. With Southbridge Towers in that immediate area, and the large amount of elderly and disable residing in the complex, easier access to buses is needed to compensate for their loss due to the reopening of Park Row.

Date: 9/15, 2006

Attach additional sheet[s] if necessary)

Vita Sabella
Signed:

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

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You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

Civic Center Residents Coalition

Anthony Tria

From: jvc180@aol.com
Sent: Tuesday, October 24, 2006 11:59 PM
To: atria@nypd.org
Subject: Fwd: One Police Plaza DEIS - comments

Banging barricades on Park Row continue to be a serious problem!

-----Original Message-----

From: jvc180@aol.com
 To: atria@nypd.org
 Cc: jvc180@aol.com
 Sent: Tue, 24 Oct 2006 11:45 PM
 Subject: One Police Plaza DEIS - comments

Dear Inspector Tria:

Yesterday I have submitted under separate cover via Federal Express in the package from Danny Chen, almost 45 business testimonies stating negative impact from the Park Row closures which is contrary to the conclusions drawn by the One Police Plaza DEIS's business survey results.

Also here are some of my comments re: One Police Plaza DEIS as regards -

Chapter 6: Neighborhood Character:

p. 6-3

Security Zone:

The establishment of a "secure zone" around 1PP has resulted in the creation of a hazardous zone around the gasoline pumps in front of 1PP and facing Chatham Green. Since tanks are located across the street from residential buildings, how safe does this make residents feel?

Area within the security zone is also home to over a dozen businesses. Some like Rite Aid, Metropolitan Restaurant and Mrs. Friggins' and many medical offices have lost their street access. What mitigation?

Contrary to the DEIS, before the action, marked and unmarked police vehicles were not parked throughout the blocks south of One Police Plaza. Madison Street, James Madison Plaza and the covered area under the Brooklyn Bridge were not used for street parking. Area under the Brooklyn Bridge was a public park used by roller bladders and skateboarders. Similarly James Madison Plaza Park had benches and almost two dozen mature trees where people could sit. The park is presently littered on all sides by a toll booth, concrete barricades and other barriers.

Thousands of residents from Smith and Knickerbocher Houses, students from Murray Bergtraum High School and Verizon workers, southeast of One Police Plaza were able to access their homes/school/workplace/transit hub through the wide, open staircase of One Police Plaza. Now, the chain link fence, barricaded staircase and street behind Police Headquarters is an eyesore.

Pedestrian access is through a narrow staircase with a single lane in each direction, sandwiched on one side by One Police Plaza and the other by the Municipal Parking Garage. This access is very busy at 8:00 a.m.-9:30 a.m., noon time and 3:00-5:30:p.m., particularly when the high school is in session.

The imposition of security booths, barricades, bollards, jersey barriers, fencing, (in addition to bomb sniffing

11/2/2006

dogs, dog trailers, dog runs, etc added by the feds in 1999) has not only restricted the ebb and flow of community life around 1 Police Plaza, the appearance is inhibiting and uninviting, akin to a military zone.

Neighborhood character/aesthetics and the community's restricted use of open space resources has increased the insecurity of residents when these structures are located directly under their windows. Furthermore the impact has been most severe on the following:

With the Park Row closures, the closest pedestrian access route for Chatham Green, Chatham Towers, Confucius Plaza and Chinatown residents/visitors, to/from the Municipal subways and Lower Manhattan is along an alleyway between the Federal Detention Center and St. Andrews Church known as Cardinal Hayes Place. This backside of the Federal Detention Center houses garbage bins that attract rats at night and idling garbage/delivery trucks during the mornings.

In the alleyway, loose gravel and large potholes on the irregular surface makes walking hazardous, particularly for those wearing heels. Before the action, residents and workers were able to walk along tree-lined Park Row to Lower Manhattan.

p.6-4

The historic streets of Chinatown already heavily utilized and congested is now even more so, since the street closures are forcing traffic onto secondary roadways. Street shutdowns have emboldened NYPD and court officers' to increase tenfold the parking of their placard vehicles on top of sidewalks, in crosswalks, bus stops and curb cuts severely impacting neighborhood character, businesses making/receiving deliveries, as well as pedestrian and emergency service access.

This traffic congestion and difficulty in accessing shops and restaurants has led to a decline in business on Mott Street immediately next to the With Action area. The loss of many, long time businesses and high turnover of at least **31 others (in the two block stretch of Mott Street between Park Row and Canal Street)** since 9/11 have resulted in 4 shuttered stores today – on the block immediately next to Park Row that was once bustling with shoppers and diners. Now there is minimal foot traffic.

Where once our neighborhood was bustling with activity and wide open streets surrounding Chinatown, it now looks alternately like a series of parking lots where NYPD and court vehicles have virtually taken over all streets and in some cases the sidewalks as well. Multiple layers of barricades have turned our neighborhood into the "security zone" but security for whom? Large, unattractive street barricades, signs, flower pots, concrete blocks, have turned streets and sidewalks into an obstacle course.

What effects did the street closures, redirection of traffic onto secondary roadways and subsequent congestion have on the following:

- *Pedestrians' ability to safely cross streets, particularly when the army of traffic agents assigned to the Chatham Square and Civic Center area speed vehicles through lights, even when they are green for pedestrians.
- *Lack of pedestrian crosswalks along the length of St. James Place between Madison and Chatham Square and on Worth Street between Park Row and Centre Street
- *Businesses that relied on truck deliveries found their drivers circling continuously to find parking after the neighborhood was taken over by NYPD/court placard and illegal vehicles.
- *Chinatown visitors – shoppers, diners, tourists and those visiting their families in Chinatown have dwindled from their pre 9/11 highs; most citing lack of parking, redirected bus routes, inability to find cabs when laden down with purchases. Those who live in Chinatown cited inability to find cabs willing to go downtown after 9/11 due to heavy congestion particularly on the Bowery and Canal Street in evenings and weekends.

*Operation of the funeral parlors on Mulberry Street with increased traffic

*Chatham Towers Parking Garage – after 9/11, rerouting of traffic away from Worth Street and then the subsequent congestion

*Houses of worship in the neighborhood cited effects of reduced parking and congestion on worshipers such as Mariners Temple

*New sidewalk concrete barriers on Park Row make it difficult for people pulling carts, pushing carriages or carrying large packages/groceries.

* Former tour bus routes have disappeared after 9/11

*Car service ridership statistics pre and post 9/11 in the neighborhood?

*Cab service to downtown?

P. 6-5

Before action, Canal Street was and continues to be a heavily trafficked east-west thoroughfare with vehicles headed west to the Holland Tunnel and east to the Manhattan Bridge. After action, there is no mention of Worth Street now being an extremely busy thoroughfare, absorbing the traffic from -- closed Park Row, Pearl Street -- once a heavily used east/west street taken away before 9/11 by the building of a Foley Square fountain, rerouted traffic from the now closed Park Row exit ramp of the Brooklyn Bridge. Ramp North to Park Row is barricaded, used for parking police commuter vehicles, forcing traffic onto secondary roads and creating rush hour traffic jams, particularly around Worth Street, St. James Place, Water Street, Pearl Street and Frankfort Street.

Worth Street is impacted further by the closing of Fulton Street during peak pedestrian hours for a pedestrian mall, one of the few other east/west streets downtown..

Also during these busy times of day, the vehicular traffic surrounding this same area is severe due not only to the Park Row closure but also the closure of the north bound exit of the Brooklyn Bridge and the forced rerouting of cars onto secondary roadways – St. James and Frankfort -- on their way to the Civic Center area's federal/state/city courthouses, federal and city prisons, municipal offices, City Hall, Holland Tunnel, Chinatown, Tribeca, Wall Street area, Little Italy and One Police Plaza.

South Street Seaport redevelopment particularly around the Former Fulton Fish Market, Peck Slip plaza, including residential projects, commercial store fronts, etc. has and will funnel increased construction vehicles, workers, noise, congestion, residents and businesses onto already overloaded St. James Place, Fulton, Frankfort Streets – but not mentioned in the DEIS.

p. 6.6

The impact is severe enough that the residents of Southbridge Towers on Water Street are unable to get out of their garage during peak hours. NYU Downtown Medical Center is across the street from Southbridge and is on the same block as Fire Engine Company #6 also located on Beekman Street. The hospital has sold their parking lot for a proposed new residential tower that may be as high as 75 stories including a proposed K-8th grade school at that site bringing thousands of people to Beekman Street, not mentioned in the DEIS.

Beekman Street is a narrow street that funnels into Park Row in front of City Hall, already heavily congested in front of the Brooklyn Bridge where Park Row is closed.. Where is all this traffic going?

11/2/2006

The congestion at Frankfort/Pearl Streets resulting from the closure of the Northbound Park Row exit from the Brooklyn Bridge impacts emergency vehicle access and the Park Row street closures impacts nearby Engine Company #6 located on Beekman Street. This firehouse dedicated in 1903 and recently under renovation is located next to a shul, across the street from New York Downtown Hospital and approximately 200 feet from a 5000 resident housing complex, Southbridge Towers, fire trucks mired in traffic congestion, not only lose fire response time, but protracted use of their sirens inflict an undue burden on residents and those who work nearby.

Study the effects of the street closures on NYU Downtown Hospital and emergency response times. Wellington Chen of Chinatown Parknership noted ambulance response time was almost 20 minutes to a site just on St. James Place. Is there a system in place to allow emergency vehicles access through Park Row and do drivers know that access is possible?

What are the hospitals', physicians', ambulance drivers', other medical personnel's, fire department's data and anecdotal accessibility experience/evidence? We have been unsuccessful in accessing ambulance, fire and other emergency vehicle response times despite many attempts through our community board, through our elected officials, through our city agencies, and through our Freedom of Information Letter.

This does not even take into consideration the mammoth traffic in the next few years if the Downtown Brooklyn Stadium is built on the other side of the Brooklyn Bridge.

Does not consider the current NYPD closing of lanes of traffic on the Bridge impacting traffic on local streets surrounding the bridge and as far north as the FDR Drive.

Does not consider: rebuilding of WTC site bringing over 100,000 construction workers according to Charles Maikish; construction vehicles/supplies/materials, reconstruction of Fulton Street and building of West Street underpass, other new proposed residential towers and commercial spaces downtown as Lower Manhattan turns into a 24/7 community.

p. 6-6 .

No Action Condition

The reduced utilization of previous sidewalks and streets is projected to impact not only the existing population but the growing populations and increasing vehicles downtown and indeed will impact all of Manhattan as 1PP becomes a bottleneck to downtown development.

Contrary to their claim The NYPD has taken over the southbound lanes of Pearl Street between Park Row and Madison Street and have constructed a concrete foundation that was poured in place and is about a foot high with a approximately 5' wrought iron fence firmly imbedded in the concrete. This unattractive structure covers the southern boundary of NYPD headquarters and extends from Madison Street to Park Row and has permanently altered the neighborhood.

The NYPD has taken over Madison Street between Pearl and Frankfort Street for a parking lot. They have installed an unattractive mesh wire fence all around their parking borders and gone so far as to encircle the fire hydrant that is in front of Murray Bergtraum High School so that they can get one extra parking spot for themselves leaving the high school vulnerable in a fire emergency and unable to access the fire hydrant in front of their building. This structure has also altered the neighborhood character.

p. 6-7

Loss of Brooklyn Bridge Exit ramp – creates congestion so that people do not even want to go down near this area for their normal business, pre-9/11.

Thousands of residents from Smith and Knickerbocher Houses, students from Murray Bergtraum High School

11/2/2006

and Verizon workers, southeast of One Police Plaza were able to access their homes/school/workplace/transit hub through the wide, open staircase of One Police Plaza. Now, the chain link fence, barricaded staircase and street behind Police Headquarters is an eyesore.

Pedestrian access is through a narrow staircase with a single lane in each direction, sandwiched on one side by One Police Plaza and the other by the Municipal Parking Garage. This access is very busy at 8:00 a.m.-9:30 a.m., noon time and 3:00-5:30:p.m., particularly when the high school is in session.

Contrary to DEIS, police vehicles were not permitted to park on James Madison Plaza before 2001 and are currently not allowed to park there due to community lawsuit win.

p. 6-8

Bottom of page, Task 2. Land Use.

“Tasks for detailed analysis include: #2 Provide a description and map of baseline 2001 land uses in the area and the surrounding study area.” What baseline date is being referred to in 2001?

Page 7

#3 “Prepare a list of development projects that have occurred between 2001 to 2005 in the study area that has influenced land use trends.” Again what baseline date in 2001?

Kam Kuo, a long time, Chinese supermarket serving the southern end of Mott Street that was open from 10:00 a.m. -9:00: p.m., closed after 9/11, not only darkening the beginning of Mott Street but leaving residents without a convenient one stop place for Chinese as well as American groceries.

About a year before 9/11, there was a newly established twice/weekly farmer’s market at Foley Square, in front of the fountain near Worth Street/Center Street, selling organic fruits and vegetables, flowers and baked goods. Chinatown does not have any organic food stores so this was a welcomed addition that unfortunately did not return after 9/11. The next closest site to purchase organic foods is in Tribeca at Reade Street between Church Street and West Broadway.

We request a study of the impacts of the takeover of the streets around Chinatown and the Civic Center area by NYPD vehicles after 9/11 (the effects of this along with the removal of Municipal Garage from the community) struck hard on the residential and business community What about long term effects? What if there was a future terrorist or even natural disaster threat and Park Row barricades were shut down preventing Chatham Green residents from leaving their parking area by vehicle?

Study the effects of increased traffic congestion on alternate streets like Worth Street, St. James, Water Street and Frankfort Street.

*What about emergency vehicle access around NY Downtown Hospital, the Engine companies on Beekman Street, Duane Street and other engine companies that serve the Chinatown and Civic Center area?

Study the effects of this increased traffic and air/noise pollution on quality of life, particularly for local residents, Columbus Park, James Madison Plaza Park, Chatham Green’s children’s park on St. James Place.

Sincerely,

Jeanie Chin

11/2/2006

Check out the new AOL. Most comprehensive set of free safety and security tools, free access to millions of high-quality videos from across the web, free AOL Mail and more.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Damon Leonn.

I live at: 72 Mott St
NY NY 10013

Contact information:
Telephone(s): _____ email: _____



永康大西藥房
LONG LIFE PHARMACY INC.

72 MOTT STREET,
NEW YORK N.Y. 10013
TEL: (212) 925-8532
966-6320

勿 紐
街 約
72 華
號 埠

I wish to state: That park now has
to be open.

Date: 10/03 2006

Attach additional sheet[s] if necessary)

Signed: [Signature]

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Stephen

I live at: 10 MOTT ST BSM7
New York NY 10013

Contact information:
Telephone(s): _____ email: _____

I wish to state: Park Row must be opened

Date: 10/11, 2006

Attach additional sheet[s] if necessary)

Stephen
Signed:

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

關於 2006年 10 月 4 日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會。
如此, 我在此加上該書面證言。

我的姓名是: _____

我居住在: 19 Pell street
new York NY

聯絡: _____
電話: _____ 電信地址: _____

我願意表明: Park Row must be opened!
Affects my business

日期: 9/29/06, 2006年

(如需要, 請附加紙件)

[Signature]
簽名

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

關於 2006年 10月 4日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會。
如此, 我在此加上該書面證言。

我的姓名是: Lou Young INC

我居住在: 74A mott st
new York NY 10013

聯絡:
電話: 212-334-2448 電信地址: _____

我願意表明: Park Row must be opened
It affects my business badly

日期: 10/4/06, 2006年
[Signature]
簽名

(如需要, 請附加紙件)

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Bok Lei Po Inc.

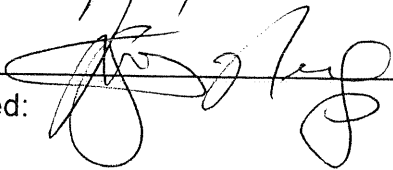
I live at: 63 Mott St
New York NY 10013.

Contact information:
Telephone(s): _____ email: _____

I wish to state: Re-open part new to public.
Help Chinatown for more business

Date: 10/1/2006

Attach additional sheet[s] if necessary)

Signed: 

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

Golden Lake Corp.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: BILLY

I live at: 59 (B) MOTT st

Contact information:

Telephone(s): 212-566-3217 email: _____

I wish to state: Reopen Park row ~~to~~ bring back the
Tourist Buses help ching town in busines.

Date: 10/11, 2006

Attach additional sheet[s] if necessary)

Signed: _____

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

關於 2006年 10月 4日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會。
如此, 我在此加上該書面證言。

我的姓名是: Hong Xhun Inc.
我居住在: 64 Mott Street

聯絡: _____ 電話: _____ 電信地址: _____

我願意表明: Open Park Row. It
has affected my business

日期: 10/1/06, 2006年 (如需要, 請附加紙件)

簽名: X Kang Chen

請于以下地址郵寄 傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718.281.1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

With regard to the Public Hearing on the DEIS to be held on Oct 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

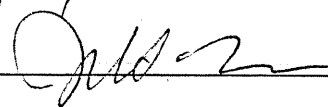
My name is: JUAN TSAO

I live at: 36 MOTT STREET-7
NEW YORK N.Y. 10013

Contact information:
Telephone(s): (212) 267-5765 email: juantsoa@earthlink.net

I wish to state:
BADLY EFFECT OUR BUSINESS IN
DOWNTOWN AREA

Date: 9/29, 2006 Attach additional sheet[s] if necessary)

Signed 

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

The last date for submission of written testimony is **October 24, 2006.**

關於 2006年 10 月 4 日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會.

如此, 我在此加上該書面證言.

我的姓名是: WINNIE YEE

我居住在: 34 MOTT ST. #7
NEW YORK, NY 10013

聯絡:
電話: 212-233-0224 電信地址: _____

我願意表明: It affect business!

日期: 9/29, 2006年

(如需要, 請附加紙件)

Winnie Yee
簽名

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

關於 2006年 10 月 4 日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會。
如此, 我在此加上該書面證言。

我的姓名是: YING CHEUNG WONG

我居住在: 9 Doyers St

聯絡:

電話: _____ 電信地址: _____

我願意表明: Park Row closed has
affected my business

日期: 9/29/06 2006年

(如需要, 請附加紙件)

簽名 Ying Cheung Wong

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

關於 2006年 10月 4日舉行的聽眾會:

Hoplee Rest.

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會。
如此，我在此加上該書面證言。

我的姓名是: Sai Hung Lam

我居住在: 1314 - 44 St.
Brooklyn N.Y 11219

聯絡: 718-8564045 電話地址: _____

我願意表明: Park Road Closed
Pos Bad To My Business

日期: 10/1/06, 2006年 (如需要, 請附加紙件)

簽名: Sai Hung Lam

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

關於 2006年 10月 4日舉行的聽眾會:

Ming Fay

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會.

如此, 我在此加上該書面證言.

我的姓名是:

Sunde Ng

我居住在:

42, MOTT ST, N.Y. 10013

聯絡:

電話:

(212)406-1957

電信地址:

我願意表明:

Park row has closed effect
my business, open park row.

日期:

10/1, 2006年

(如需要, 請附加紙件)

簽名

Sunde Ng

請于以下地址郵寄, 傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

26 Mott St.

With regard to the Public Hearing on the DEIS to be held on Oct 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: NANCY SEID

I live at: 170 PARK Row NYC
NY, NY. 10038

Contact information:
Telephone(s): 212 962-3577 email: _____

I wish to state:

It affects business.

Date: 9/29, 2006

Attach additional sheet[s] if necessary)

Nancy Seid
Signed

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

The last date for submission of written testimony is **October 24, 2006**.

10 Mott Street

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Shirley Lau

I live at: Brooklyn

Contact information:

Telephone(s): 212-732-6405 email: _____

I wish to state: Park rows closing has ~~been~~ badly
affecting my Business at Mott Street.

Date: 10/1/2006

Attach additional sheet[s] if necessary)

Signed: Shirley Lau

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

Haagen Dazs

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: David Nguyen

I live at: 53 1/2 Mott New York NY 10013

Contact information:

Telephone(s): 212-571-1970 email: _____

I wish to state: It'll be affected our business if
The Park Row is closed.

thank you for understanding

Date: 10-1, 2006

Attach additional sheet[s] if necessary)

David Nguyen
Signed:

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359

Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013

Fax 212-966-4303

kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

Fay Da Babery
Mott

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Victor Theung

I live at: New York, NY, 10128

Contact information:

Telephone(s): _____ email: _____

I wish to state: That Park Row is very beneficial
to Residents & tourist of this area,
closing it would hurt business as well
as economy here.

Date: 10/3, 2006

Attach additional sheet[s] if necessary)

Victor Theung

Signed:

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

New Beef King
Corp.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Robert YEE

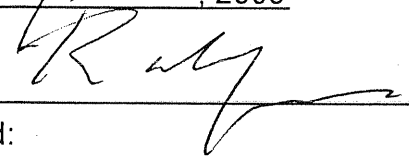
I live at: 89 Bayard St.

Contact information:
Telephone(s): 212-233-6612 email: _____

I wish to state: Bad for Business

Date: 10/3, 2006

Attach additional sheet[s] if necessary)

Signed: 

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on Oct 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: CAROL TSAO

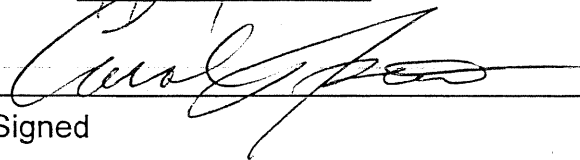
I live at: 36 MOTT STREET
NEW YORK N.Y. 10013

Contact information:
Telephone(s): (212) 267-5765 email: _____

I wish to state: Badly effect our community
business.

Date: 9/29, 2006

Attach additional sheet[s] if necessary)


Signed

Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY-11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

The last date for submission of written testimony is **October 24, 2006.**



順源西藥房

canalberry pharmacy

Thuan Nguyen cũ

84 Mulberry Street
New York, NY 10013

Tel: (212) 619-6190
Fax: (212) 619-6191

With regard to the Public Hearing on the DEIS to be held

I live in or near the "Security Zone" and I cannot attend
October 4, 2006. I am therefore submitting this written

My name is: MIKE LAM

I live at: 84 MULBERRY ST.

Contact information:

Telephone(s): (212) 619-6190 email: _____

I wish to state: affects business on Mulberry st.

& surrounding area

Date: 10/03, 2006

Attach additional sheet[s] if necessary)

Signed: _____

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held

I live in or near the "Security Zone" and I cannot attend on October 4, 2006. I am therefore submitting this written testimony.

My name is: _____

I live at: _____

Contact information:

Telephone(s): _____ email: _____

I wish to state:

Bank Row closed has affected my business.

Date: 9-29, 2006

Attach additional sheet[s] if necessary)

[Signature]
Signed _____

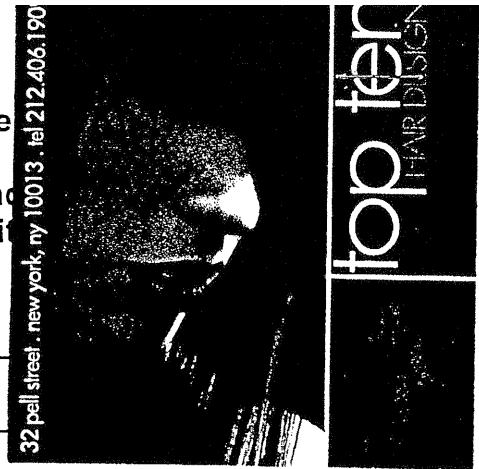
Mail, fax or email copies of your written testimony to the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

The last date for submission of written testimony is **October 24, 2006.**



With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Danny Lee

I live at: 71 Mott Street
L.S. Electronic

Contact information:

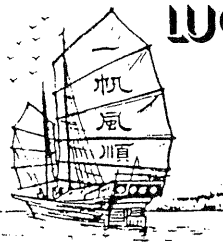
Telephone(s): _____ email: _____

I wish to state: Police Headquarters should
move to Brooklyn!
Very bad for business

Date: _____, 2006

Danny Lee

Signed:



LUCK SHING CORP.

China Fine Arts & Crafts

(212)227-6820

71 Mott Street,
New York, N.Y. 10013

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: _____

I live at: _____

波記潮州小食
NEW BO KY RESTAURANT, Inc.
金邊粿條、粉、麵、飯、粥
SPECIAL SEAFOOD NOODLE SOUP
PHỞ, HỦ TIẾU, NAM VANG, TRIÊU CHÂU

Contact information:

Telephone(s): _____

78-80 BAYARD STREET
NEW YORK, N.Y. 10013

TEL (212) 406 2292
FAX (212) 285 2670

I wish to state: _____

Bad For business

Date: 10/2, 2006

Attach additional sheet[s] if necessary)

Signed: _____

New Bo - Ky

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: _____

I live at: _____



英皇時裝公司 **貨專**
Wong Fashion Outlet Inc. **真售**
零售 **名廠**
通批 **價實**
全發

Tel: 917-579-8808

82B Mulberry Street, New York, NY 10013

Contact informa
Telephone(s): _____

I wish to state: _____

Very bad for business

Date: 10/3, 2006

Attach additional sheet[s] if necessary)

Signed: *Suk Au Wong*

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: CUONG-B. LY

I live at: 87 Mulberry St. Chinatown

Contact information:

Telephone(s): _____ email: _____

I wish to state: Very bad for business

Date: 10/3/06 (2006)

Attach additional sheet[s] if necessary)

Signed: *Cuong B. Ly*

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: _____

I live at: _____



Asia Market Corporation

Contact information:
Telephone(s): _____

Bradford Kwong

71 1/2 Mulberry Street, New York, NY 10013
Tel: (212) 962-2028 / 962-2020 Ans. & Fax: (212) 962-3391

I wish to state: _____

bad for business

Date: 10 - 3, 2006

Attach additional sheet[s] if necessary)

Mother C.

Signed:

Mail, fax or email copies of your written testimony to **both** the addresses below:

<p>Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org</p>	<p>Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org</p>
---	--

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: _____

I live at: _____



美麗禮品公司

H.P.T. GIFT SHOP

Assorted Hand Bags & Scarves
Sweat Shirt, T-Shirt, Hats & Ties
Wholesale or Retail



Contact info Telephone(s)

55B Mott Street,
Chinatown, NY 10013

Open 7 Days A Week
Tel.:(212) 406-9166

I wish to state: _____

Bad for business

Date: 10/1/06, 2006

Attach additional sheet[s] if necessary)

Signed: _____

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be |

I live in or near the "Security Zone" and I cannot atte
October 4, 2006. I am therefore submitting this writt

莊 酒 白 太
MARK'S WINE & SPIRITS INC.
Retail Wine & Liquor

My name is: _____

53 MOTT STREET
NEW YORK, NY 10013

TEL: (212) 962-1993
FAX: (212) 962-1982

I live at: _____

Contact information:

Telephone(s): _____ email: _____

I wish to state:

The closing of Park Row has
been terrible for business

Date: 10/3 2006

Attach additional sheet[s] if necessary)

Signed: Adam Chan

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

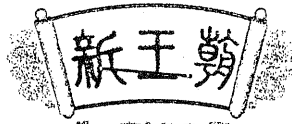
You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Pl

ber 4, 2006:

I live in or near the "
October 4, 2006. I ar

新 精
派 緻
風 小
格 食



chenoodle
79 Mulberry St.,
New York N.Y. 10013
Tel: 212-349-1495
212-331-3939

粥 各
粉 式
麵 飯
飯 品

c Hearing in person on

My name is: _____

I live at: _____

Contact information:

Telephone(s): _____ email: _____

I wish to state: Not good for business

Date: 10-3-2006

Attach additional sheet[s] if necessary)

Handwritten signature

Signed:

Mail, fax or email copies of your written testimony to both the addresses below:

Table with 2 columns: Inspector Anthony Tria (Capital Construction, NYPD, 620 Circle Drive, Suite B, Fort Totten, NY 11359, Fax 718 281 1593 atria@nypd.org) and Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling (99 Hudson Street, 12th Floor, New York, New York 10013, Fax 212-966-4303, kkimerling@aaldef.org)

You can also email your written testimony to: ctownissues@gmail.com. We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Se
October 4, 2006. I am 1

hearing in person on

翠園藝品公司
JADE GARDEN ARTS & CRAFTS CO.

紐約華埠茂比利街76號 (堅尼路金門公司左邊)
76 MULBERRY ST., NEW YORK, NY 10013
TEL: (212) 587-5685 · FAX: (212) 732-8038

My name is: _____

I live at: _____

經營：陶瓷、玉器、字畫、禮品、大宗進口宜興紫砂花盆、
茶壺、雕塑、洛陽唐三彩，價格特平，歡迎零售、
批發。

Pottery & Porcelain, Jade Carvings, Chinese Paintings & Calligraphy,
Black Wood Carvings, Tricolor Pottery of Tang Dynasty
The Yixing Violet Sand Earthen, Wares, (Flower Pots and Tea Pots)

Contact information:


Telephone(s): _____ email: _____

I wish to state: _____

Bad for Business.

Date: 10/03, 2006

Attach additional sheet[s] if necessary)

Signed: 

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

關於 2006年 10月 4日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月4日親自
如此, 我在此加上該書面證言.

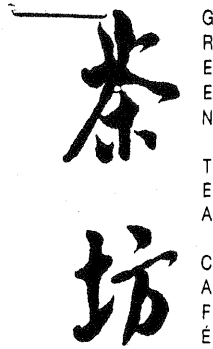
我的姓名是: _____

我居住在: _____

聯絡: _____

電話: _____ 電信地址: _____

45 Mott Street, New York, NY 10013
Tel: 212-693-2888 Fax: 212-693-0611



我願意表明: Very bad for business

日期: 10/22/, 2006年

(如需要, 請附加紙件)

WJL
簽名

請于以下地址郵寄, 傳真或電傳您的證言:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: _____

I live at: _____

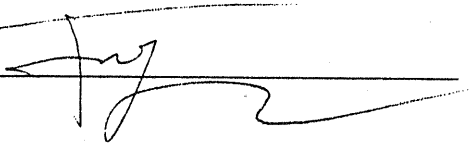
Contact information:
Telephone(s): _____ email: _____



I wish to state: No Good for Business

Date: 10/22, 2006

Attach additional sheet[s] if necessary)

Signed: 

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

關於 2006年 10月 4日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會。
如此，我在此加上該書面證言。

我的姓名是: _____

我居住在: _____

聯絡: _____

電話: _____ 電信地址: _____

我願意表明: Very bad for my business



紐約華埠勿街五十六號

Business Hours:
Mon. - Fri. 11AM to 2AM
Sat. & Sun. 9AM to 2AM

NEW WONTON GARDEN
56 Mott Street
New York, NY 10013
Tel: (212) 966-4886

日期: 10/22, 2006年

(如需要, 請附加紙件)

簽名

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

關於 2006年 10月 4日舉行的聽眾會:



HAPPY TIME CAFE

我局住在或靠近“保安特區”而不能于2006年10月4日親自參加該聽！
如此，我在此加上該書面證言。

我的姓名是: _____

我居住在: _____

聯絡: _____

電話: _____ 電信地址: _____



51 Bayard Street
New York, NY 10013

212-732-2395

7 DAYS A WEEK:
11:00 am - 2:00 am

我願意表明: Very Bad for Business

日期: 10/22, 2006年

(如需要, 請附加紙件)

簽名

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

DEIS to be held on October 4, 2006:

cannot attend the Public Hearing in person on
ig this written testimony.

大鵬運 海鮮酒家

LONG LIFE TO YOU 壽

Contact information:

Telephone(s): _____ email: _____

I wish to state: No good for business!

Date: 10/22, 2006

Attach additional sheet[s] if necessary)

Signed: Alan Yau Chein

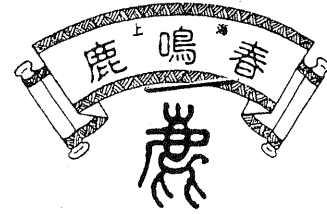
Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

關於 2006年 10月 4日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年
如此, 我在此加上該書面證言.



Joe's Shanghai

RESTAURANT

www.JoesShanghaiRestaurant.com

我的姓名是: _____

我居住在: _____

聯絡:

電話: _____ 電信地址: _____

我願意表明: No Good for Business

日期: 10/22, 2006年

(如需要, 請附加紙件)

簽名 [Signature]

請于以下地址郵寄, 傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

關於 2006年 10月 4日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月4日親自參加該聽眾會。

如此, 我在此加上該書面證言。

Tel: (212) 766-3773
Fax: (212) 766-3981

我的姓名是: _____

我居住在: _____



安 寧 西 藥 房

UNITED HEALTH PHARMACY INC.

接受各類醫藥咭配藥
現金配藥一律九折優惠

聯絡:

電話: _____ 電信地址: _____

紐約華埠白蘭沙白街四號
4 Elizabeth St., New York, NY 10013

我願意表明:

Open the street
Bad for business.

日期: 10/22, 2006年

(如需要, 請附加紙件)

X _____
簽名

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

Civic Center Residents Coalition

惠民大藥房



Bayard L.C. Pharmacy Corp.

紐約擺也街六十二號

62 Bayard St., N.Y., NY 10013

Tel.: (212) 219-8116 Fax: (212) 219-8115

TRACY CHAN R.Ph.

陳綺雯 藥劑師

歡迎詢問·醫藥問題

接受老人醫藥卡，多種醫藥保健卡

關於 2006年 10月 4日舉行的聽眾會:

我局住在或靠近“保安特區”而不能于2006年 10月
如此，我在此加上該書面證言。

我的姓名是: _____

我居住在: _____

聯絡: _____
電話: _____ 電信地址: _____

我願意表明: Very bad for business!

日期: _____, 2006年 (如需要, 請附加紙件)

X Agel
簽名

請于以下地址郵寄、傳真或電傳您的證言:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

您亦可電傳傳您的證言到: ctownissues@gmail.com.

我們將代轉給檢查官 Anthony Tria 及 AALDEF.

With regard to the Public Hearing on the DEIS to be held

“買得滿意, 食得開心”

I live in or near the “Security Zone” and I cannot attend
October 4, 2006. I am therefore submitting this written t

點心燒賣 水餃鍋貼 各式粽粽 南北風味 佳節美食

美美食品公司

35 Pell Street | New York | New York | 10013
Tel: 212-267-0733 212-267-0744 Fax: 212-406-9801
Email: sales@maymayfood.com

My name is:

Jason Hung

I live at:

170 PARK ROW #16C NEW YORK
NEW YORK 10013

Contact information:

Telephone(s):

(212) 267-0733

email:

jh.maymay@yahoo.com

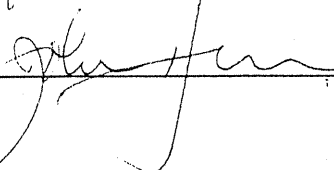
I wish to state:

that since the Sept 11. the block off traffic from
the city hall to Chinatown is bad. people can not
walk to Chinatown for lunch and shopping during lunch
hours. have a big impact on our Chinatown business.
I don't think block off PARK ROW is GOOD FOR CHINATOWN
FOR ALL KINDS OF REASON!

Date: 10/22, 2006

Attach additional sheet[s] if necessary)

Signed:



Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: RIVIN CHAN

I live at: 180 PARK ROW #4B

N.Y. N.Y. 10038

美國 宏安公司 紐約
FONG INN TOO INC.
46 Mott Street, New York, NY 10013
Tel: (212) 962-5196

Contact information:

Telephone(s): 212-962-5196 email: _____

I wish to state: I WITNESS A POLICE OFFICER WITH A PLACARD PULL INTO A PARKING METER RIGHT BEHIND A WOMAN THAT WAS GOING TO PARK AT THAT METER AND TOLD THE WOMAN I AM A COP YOU CANNOT PARK HERE. I'VE ALSO WITNESS OTHER POLICE OFFICER & COURT OFFICER PULL RIGHT BEHIND OTHER CARS THAT WERE GOING TO PARK AT THE METER AND DON'T SAY A WORD PUT THEIR PLACARD IN THE WINDSHIELD AND WALK AWAY. FIRST THEY ^{DON'T} PAY THE METER SO THE CITY LOSES OUT ON THE MONEY. THEY PARK AT THE METER FROM 4 TO 15 HOURS SO I HAVE TO BELIEVE (N.Y.S.) NEW YORK CITY & STATE IS A POLICE STATE?

Date: 10/3, 2006

Attach additional sheet[s] if necessary)

Rivin Chan

Signed:

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

My name is: Thomas Lee, Jr.

I live at: 94 Bayard St and my
business address @ Mulberry St.

Contact information:
Telephone(s): 212-233-4148 email: _____

I wish to state: That businesses in Chinatown
consider the drive down Mott St. almost
like a ramp off the highway. Driving
south on Mott takes traffic away
from ~~Mott St.~~ Chinatown when it dead
ends on Park Row

漢美肉公司
Han May Meat Co.

Since 1948

Date: 10/3/2006

[Signature]

Signed:

價廉物美
羊鴨雞蛋
鮮雞豬牛
本號常備

69 MULBERRY STREET
(Corner Bayard St.)
New York, N. Y. 10013
Tel: (212) 233-4148

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718-281-1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
---	---

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

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www.chinatownicecreamfactory.com
info@chinatownicecreamfactory.com



Christina Seid Philip Seid

With regard to the Public Hearing on the DEIS to be held

I live in or near the "Security Zone" and I cannot attend
October 4, 2006. I am therefore submitting this written

My name is: PHILIP SEID

I live at: 65 BAYARD ST
N.Y.C. N.Y. 10013

Contact information:
Telephone(s): 212 6084170 email: _____

I wish to state: Park Row should be
restored to pre 9-11 situation.
It is difficult for businesses and
residents for all the unnecessary restrictions

Date: 10-27, 2006 Attach additional sheet[s] if necessary)

Signed: Philip Seid

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281 1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
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99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I am attending the hearing in person on October 4, 2006. I am t

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My name is: _____

I live at: _____

Contact information:

Telephone(s): _____ email: _____

I wish to state: Without vehicular traffic,
amount of people, vehicles, customers hasnt been
the same. loss of speedy emergency service.
The loss of the Park Row Exit on the Brooklyn
Bridge has a huge negative impact. it formerly
brought business directly into Chinatown; now it is
rerouted everywhere else. Missing 400 car municipal
parking lot, it has definitely affected business.

Date: 10/3, 2006

Attach additional sheet[s] if necessary)

Signed: Sue.

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax 718 281-1593 atria@nypd.org

Asian-American Legal Defense and Education Fund
(AALDEF) - attn: Ken Kimerling
99 Hudson Street, 12th Floor
New York, New York 10013
Fax 212-966-4303
kkimerling@aaldef.org

You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.



PARENTS TEACHERS ASSOCIATION, INC.

8 Henry Street
New York, NY 10038
(212) 587-5634

Dear

As President of the PS1 Parent Teacher's Association, I represent over 600 students and families attending our school. We have about 600 students traveling in and out of the school, crossing our streets.

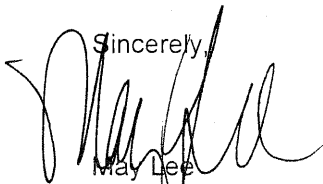
The enclosed petition represents our plea for the safety of our children. We are opposing the proposed plan to reverse the Oliver Street traffic direction. This reverse of traffic direction onto Oliver and into Madison Street will be a threat to the safety of our children crossing these streets. Not only is this a safety threat to our children but also to the heavy senior population that resides nearby. Many walk with canes and special walkers. Please do not wait till something tragic to happen to acknowledge the dangers.

PS1 is surrounded by the streets of Henry, Catherine, Madison and Oliver. The parents are already struggling with the potential dangers of heavy traffic coming through the narrow streets of Catherine and Henry. We've seen buses and trucks get stuck on the curbs.

With the added traffic on the small street of Oliver as a result of the DEIS will mark all 4 corners of PS1 a danger zone for crossing. Therefore, we are in strong opposition of the proposed change on the direction of traffic on Oliver Street.

Thank you for considering the safety of our children.

Sincerely,



May Lee
President,
PS1 RTA

TESTIMONY SUPPORTING THE PARK ROW RESOLUTION & CRITICISM OF THE PARK ROW
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS), 9/26/06, Submitted by Jeanie Chin
Member: Chatham Towers Board, Civic Center Residents Coalition and CB#3, Community Outreach Task Force on
Transportation Issues

Five years ago after 9/11, the NYPD closed Park Row a major road downtown that linked the Lower East Side/Chinatown and Downtown Manhattan communities. After many legal battles, the NYPD has finally completed a long awaited Draft Park Row Environmental Impact Statement (DEIS). The DEIS is an insult to our intelligence and common sense. It demonstrates no understanding of the cumulative effect of changes that have transformed our communities with street closures that encompass an area larger than the WTC site. There is a failure to address the entire NYPD security program and arbitrary limitation of the traffic study area.

The DEIS is riddled with data that is missing, misleading and manipulated to produce conclusions that are incomplete and inaccurate. Incorrect traffic volumes are used, unsolved cases of missing vehicles, all impacts under-reported, traffic model not released, parking entirely shortchanged, transit info distorted.

To cite just one example – the Park Row exit ramp from the Brooklyn Bridge that was closed, formerly processed 500 to 700 or more vehicles an hour onto Park Row North. Its closure in 2001 diverted them somewhere. Nowhere in the DEIS is this discussed.

Conditions beyond 2006 are totally ignored in the DEIS. No mention of the redevelopment of Lower Manhattan and Downtown Brooklyn projected to bring 100,000 workers alone to the WTC site and to a closed Park Row.

No mention or study of the effects of the closing of traffic lanes by the NYPD on the Brooklyn Bridge and its impact on traffic as far north as the FDR Drive and the impact as vehicles barrel through local streets to avoid the already heavy traffic congestion.

Under-reporting of vehicles calls into question the air/noise pollution data. How will this additional traffic impact emergency vehicle response times?

With Park Row closed, narrow Worth Street has been transformed into one of Downtown's few crosstown streets. How will this affect future growth?

Police Headquarters claims that it must have a buffer zone that no other terrorist target in the city has. Commissioner Kelly has criticized former Mayor Guiliani's decision to locate the OEM at 7 WTC, next to a known terrorist target, the Twin Towers. Isn't Police Headquarters also located next to known terrorist targets – the Brooklyn Bridge, City Hall, the Courthouses, 26 Federal Plaza? Is it wise to locate all the eggs in one basket rather than decentralize?

The NYPD's DEIS is a self serving document, a mockery of a long process in our communities. I leave you with one DEIS suggested mitigation to accommodate the traffic congestion at Chatham Square and along Worth Street – adjust the traffic signal by one second. Let reason prevail open Park Row and move Police Headquarters to a site where they can have all the buffer distance and parking that they want.

With regard to the Public Hearing on the DEIS to be held on October 4, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on October 4, 2006. I am therefore submitting this written testimony.

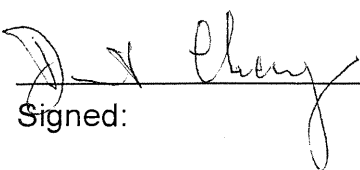
My name is: DAVID CHENG

I live at: 170 PARK ROW, APT. 10C
NEW YORK, NY 10038

Contact information:
Telephone(s): 212-227-3461 email: DAVID CHENG @ AOL.COM

I wish to state: (SEE ATTACHMENT)

Date: 10/10, 2006 Attach additional sheet[s] if necessary)


Signed: _____

Mail, fax or email copies of your written testimony to **both** the addresses below:

Inspector Anthony Tria Capital Construction NYPD 620 Circle Drive, Suite B Fort Totten, NY 11359 Fax 718 281 1593 atria@nypd.org	Asian-American Legal Defense and Education Fund (AALDEF) - attn: Ken Kimerling 99 Hudson Street, 12 th Floor New York, New York 10013 Fax 212-966-4303 kkimerling@aaldef.org
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You can also email your written testimony to: ctownissues@gmail.com.
We will forward your testimony to Inspector Anthony Tria and AALDEF.

Written Testimony for DEIS

David C. Cheng

I am a local resident, the president of a local real estate company and the C.E.O. of a community bank in Chinatown. I am familiar with the Chinatown business community because it is part of my responsibility to keep track of the economic vitality of the local community.

(A) Impact Socioeconomic Conditions

I would like to first address the impact of the Park Row closure on the Socioeconomic Conditions of the neighborhood. Given my close observation of the local business community, I am absolutely shocked by the report's conclusions. The serious impacts caused by the Park Row closure on the economic health of the area are beyond dispute in Chinatown's business community. Overwhelming majority of the merchants disagree with the DEIS report's conclusion that the Park Row closure has had little impact on the local business community. Unfortunately, most local merchants also believe that it is a waste of time to fight NYPD and did not testify. The Chinese merchants and residents in Chinatown are indeed upset by the Park Row closure. But they are also resigned to the fact that they are powerless against the police department. I personally hope that they are wrong.

In spite of the Chinese merchants' reluctance to testify, it should not be difficult to confirm the resentments of the community. However, the DEIS investigators made use of public data that are often not directly relevant to the study, and conducted an unscientific survey of about 20 local merchants, a woefully inadequate sample size for statistical analysis. The DEIS then reached conclusions that are not objectively supported by data. In cases where the decline of local business are too apparent to ignore, the DEIS simply attributed the decline to the 9/11 attacks and a host of other contributing factors without objective analysis. As a former scientist with forty years of experience in statistical analysis, it is obvious that such an inappropriate use of data would only lead to inconclusive findings. What I found shocking, however, is that the report then proceeded to use these inconclusive findings to justify their claim that there is little or no impact on the business community or on the lives of local residents.

Overall, the DEIS is a seemingly impressive report that appears to be supported by a massive amount of data. However, a closer look at the report reveals that the connection between the data and claims is superficial at best. These problems are pervasive in the report, and too numerous to cite in this testimony. Instead, I shall illustrate these problems with a few examples from the report:

Example #1:

On page 4-20, the report claims that

"...Chatham Towers and Chatham Green Houses, are both Mitchell Lama co-ops, which are not susceptible to changes in property values due to market forces. Mitchell Lama co-ops are typically not bought and sold in the regular real estate market, but rather the shares are sold back to the co-op board."

This is simply false. There is no restriction on the sales of apartments in either co-op. These apartments are definitely susceptible to changes in property values due to market forces, contrary to the claims made in the report. At best, the research was done haphazardly without proper checking of facts.

Example #2:

The decline in socioeconomic activities is attributed to the 9/11 attacks in several sections of the report. There is no question that the 9/11 attacks had significant impacts on the local business community. However, the role of DEIS investigators is to separate the different contributing factors, and to determine how the Park Row closure has impeded the recovery of the neighborhood's socioeconomic health from the 9/11 attacks. The investigators of this report definitely have not met these basic goals. Instead, they attributed the severe economic impacts primarily to the 9/11 attacks, in addition to a host of other contributing factors. The primary issue that is not properly addressed by the report is how the Park Row closure has affected the recovery from the 9/11 attacks. The report's conclusion that closure of Park Row is a minor contributing factor to the decline of the neighborhood is made without objective analysis or justification.

On the tourism industry, the report claims (on page 4-44) that:

"...the street closures resulting from the One Police Plaza security plan have therefore not had a significant adverse impact on the operation or viability of the City's tourist industry. Therefore, the action does not have the potential to affect the operation and viability of the City's tourism industry."

This claim has little bearing on the local problems addressed by this DEIS. No one claims that the Park Row closure has affected the tourist industry of the entire city. This is an example of inappropriate use of data made by the investigators to support NYPD's claims.

On the local tourist activities, the report claims that:

"Although there are some complaints that Chinatown has suffered disproportionately in terms of tourist activity, that would appear to be an effect of the September 11 attacks which has been felt throughout the tourism industry and not just in Chinatown, and these negative effects seem to have lessened with time."

This is one of many examples of the use of the 9/11 attacks to justify NYPD's claims. The proper question is not whether the 9/11 attacks affected the decline of the tourist activities, but how to separate the impact of Park Row closure from other contributing factors to the recovery from the 9/11 attacks. The report has made no attempt to separate the effect of these contributing factors. The conclusion that the Park Row closure has little impact on the local tourist activities has no supporting evidence in the report, and this conclusion is unjustified.

Example #3:

On page 4-44, the report drew the following conclusions:

"The action has not resulted in significant adverse impacts for all areas considered in the socioeconomic analysis."

*"Moreover, although it appears that the security zone may have contributed to the general decline in business conditions in those areas nearest the security zone, business survey results **do not conclusively** indicate that proximity to the security zone is the sole cause of this decline in business. The security zone has also not adversely affected the viability of the Chinatown retail and restaurant sectors, which continue to be a major draw for both residents and tourists."*

These conclusions are not supported by the data presented in Chapter 4. A careful reading of Chapter 4 reveals that the data presented are either not directly relevant to the issues discussed or totally inadequate to justify these conclusions if interpreted objectively by investigators.

(B) Alternatives

Next, I'd like to address the "Alternatives" (in Chapter 12).

The report accepts, without any question whatsoever, the decisions of the NYPD in all matters related to security. One such example, on the alternative for Chatham Green parking lot, the report stated on page 12-9:

"This proposed alternative was reviewed and evaluated by NYPD's Counter Terrorism Bureau and it was determined that this alternative would not allow sufficient stand-off distance between NYPD headquarters and the Chatham Green Houses parking lot."

Such an uncritical acceptance of NYPD's decision is troublesome because there are serious conflicts of interest in these decisions. When the local residents questioned NYPD on their use of Park Row for private cars after Park Row was closed, a NYPD spokesman responded that the parking space on the full length of Park Row are needed to satisfy their contractual obligation with the union. This statement supported many residents' belief that NYPD confiscated a few hundred feet of standoff distance on the north side, but only about one-tenth of this distance on the south side, not because they needed this long standoff distance for security, but because they wanted more parking spaces. No other terrorist target, including FBI, CIA, and courthouses, has remotely the amount of standoff distances the NYPD has acquired on the north side. Pressures from the court and several legislators, and finally Mayor Bloomberg's decision to allow buses on Park Row, eventually resulted in the removal of private cars from Park Row. But this is an example of conflicts of interest that is bound to occur when an institution is the sole decision maker on matters that affect them. When such a conflict of interest exists, it is paramount that a third party, such as a counter terrorism bureau from a federal agency, make an independent assessment whether the long standoff distance is justified in light of the severe impacts it has on the neighborhood.

On the alternative of relocating the police headquarters, the report reiterated all the claims made by the NYPD, without any critical analysis on whether those claims are appropriate to the situation.

For example, the report stated on page 12-7 that:

"Given the functions hosted by One Police Plaza, and the close coordination required between the NYPD and the criminal justice system, it is essential for the police headquarters to be located within close proximity to the court facilities and detention centers, as well as the seat of government."

The DEIS accepted the claim that "it is essential for the police headquarters to be located within close proximity to ... the seat of government" without any effort in objective investigation. It took me fifteen minutes of on-line investigation to find a counter-example to this claim. In the fall of 1997, the Boston Police Department (our nearest major metropolitan area) moved its headquarters to a site three miles away from Boston City Hall. Such a distance is acceptable because the advances in modern telecommunication have significantly reduced the importance of physical distance. The fact that Boston Police Department had an opportunity to move close to

the "seat of the government", but chose not to do so clearly demonstrates that NYPD's proximity claim is not critically important.

In the time of war against terrorism, the need for security is much more important than the need to be close to the seat of government. So the case for moving the NYPD headquarters to a more secure location is in fact much stronger after the 9/11 attacks.

On page 12-7, the report states that:

"In addition, the relocation of police headquarters would be an expensive undertaking, that would require the City to spend large sums of money ..."

This is true. But this is part of the cost of the war on terrorism. In a democratic society, the cost of such wars should be borne by the society as a whole, and not by an unfortunate local community. By refusing to fund the move of the police headquarters, the government is, in effect, making the Chinatown community bear the cost of their inactions. The cost to Chinatown is both direct (such as the five-fold increase in insurance premium in Chatham Towers after the NYPD made the buildings part of the terrorist target zone) and indirect (such as deterioration of the businesses and loss of jobs in Chinatown). In an open society, this is blatantly unfair to the local community. It would be unthinkable that the NYPD could get away with such condescending attitudes if the police headquarters were located on Park Avenue instead of Park Row. NYPD's claim of a lack of money for such a move is disingenuous. If funding for this move is a real issue, the NYPD should have applied for funds from the state and federal governments as part of the war on terrorism. This, they have not done.

On page 12-8, the report states that:

"Given the presence of a number of other sensitive facilities within the security zone..., all of which would still remain if police headquarters are relocated, it would be necessary to maintain some, if not all, of the current security measures in the area."

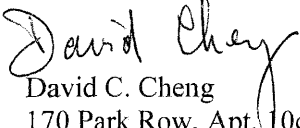
This is true and anticipated. However, these other facilities currently do not have the enormous buffer zone confiscated by the NYPD, and will not have such buffer zones unless they close a large number of streets, resulting in a partial shutdown of the entire downtown neighborhood. That is an extremely unlikely scenario. Therefore, the protective measures needed after the relocation of the NYPD would not be anywhere as drastic to Chinatown and would not require the closure of Park Row.

This is yet another example of statements made in DEIS to justify the NYPD's claims, rather than arriving at a conclusion through objective analysis.

(C) Summary

In general, the seemingly comprehensive DEIS report is focused on supporting the claims made by NYPD. The DEIS has presented a seemingly impressive amount of data. But there is very little effort in gathering statistical data that are objective and relevant to the case, and even less effort in analyzing the data to reach truly independent conclusions. Instead, the DEIS made use of data mainly to support conclusions favorable to the NYPD.

On the alternative of relocating the NYPD headquarters, the DEIS simply repeated all the claims made by NYPD without any serious investigation. A neutral, objective analysis would find that this alternative deserves consideration, and should be pursued by the government as a potential solution both to satisfy NYPD security needs and to alleviate the serious problems caused by Park Row closure.


David C. Cheng
170 Park Row, Apt. 10c
New York, NY 10038

October 10, 2006

美 國 紐 約 中 華 公 會

CHINESE COMMUNITY CENTER, INC.

CHINESE CONSOLIDATED BENEVOLENT ASSOCIATION

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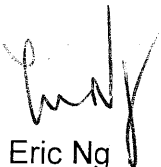
Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359

Dear Inspector Tria,

CCBA was established in 1883, and has functioned as Chinatown's representative to this day. We work closely with the NYPD on many issues, and appreciate their hard work in making Chinatown streets safer. However, after reviewing the Draft Environmental Impact Statement (DEIS) we have determined that there are many discrepancies with regard to Socioeconomic conditions, real estate values, and the lack of a rapid and direct route to Downtown Hospital. We urge you to review once again, this DEIS, and correct the discrepancies that so grossly misrepresent our neighborhood.

The reopening of Park row is one of the major priorities of Chinatown Businesses and the community. We cannot accept this DEIS in this draft form.

Sincerely,



Eric Ng
President

Cc: Asian-American Legal Defense and Education Fund (AALDEF)

Oct. 17, 2006

Inspector Anthony Tora
Capital Construction
NYCD
620, Cerch Drive, Suite B
Fort Totten, N.Y. 11359

I would like to address how the lack of parking impacts on the traffic congestion in and around Chinatown.

Cars and Trucks constantly cruise around looking for parking.

This slows traffic and adds to congestion and all the horrors attendant to it.

Reconfiguring of the streets in Chinatown will not ease traffic flow or contribute to the security for anyone - without the availability of affordable parking.

I am opposed to the widening of St James Place for the purpose of accommodating extra traffic.

There is more than enough road access west of Broadway to accommodate the transport of construction materials to the Freedom Tower site.

Chinatown should not have to bear this extra burden. We should not have to contort our lives to accommodate other community's convenience.

The Municipal Garage has been off limits to the public for years - currently for security reasons. If present day technology and tactical know how is not adequate in maintaining security - then another municipal garage needs to be built.

After all we live and work in an area
that is the heart beat of the city where
necessary business needs to be conducted.

A municipal parking facility is indispensable
to a civic center and its surroundings.

Currently N.Y. Downtown Hospital has lost
its parking area.

If for some reason the subway system becomes
grounded - how would the hospital personnel
make it to work to man the only hospital
that serves this downtown area.

Parking issues need to be addressed
before any consideration of reconfigurations!

Yours truly,
Dorothea Thom
165 Park Row
New York N.Y. 10038
e mail DOTH.06888

**ANNE K. JOHNSON
7 ST. JAMES PLACE, # 10-I
NEW YORK, NY 10038**

October 14, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

Dear Inspector Tria:

I live in Smith Houses on St. James Place behind the Police Headquarters. I travel through Chinatown and the Civic Center Area around Police Headquarters. I reject the Draft Environmental Impact Statement (DEIS) on Park Row which claims that the closing of Park Row has little impact on our neighborhood.

The traffic on St. James Place since 9/11 has been horrible to say the least. We put up with it for a while because we knew that our city had been attacked. However, now the Police Department wants to take away parking on St. James Place between Madison Street and Oliver Street and make additional lanes of traffic on that street. This is because even though a court of law has ruled that you must open Park Row to traffic again, you have refused. You seem to think that more traffic on St. James Place will not have a terrible effect on an already overburdened neighborhood. St. James School is on St. James Place in that block. The children at the school have no gym, and are forced to play on James Street at St. James place. The air quality will be severely negatively impacted by your plan. There is also a children's playground across the street behind Chatham Green Housing Development. The asthma rate in this neighborhood is very high among children, and the traffic has made it worse.

In addition, your study recommends changing the traffic direction on Oliver Street so that the cars and trucks will go down onto Madison Street. Oliver Street is a residential street on one side, and has a school, church, and home for disabled on the other side. Madison Street is already severely over crowded due to rerouting of busses in the past and due to the many businesses further up the street. Smith Houses and Hamilton Madison House and another children's playground are on one side of Madison Street, and the P.S. 1 playground is on the other side.

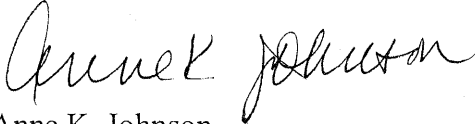
Your refusal to properly study the area, asking only 22 merchants out of thousands in and around the Chinatown area, asking no residents of Smith Houses, no members of the local churches, tenant associations, school PTA's, etc. is at best unfortunate. What it really is, in my opinion is **racist!** Most of the people who live in our neighborhood are so called "minorities". Just what were you thinking! Do you think you could get away with this in a "white, middle class" neighborhood? I don't think so.

In addition to closing Park Row, you took over the Municipal Garage several years ago which was very needed by this entire community. Now that you have opened the garage to police

vehicles the police, judges, court officers, and others with placards seem to park even more on our streets, sidewalks, bus stops, and places designated for deliveries. This makes the Park Row closure even worse.

Please open Park Row to traffic as it was before 9/11. Please also restrict the parking of private police vehicles and judges' and court officers' private vehicles on the streets and put them into the parking garage that you took away from the neighborhood several years ago.

Sincerely,

A handwritten signature in cursive script that reads "Anne K. Johnson". The signature is written in black ink and is positioned above the printed name.

Anne K. Johnson

Anthony Tria

From: Roberta Singer [roberta.singer@juno.com]
Sent: Sunday, September 10, 2006 4:18 PM
To: atria@nypd.org; kkimerling@aaldef.org
Subject: public hearing
Attachments: Environmental Impact Study testimony.doc

Please find attached my letter regarding the DEIS.

Roberta L. Singer, Ph.D.

Roberta L. Singer
77 Fulton Street #16f
New York, NY 10038
212.285.1736
roberta.singer@juno.com

September 10, 2006

To whom it may concern:

I am unable to attend the public hearing because limited mobility prevents me from walking to the meeting site and the NYPD street closings have forced a re-routing of the only bus that would get me there.

Limited mobility makes it extremely difficult to negotiate the subway steps, thus, when circumstances do not permit me to take the bus, I drive. Construction on nearly every street in this area, NYPD headquarters' barricades and street closures, and police officers' cars parked on the streets reducing the number of travel lanes, combine to make it time consuming, frustrating and often dangerous (for pedestrians and drivers) just to get into and out of the area. Even before 9/11 this area had a fair amount of congestion, but going and coming was not hampered by all the above factors.

The day and night construction is noisy, dirty, and air-polluting, adding to the already problematic issues of air quality down here. (Two years ago I was diagnosed with an asthmatic condition as a result of 9/11.) I understand the need for street digging and building construction, but the degree of it, compounded with all the other factors have greatly diminished the quality of life here. I love this neighborhood and the Southbridge Towers community, but living here has very often become very difficult.

The traffic congestion makes it difficult for emergency vehicles to get to their destination and thus they use their sirens and claxons loudly and continuously; the noise is deafening. On beautiful days when I would like to keep the windows and terrace door open I am forced to close them and use the AC--not an environmentally or economically sound solution.

Finally, it hardly inspires confidence in the police department when we see them closing streets a couple of blocks surrounding their headquarters and hiding behind barricades. If there is even a possibility of moving NYPD Headquarters out of this area to one less densely populated and congested it would go a very long way to resolving many of this area's problems.

Thank you very much for your consideration of these issues.

Sincerely,

Roberta Singer

Sept. 9, 2006

With respect to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in the "Security Zone" and I cannot attend the Public Hearing in person on September 14, 2006. Therefore, I am submitting this written testimony.

My name is:

I live at:

e-mail address:

I wish to state: The events of 9/11/2001 have been a mixed blessing in a way. I was watching the twin towers collapse in China on that fateful date. When I came back at the end of September, 2001, I had to be escorted to get back to my home. That was the initial inconvenience. The ambient air was smelly, with a certain unpleasant odor, for a long time. Would that have a health impact on us? It'll be hard to assess. Definitely, all those relief workers at the site sustained adverse health effects. Anyone with common sense would be able to tell, not needing the Mayor's prophecy that there was no linkage. This I have to disagree with him.

The immediate and nagging, negative longer-term impact of the disaster has been the traffic. Because of the closing of Park Row beneath the police headquarters, all traffic leaving lower Manhattan turned bad. There has been constant congestion on Pearl Street near the Southbridge Tower residential complex, since no traffic is permitted on Park Row, coming and going through the police plaza. To say it ironically, I sarcastically often tell my friends and family that in the morning when I go to work, at the Chambers St. area, I can cross Park Row from Pace University's building with my eyes closed. But, the case is not so with the Pearl St. Frankfort Street area. It's just the opposite, with cars crawling, impatient New York drivers honking. Result: Nose and air pollution. Absolutely. Driving in and out of our complex has not been that bad, but still it's an inconvenience, since we'd have to make changes to our driving habits.

So, what's the long-term solution? Move the police headquarters. The City didn't have the foresight (nobody did at the time it was conceived, of course, as nobody ever heard of Al Qaeda, Osama, etc. then). So, 1 Police Plaza was built across Park Row right next to the Municipal Building. That's fine if Osama were never to surface. Now, it's time to move the police headquarters to a more isolated location, so it can be cocooned up. On hindsight, should the police plaza have been built in a more isolated location? Absolutely. At least it should have been built in a more self-contained manner, not risking that it could be attacked from right below it.

Anthony Tria

From: [REDACTED]@gmail.com
Sent: Saturday, September 09, 2006 4:18 PM
To: atria@nypd.org; kkimerling@aaldef.org; ctownissues@gmail.com
Cc: [REDACTED]@yahoo.com
Subject: Sept. 14 DEIS hearing
Attachments: Sept 14 Hearing.doc

Additional text -

The health impact on the rescue and relief works of the 9/11 disaster does not require more than common sense to understand. The government should give it the benefit of the doubt to treat these heroic individuals. You haven't heard of the health impact on the residents yet. It's hard to visualize how the government (the Mayor included) can sometimes say things in not-so-compassionate way. The former EPA chief is now under scrutiny for her irresponsible words. Additionally, I might want to point out that the EPA's ORD had drafted a report to address the health effects of the chemicals connected to the twin-tower collapse. I was at the public hearing where ORD invited "experts", quote unquote, to critique its report on its assessment of the various chemicals related to the incident, and their impact on human health. EPA did not collect any samples for I believe at least two weeks after 9/11/2001 (the NYPD treated the area as a crime scene?), and it had the audacity to proclaim, for pretty much all the chemicals measured, that there would be no long-term adverse health impact on human health. That's an irresponsible statement. Anyone with some common sense would have said that since he did not have the best samples, the recommendations are at best inconclusive. Footnote: EPA ORD never issued THAT report. One wonders why.

Lastly, if I should be quoted, I prefer to remain an anonymous citizen.

Anthony Tria

From: JOYCE WEST [jycwestflorida@verizon.net]
Sent: Saturday, September 09, 2006 10:58 AM
To: atria@nypd.org
Cc: kkimerling@aaldef.org
Subject: public hearing on deis 9/14/06

i wish to state that the closure of surrounding streets/police barricades has greatly impacted my quality of life in so many ways. to name just a few, my terrace door has to be closed at all times because the noise from the traffic is quite unbearable. you would not be able to speak on the phone or hear the tv if the door was left open. in addition, to say that the air quality is poor would be an understatement. i have developed many allergies of unknown origin and at one point lost 40 lbs. because of the problem. i went to three doctors, not one could determine the exact cause even after many tests were performed.

whenever i'm expecting a delivery or car service i have to hold my breath because they find it difficult getting to the area and gaining access to the building. it's become necessary at times, for me to personally go to the checkpoint to get them in.

the selling of apartments has gotten more and more difficult and if these proposed and ridiculous changes are enforced it will be all but impossible to do so, impacting us financially as well.

i could go on and on but i'm sure you get my point and will use your common sense to return this long suffering and forgotten area to normalcy.

thank you,

joyce west
resident of chatham green co-ops.
165 park row
ny 10038

With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and I cannot attend the Public Hearing on September 14, 2006. I am therefore submitting this written testimony.

My name is: Daniel Levine

I live at: 215 Park Row, Apt. 17C, NYC NY 10038

Tel: 917-676-6615 email: peckslip@verizon.net

To Whom It May Concern:

I read the Park Row/Chinatown Draft Impact Study and was extremely disturbed by the misinformation, skewing of facts, lies, land-grabbing tactics, and downright hubris of the Study.

I am a shareholder in Chatham Green, located on Park Row, and contrary to the DEIS, both Chatham Green and Chatham Towers are private-held co-op buildings, in which apartments regularly sell for over one million dollars – the "facts" stated in the Study are dead wrong. We not only have a personal stake in the neighborhood, with middle- and upper-class residents initially populating it in the early 1960s, but we also have an equity stake.

The figures stated for traffic patterns are based on old, or manipulated information. Daily, northbound traffic on St. James is backed up from the Brooklyn Bridge to Chatham Square. And daily, eastbound traffic is backed up on Worth Street from Centre Street to Chatham Square – and this is with one to two police directing traffic at Chatham Sq, and one to two police directing traffic at Brooklyn Bridge/Pearl Street. Traffic is overwhelming now, and dangerous for pedestrians, and will only get worse if this plan is implemented.

Ambulances and fire engines are often stuck in traffic, and sometimes it takes minutes to transverse one block. The "facts" given in the study are all based on off-hour statistics. Due to the closure of Park Row, the traffic, and restrictive signs, ambulances and private cars often have difficulty entering my building; at times even residents have been denied access.

These issues were raised at the presentation of the initial traffic plan, but fell on deaf and/or incompetent ears. This new Study is even worse than the original one enacted: air quality has dropped due to the traffic, noise has increased dramatically, safety is an issue, investments in real estate are being threatened, property is potentially being taken away, quality of life is being ignored, businesses have closed – and things will just get worse if this plan is instituted...this plan should be scrapped immediately.

The plan also states that trucks for the Trade Center need a wider St James street for access. Not only would our property be taken away on the St. James and Park Row sides, but we are on the east side and the Trade Center site is on the west side – seven WTC and all other construction projects have proceeded fine without infringing on our streets and our rights as residents. Also, there are two churches and three schools which would be immediately be affected by the noise, and, as the traffic now is a danger, increased traffic would create an even greater danger for children and church-goers.

We live here, we grew up and went to school here, we raised our families here – and this plan will ruin Chinatown further, possibly even destroy the neighborhood forever.

Thank you.

/s/ Daniel Levine

Anthony Tria

From: GeoffLee [noved@verizon.net]
Sent: Sunday, September 17, 2006 10:49 PM
To: NYPD CapitaConstruction; AALDEF Ken Kimerling
Subject: Fw: Park Row DEIS
Attachments: DEIS testimony.doc

----- Original Message -----

From: RW56@aol.com
To: ctownissues@gmail.com ; kkimerling@aaldef.org ; atria@nypd.org
Sent: Tuesday, September 12, 2006 10:46 PM
Subject: Park Row DEIS

Attached is written testimony I would like to submit to the public hearing on the DEIS. I am unable to make a stronger argument since the issue I comment on was not addressed in the DEIS.

Richard & Mae Wong
9 Oliver Street
New York, NY 10038

September 12, 2006

Testimony on the Security Zone DEIS

We understand that the Security Plan proposes to reverse the direction of traffic on Oliver Street from the existing northbound from Madison St to St James Place. I have reviewed the DEIS and can find no statement of rationale as to what this would accomplish or any discussion on the impact of such traffic reversal. The only thing we could find was in Chapter 12 Mitigation where in Figure 11-2 a plan of the streets at Chatham Square Oliver Street is shown with an arrow pointing opposite the present traffic direction. I can only assume that this plan shows the traffic direction the plan will provide. If this is so, the proposed change in traffic direction should be deemed arbitrary and capricious because the DEIS has given no rationale for such a change, or any discussion of the impact of such a change. It is difficult to speak out against this change without knowing what the rationale is for this change.

Being a resident and property owner on Oliver Street for over 35 years, we believe that such a change will seriously impact on the living standard of the residents of the street by increasing the traffic flow with traffic coming of Chatham Square. Access to the church and school on the street would also be hampered by this traffic reversal.

Respectfully submitted,

Richard & Mae Wong

Anthony Tria

From: Carol Towbin [caroltowb@juno.com]
Sent: Sunday, September 17, 2006 1:29 PM
To: atria@nypd.org
Cc: kkimerling@aaldef.org; ctownissues@gmail.com
Subject: DEIS

Dear Inspector Tria:

As a Chatham Green resident, I have lived since 9/11 in a so called "security zone" which offers no additional security as far as I can see. The barricade has impacted terribly on our health, safety, peace of mind and way of living.

Horrendous noise, pollution not to be believed, traffic delay, difficulty in crossing the streets (and after the lies about the quality of air for years, it is very clear that our health and safety are the last item on the political agenda.) have changed our schedules and imperiled all, especially our children and the aged. Of which I am one. I have asthma, and never, and I mean, never, open my windows on the St. James side of the building. I have often been awakened by traffic sounds coming from that side, as it is a north-south street which has had to serve in place of the closed off Park Row. Security?

Easy access by friends is a thing of the past. I take a taxi rarely, yet on occasion the drivers are reluctant to enter this policed area--as it seems to be a secret for the rest of the City. Visitors attempting to come through by car must be vetted, yet the M103 and M15 buses (we are very relieved for their restoration after years of increased difficulty in reaching our destinations) sail through and no bus travellers are questioned. And of course there is no control over the traffic on St. James.... Security?

In my own experience, a delivery truck was not permitted to enter, the delivery man had to trundle the item all the way from outside the barricade.

Requiring our City's finest (and we will never forget their valiance on 9/11) to go ten feet forward, and then ten feet back in a police car each time a car or bus wishes to emerge from the Park Row enclosure going north is laughable, considering our technical knowledge. And in the south direction, the light permitting cars to enter has been broken for I don't know how long--Is this New York City in the United States we are talking about? Delay of the arrival of emergency vehicles is unconscionable due to traffic. Security?

The entire Chinatown area is suffering financially as well as in health.

Please do not compound the awful effect of 9/11 by adding more pollution and noise and traffic problems. The DEIS was poorly researched in any number of points (we of course are not Mitchell-Lama housing) and the plan to further implement all the disadvantages above touched upon, and turn a business/residential street already overburdened with traffic, noise, pollution, into a truck route is a cruel attempt to solve a problem in the most misguided, dangerous to pedestrians, simplistic way. A more advanced solution (perhaps a tunnel on either side of the island?) not affecting any community as opposed to the blatant way the DEIS has presented its "findings" is called for.

Sincerely,

Carol Towbin
165 Park Row #21A
New York, N.Y. 10038
caroltowb@juno.com
212-732-6087

Anthony Tria

From: GeoffLee [noved@verizon.net]
Sent: Sunday, September 17, 2006 10:51 PM
To: NYPD CapitaConstruction; AALDEF Ken Kimerling
Subject: Fw: Reopen of Park Row

----- Original Message -----

From: Civic Center Residents Coalition
To: noved@verizon.net
Sent: Sunday, September 17, 2006 10:39 PM
Subject: Fwd: Reopen of Park Row

----- Forwarded message -----

From: hi2020 <hi2020@verizon.net>
Date: Sep 11, 2006 12:34 PM
Subject: Reopen of Park Row
To: ctownissues@gmail.com

With regard to the Public Hearing on the DEIS to be held on 9/14/2006.

I live in or near the "Security Zone" and I cannot attend the Public Hearing in person on 9/14, 2006. I am therefore submitting this testimony.

My name is: WAYNE WONG
I live at: 180 PARK ROW,#2A
NEW YORK, NY 10038

TEL: 212-964-5952
EMAIL: hi2020@verizon.net

I wish to state: Since the closing of Park Row for public traffic the traffic from Bowery right turn to Worth St. becomes very heavy. Crossing the Worth St. is a very difficult and very dangerous movement. Each time I have waited for the green light to start crossing but the cars keep coming from the Bowery and Mott. St. Most time I have to wait at the middle of the street to get a chance to run across the street. That's why I wish Park Row to be reopened for all public traffic so that to reduce traffic hazard at crossing Worth Street.

Date Sept. 10, 2006

Signed: Wayne Wong

--

send inquiries to: ctownissues@gmail.com

Anthony Tria

From: GeoffLee [noved@verizon.net]
Sent: Sunday, September 17, 2006 10:50 PM
To: NYPD CapitaConstruction; AALDEF Ken Kimerling
Subject: Fw: DEIS

----- Original Message -----

From: "Sabella, Vita M." <VSABELLA@stroock.com>
To: <ctownissues@gmail.com>
Sent: Friday, September 15, 2006 4:16 PM
Subject: DEIS

I live in the Southbridge Towers apartment complex on Pearl and Frankfort Sts. Since the reopening of Park Row, bus travel has been made more difficult. Where the M103 once stopped at the corner of Pearl/Frankfort Sts., is now a Staten Island express bus stop. The 103 was re-routed to Wagner Pl. by the Alfred E. Smith complex, which was only 1-1/2 block walk, but that was short-lived. We now have to walk to Park Row and Chatham Sq. to have access to the M103. The difficulty in this is more compounded by the fact that many seniors and disabled individuals reside in the Southbridge Towers complex. What was once very convenient and easily accessible for them is now a major problem for most. Not all seniors use Access-A-Ride!

Therefore, based on the above, the re-routing of buses due to 9/11 was actually a plus rather than a negative. It is the re-opening of Park Row that is the negative only because of the elimination of the M103 bus stop at Pearl St. and its inconvenient accessibility.

Thank you for your concern.

Sabella, Vita M. <VSABELLA@stroock.com>

Anthony Tria

From: RDBRUCE@aol.com
Sent: Monday, October 02, 2006 7:57 PM
To: atria@nypd.org; kkimerling@aaldef
Subject: Public Hearing on DEIS held on September 14, 2006

Dear Inspector Tria,

I was unable to attend the September 14, 2006. Please accept these comments in lieu of any oral presentation I could have made. I have lived at Apartment 21F at Chatham Green, Inc. since the building was built. Since the closure of Park Row, the noise along Saint James Place has been extremely disturbing. I feel that the reduction in the sidewalk along Saint James Place to make a three lane road, will bring the noise closer to the building and make things worse. I therefore oppose this alternative to re-opening Park Row, and restoring the traffic flow to the design which was previously in existence.

Respectfully submitted,

Ronald D. Bruce
165 Park Row, APT 21F
New York City NY 10038-1178
Home: 212-349-3779 Cell: 208-863-0897

10/4/2006

Name: Fai Cheng
I live at: 215 Park Row, #20C
New York, NY 10038
Contact Info: 718-935-5836 (work)
Email: fmcheng@us.ibm.com

I wish to state:

I find the NYPD DEIS faulted in at least a couple of areas.

Chatham Green is a market price cooperative, not Mitchell-Lama apartments. The units are worth much more than a few thousand dollars. Last year, we have a unit that sold for more than a million dollars. One of the selling points of the Co-op is that it is surrounded by a relatively quiet wide sidewalk. The proposed shrinking of St. James sidewalk would definitely affect the value of the coop.

I used to take a walk with my mom every evening around Chatham Green. We enjoyed the wide sidewalk and low noise level on Park Row. She passed away last year. Now, for the same reasons, I am taking my daughter on a stroller around Chatham Green a few times a week. I cannot imagine what St. James would look like if we shrink the sidewalk to allow one more lane for construction vehicles. I would have to stop using the sidewalk because it would be too narrow, noisy, dusty and dangerous.

I also find the proposed widening of the road very short sighted. The traffic jam is more than just this section of the road. It extends all the way up to Houston street. There are a few choke points from Bowery to Houston, including the cross streets at Canal, Delancey, and Houston. Widening the St. James section is not going to solve the congestion problem. Instead, the city should look into the use of the barge to bring in the construction material. This method was very successful when we had to remove the debris of the World Trade Center. Why not use it again? Or re-open Park Row for the construction vehicles?

Anthony Tria

From: Ken Kimerling [kkimerling@yahoo.com]
Sent: Thursday, October 12, 2006 1:05 PM
To: Anthony Tria
Subject: Fwd: NPD DEIS hearing Sept. 14, 2006

Mary Ann Jung <majnyc@webtv.net> wrote:

From: "Mary Ann Jung" <majnyc@webtv.net>
To: ctownissues@gmail.com
CC: kkimerling@aaldef.org
Subject: NPD DEIS hearing Sept. 14, 2006
Date: Thu, 14 Sep 2006 16:40:29 GMT

September 14, 2006

Inspector Anthony Tria
Capital Construction, NYPD

Dear Inspector Tria:

Re today's hearings on the NYPD's DEIS on their closure of Park Row:

I live in the "Security Zone" and cannot be at the public hearing in person. So, I am submitting this written testimony.

Mary Ann Jung
180 Park Row-17E
NYC 10038
majnyc@webtv.net

I wish to state that, as with happens with most polls and the like, the clients for this DEIS received the skewed answers they sought. No surprise.

As a resident of Chinatown for nearly 40 years, these things I know to be true since the Sept 11, 2001 attack:

- + The increased traffic along Worth, St. James and the general Chatham Square area has increased, leading to poorer air quality, much more noise, and dangerous conditions for pedestrian and drivers.
- + Businesses in Chinatown have suffered more than any general decline found in Manhattan businesses.
- + The staffing for the traffic cops (and traffic police in cars 'monitoring' them) and the manned barriers along Park Row has added mightily to policing costs and/or taken this personnel away

from other duties.

+ While my building, Chatham Towers, is in compliance with the Americans with Disabilities Act, the building's ramp is on the Park Row side, a street my Access a Ride vans cannot access to pick me and my walker up. The long walk from the ramp, along Park Row and back on Worth to the Worth Street entrance is difficult on good weather days, a burden in rain, snow and ice. The NYPD closure of Park Row negates my building's compliance with that Act.

+The DEIS has willfully minimized the scope of its 'study'. No consideration is given to the traffic implications of the decade-long reconstruction of the WTC site, including the Calatrava station and the connecting Fulton Street Transportation Center on my neighborhood. Nor is consideration given to the traffic connected with the continuing growth in residents in Lower Manhattan and added workers once the WTC site buildings are built and leased.

+ The headquarters of the NYPD is embedded in what was a thriving residential neighborhood (Chatham Green and Chatham Towers with Southbridge and Confucius Plaza also affected). Why isn't the headquarters moved to somewhere where citizens won't provide the shield the NYPD perceives it needs.

Mary Ann Jung

Ken Kimerling

Legal Director

ASIAN AMERICAN LEGAL DEFENSE AND EDUCATION FUND

99 Hudson Street, New York, NY 10013

212.966.5932 -EXT 203 --- Fax 212 966 4303

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Betty Lee Sung Chung and Charles Chia Mou Chung

165 Park Row, Apt 20F

1. The most important impact was the longer route we had to take to get to the subway. Both my husband and I are in our eighties. It is hard for us to walk far and we walk very slowly. We used to be able to walk across the Police Plaza and get to Municipal Bldg in 5 minutes. Now we have to take a much longer route. I have clocked the time – 18 minutes to get to subway entrance. It has become much more difficult for us to use the subway.
2. When we had our car, we used to be able to exit on Pearl St from our parking lot and turn left onto East River Drive. Now, we have to drive around the block and stop at three traffic lights to get to same place.
3. All the bus stops, M15, M9, M22, B51, M103 are constantly shifting so if you go down to wait for a bus and it never comes, the stop has shifted again or relocated two blocks away. There are never adequate notices of the shifts.
4. The traffic on St. James St. is so heavy that sometimes it takes 10 minutes to go the one block from Pearl St. to Chatham Square if there is no traffic cop at the Square to let traffic flow. The red light turns so quickly there that only 3 cars can move before the light changes. That means gas fumes accumulate for us at Chatham Green to breathe. All the North/South traffic from Park Row is now shifted over to St. James St, which is only a narrow street compared to Park Row.
5. The worst thing is when the ambulances or fire trucks come down St. James. They can't get through because of the traffic jams. Their sirens are screeching and piercing and very hard on our ears and nerves.
6. The entrance to our parking lot is at the mouth of Park Row. We residents must show our drivers' license every time we come in and sometimes, the cops refuse to let us into our own residences. I now carry Lt. Lopez's phone number so that I can call him personally to tell the cops to let us come in. That is ironic!!!
7. Same thing with car service and taxi cabs. Some cops let them in to pick us up. Others won't. As I mentioned before, my husband and I are in our eighties. Some times we have luggage. We can't get off at the mouth of Park Row with heavy luggage and walk to the last building where we live. When car service drivers come to pick us up, invariably they are delayed because of the hassle of coming to our door. I have made repeated suggestions that we Chatham Green residents be issued special passes so that the cops can recognize we want to get into our homes. Nothing has been done.

8. As a taxpayer, I cannot see why Park Row is barricaded and manned by so many policemen at the five corners of our block. There are two at mouth of Park Row,

2

one each on East and West of Park Row and Pearl, one at Pearl and Madison, and one at Pearl and St. James. That's the salary of six men, three shifts a day. Multiply that by their pay. (Low estimate: $18 \times \$35,000 = \$525,000$)What does that come to per year to blockade one block??? Multiply that by the five years that the barricade has been here. (\$2,625,000 !!!) Is this wasteful??

9. The other waste is the exit at the mouth of Park Row. The pop-up barrier has been broken for nearly a year. One policeman sits in a patrol car and moves it back and forth each time a vehicle has to go out. That costs more than fixing the pop-up.
10. I don't think there is another block in the entire city that is so barricaded -- not City Hall, not the Empire State Bldg, not the United Nations. Police Headquarters may be the central command center, but five years have lapsed whereby the government could have decentralize the command center to the outer boroughs. If they have, then it is time for them to re-open Park Row.



ASIAN AMERICANS FOR EQUALITY

FACSIMILE TRANSMITTAL SHEET

TO: *Inspector Anthony Tria* FROM: *Maria E. Bottino, Dir of Govt. Affairs*
 COMPANY: *NYPD Capital Construction* DATE: *October 20, 2006*
 FAX NUMBER: *(718) 281-1593* FAX NUMBER: *212-979-8386*
 PHONE NUMBER: *(718) 281-1254* PHONE NUMBER: *212-979-8381 X131*
 RE: *One Police Plaza Security Plan Draft Environmental Impact Statement*
 TOTAL NO. OF PAGES INCLUDING COVER:

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

We are submitting written comments.

Thank you!

*Maria E. Bottino (212) 979-8381 X131
AAFE*

Web Site: www.aafe.org

- AAFE Management C**
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- AAFE Queens**
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- Central Office**
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Fax: (212) 979-8386
- Housing Immigration and Social Services**
108 Norfolk Street
New York, NY 10002
Tel: (212) 979-8988
Fax: (212) 979-8811
- AAFE CDF/REDC**
111 Division Street
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Tel: (212) 964-6023
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**ASIAN AMERICANS FOR EQUALITY**

108-110 Norfolk Street, New York, NY 10002

Tel: 212-979-8381 Fax: 212-979-8386 www.aafe.org

Asian Americans for Equality
Public Hearing on the DEIS on Closure of Park Row Testimony
October 20, 2006

For more than four years, Asian American for Equality (AAFE) has worked hand-in-hand with Community Board #3 and Chinatown residents and businesses to assess the problems created by the closure of Park Row. We believe that the solution to these problems must address two basic issues: 1. to ensure the collective safety of the residents and businesses of the area, and 2. to regain the public space as a vital point of exchange in the community.

The September 11th attacks had a tremendous negative impact on Chinatown due to street closures, traffic interruption, and the disruption of business services. Businesses relied on foot and automobile traffic from points south and east, including the office workers who came to Chinatown during the lunch hour to enjoy a meal, perhaps do some shopping, and still have time to get back to their office. And it interrupted the flow of visitors and tourists. The barriers to foot traffic have increased the time it now takes to get to Chinatown. Many former patrons simply have not returned. Visitors are discouraged from maneuvering the maze of streets, resulting in many longstanding businesses closing their doors for good.

Area residents have fared no better. The Draft Environmental Impact Study found that the closure of Park Row caused "significant traffic impacts at four intersections," especially during the morning rush hour, a rise in pedestrian accidents and fatalities, added to deteriorating air quality, and in their own words "created a disconnect between the security zone area and the surrounding area."

Calls for action to mitigate these problems have been dismissed by the New York City Police Department (NYPD) as jeopardizing the safety and security of One Police Plaza. Chinatown residents and businesses perceive the NYPD's posture as an unwillingness to engage in a real dialogue. The neighborhood sees the abuse of parking privileges, the use of James Madison Park for personal automobiles, and the conversion of the Municipal Garage into a private garage for NYPD-authorized vehicles only, as, at best, disregard for the needs of the community. To many, the permanent closure of Park Row just seems like another way of turning Park Row into a Parking Lot.

Park Row is an essential connector for Lower Manhattan neighborhoods. Without the flow of pedestrians and vehicular traffic, communities lie isolated and removed from the bustle of civic life. If we are truly concerned about the economic and residential vitality of our communities, then Park Row must be open. If other important buildings in New York City and around the world, including US embassies, allow cars and trucks to pass nearby why should Police Headquarters be the only building that needs such an enormous buffer?

But, if this is most targeted and most vulnerable building in New York City, then it is prudent and necessary that the NYPD think hard about where Police Headquarters should be located. If, in fact, One Police Plaza will continue to be a major target for extremists, then we believe it is appropriate to ask: Why are they located in the middle of a residential neighborhood? And One Police Plaza sits at the heart to the City's Civic Center, which includes the seat of government at City Hall, municipal offices, courts, and a school.

Thank you.

Anthony Tria

From: RScor215@aol.com
Sent: Monday, October 23, 2006 2:40 PM
To: atria@nypd.org; kkimerling@aaldef.org
Cc: RScor212@alumni.pace.edu
Subject: park row DEIS comments

One of the first glaring errors in the DEIS was the statement that Chatham Green & Chatham Towers were Mitchell Lama Coops –and thus were not for sale on the open market. These buildings were never part of the Mitchell Lama program. As a result, the study completely ignored the analysis of what effects the closures had on market values of these apartments. Whether this was done intentionally or out of ignorance made me think what other errors exist in this study or what other facts are twisted to support the desired outcome.

One of the community suggestions was closing off the exit of the Chatham Green driveway and having out entrance/exit use the same entrance on Park Row. Then the NYPD could do whatever they wanted with Pearl St. The response was that the counter terrorism unit said it would be unsafe. So, I asked myself "for the past five years we have been exiting onto Pearl Street with an active fuel tank (operated by NYPD– approximately 25 feet from our driveway) within a stone's throw. This alternative would have permanently closed our exit onto Pearl St and INCREASED the "buffer space" from 80 to 100 feet. This was deemed unacceptable.

Speaking of buffer space, I have always wondered about the difference in the "secure zones" for One Police Plaza. The measurements are as follows:

- 750 ft from Chatham Green driveway to 1pp
- 300 ft on the Brooklyn bridge FDR ramp
- 500 ft from St James Place
- 300 ft from Park Row South exit of the Bklyn Bridge

If I accept the reasoning that 700 feet is the needed buffer space, then shouldn't it be 700 feet in all directions from the center of 1PP. If so, then the secure zone should extend to Spruce St on the south, Lafayette Street on the west; Worth Street on the north; and mid way into the Smith housing projects to the east. So I ask "what is the acceptable amount of buffer space that 1PP really needs?"

Why isn't the city concerned about a rocket being launched from the bridge/fdr ramp which comes within 300 feet of 1PP?

Finally, looking at other potential targets: the Federal & State courthouses, 26 Federal Plaza, it seems like they feel secure with the bollards currently in place and having the streets open to both pedestrian & vehicular traffic. Another inconsistency.

1PP considers themselves a target and are endangering the lives of people in the community by making us part of their buffer zone. THEY ARE THE PROBLEM! IPP is a 30 year old building that has outlived its usefulness. I feel they should follow the example of the OEM and the FDNY communications centers and move to either the Brooklyn waterfront or Randall's Island.

Therefore we urge the city to consider the alternatives on the following page.

NAME: RICHARD SCORCE date : 10/20/06

11/2/2006

I LIVE AT: 215 PARK ROW 7H (CHATHAM GREEN) NY 10038

TEL 212 349-2321 EMAIL: RSCOR215@AOL.COM

The residents of Chatham Green have experienced undo hardship for the last five years caused by the NYPD's onerous and not equidistant "security zone" placed around One Police Plaza,

I find it unacceptable that Park Row remains closed and no effort has been made by the city/nypd to alleviate the hardships this closure has had on Chatham Green. I have thought about this situation and believe it can be alleviated with the enactment of the following:

Realistic buffer zones be established which truly represent a safe zone for 1PP as opposed to the unevenly devised buffers that currently exist. (attached is a map showing the distances from the closure point to 1PP). No one is saying that 1PP should not be secure but in their land grab they have gone far beyond what other target buildings in the area have done. The streets in front of both the federal and state courthouses are open. Also 3 of the 4 streets surrounding 26 Federal Plaza are open to the public & traffic. City Hall has traffic passing by on both Park Row and Broadway.

Relocation of the northern most pop up barriers so that they would be south of the Chatham Green driveway. Originally barriers were placed south of our driveway (about 25 feet south of the current popup), Then, about 8 months after 9/11 barriers and pop ups were placed north of our driveway.

Detailed explanation of why Community Alternative Plan #2 (closing the exit of Chatham Green driveway) is not feasible according to the counter terrorism unit (especially since this plan called for the permanent closure of the exist onto Pearl Street and an increasing the buffer between Chatham Green and 1PP from 80 to 100 feet).

The elimination of the active fuel tank that sits only 100 feet from Chatham Green property. If 1PP is such a target, then a fuel tank should not be out in the open as it currently exists.

Alternative reconfiguration plans for Chatham Green parking area entrance/exits and construction of such entrance/exits at city expense.

Finally, the city should relocate 1PP, thereby replacing a 30 yr old building that is not state of the art in both function and security. The OEM and FDNY moved operations from lower Manhattan to the waterfront in Brooklyn. There is no reason why NYPD cannot do the same.

Written Statement of Rocky Chin¹
In response to the
Draft Environmental Impact Study
Concerning the impact of the Closure of Park Row after September 11, 2001.

Sent by E-mail

October 23, 2006

Thank you for the opportunity to submit this written statement to supplement oral remarks at Public Hearings held on September 14th and October 4th, 2006.

Soon after the terrorist attacks on 9-11, the NYPD unilaterally closed Park Row, the southern-most tip of the Bowery – a major north-south Lower Manhattan traffic artery. Chinatown & the Lower East Side - like other downtown neighborhoods - experienced severe traffic, telephone & public transit disruptions. Smoke & fumes from fires burning at the WTC site were a constant part of our daily lives. At the time, we understood the necessity of these measures. However, we also expected the NYPD to re-open Park Row in due time. Unfortunately, months turned into years, and efforts by residents and community members to engage the NYPD in discussions about NYPD-imposed security measures in and around Park Row were frustrated.

In the months after 9-11, Chinatown and the Lower East Side had to mobilize hundreds of members from their respective communities. Only after these advocacy efforts did elected officials and members of the Lower Manhattan Development Corporation begin to acknowledge the suffering of these communities. Nevertheless, the concerns of Chinatown and the Lower East Side were frequently ignored and even counter-posed with the concerns of the Seaport District, Battery Park City & TriBeCa. In point of fact, all of the residential and commercial neighborhoods were suffering – and the concerns of these communities all took a back seat to what was clearly the

¹ I served as a civil rights attorney at the New York City Commission on Human Rights under four mayors from 1985 to 2002. I coordinated Mayor David Dinkin's Roundtable Conference at City Hall addressing issues impacting Asian Americans. I currently am a member of Community Board 3, CB 3's Task Force on Chinatown Traffic Issues and a resident of the Lower East Side.

priority of the Bush White House - to bring Wall Street and those businesses that serve Wall Street back to “normal” as quickly as possible.

Residents and businesses impacted by the closure of Park Row were ignored by the Mayor and the Police Commissioner. Litigation and two lawsuits forced the NYPD to commission an environmental impact study.

Although Chinatown has been a part of Lower Manhattan for over 150 years, government officials, social scientists & public policy institutions have generally ignored the community. Even in 2006, many New Yorkers relate to Chinatown just as a place to eat or purchase an inexpensive trinket. In the past, Chinatown was either a quaint ethnic enclave whose residents seemed to keep their problems to themselves, or a community filled with hatchet men and opium dens, sensationalized in lurid pulp fiction novels. The very real issues and problems of Chinatown were first tackled by social service agencies such as the Chinese American Planning Council (founded in 1965). Introductory Asian American studies courses were not part of private or public university curricula until the 1970s. Today, few academic institutions employ faculty who regularly conduct social science research utilizing information from Chinatown.

This lack of research – and research data – is in sharp contrast to Asian American scholarship and research on the West Coast. The Asian American Studies Program at the University of California at Los Angeles, for examples, has over 60 scholars affiliated with the Asian American Studies Program. Social science researchers – often graduate students under the supervision of faculty - often help government officials make informed public policy decisions.

When faced with some basic obstacles regarding data and data collection – the consultant for the DEIS chose to punt. There is also no indication that the consultant consulted with any of the several scholars that have conducted studies about Chinatown².

I point out these flaws in research methodology because I am very familiar with the problem. In the early 1990s, I coordinated Mayor David Dinkins City Hall Roundtable on Asian American issues. Over a two day period, the Mayor brought together his top commissioners to meet and hear

²Professors Margaret M. Chin(Hunter), Peter Kwong(Hunter), Tary Hum(Queens), Madhulika Khandaval(Queens), Gary Okihiro(Columbia), Jack Tchen(NYU) or Dr. Shao Chi (formerly, Asian American Federation of NY).

from community leaders and scholars. The roundtable/hearing was held at City Hall – and this ambitious endeavor revealed that insufficient research capacity was adversely impacting the community as well as the city’s ability to address problems. The need for a vibrant Asian American policy & research institute was on the minds of many. The DEIS consultant chose not to do the necessary research. They took “snap-shot” data – incomplete snap shots at that – of Chinatown’s businesses. Which does not tell the story of how the closure of Park Row has impacted the Chinatown business community. Moreover, the failure to translate materials and address the language realities of Chinatown puts into question the consultant’s conclusions.

The Draft EIS - coming out in 2006, five years after 9-11 - is deeply disappointing. While it identifies some of the obvious negative impacts on the community, the report justifies some and ignores or rationalizes others. The impact of 9-11 – the traffic closures, the fumes from burning debris, noise & other forms of pollution – all were environmental impacts that should have been addressed 4 or 5 years ago by city, state & federal authorities – but weren’t.

The consultants’ methodology is flawed and the data they chose to cite or not cite is problematic. For example, prior to 9-11, the westbound off ramp of the Brooklyn Bridge was processing 500 to 700 cars onto Park Row north. What happened to these cars after 9-11 and the closure of Park Row?

The report recommends some forms of mitigation but not others. The DEIS recommends that 40 parking spaces for "City Employees" be restored on Park Row on a street that is controlled by the NYPD. 40 spaces for City Employees translate into 40 spaces for the NYPD. It is disingenuous to consider rewarding the NYPD for extending its security perimeter nearly 600 feet into Chinatown as mitigation for the community – especially given the proliferation of illegal parking in and around Chinatown after 9-11 by police and other governmental officials.

The report also fails to analyze and account for the impact of loss of the 400 municipal parking garages and falsely asserts that “the security plan has not resulted in changes to off-street parking.” Illegal parking and the lack of legal parking has had a negative impact on Chinatown retail & wholesale businesses.

The DEIS analysis of the impact of the Park Row closure upon emergency vehicles and public bus routes and trips is flawed. Where is the data on ambulance response times pre and post 9-11?

The DEIS consultants failed to use standard scientific research methodology, failed to collect key information, and failed to create appropriate research tools – all of which had led the consultants to reach only the conclusions sought by the NYPD.

The DEIS fails to look at the environmental impact of the closure of Park Row in lieu of 3 major developments which will likely impact traffic in and around the study area. These are: the massive reconstruction around Ground Zero in Manhattan, the Atlantic Yards and the Brooklyn Bridge Waterfront. The impacts of all of the street closures in the NYPD security plan must examine conditions at least 10 years into the future, not simply in the present year. The DEIS cannot be allowed to ignore the forecasted growth of traffic volumes of the redevelopment of Lower Manhattan and Downtown Brooklyn during the coming decade -- impacts that should be well understood by the NYPD engineering consultant, Philip Habib Associates, since they also prepared traffic and transit work for EISs on projects in Downtown Brooklyn. The thousands of construction trucks and traffic associated with these developments will contribute to pollution and congestion – and these developments are not addressed in the DEIS. The addition of hundreds of trucks carrying heavy equipment and materials as well as the addition of thousands of construction workers and other personnel entering into and leaving Ground Zero will have an impact upon the quality of air and traffic in and around the already clogged arteries of Chinatown and the neighborhoods of Lower Manhattan. This failure to study the environmental impact of these large-scale developments presents an incomplete picture of traffic congestion due to the closure of Park Row after 9-11.

For all the security concerns being voiced by the Mayor and the NYPD, perhaps it is time to consider a long-term plan to re-locate the headquarters to a safer and more secure part of the city. The Mayor can commission an independent study to examine whether the central headquarters of the New York City Police Department should be located in Lower Manhattan or re-located, and hold public hearings to discuss the findings of that study and solicit input from the community board and the communities of Lower Manhattan. Consider relocating Police Headquarters to a site where the

threat of attack can be properly mitigated without putting ten of thousands of civilians at risk.

While all New Yorkers understand the need for the Police and Mayor to address terrorism and develop security measures, Chinatown and other neighborhoods of Lower Manhattan should not be forced to bear an undue burden nor do they want their communities turned into fortresses.

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October 24, 2006

BY FACSIMILE

Inspector Anthony Tria
Capital Construction, New York Police Department
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: (718) 281-1593

Re: Comments on NYPD Draft Environmental Impact Statement (CEQR
#04NYPD002M)

Dear Inspector Tria:

We are counsel for petitioners in Chatham Towers, Inc., et al. v. Michael Bloomberg, et al., Index No. 107761/04, and submit these comments on behalf of petitioners. Many of the individual petitioners, as well as residents of the private cooperative housing complexes that they represent, have submitted their own comments along with an expert report prepared by Community Consulting Services, Inc.¹ Those comments are incorporated in this submission.

The NYPD's Draft Environmental Impact Statement ("DEIS") is replete with factual errors, faulty analysis, and unsupported assumptions. As with the earlier Environmental Assessment Statement prepared by the NYPD, it fails to take a "hard look" at the impact of the NYPD's One Police Plaza Security Plan (the "Plan"), as

¹ Community Consulting Services was retained in part by petitioners.

required by state law. The extensive problems with the DEIS are too numerous to describe in any great detail here and can only be outlined below.

Traffic and Parking

The primary effect of the barricades put in place by the NYPD is to close a number of significant streets in lower Manhattan, as well as an exit from the Brooklyn Bridge, which creates significant changes in traffic and travel patterns. Unfortunately, the DEIS fails to properly measure the impact of the barricades on such traffic. As stated below, this failure to account for the *actual* effects of the street closures completely undermines the conclusions of the DEIS.

Despite thorough and specific comments by Brian Ketcham and others about what is needed for a properly scoped traffic study, the DEIS fails to properly study the traffic impacts caused by the Plan. As set forth in greater detail in the recent analysis performed by Community Consulting Services, the DEIS improperly segments² its study by excluding elements of the so-called "security zone" that surrounds One Police Plaza from its with-action analysis by disregarding street closings made in 1999 and the closing of the Public Parking Garage. Both the 1999 street closings and the Public Parking Garage closing are within the so-called "security zone" studied by the DEIS and, consequently, cannot be segregated and treated as separate actions because both were closed for ostensible security reasons.

² 6 NYCRR 617.2(ag) provides: "Segmentation means the division of the environmental review of an action such that various activities or stages are addressed under this Part as though they were independent, unrelated activities, needing individual determinations of significance." 6 NYCRR 617.3(g)(1) clearly notes that "[c]onsidering only a part or segment of an action is contrary to the intent of SEQRA."

The City Environmental Quality Review ("CEQR") Manual requires lead agencies to consider any potential segmentation and suggests as a starting point the State Environmental Quality Review Act ("SEQRA") Handbook, which lists eight questions that help identify what a lead agency such as the NYPD should include in a SEQRA study. The DEIS, however, does not contain any review of these questions. If such a review had been conducted, the no-action scenario would not have included as baseline conditions the 1999 street closures and the closing of the Public Parking Garage. The failure to do so undermines the estimates of traffic and the impact on parking as clearly laid out in Community Consulting Services's comments.

These issues of segmentation were all discussed in previous comments on the draft scope in this environmental review. Nevertheless, the comments were entirely ignored by the NYPD in its preparation of the DEIS.

In addition, there is no consideration of other planned projects that will increase the traffic flow into the area, including the Atlantic Yards project in Brooklyn, the building of a 76-story residential tower just south of the Brooklyn Bridge, and the reconstruction of the World Trade Center site. All of these projects will add to the current flow of traffic into lower Manhattan and over the Brooklyn and Manhattan Bridges. Even the one-year closing of the lower level of the Manhattan Bridge, which will place more vehicles on the Brooklyn Bridge, is not mentioned. While with-action measurements can be made because the streets have already been closed, this does not relieve the study of the obligation to augment those measurements with predictions of increased traffic as a result of planned and/or already commenced projects in the area.

The DEIS study area for traffic is itself truncated and fails to account for the large volume of vehicles that are now exiting the Brooklyn Bridge as well as the increased number of vehicles in the future. As graphically presented in Community Consulting Services's report, there are a large number of vehicles that are exiting from the Brooklyn Bridge that are not accounted for in the DEIS because the DEIS takes no measure of the cars exiting the Brooklyn Bridge; it only measures cars passing through nearby intersections. In addition, the DEIS makes no attempt to explain what happened to the vehicles exiting the Brooklyn Bridge that earlier surveys found were heading north through Park Row by way of the now-closed exit ramp. The absence of these vehicles from the NYPD's study can mean only one of two things: either these vehicles are causing increased traffic outside the study area or the measurements that were taken in the study area were not accurate. If the former, the study area should have been larger. If the latter, the data should be corrected. Whatever the case, the DEIS has an obligation to find out what is *actually* happening in the study area.

The DEIS also fails, as did the EAS, to monitor and measure the traffic congestion on St. James Place. The congestion on this street has been a constant complaint from local residents but no effort was made to measure it except to measure vehicle flow of the cars that reach the intersections.

The DEIS also fails to consider and account for the impact of traffic officers posted at the congested corners. These officers help the traffic flow and their effect needs to be accounted for in the study and in the suggested mitigation and alternative proposals.

As noted above, the DEIS improperly segments the impact on parking by disregarding the closing of the 400-vehicle Public Parking Garage. It also fails to consider the environmental impact study done on parking earlier for the Public Safety Answering Service. That study found only 13 garages in the area, including the 400-car garage, and a total of 1,743 publicly accessible parking spaces, not the 41 garages and the 5,409 available spaces claimed by the DEIS in 2006 nor the estimated 4,711 available spaces in the baseline number. Significantly, the DEIS states that there is a 314-car garage at 130 Duane Street with 126 spaces vacant. Yet, this site is outside the study area. Moreover, the baseline report states the garage has a capacity of only 40 spaces, not the 314 reported in 2006. In any event, there is no garage or parking lot at 130 Duane Street because it is a newly-constructed residential building. Thus, the DEIS has not only relied upon the existence of alleged parking outside of the study area and inflated the number of parking spaces, but it made the whole thing up, as no such parking lot exists. This is emblematic of the effort to find no impact by avoiding looking at the real problems caused by the so-called "security zone."

Moreover, the earlier Answering Service EIS found that if the Public Parking Garage were to close, there would be an impact on parking unless the NYPD set aside on-street parking space and made them available to the public. The NYPD has not relinquished any spaces and, in fact, has taken more spaces, while its employees take even more spaces in violation of the law. The DEIS does not explain why the earlier study found that the loss of the garage would cause an impact and yet the current study finds no shortage of parking.

The DEIS fails to consider existing plans for development in the area that will eat up most of the vacant spaces in the area south of the Brooklyn Bridge where both residential and commercial development is planned and/or under construction. The two largest identified off-street parking sites that are available, 56 Fulton Street and 57-61 Ann Street, are at the southernmost end of the study area. These lots will soon have to accommodate the new 76-floor high-rise residential building being built next to NYU Downtown Hospital and the displaced 110 cars that are presently parked at the site of the new construction. None of this is considered in the DEIS. In addition, the DEIS does not indicate when the determinations of vacancies were made for these two sites. Both are close to the South Street Seaport, and if the counts were made on a cold day, they are not representative of the true vacancy rates for this area when tourists visit the area in large numbers.

The DEIS recognizes that the so-called "security zone" has taken away on-street public parking spaces. Yet, the DEIS does not consider that the absence of off-street parking is exacerbated by the absence of on-street parking. The DEIS suggests that the loss of on-street parking is of no import and any additional parking would soon be taken by illegally parked government employees. Unlawful competition for spaces by the NYPD apparently is an acceptable way to avoid a finding of impact.

Community Facilities

The DEIS also depicts a false picture of emergency response times to the affected area. The NYPD and its consultants ignored extensive testimony that the Plan has led ambulances on their way to the area to travel a more circuitous route in order to circumvent the barricades, imposing further delays that have the grave threat of causing

irreparable harm to persons in the area requiring immediate medical attention. Instead, the DEIS relies on statistical compilations of response times that are not fully explained and have not been provided to the public for purposes of verification and duplicability.

Transit and Pedestrians

The DEIS also ignores the effect the street closures have had on disabled persons. Aside from the effects the street closure and barricade impacts have had on the general population, these impacts have had a pronounced effect on the disabled, particularly where the Security Plan measures negate compliance with the Americans with Disabilities Act by preventing disabled persons from making easy, unobstructed use of ramps and other installations to accommodate ingress and egress.

Air Quality

The expert report prepared by Community Consulting Services specifies the failures to meet professional standards in the analysis of air quality. These critiques and observations highlight the absence of a hard look at the impact. For example, the DEIS fails to consider the 20-year time frame required by the National Ambient Air Quality Standards ("NAAQS") in making its determination. In this study area, as in others, the DEIS looked only at 2006 and did not consider the planned future developments that will impact traffic. Over the next twenty years, the predicted growth in population and employment associated with these already-planned changes requires that the analysis be redone.

The DEIS also fails to set forth the results of its study of vehicle classifications. The accuracy of these classifications will impact on the DEIS's overall conclusions. Moreover, there is no indication that the closing of the Brooklyn Bridge to

commercial traffic or the resultant impact on air quality, which is likely to be significant, if that restriction were lifted were considered in the analysis.

Noise

The expert report prepared by Community Consulting Services specifies the failures to meet professional standards in the analysis of noise impacts.

The DEIS needs to reconsider its findings on noise and air once it reconsiders its determinations on traffic. The failure to consider future planned developments makes reconsideration particularly necessary. In addition, the noise study took only one noise measurement instead of three measurements to ensure accuracy. Finally, the study fails to consider the impact of return of commercial traffic to the Brooklyn Bridge. The introduction of additional trucks into the area will also have a major impact on noise.

Socioeconomic and Other Impacts

The DEIS also fails to consider several socioeconomic and other impacts caused by the NYPD's street closures and related implementations or, when it does consider these impacts, engages in flawed and improper analyses. These deficiencies further demonstrate that the DEIS fails to take a hard look at the Plan's impacts.

One error is the classification of "the two residential developments which are located within the security zone, and are therefore directly affected by the action, namely Chatham Towers and Chatham Green Houses" as Mitchell-Lama co-ops. Chatham Towers and Chatham Green Houses are not Mitchell-Lama co-ops, and thus, contrary to the DEIS's findings, are in fact "susceptible to changes in property values due to market forces." *Id.* The DEIS's failure to take note of this fact and to analyze the

effects on property values at these two developments is inexcusable and renders the findings facially deficient.

Martin Rosenblatt has submitted additional comments augmenting his earlier study of the tax assessment property values of Mott Street properties with 2006 data that confirm the initial results of economic impact. In addition, the DEIS's reliance on "market values" is inappropriate because "market value" is not a valid measure when applied to Mott Street properties, which have had few, if any, recent sales.

Moreover, the DEIS's business survey fails to provide a valid analysis of the impacts caused by the Plan. One flaw in this survey is the surprisingly low sample size of 61 businesses in an area that includes almost 500 businesses. Furthermore, notices that the surveys would be conducted were mailed in December 2005, months before any businesses were actually surveyed. These letters were written only in English, despite the fact that the intended audience—businesses located in the Chinatown area—are in an area that New York City census data states has a population of 70% who do not speak English very well. Finally, a copy of the actual survey, which would include the questions that had been posed to the businesses, is not included in the DEIS.

Mitigation

The NYPD and its consultants conducted virtually no analysis of the impacts that would result from the proposed changes to Oliver Street (change in direction) and St. James Place (street widening to accommodate more lanes). Indeed, one must scour the voluminous DEIS to find the lone, slight reference to changing the direction of traffic on Oliver Street. The lack of any further analysis on this issue, while improper, is understandable given the desire to minimize the public's awareness of this

Inspector Anthony Tria
October 24, 2006
Page 10

impending change. The NYPD needs to consider the impact these changes would have on the persons attending the numerous churches and schools in the area, not to mention the residents on these streets and the related pedestrian traffic.

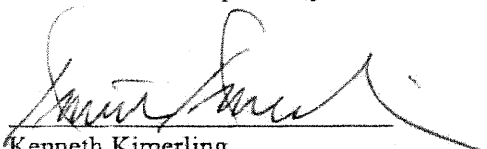
Alternatives

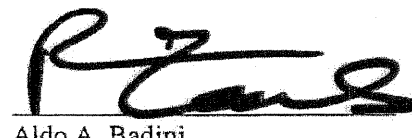
In considering alternatives to the NYPD's action, the consultants disregarded the purpose of their retention by the NYPD (presumably to provide an objective set of findings) and instead adopted wholesale, without any verification or scrutiny, the NYPD's own reasons for why the proposed alternatives were simply not feasible or practicable. This sort of expert obedience cannot satisfy the "taking a hard look" standard set out by the courts.

Conclusion

The DEIS does not meet its purpose of fully measuring the impacts caused by the NYPD's street closure and barricade plan. It is our hope that the NYPD takes these comments into account and amends the DEIS to fully address the flaws and concerns discussed herein.

Respectfully submitted,


Kenneth Kimerling
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With regard to the Public Hearing on the DEIS to be held on September 14, 2006:

I live in or near the "Security Zone" and this written statement is to supplement my oral testimony which was given on October 4, 2006.

My name is: Geoffrey Lee

I live at: 19 Mott Street, #1, NYC 10013

Contact information:

Telephone: 917 969 5226 email: noved@ix.netcom.com

The following will supplement what I have already offered in oral testimony on 10/4/2006 at the Public Hearing.

I feel the DEIS in its current form is faulty, inadequate, and flawed in numerous ways. By order of a judge, the NYPD called on Habib & Associates to report on the Security Plan since 9/11, and, by means of this deceptive report, Habib would give the NYPD and its Security Plan a free ticket to continue with creating safety hazards, increasing traffic congestion, parking illegally, increase air pollution, keeping Park Row closed, and overall negatively affect the safety, economics and quality of life in lower Manhattan, particularly the Chinatown area.

I will list a few of the points to exemplify just how faulty the DEIS is, these few points are just a tiny sampling of how the NYPD has gotten the fox to guard the hen house:

1. At the 10/4/06 public hearing Christine from Habib stated there were no effects on emergency response times found by the DEIS, and this is stated in the DEIS itself. Therefore, according to the DEIS, the Opening of Park Row was not necessary. There was obviously much inadequate research done regarding emergency response times being increased by the Security Plan. I refer to the article below (bold) in a local paper in 2003 quoting Kenneth Eshak:

**The Villager- Volume 73, Number 10 July 9-15, 2003
Judge says Park Row closings were 'heavy-handed'**

By Josh Rogers

Kenneth Eshak [N.Y.U. Downtown Hospital], the hospital's interim president and C.E.O., said the city is endangering the lives of Downtown residents.

"Specifically, we believe that the closures and other obstacles by New York City between the hospital and the neighborhood have lengthened the time... for emergency vehicles...to bring patients to our hospital," Eshak wrote in a letter submitted to the judge (State Supreme Court Justice Walter Tolub).

"Needless to say, this constitutes a tangible detriment to the health and safety of the affected New York citizens, residents and employees, and in specific cases, could be life threatening."

In addition, several speakers at the Oct. 4, 2006 public hearing gave testimony citing clear incidents and examples of delayed ambulance service and response times. Please refer to the transcript of Oct. 4, 2006 Public Hearing on DEIS. Does someone have to die before Habib gets to the truth and the facts?

2. With regard to illegal parking, the DEIS in Chapter 7 counts 1,012 illegally parked cars with parking placards on a typical work day. This number, multiplied by the number of work days since 9/11, would produce a total of **1.25-million parking violations in the Security Zone in five years**. It is insulting for the DEIS to say that 1.25-million parking violations have not had a negative effect in the Security Zone. At the hearing on Oct. 4, 2006, I dared anyone from Habib or the NYPD to experience what it is like to walk out everyday on their own local streets to 1.25-million parking violations for five years.

a) I have personally witnessed many businesses fold because every street in Chinatown was taken up by illegal parking with placarded cars. It is ludicrous for the DEIS to determine that there has been no deleterious effect on the community caused by illegal parking. Many businesses have folded in the same location multiple times in Chinatown since 9/11. The number of

businesses closing, compared to the rest of New York City since 9/11, is disproportionately high. The DEIS offers no mitigation regarding illegal parking in its Mitigation chapter.

b). The wording of the DEIS is 1,012 **illegally** parked cars (by NYPD and government employees). **Illegal means illegal** – this is lawbreaking done 1.25-million times in five years since 9/11. Repeat -This means the law has been broken 1.25-million times, all by the NYPD and government employees. **The DEIS does not acknowledge that the law has been broken at all**, yet it uses the term **illegal parking** freely. This bespeaks of plain and total arrogance by the NYPD who ride in cars emblazoned with the words: COURTESY, RESPECT, PROFESSIONALISM. The DEIS has shown no Courtesy, no Respect and no Professionalism in carrying out its report on the NYPD and the Security Plan.

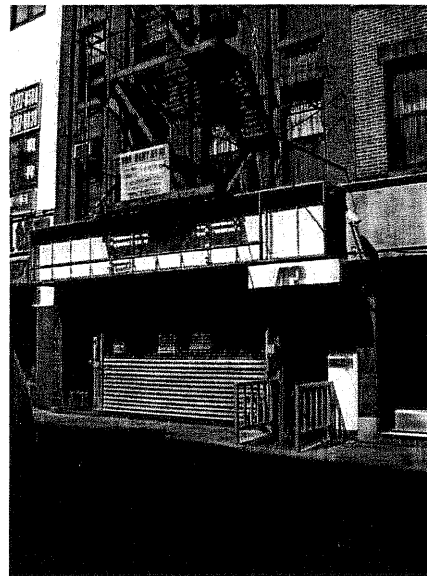
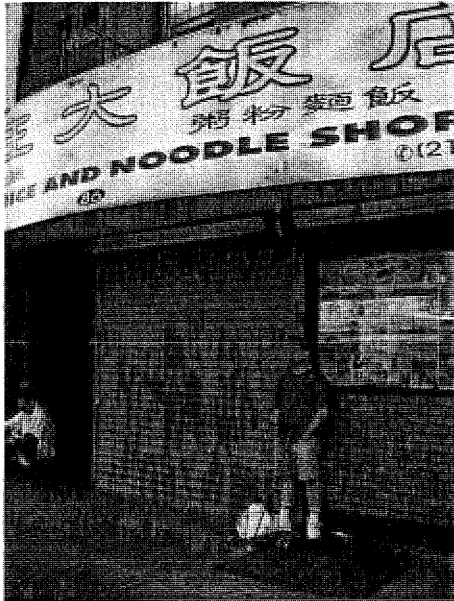
The elimination of 1,012 parking violations per day in our neighborhood within the Security Zone would be a tremendous boon to business. It would reduce air pollution in the Security Zone as less cars and trucks would be circling multiple times looking for parking spots. The DEIS does not mention this fact.

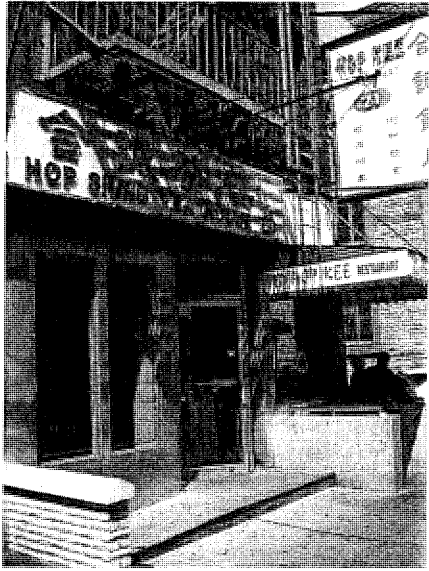


In addition, countless millions of dollars of lost New York City revenue would be retrieved from parking meters alone if existing parking laws were enforced. This is not brought out in the DEIS, Habib missed this fact also.

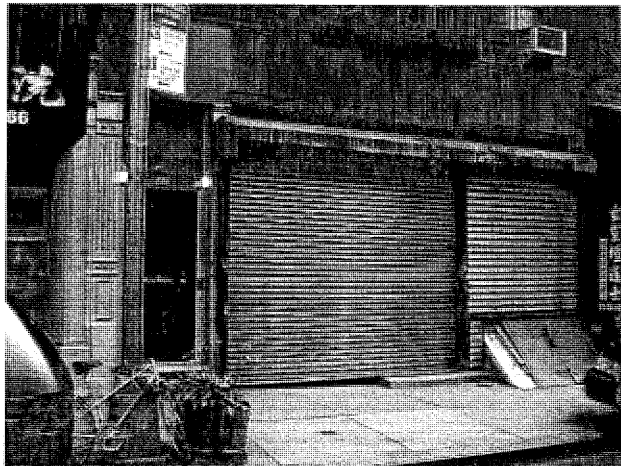
Chinatown is in a **NO PERMIT ZONE** – just ask the Department of Transportation. Therefore, no placarded cars are allowed, except when parking signs are posted to designate “official areas”, such as around the courts. The **NO PERMIT ZONE** rule has been virtually and literally ignored for five years since 9/11. The DEIS also ignores, or, refuses to acknowledge, or, never bothered to find out about - the Department of Transportation’s **NO PERMIT ZONE** rule. Enforcement of the **NO PERMIT ZONE** rule would eliminate many thousands of illegal parking violations in the Security Zone, it would enable the NYPD to show respect for existing laws (we **are** talking about the police and the law here) and respect, not arrogance, toward the local community within the Security Zone. How can the NYPD expect to gain the community’s admiration and respect if the community witnesses lawbreaking on a grand scale everyday by the ones who are supposed to be enforcing the law? I do not want my children to have disrespect for the law, but when they see police officers everyday breaking the law right outside their door, respect for the law becomes meaningless.

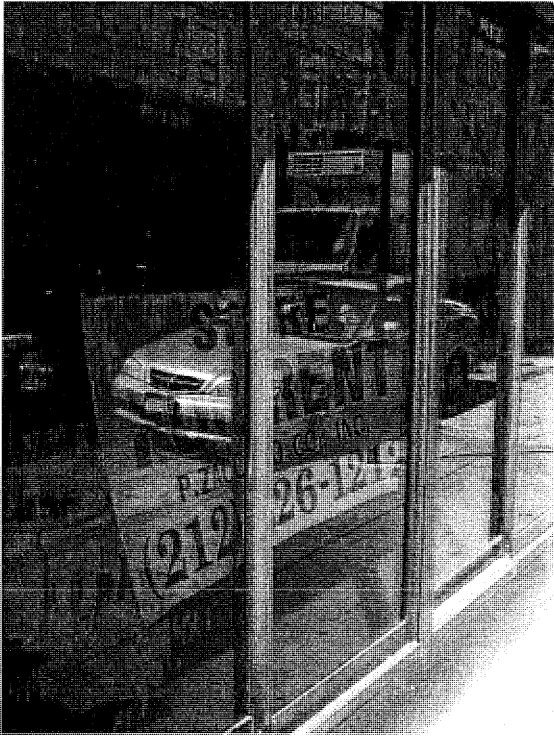
Additionally, enforcement of existing laws would gain millions of dollars for New York City, and greatly reduce parking congestion in Chinatown, allowing businesses to grow again and recover from 9/11. I have included pictures of businesses closed since 9/11, taken one afternoon this summer of 2006 in a 1-block radius starting from the corner of Mott Street and Pell Street.





The oldest store in Chinatown closed post 9/11, due to closing of Park Row and illegal parking by NYPD and government salaried employees





In the years post-9/11, everyday Mon-Fri, I have personally witnessed thousands of incidents of illegally parked cars with placards on fire hydrants, blocking sidewalks and curbs, parking with two wheels on the sidewalk (impeding pedestrian traffic), blocking curb cuts so that wheelchairs cannot go by, and blocking streets in Chinatown to the point where emergency vehicles, ambulances and fire trucks, have been significantly delayed. I have many photographs to document this.

There are also many, many news articles and features on local t.v. news channels to attest to the illegal parking by government employees. This is a travesty, this is shameful, this is not the law. Habib obviously did no homework in this regard and does not mention any documentation of the press, newspapers and t.v. with regarding to negative effects of the Security Plan. In fact, the DEIS, to add insult to injury, proposes to give the NYPD 40 more parking spaces on Park Row. There is much documentation regarding Court Officers whose parking placards are not issued by the D.O.T., they printed by the Court Officers union, and are therefore illegal. This fact was not mentioned by the DEIS. A real crackdown on illegal placards, including copied ones, and not token and rare and random ticketing, by means of enforcement of existing laws, would be mitigation; again, this is not mentioned in the DEIS.

The DEIS really does show the fox guarding the hen house.

The DEIS is a waste of taxpayer dollars because it is false and one-sided.

The NYPD did not obtain a true and accurate report, and neither did the local community within the Security Zone.

The Security Plan as portrayed by the DEIS is a security plan only for the NYPD, not for the residents who live in the Security Zone.

The DEIS needs to be redone by an impartial, objective, unbiased outside agency, that is, an agency that will include the safety and welfare of the community in its report.

Below are some of the news items the DEIS missed.

Subject: Links pages regarding illegal parking in Chinatown. There are many, many more.

Videos:

http://wcbstv.com/local/local_story_234132355.html

Selective ticketing by ticket workers 8/23/2006 CBS TV

<http://www.wnbc.com/video/9039420/index.html>

Ralph Penza - Channel 4 4/26/06

<http://wcbstv.com/video/?id=86222@wcbs.dayport.com&cid=48>

Mario Bosquez WCBS TV 3/29/06

http://www.ny1.com/ny1/content/index.jsp?&aid=58918&search_result=1&stid=6

NY1 cable feature (click on road runner icon for cable/DSL video streaming) Solan Pyne, reporter

An undercover cop illegally stops Jan Lee from taking photos of a placarded car blocking a fire hydrant.

<http://www.youtube.com/watch?v=amy8wtjH56Q&search=clogged%20arteries>

CLOGGED ARTERIES video about effects of illegal parking in Chinatown

Part 1 of 2

http://www.youtube.com/watch?v=zsBAHx_09el&search=clogged%20arteries

CLOGGED ARTERIES video about effects of illegal parking in Chinatown

Part 2 of 2

Newspaper Articles:

<http://www.nydailynews.com/04-27-2006/news/story/412431p-348789c.html>

Mayor Bloomberg made a statement. 4/27/06 Daily News "Mike in gear vs. Chinatown parking"

<http://www.nydailynews.com/04-26-2006/news/story/412090p-348524c.html>

4/26/06 Daily News story.

<http://www.villagevoice.com/news/0618.ferguson,73012.2.html>

When Good Cops Park Badly, April 26, 2006 Village Voice Sarah Ferguson

NY Times - requires a free registration

<http://www.nytimes.com/2006/03/12/opinion/nyregionopinions/l12city.html?ex=1144468800&en=e1772fb51871a5fa&ei=5070>

<http://www.villagevoice.com/news/0615.ferguson,72804.5.html>

Watching the Detectives - Village voice April 11, 2006

http://www.thevillager.com/villager_146/chinatownisgettingtired.html

The Villager Feb 15 -21/ 2006 issue

<http://www.transalt.org/press/media/2006/287.html>

DownTown Express -Transportation Alternatives February 10, 2006

I am limited in time to make more comments on further faults of the DEIS. Again, the points made above are but a tiny sample of how flawed the DEIS is. I feel that there was not enough time given to read the entire complex 290+ page DEIS and also not enough time to prepare a more complete testimony. I would like to make further comments in the future.

Thank you for reading my testimony,

Date: Oct. 23, 2006

Respectfully,

Geoffrey Lee

Anthony Tria

From: Eugene Falik [falik@msn.com]
Sent: Monday, October 23, 2006 2:35 PM
To: Atria@nypd.org
Subject: Environmental Impact Statement CEQR No. 04NYPD002M

Inspector Anthony Tria
 Capital Construction
 NYC Police Department
 620 Circle Drive, Suite B,
 Fort Totten, New York, 11359
 718/281-1254

Inspector Anthony Tria,

We had spoken on Tuesday, September 5, 2006 about the security plans for Police Plaza. You had asked me to send you my notes on the draft Environmental Impact Statement CEQR No. 04NYPD002M, <http://nyc.gov/html/nypd/pdf/dclm/1PPSecurityPlan7-28-06.pdf>, in regard to closing of streets near Police Plaza [Chatham Towers, Inc. et al. v. Bloomberg et al. (Index No. 107761/04) - opinion dated October 15, 2004, by Justice Tolub] but a review of my activities last month indicates that I never sent them to you. I apologize for the delay and hope that they can contribute useful insights before the matter is resolved in court.

Questions:

1. Is there any reason to believe that NYPD is more of a target, or requires more protection, than hundreds of other targets that have not been able to impose protection for themselves at gun point?
2. Why should the police have better protection than others?
3. Police have a relatively safe job compared to others -- Sanitation, Fire, construction. Why should they have extra protection?
4. Is it appropriate to force citizens to live in an armed camp, or leave the area?
5. Is there any reason, based on what has happened in Iraq, to suppose that this, or any such plan would be effective anyway?
6. Will the next step be to do this around every police station in the City?
7. Isn't the effectiveness is similar to waving sign in Times Square to keep the elephants away?
8. Deaths at WTC were due in significant part to security arguments not to follow the rules (NYC building code)
9. Why aren't police vehicles put in the garage to make those spaces available to the public?
10. Since the V&TL generally prohibits street closings such as these, shouldn't a court should issue summonses every 2 hours to commissioner and mayor from the first hour of closing until the closing is authorized by law?
11. Why isn't garage opened to city owned vehicles to remove them from the street?

The conclusion of no action section (12) states -

- "The necessary security measures needed to protect potential terrorist targets such as NYPD headquarters would not be implemented under this alternative."
- There is no showing that these "security measures" are -
 - necessary, or,
 - effective.

I would, of course, appreciate any comments that you, or Mr. Kelly, may have on these matters.

You, and/or other interested parties may reproduce this e-mail as part of the review process of the Environmental Impact statement and any following review or proceedings.

11/2/2006

Eugene Falik
Solutions by Design
falik@msn.com
718/327-6370

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This message is a PRIVATE communication. If you are not the intended recipient, please do not read, copy, or use it, and do not disclose it to others. Please notify the sender of the delivery error by replying to this message, and then delete it from your system. Thank you.

My name is Danny Chen. My wife and I are shareholders in the Chatham Green Cooperative on Park Row. I played in the empty lot before Headquarters was built and I watched, with some pride, as the new home of the NYPD was being built in my backyard.

The comment that I have about the DEIS and the "security plan" is more of a question. Why is the NYPD (through its contractor, Habib and Associates) incapable of extending any courtesy to the PEOPLE affected by the One Police Plaza land grab? In resolving to take away PEOPLE's rights to move freely through public land, must one abandon all sympathy towards those PEOPLE's humanity? It is the only explanation for denying access to emergency service vehicles through your "secure zone" and at the same time proclaiming that emergency service vehicles have access. It is inhumane to be denying access while at the same time saying that access to emergency service vehicles is full and unfettered.

Other problems with the DEIS include:

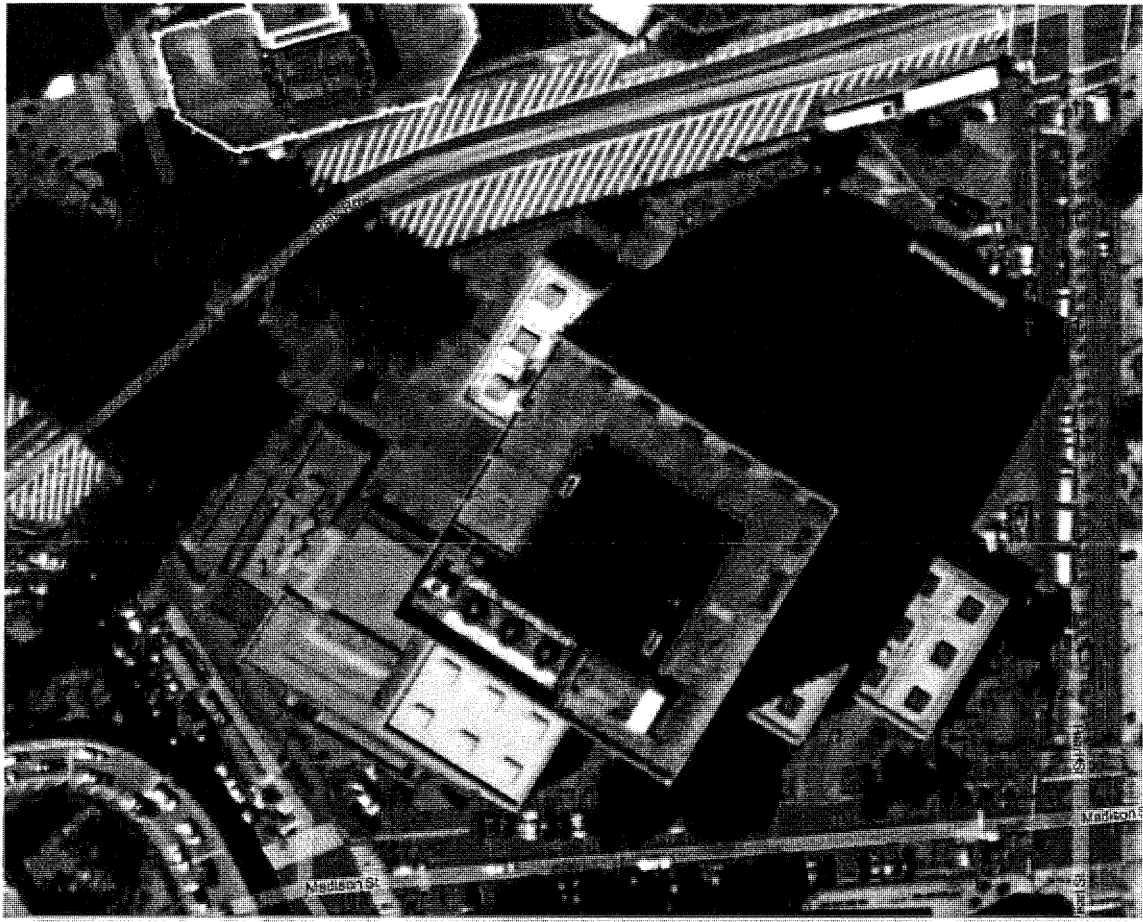
- The statements that Madison Street and Ave. of the Finest were closed in 1999 is just plain not true. Both streets were used as approaches to the Municipal Parking garage until the garage was closed in 2001.
- Chatham Green and Chatham Towers are NOT Mitchell Lama co-ops. We are private co-ops and subject to market value fluctuations. So a study of real estate values and apartment sale prices is probably in order. The ACRIS database does seem to show that an apartment in Chatham Green last year sold for \$184,000. This appears to be a very low price for Manhattan real estate.
- There appear to be no interviews with residents or businesses INSIDE the security zone.
- The inventory of available garage parking spaces presented in the DEIS seems to include parking lots that are no longer available.
- No local residents or small businesses were consulted about real mitigations that might offset the effects of the street closures.
- No plan was presented to re-establish pedestrian access up to Police Plaza from Madison Street.
- The conclusion of no measurable impact on businesses does not match up with actual experiences.
- An actual analysis of the best location for Police Headquarters was not performed in this DEIS. I suggest that it be included.

I'd like to close with one mitigation that was not covered in the DEIS. Looking at the below photo, it is pretty evident that the "core" of Police Headquarters actually enjoys quite a bit of standoff distance from ANY street. It is only the "appendage buildings" to the complex that are close to streets. So, by abandoning these outer buildings, the NYPD can maintain reasonable standoff distance without closing Park Row or Pearl Street.

The NYPD also needs to realize that if the building is actually a potential target, the continued operation of the gas filling station on Pearl Street must also end.

Thank you,

Danny Chen



MOTT STREET TAX ASSESSMENT STUDY

PREPARED BY MARTIN ROSENBLATT

ON BEHALF OF THE CIVIC CENTER RESIDENTS COALITION

TABLE OF CONTENTS FOR MOTT STREET STUDY

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- Section Two 2. Chart Comparing Mott Street Tax Assessment Changes By Sections Of Mott Street For Fiscal Years 2005 and 2006.
This Chart Shows Valuations By Location Closest To The Security Zone In The Middle, And Ending At Canal Street
- Section Three 3. Chart Comparing Mott Street Tax Assessments Arranged By Median Numbers For The Same Three Sections as Section Two Above And For Fiscal Years 2005 and 2006.
- Section Four 4. Chart Showing Tax Assessments Of All Of Mott Street Arranged According To Three Sectors But Arranged by The North and South Side Of Mott Street.

INTRODUCTION

This study is in response to the submission by the New York City Police Department's One Police Plaza Security Plan DEIS. It attempts to illustrate how the closing of Park Row has adversely impacted the economic well being of the area near the closure as illustrated by the negative impact on Mott Street, a major historic Chinatown street.

It was on this street that Sun Yat-sen, who played an historic role in bringing about a stable Chinese republic according to the principles of democracy and people's livelihood sought the help of the Chinese community in Chinatown and met with people on Mott Street in the corridor closest to the closing.

It is this corridor which is seeing its illustrious past and current economic conditions ruined as a result of the closing of Park Row.

The section of the DEIS that was commissioned by the NYC Police Department that deals with property values on pages 4-34 and 4-35 of their report in response to my earlier study about Mott Street and is under the headline Property Values has serious methodological flaws, errors in fact, and can best be described as: "ALICE IN WONDERLAND", where up is down, black is white, and all is well this way!!

The initial study that I did and which is now being followed up with an additional study to update the available data and situation used tax assessment figures, percentages of change, and average percentages of change along Mott Street to arrive at conclusions. Since the conclusions that were arrived at didn't look good as far as the NYC Police Dept. was concerned and since their PAID CONSULTANT needed another conclusion, their consultant it appears visited the Mad Hatter of Alice In Wonderland Fame and concocted another "Scenario". The new approach is: IF THE FACTS DON'T FIT YOU FIT THE FACTS TO FIT.

So... instead of commenting on the initial study drawn from assessment figures, the NYC Police Department's consultant instead uses a totally unresponsive approach, they respond but don't answer, and changes the subject by using data I didn't use, i.e. property values and then goes back to my study to say that in my assessment study I should have used median figures instead of averages to measure changes.

The NYC Police Dept.'s consultant who prepared the report didn't use any actual data to arrive at conclusions but instead provided some estimates of property values over a period of time. No facts about anything were provided, not even any actual sales figures which would have shown the true measure of what property values would have been i.e. market price.

The Mott Street Assessment Study took account of what the NYC Police Dept.'s consultant refers to when it talks about "outliers". Let's use plain language. Some buildings assessments increased by large amounts mostly up in assessment value and some down. The study was fully cognizant of this issue. These larger incremental changes resulted from either a new building going up, a renovation, or a closing. These dramatic shifts were few and far between. It is precisely these events which reflect the character of what actually happened on Mott Street post 9/11.

It seems that the NYC Police Dept's DEIS consultants didn't really visit Mott Street, because had they done so, their conclusion that they reached, that the closer you were to the security zone, the higher the property values in relation to the rest of Mott Street would seem ridiculous. The exact language from the Police Dept.s consultants report is as follows:

"... with the median rate of increase actually highest in the Section closest to the Security zone."

This is where Alice In Wonderland Comes In!! There are actually stores that went out of business in the section of Mott Street closest to Chatham Square, since 9/11 at least thirty one businesses have failed on Mott Street and numerous other properties along Mott Street have not been able to rent their spaces. This is precisely the location that the Police DEIS study a portion of which was quoted from above said the highest increase in property values took place. So,.. in the Police DEIS study, all was swimmingly well, and the closing of Park had no impact. A simple walk down Mott Street, looking at the store closings, which bring down assessment values, and speaking with the owners of these buildings would have painted a far different picture. And also, by the way, the New York City Department Of Finance assessment information and year to year changes are measured by percentage changes to arrive at data and not median calculations in any measure. Another factoid missing from the "Through The Looking Glass" DEIS study done on behalf of the NYC Police Dept. to justify their closing of Park Row.

In this follow up report, various comparisons were done to demonstrate how the section of Mott street closest to the Security zone has had the worst assessment record:

The first chart compares the changes of assessed real estate in Manhattan over two years 2005 and 2006 with Mott Street. The chart shows that while Manhattan tax assessment percentages between 2005 to 2006 increased in value by 228.32%, the assessments of properties on Mott street went up by a miniscule 6.6%.

The second chart shows the changes in assessments on Mott Street in three different sections. Section One is the section that is closest to Park Row, called the Security Zone by the Police Department. The Second Section is the middle part of Mott Street and the Third Section is that part of Mott Street that is closet to Canal Street. The actual boundaries of each of these three sections is detailed in this chart.

The major finding illustrated by this chart is that while the tax assessment changes expressed in percentages on Mott Street were relatively similar in all three sections in 2005, a dramatic shift occurred for the tax year 2006. The increase in Section One was a 1.6% in tax assessments, the increase in Section Two was 2.8%. The increase in Section Three was 4.2%. This means that Section One, that part of Mott Street closest to the Security zone, had the worst increase in property tax assessment. Section Two went up by 42.8% when compared to Section one, and Section Three went up 61.9% when compared to section one.

The third chart shows an analysis of Mott Street Tax Assessments arranged by Median Numbers for years 2005 and 2006, comparing all three sections. This chart illustrates that Section One, that section closest to Chatham Square and Park Row, had the lowest median scores of property tax assessments of the three sections on Mott Street.:

Section One had a median increase of 7.4% in 2005 and 4.75% in 2006.
 Section Two had a median increase of 9.45% in 2005 and 6.7% in 2006.
 Section Three had a median increase of 8.5% in 2005 and 5.65% in 2006.

So... both charts illustrate that Section One, that part of Mott Street closest to the Security Zone has fared worse than the other parts of Mott Street and that Mott Street as a whole fared very poorly when compared to the rest of Manhattan's booming real estate market.

The fourth chart details all of the properties on both the North and South Sides of Mott Street and compares tax assessment increases for each of the three sections for 2005 and 2006. This table provided the basis for charts two and three.

It is important to understand that Chinatown isn't a Rodney Dangerfield comedy show, when Chinatown says that: "It Gets NO Respect". One has only to read the NYC Police Department consultant's DEIS report, to see why this is so when it concludes that there is no impact on Mott Street or Chinatown by the closing of Park Row. Only in this case there aren't any peels of laughter from the audience. The residents of Chinatown aren't laughing. They are witnessing the strangulation of their businesses and their way of life.

COMPARISON OF PROPERTY TAX ASSESSMENT CHANGES OF MOTT STREET AND MANHATTAN ANNUAL ASSESSMENTS FOR FISCAL YEARS 2004 -2005 AND 2005-2006 ASSESSMENTS ARE IN MILLIONS OF DOLLARS AND YEAR TO YEAR CHANGES ARE EXPRESSED IN PERCENTAGES

MANHATTAN		MOTT STREET	
YEAR	% CHANGE	% CHANGE	DIFFERENCE
2006	11.36	3.2	8.16
2005	3.46	3.0	.46

This chart demonstrates that while Manhattan was experiencing a boom in the assessed value of its real property during 2006, Mott Street's assessed value barely moved. More precisely, from 2005 to 2006, the percentage change for all of Manhattan's assessed value went up by 228.32%. In contrast, Mott Street rose only by 6.6%.

This table and the study which follows of what happened to tax assessments on Mott Street over two fiscal years is based on figures obtained from the NYC Department Of Finance records of annual tax assessments.

The numbers clearly show that while New York City was increasing in substantial property assessment growth and Manhattan in particular, Mott Street, a street within the scope of the EIS was doing poorly.

MOTT STREET Tax Assessment Spreadsheet
 By Section Units 10/20/06

Key: Reason for % Increase / Decrease
 R: Renovation/Development;
 C: Closed Down; U: Unknown

Address	Block/Lot	2004-2005	2005-2006	Reason	% Change	2006-2007	% Change	Reason
TOTAL AS UNIT ---								
Averages 2005: 10.8% 2006: 1.6%								
Section One								
Chatham Sq. North Side								
Mott St 2 - 6	162/1	3,627,000	3,881,700		7.03%	4,068,000	4.80%	
8	162/42	553,500	602,100		8.80%	597,600	-1.00%	
10	162/6	98,500	109,170		10.80%	114,300	4.70%	
12	162/7	120,150	123,840		3.10%	110,250	-11.00%	
14	162/8	256,320	271,170		5.80%	287,190	5.90%	
16	162/9	160,730	283,360	Unkn	76.20%	313,290	10.60%	
18	162/10	329,378	355,728		8.00%	355,050	-0.20%	
20	162/11	315,450	335,700		6.40%	261,000	-23.00%	Clsd
22	162/12	340,200	367,416		8.00%	380,250	3.50%	
24	162/13	399,600	317,250		-21.00%	409,680	29.00%	Unkn
26	162/14	284,400	285,750		0.47%	273,150	-5.00%	
28	162/15	304,920	261,000		-15.00%	286,650	9.80%	
30	162/16	179,132	193,462		8.00%	208,938	8.00%	
32	162/17	315,390	288,560		-9.00%	162,190	-44.00%	Clsd
Mott 35 - 38	162/18	556,200	597,600		7.40%	650,700	8.90%	
Pell Street								
Worth St. South Side								
Mott St. 1-3	164/54	508,500	575,100		13.00%	558,000	-3.00%	
5	164/53	339,300	398,340		17.00%	445,410	11.80%	
7 to 9	164/51	787,500	872,100		10.70%	941,400	8.00%	
11	164/50	368,423	368,423		0.00%	397,896	8.00%	
13	164/49	234,000	264,060		12.80%	275,130	4.20%	
15	164/48	237,600	247,500		4.20%	251,100	10.10%	
17	164/47	262,260	265,500		1.20%	220,500	-12.00%	

MOTT STREET Tax Assessment Spreadsheet
 By Section Units 10/20/06

Key: Reason for % Increase / Decrease
 R: Renovation/Development;
 C: Closed Down; U: Unknown

60 - 64	201/4	574,782	616,576		7.30%	659,760	7.00%
66	201/6	277,875	277,875		0.00%	292,500	5.30%
68	201/7	387,540	380,250		-2.00%	332,550	-13.00%
70	201/8	194,850	225,000		15.50%	227,640	1.20%
72	201/9	250,200	260,190		4.00%	262,530	9.00%
74	201/10	324,630	332,280		2.40%	334,800	7.60%
76	201/11	181,350	221,220	Uknwn	22.00%	243,540	10.00%
78	201/13	1,647,900	1,804,500		10.00%	1,933,200	7.10%
CANAL ST.							
Bayard St. South Side							
57	200/31	155,700	207,540		33%	203,670	-2.00%
59	200/30	281,250	350,280		25%	366,930	5.00%
61	200/29	248,850	303,670	Unkn	22.00%	311,730	3.00%
63	200/28	203,850	252,580	Unkn	24.00%	247,500	-2.00%
65	200/27	282,600	308,250		9.00%	317,010	3.00%
67	200/26	311,130	301,500		-4.00%	318,690	6.00%
69 to 71	200/24	366,300	432,000		18.00%	373,050	-14.00%
73 to 75	200/22	454,300	461,500		1.60%	465,600	0.90%
77	200/21	367,980	438,380		19.00%	461,580	5.20%
79	200/20	452,880	472,500		4.30%	513,000	8.60%
81	200/19	398,880	406,380		1.90%	462,180	14.00%
83 to 85	200/17	1,089,000	1,123,200		3%	1,111,500	-1.00%
CANAL ST.							

Median Numbers of Mott Street Tax Assessments

Median Numbers

Address Block/Lot 2004-2005 2005-2006 Reason % Change

Section One

2005

Mott Strt. 16	162/9	160,730	283,360		76.20%
19	164/46	197,100	237,420		20.50%
5	164/53	339,300	398,340		17.00%
Mott St. 1-3	164/54	508,500	575,100		13.00%
13	164/49	234,000	264,060		12.80%
10	162/6	98,500	109,170		10.80%
	164/51	787,500	872,100		10.70%
8	162/42	553,500	602,100		8.80%
22	162/12	340,200	367,416		8.00%
18	162/10	329,378	355,728		8.00%
30	162/16	179,132	193,462		8.00%
Mott 35 - 38	162/18	556,200	597,600		7.40%
Mott St 2 - 6	162/1	3,627,000	3,881,700		7.03%
20	162/11	315,450	335,700		6.40%
14	162/8	256,320	271,170		5.80%
15	164/48	237,600	247,500		4.20%
12	162/7	120,150	123,840		3.10%
17	164/47	262,260	265,500		1.20%
26	162/14	284,400	285,750		0.47%
11	164/50	368,423	368,423		0.00%
21	164/45	294,750	285,750		-4.00%
32	162/17	315,390	288,560		-9.00%
28	162/15	304,920	261,000		-15.00%
24	162/13	399,600	317,250		-21%

2006

Median Numbers of Mott Street Tax Assessments

Address Block/Lot 2006-2007 % Change from 2005

24	162/13	409,680	29.00%
5	164/53	445,410	11.80%
16	162/9	313,290	10.60%
15	164/48	251,100	10.10%
28	162/15	286,650	9.80%
21	164/45	313,110	9.60%
Mott 35 - 38	162/18	650,700	8.90%
30	162/16	208,938	8.00%
7 to 9	164/51	941,400	8.00%
11	164/50	397,896	8.00%
14	162/8	287,190	5.90%
Mott St 2 - 6	162/1	4,068,000	4.80%
10	162/6	114,300	4.70%
13	164/49	275,130	4.20%
22	162/12	380,250	3.50%
19	164/46	238,230	0.34%
18	162/10	355,050	-0.20%
8	162/42	597,600	-1.00%
Mott St. 1-3	164/54	558,000	-3.00%
26	162/14	273,150	-5.00%
12	162/7	110,250	-11.00%
17	164/47	220,500	-12.00%
20	162/11	261,000	-23.00%
32	162/17	162,190	-44.00%

Section Two

2005

53	164/24	396,000	479,100	21.00%
50	163/18	981,000	1,167,300	19.00%
46	163/16	158,850	187,740	18.20%

Median Numbers of Mott Street Tax Assessments

22 to 31	48 163/17	244,350	282,960	15.80%
	164/37	828,000	936,000	13.00%
	41 164/30	459,000	513,900	12.00%
	45 164/28	298,350	302,130	10.00%
42 - 44	163/15	639,900	696,600	8.90%
	40 163/14	328,185	354,439	8.00%
	39 164/31	352,755	380,975	8.00%
	51 164/25	140,936	152,207	8.00%
47 to 49	164/26	589,500	622,500	5.60%
	43 164/29	299,790	310,140	3.40%
33 to 37	164/32	675,900	625,500	-8.00%

2006

22 to 31	45 164/28	389,160	29.00%
	48 163/17	335,160	18.40%
	163/15	798,300	14.60%
42 - 44	41 164/30	575,100	12.00%
	46 163/16	202,410	7.80%
	39 164/31	410,085	7.60%
22 to 31	164/37	990,000	5.80%
33 to 37	164/32	652,500	4.30%
	51 164/25	157,085	3.00%
	40 163/14	356,674	0.63%
	43 164/29	284,400	-8.00%
	53 164/24	428,400	-11.00%
47 to 49	50 163/18	1,021,500	-12.00%
	164/26	420,750	-33.00%

Section Three

2005

Median Numbers of Mott Street Tax Assessments

57	200/31	155,700	207,540	33.00%
59	200/30	281,250	350,280	25.00%
63	200/28	203,850	252,580	24.00%
61	200/29	248,850	303,670	22.00%
76	201/11	181,350	221,220	22.00%
77	200/21	367,980	438,380	19.00%
	200/24	366,300	432,000	18.00%
70	201/8	194,850	225,000	15.50%
52 - 56	201/1	1,143,000	1,313,100	15.00%
	78 201/13	1,647,900	1,804,500	10.00%
	65 200/27	282,600	308,250	9.00%
	58 201/2	99,457	107,413	8.00%
60 - 64	201/4	574,782	616,576	7.30%
	79 200/20	452,880	472,500	4.30%
	72 201/9	250,200	260,190	4.00%
83 to 85	200/17	1,089,000	1,123,200	3.10%
	74 201/10	324,630	332,280	2.40%
	81 200/19	398,880	406,380	1.90%
73 to 75	200/22	454,300	461,500	1.60%
	66 201/6	277,875	277,875	0.00%
	68 201/7	387,540	380,250	-2.00%
	67 200/26	311,130	301,500	-4.00%

2006

52 - 56	201/1	1,616,000	23.00%
	81 200/19	462,180	14.00%
	76 201/11	243,540	10.00%
	72 201/9	262,530	9.00%
	79 200/20	513,000	8.60%
	58 201/2	116,005	8.00%
	74 201/10	334,800	7.60%
	78 201/13	1,933,200	7.10%
60 - 64	201/4	659,760	7.00%
	67 200/26	318,690	6.00%

Median Numbers of Mott Street Tax Assessments

66 201/6	292,500	5.30%
59 200/30	366,930	5.00%
77 200/21	461,580	5.00%
61 200/29	311,730	3.00%
65 200/27	317,010	3.00%
70 201/8	227,640	1.20%
73 to 75	465,600	0.90%
83 to 85	1,111,500	-1.00%
	203,670	-2.00%
57 200/31	247,500	-2.00%
63 200/28	332,550	-13.00%
68 201/7	373,050	-14.00%
69 to 71		

Mott Street Property Tax Assessments

Address	Block/Lot	2004-2005	2005-2006	% Change	2006-2007	% Change	Notes:
		TOTAL AS UNIT ---		2005: 9%	2006: 3%		
NORTH SIDE							
Chatham Sq.							
Mott St 2 - 6	162/1	3,627,000	3,881,700	7.03%	4,068,000	4.80%	Citibank/NIKI Gift
8	162/42	553,500	602,100	8.80%	597,600	-1.00%	Chinatown Fair
10	162/6	98,500	109,170	10.80%	114,300	4.70%	Bangkok Gift
12	162/7	120,150	123,840	3.10%	110,250	-11.00%	Jun Hair Salon
14	162/8	256,320	271,170	5.80%	287,190	5.90%	Gift shop
16	162/9	160,730	283,360	76.20%	313,290	10.60%	Hop Lee
18	162/10	329,378	355,728	8.00%	355,050	-0.20%	Alison's Pharmacy
20	162/11	315,450	335,700	6.40%	261,000	-23.00%	Closed
22	162/12	340,200	367,416	8.00%	380,250	3.50%	Ping Seafood
24	162/13	399,600	317,250	-21%	409,680	29.00%	Ruby Ho
26	162/14	284,400	285,750	0.47%	273,150	-5.00%	windon wo & Co.
28	162/15	304,920	261,000	-15.00%	286,650	9.80%	Peking Duck House

Average for North Side (2005): 11% (2006): 3.2%

Mott Street Property Tax Assessments

30	162/16	179,132	193,462	8.00%	208,938	8.00%	Silk Road Mocha
32	162/17	315,390	288,560	-9.00%	162,190	-44.00%	(Shut down)
Mott 35 - 38	162/18	556,200	597,600	7.40%	650,700	8.90%	1) Don Enterprise 2) New Age Designer 3)
			Block Average 2005: 6.9%	Average 2006: 0.06%			
	Pell Street						
40	163/14	328,185	354,439	8.00%	356,674	0.63%	Chinatown Optical
42 - 44	163/15	639,900	696,600	8.90%	798,300	14.60%	1) Ah Wang Bakery 2) Ming Fa Book
46	163/16	158,850	187,740	18.20%	202,410	7.80%	Fong Inn Too
48	163/17	244,350	282,960	15.80%	335,160	18.40%	Qittu (Drs.Office)
50	163/18	981,000	1,167,300	19.00%	1,021,500	-12.00%	Mr. Tang's
			Block Averages 2005: 14%	Averages 2006: 5.8%			
	Bayard St.						

Mott Street Property Tax Assessments

52 - 56	201/1	1,143,000	1,313,100	15.00%	1,616,000	23.00%	1) "PTICAL" 2) Wonton Garden
58	201/2	99,457	107,413	8.00%	116,005	8.00%	New Serendipity Chinese Community Center
60 - 64	201/4	574,782	616,576	7.30%	659,760	7.00%	Eastern Villa Restaurant
66	201/6	277,875	277,875	0.00%	292,500	5.30%	House of Veges
68	201/7	387,540	380,250	-2.00%	332,550	-13.00%	Tai Hong Lau
70	201/8	194,850	225,000	15.50%	227,640	1.20%	Long Pharmacy
72	201/9	250,200	260,190	4.00%	262,530	9.00%	1) Lou Young 2) Good Field Trading Company
74	201/10	324,630	332,280	2.40%	334,800	7.60%	Egg Custard King Café
76	201/11	181,350	221,220	22.00%	243,540	10.00%	1) Chase Bank 2) Excel Realty Group
78	201/13	1,647,900	1,804,500	10.00%	1,933,200	7.10%	
CANAL ST.							
			Block Average 2005: 8.2%		Average 2006: 6.2%		
Address	Block/Lot	2004-2005	2005-2006	% Change	2006-2007	% Change	

Mott Street Property Tax Assessments

SOUTH SIDE		Average for South Side (2005): 11.5 (2006): 2.3%			
Worth St.					
Mott St. 1-3	164/54	508,500	575,100	13.00%	558,000 -3.00% King
5	164/53	339,300	398,340	17.00%	445,410 Buddha Bodai Kosher Rester.
7 to 9	164/51	787,500	872,100	10.70%	941,400 8.00% Closed for construction
11	164/50	368,423	368,423	0.00%	397,896 8.00% Fashion Hair
13	164/49	234,000	264,060	12.80%	275,130 4.20% Chinese Rester.
15	164/48	237,600	247,500	4.20%	251,100 10.10% Wo Hop Restaurant
17	164/47	262,260	265,500	1.20%	220,500 -12.00% 1) Whole World Fasion 2) Wo Hop
19	164/46	197,100	237,420	20.50%	238,230 0.34% 1) St. Paula 2) Sinotique
21	164/45	294,750	285,750	-4.00%	313,110 9.60% Sun Hop Shing
					Block Averages 2005: 8.4 Averages 2006: 1.1%
Mosco					

Mott Street Property Tax Assessments

22 to 31	164/37	828,000	936,000	13.00%	990,000	5.80%	(#22)Ping-S Seafodd (#24) Ruby Ho In't Trading (#26) Wing-on Wo & Co. (#28) Peking Duck (#31) Good Fortune Gift Shop
33 to 37	164/32	675,900	625,500	-8.00%	652,500	4.30%	Eye Solutions
39	164/31	352,755	380,975	8.00%	410,085	7.60%	NY Chung Chu
41	164/30	459,000	513,900	12.00%	575,100	12.00%	Golden Fung Wah Bakery
43	164/29	299,790	310,140	3.40%	284,400	-8.00%	Closed
45	164/28	298,350	302,130	10.00%	389,160	29.00%	Green Tea Café
47 to 49	164/26	589,500	622,500	5.60%	420,750	-33%	Assoc. 2) Chinatown Gifts
51	164/25	140,936	152,207	8.00%	157,085	3.00%	"Tearrific" Cafe
53	164/24	396,000	479,100	21.00%	428,400	-11.00%	Mike's Wine & Spirit
				Block Average 2005: 8.1% Average 2005: 1%			
Bayard St.							
57	200/31	155,700	207,540	33%	203,670	-2%	1) New Crown Inc. 2) Call Wire

Mott Street Property Tax Assessments

59	200/30	281,250	350,280	25%	366,930	5.00%	1) Chinese Herb Health 2) Golden Lake
61	200/29	248,850	303,670	22.00%	311,730	3.00%	Mandarin Court
63	200/28	203,850	252,580	24.00%	247,500	-2.00%	1) Bok Lei Trading 2) Shangai Inc.
65	200/27	282,600	308,250	9.00%	317,010	3.00%	Chung Wah Pharmacy
67	200/26	311,130	301,500	-4.00%	318,690	6.00%	Big Wong Pharmacy
69 to 71	200/24	366,300	432,000	18.00%	373,050	-14.00%	Electronics 2) Singapore Food
73 to 75	200/22	454,300	461,500	1.60%	465,600	0.90%	1) Conford Shoes 2) Ten Ken Ginseng
77	200/21	367,980	438,380	19.00%	461,580	5%	People's Pharmacy
79	200/20	452,880	472,500	4.30%	513,000	8.60%	1) Ten Ren's Tea 2) Gift Center
81	200/19	398,880	406,380	1.90%	462,180	14.00%	1) Hoy Wong Restaurant 2) "Hair" Salon
83 to 85	200/17	1,089,000	1,123,200	3%	1,111,500	-1.00%	
CANAL ST.							
		Block Average 2005: 1.1%		Average 2006: 2.2%			

Submitted Testimony for Park Row DEIS, Thursday, September 14, 2006

I am the President of the Board of Chatham Towers, Inc, a residential co-op which is located at the corner of Park Row and Worth Street. I have watched Worth Street, in front of our building, suddenly transform from a relatively quiet street into a major east/west thoroughfare, after 9/11. Now it is also one of the few crosstown streets serving all of Lower Manhattan.

At the corner of Worth Street and Park Row, 5 lanes of traffic converging on two narrow westbound lanes of Worth Street makes this congested corner particularly hazardous for children, seniors and the disabled to navigate. There is not a single crosswalk the entire length of Worth Street from Park Row to ~~Center~~ ^{Center} Lafayette Street. That is 4 long blocks without a pedestrian crosswalk, despite repeated community requests to the Department of Transportation after 9/11 and a resolution that passed Community Board #3. All pleas haven fallen on deaf ears despite the fact that the community's major park bordering Worth Street and the neighborhood has a large senior population with walkers and wheelchairs.

Compounding the problem on narrow Worth Street is the stream of illegal government placard parkers, mainly NYPD parkers, who persistently park daily on top of the sidewalk in front of our buildings despite repeated calls to the Fifth Precinct. Enforcement is spotty and frequently available only when the media is present. A few months ago, we had to once again repair the concrete and steel rim on our curb due to the parking on top of our sidewalk.

The traffic congestion has also increased air/noise pollution and reduced the quality of our lives. Most offensive is the loud, banging mechanical barricades erected on Park Row last fall, located just a few yards under residents windows when our surface transportation was restored after almost 4 years of protest. Hundreds of vehicles, particularly buses bang 24 hours a day/7 days a week over the curved steel plate and is loudest when an articulated bus rolls over them. Despite pleas to 311, Police Headquarters, the Fifth Precinct and the Community Assistance Unit have done nothing to mitigate this loud assault. The DEIS says this "happens sporadically" and is therefore not much of a problem.

Our community has not only lost a speedy and wide tree lined pedestrian walkway on Park Row to Downtown that was replaced by a pot hole, rat and auto littered alleyway on Cardinal Hayes Place, also those who live on the eastern side of Police Headquarters lost the use of a wide stairway and were relegated to a steep and narrow staircase that lies by the side of Police Headquarters and the former Municipal Garage also taken over by the NYPD. This

staircase can only accommodate one person walking in each direction. People carrying baby strollers are observed on this staircase. The alternative is to use the staircase or navigate an extra two blocks out of their way to Cardinal Hayes Place.

For the Park Row DEIS to claim that there has been minimal, if any impact, is an insult to this community's intelligence and common sense. The closing of Park Row and surrounding streets has been an assault on our physical and mental health, quality of life, emergency service access and untold hours of lost travel time.

Toby Turkel
President of the Board
Chatham Towers Inc.
170 Park Row
New York, NY 10038

As a 26 year-old organization in Chinatown that regularly hosts school groups, tourists, and visitors from all over New York metropolitan area and the world, the Museum of Chinese in the Americas experienced first-hand the isolating effects of the closure of Park Row and Lower Manhattan immediately following September 11th. One direct effect of the closure was the creation of a siege-like atmosphere both unwanted in our community and off-putting to visitors, as well as, the long-term effect of influencing the habits of weekday and weekend shoppers from visiting Manhattan Chinatown, that continue to dampen our community's psychological and economic recovery efforts. The Park Row issue is also connected, however, to other concerns – the closure of municipal parking to the public, and the clear abuse of power and privilege by government officials and employees who use our neighborhood streets as their private parking lot.

We are disappointed in the way many of these issues have been handled, and the spirit in which our representative government has approached our community's legitimate quality-of-life and economic stabilization concerns. While responses to small, particular issues may have created incremental improvements since 9/11, we feel that the government needs to seriously and respectfully address the cumulative effects of these measures on our community.

Respectfully,

Cynthia Lee
Museum of Chinese in the Americas
Mulberry Street

**New York Police Department
Public Hearing on the One Police Plaza
Draft Environmental Impact Study (DEIS),**

**125 Worth Street
Thursday, September 14, 2006**

**Testimony of
Graham Beck, Communications and Campaign Coordinator
Transportation Alternatives**

My name is Graham Beck, Communications and Campaign Coordinator for Transportation Alternatives. I want to thank you for the opportunity to testify in relation to the One Police Plaza Security Plan Draft Environmental Impact Statement (DEIS) CEQR# 04NYPD002M. Our comments particularly focus on the traffic impacts in the area since the closure.

While traffic problems are rife throughout the city, downtown Manhattan is particularly burdened by vehicular congestion, which negatively impacts mobility, commercial activity, quality of life, and the health of residents and visitors to the area. 2000 Census data show that the top 5 drive-to-work census tracts are in lower Manhattan, with the 2900 Chinatown tract topping the list with between 11,000-12,000 daily automobile trips. 46% of workers commuting to this tract do so in a car, the highest percentage of auto commuters in the Manhattan Central Business District. Of these, 56% are government workers, who not surprisingly drive at an even higher rate than the private sector workers, by an almost 2 to 1 margin.

Furthermore, many government workers illegally park their cars on sidewalks, in front of fire hydrants, in bus stops, and in crosswalks. These government workers who park illegally have the effect of slowing emergency response times, jeopardizing public safety, crippling truck and delivery traffic, impeding pedestrian flow and damaging businesses. Further, it sends a message to community residents that their streets are seen as parking lots for commuter vehicles rather than neighborhoods to be respected. The NYPD's own DEIS documented 1217 illegally parked vehicles in the study area, 1012 of which were using government issued parking placards.

Given the conditions prior to the closure of Park Row, the DEIS makes insufficient mitigation recommendations to deal with increased traffic, such as slight alterations to signal timing, and completely skirts the central issue of enforcing illegal permit parking by government workers. The DEIS must include a plan to mitigate the abuse or permit parking placards by enforcing existing parking laws. Likewise, the DEIS should offer mitigations to all the adversely affected intersections, not just three of the five, and should include plans for reducing the total number of drivers to the area by reducing the number of parking placards issued to government workers.

Anna Goldstein
170 Park Row
New York, NY 10038
September 14, 2006

Subject: Public Hearing on DEIS – Park Row Closure

My name is Anna Goldstein, and I am a resident of Chatham Towers on Park Row at the south of Chinatown.

It has been five years since 9/11, and the temporary closure of Park Row does not feel temporary. In fact, I believe that the Police Department and the city have deliberately misrepresented the closure from the beginning, and all of us who live in the community are suffering with the consequences.

The closure of Park Row has resulted in a high volume of traffic on Worth Street, which borders my building. It has been extremely difficult ^{for} my children and I to cross the street because of the non-stop, steady stream of traffic on Worth Street. Cars come from St. James Place when the traffic light is red, but then when it is green and time for pedestrians to cross, cars turn in from Mott Street as well as the Bowery – because Park Row is closed. We feel like there is no safe time to cross the street.

To deal with the high volume of traffic being diverted as a result of the Park Row closure, it was necessary for the police to put as many as 6 traffic officers at Chatham Square. The traffic officers are there to keep traffic moving and usually ignore pedestrians; my experience has been that they direct cars to go even when the traffic light says that pedestrians can cross.

My children like to play in Columbus Park with their friends, as do most of the children in Chinatown. The heavy traffic makes me concerned about the levels of pollution surrounding the park.

Since the closure of Park Row, my extended family prefers not to come to Chinatown to dine and have family get-togethers. Traffic patterns have diverted them as much as two miles in order to get back to Chinatown.

Then there is the parking problem. Parking has been usurped by not only the court personnel, but by private cars bearing police placards. All the parking that once existed for the residents and visitors of Chinatown prior to 9/11 has become almost non-existent. Cars used to be able to park on Park Row, Mulberry Street, Bayard Street, and Baxter Street. In addition, the municipal parking garage at Police Plaza has closed to the community.

I am sure the traffic and parking situation has changed other people's willingness to come to Chinatown as well. Our pediatrician says she no longer comes to Chinatown if she can

avoid it because of the traffic and parking problems. She and her family now go to Queens Chinatown to shop and dine.

I see that the businesses of south Chinatown have suffered. The Chinese supermarket, Kam Kuo, where I used to pick up milk and groceries, closed a few months after the Park Row closure, and nothing has re-opened there. The restaurant on the corner of Worth Street and Mott has changed hands a few times, but it was vacant more than not during the past 5 years – it used to be a highly desirable location. The south end of Mott Street used to be a bustling section prior to the Park Row closure. In fact, it used to be part of the heart of Chinatown.

The closing of Park Row caused in bus stops to be moved and bus routes to be diverted, contributing to the loss of customers due to inconvenience. Shoppers do not want to carry their packages an extra few blocks to get to the bus stop, so they stopped buying at the stores near the street closings.

It has been with much time and effort that the community was able to have buses permitted to travel the closed section of Park Row. Prior to opening Park Row for buses, the section was used by the Police as a huge parking lot for themselves.

Park Row is a major artery for the Chinatown community, and it has been cut off. Not only has it been closed to private vehicles, it has been closed to emergency vehicles, impacting on response time and access.

The street closures in the community have made insurance companies view us as living in a “high risk” area. At one point, Chatham Towers could not get our building insurance renewed. After much difficulty, my building found a company who was willing to insure us at five times the previous cost. So, the Park Row closure has cost me financially!

Please, see that the closure of Park Row has had an obvious **major and negative impact** on those who live, work, or visit our community. We look forward to the re-opening of Park Row. Street closures of more than five years are NOT temporary. If it is necessary to keep a “safety perimeter” around Police Plaza, it is time to move Police Headquarters somewhere else, perhaps Governor’s Island!

Sincerely,

Anna Goldstein
Anna Goldstein

42-65 Kissena Boulevard, Apt. 609
Flushing, NY 11355-3267
16 September 2006

Anthony Tria
New York Police Department Capital Construction
620 Circle Drive
Fort Totten, NY 11359-1011

Re: *One Police Plaza Security Plan: Draft Environmental Impact Statement*

Dear Inspector Tria:

The *One Police Plaza Security Plan: Draft Environmental Impact Statement* is incomplete with respect to actual transit operations described in Chapter 8. Both the pre-2001 and post-2001 bus route descriptions and analyses fail to include all Park Row express bus services. Prior to being finalized, the statement should be corrected, and any conclusions based on the incomplete draft statement should be re-evaluated.

In 2001, all of the local bus service in lower Manhattan was operated by the New York City Transit Authority ("NYCT"), and this service appears to be described accurately in the draft statement. But with respect to New York City express bus service, only one-third of this service was operated by NYCT; the remaining two-thirds was being operated by private companies under contract with the New York City Department of Transportation ("NYCDOT"). However, the statement examines only the NYCT express service and does not consider the equally-important (and possibly more-important) NYCDOT express bus service.

Immediately prior to the tragic events of 2001, there were four NYCDOT express bus routes serving streets in the study area that are now closed to bus traffic, i.e., Park Row from Broadway to Pearl Street, and Pearl Street from Park Row to Centre Street. These four NYCDOT express bus routes, BM1, BM2, BM3, and BM4, were operated contract by Command Bus Company, Inc., and all are shown on the map in Figure 8-2.¹ Since the tragedy, these four express bus routes have been changed more so than any other bus routes in Lower Manhattan.² Their exclusion from the statement seriously underestimates the impact of the street closings on users

¹ The map in Figure 8-2 also shows route BM2S, but by 2001 this route had been absorbed into route BM2 and no longer existed as a separate route.

² All of the routes that had been operated by private companies prior to the tragedy are now being operated by the MTA Bus Company.

of bus service in Lower Manhattan.

The DEIS might be corrected by adding the following text to the statement (text to be added in underlined, and text to be deleted is in strikethrough text).

Page 8-3

The role of the express bus service in the area is to serve commuters from communities generally outside of Manhattan, and to transport them to and from Lower Manhattan. Some express routes were operated by NYCT, while other express routes were operated by private companies under contract to the New York City Department of Transportation. A total of 36 express bus routes were operated by NYCT between Lower Manhattan and various parts of New York City (mostly the outer boroughs), and 9 express bus routes were operated by private companies between Lower Manhattan and the Bronx, Queens, and Brooklyn. These express bus routes operate on a limited schedule (usually during the morning and evening peak periods) and are designed to bring commuters from distant locations into Lower Manhattan in a quick and efficient manner.

Prior to September 11, 2001, NYCT operated two express bus routes that traversed Park Row including the X25 and X90 (see Figure 8-2). Both of these bus routes started/terminated in Lower Manhattan and connected with destinations in Midtown and Upper Manhattan. Figure 8-2 shows the Lower Manhattan area bus route maps for 1995 and 2006. As shown in the figure, prior to implementing the security plan in 2001, Park Row hosted the X25 and X90 express bus routes. The X25 route operated between Grand Central and Battery Park via the FDR Drive, while the X90 operated between East 110th Street and Fifth Avenue and the World Financial Center via the FDR Drive. Table 8-2 presents the pre-September 11, 2001 data on the average weekday express bus ridership for the total length of these routes.

Also prior to September 11, 2001, one private company (Command Bus Company, Inc.) operated four express bus routes that traversed Park Row and Pearl Street, i.e., routes BM1, BM2, BM3, and BM4 (see Figure 8-2). In the morning these four routes all originated in Brooklyn, traveled through the study area, and terminated in Lower Manhattan on Worth Street at Centre Street. In the afternoon, these four routes originated on Worth Street at Centre Street, but remained on the periphery of the study area (using Lafayette Street, Centre Street, and Park Row to reach Broadway) before returning to Brooklyn.

During the midday and on Saturdays, Brooklyn-bound BM1, BM2, BM3, and BM4 buses originated in midtown Manhattan, traveled to Lower Manhattan via the F.D. Roosevelt Drive, and passed through the study area using Robert F. Wagner Sr. Place, Pearl Street, and Park Row to Broadway. In the opposite (i.e., Manhattan-bound) bound, the BM1, BM2, BM3, and BM4 bus routes traveled uptown on Church Street, then along Vesey Street, Park Row, and Frankfort Street to the F.D. Roosevelt Drive.

Page 8-5

As discussed above, Park Row hosted the X25, and X90, BM1, BM2, BM3, and BM4 bus routes. In the No-Action condition, these bus routes would not have been rerouted around Park Row and would continue to run on the pre-September 11, 2001 routes (see Figure 8-2). The ridership for these bus routes, like local bus routes, also decreased as a result of the loss of office space in Lower Manhattan due to the events on September 11, 2001 (see Table 8-8 below).

Page 8-8

Table 8-8 presents a comparison of pre- and post-September 11, 2001 average weekday ridership for the NYCT express bus routes that have been rerouted due to the With-Action condition. Bus ridership on the X25 bus fell dramatically (approximately 83%) from pre-September 11, 2001 to post-September 11, 2001 conditions. Bus ridership on the X90 also fell by approximately 17%. In total, average weekday bus ridership for these two bus routes fell approximately 28% from pre-September 11, 2001 to post-September conditions. Bus ridership to and from Lower Manhattan on the BM1, BM2, BM3, and BM4 routes also fell dramatically.

As discussed above, as a result of the terrorist attacks on September 11, 2001, 34.5 million square feet of office space in Lower Manhattan was destroyed or damaged. The loss of ridership on the express bus routes is attributed to the loss of office space that occurred and not to the rerouting of the bus routes. As shown in Figure 8-2, the rerouting of the X25 around the security plan street closures did not change drastically from its previous route. As such, the drop in ridership between pre- and post-September 11, 2001 is most likely not attributable to the rerouting of the bus route.

Besides being rerouted around Park Row, the route for the X90 bus changed somewhat from the pre-September 11, 2001 route, unrelated to the security plan. The X90 was consolidated with the X92 route and now operates between East 92nd Street and York Avenue and the World Financial Center via the FDR Drive and Pearl/Water Street (see Figure 8-2). According to the MTA, the rerouting of the X90 is permanent and would not return to its former route down Park Row.

The routes used by the BM1, BM2, BM3, and BM4 changed significantly following the tragedy. In the morning these bus routes continue to travel uptown on Church Street as they had done prior to the tragedy, but instead of turning eastward onto Vesey Street and up Park Row towards the Worth Street and Centre Street terminal, these bus routes now continue traveling uptown on Church Street to a new terminal on Church Street at Thomas Street. In the afternoon these bus routes no longer originate at Worth Street and Centre Street, and no longer pick up passengers along Broadway. Instead all four bus routes originate at a new terminal on Park Place between Church Street and Broadway, proceed along Park Place, up Park Row to Frankfort Street, and then down Pearl Street and Water Street towards the Brooklyn-Battery Tunnel.

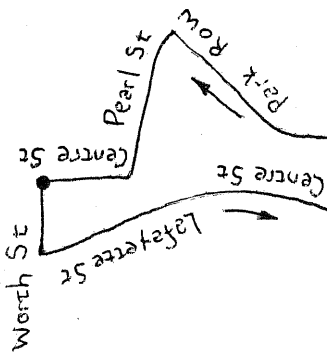
During the midday and on Saturdays, these four routes have also been changed significantly. Brooklyn-bound buses originating in midtown Manhattan continue to travel to Lower Manhattan via the F.D. Roosevelt Drive, but instead of traveling through the study area and picking up passengers along Broadway, these buses now pick up passengers along Pearl Street and Water Street to the Brooklyn-Battery Tunnel. In the opposite direction, the BM1, BM2, BM3, and BM4 bus routes continue to drop off passengers along Church Street, but instead of using Vesey Street to get to Park Row and the F.D. Roosevelt Drive, these bus routes now use Park Place.

Your consideration of the foregoing corrections will permit the important and necessary consideration of the interests of bus passengers (especially passengers from the Borough of Brooklyn) as plans for securing government buildings are devised, reviewed, and updated.

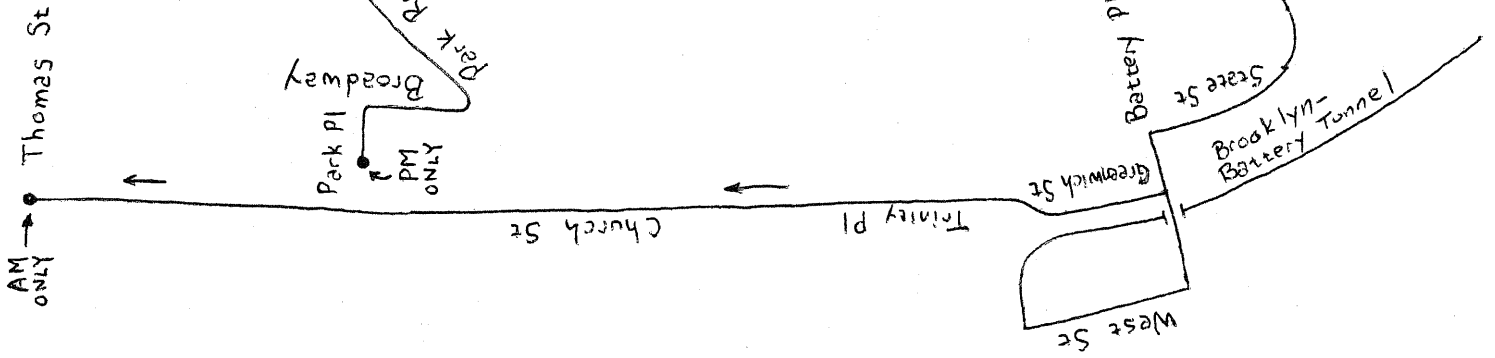
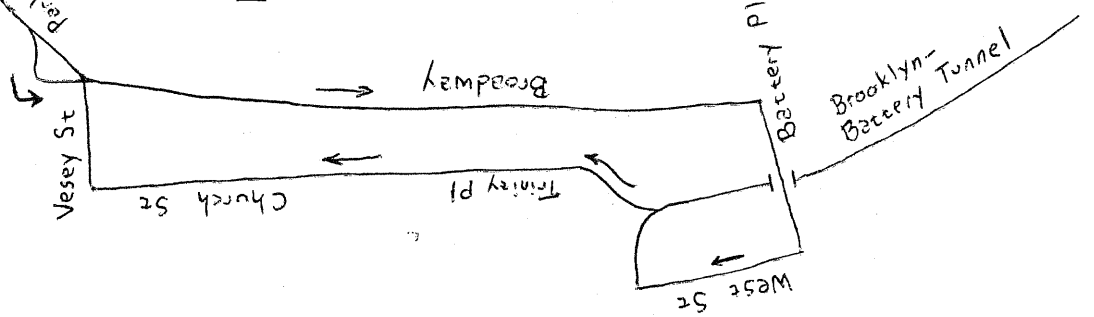
Very truly yours,



Lawrence F. Hughes, AICP



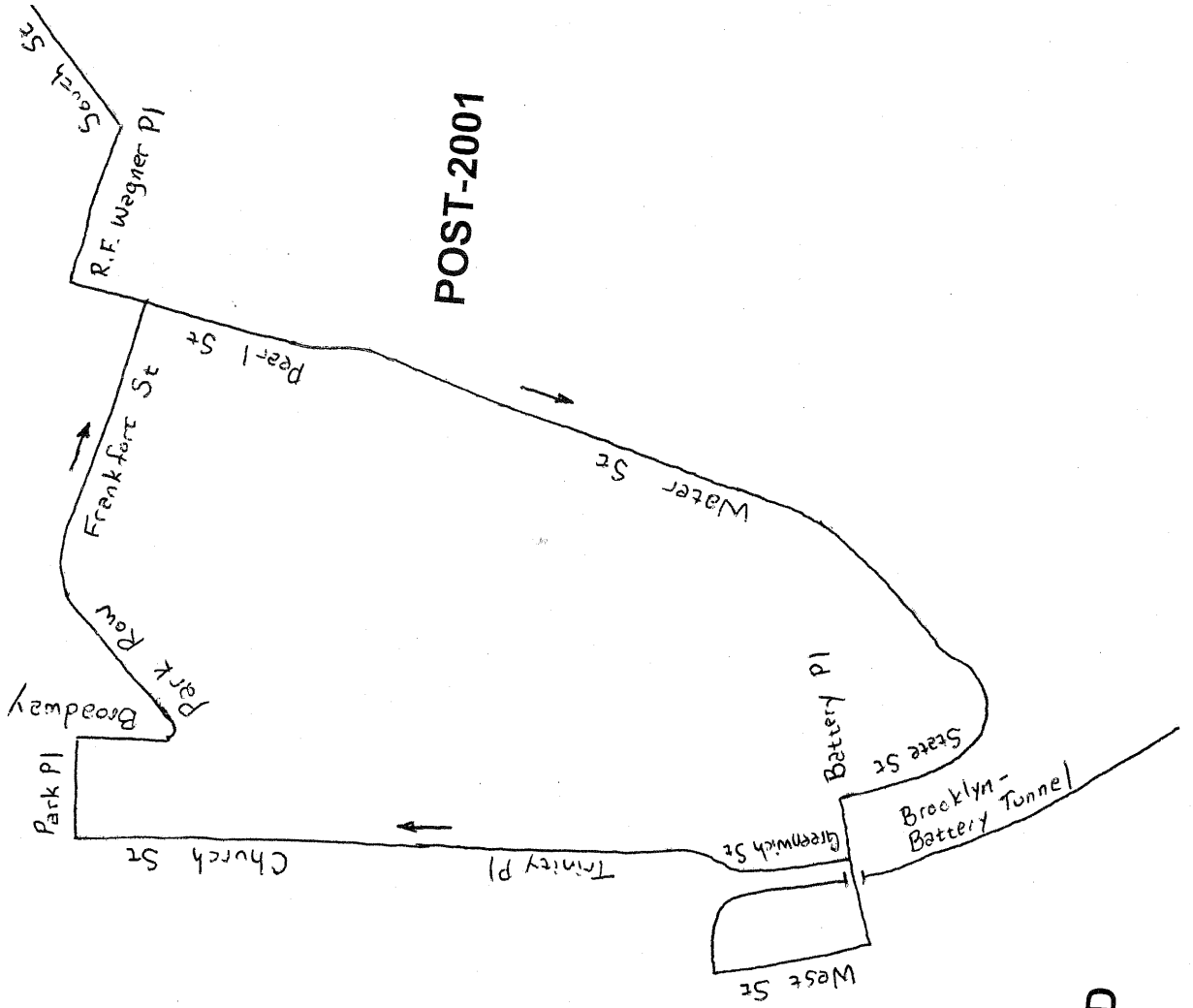
PRE-2001



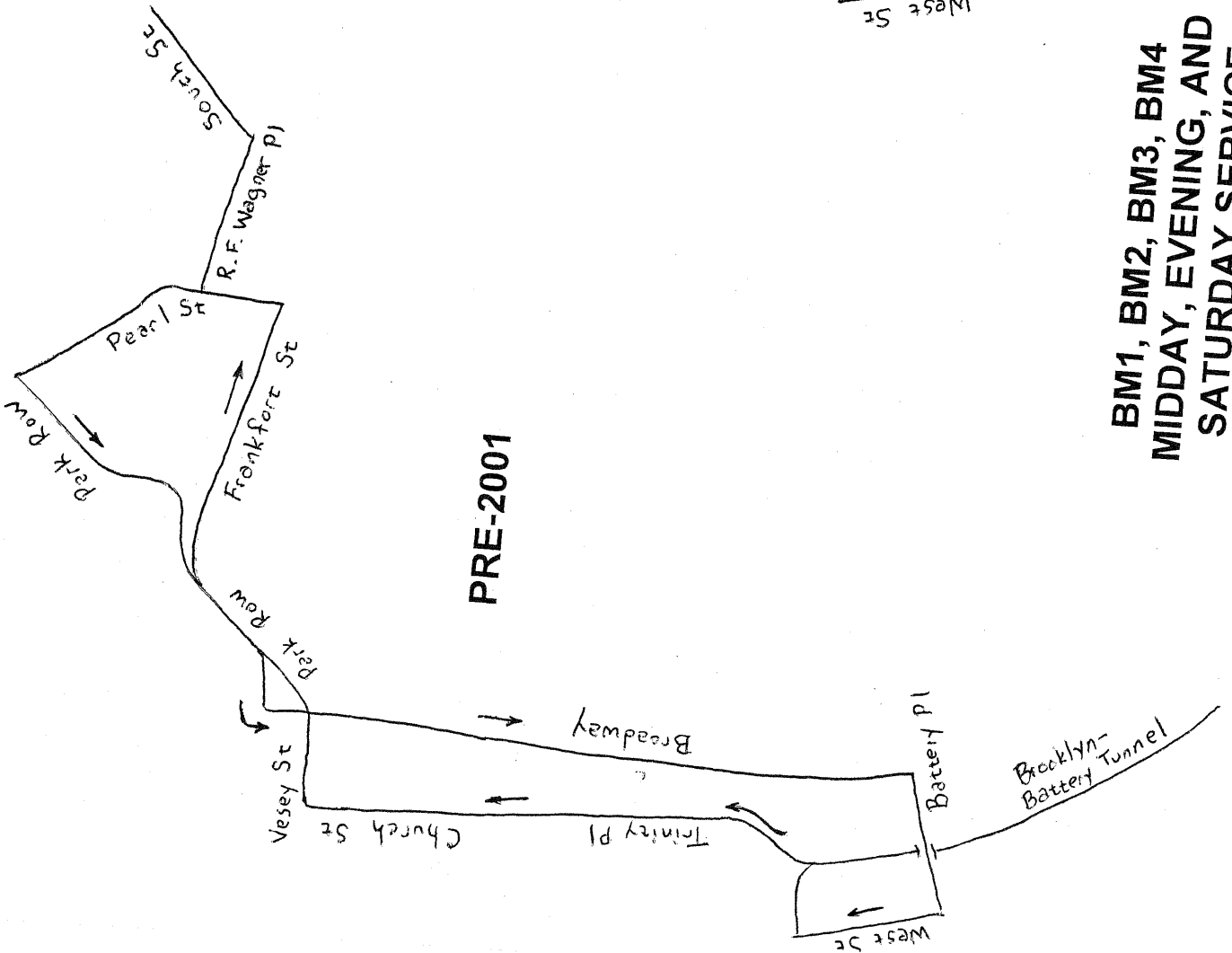
POST-2001

BM1, BM2, BM3, BM4
RUSH HOUR SERVICE

POST-2001



PRE-2001



**BM1, BM2, BM3, BM4
MIDDAY, EVENING, AND
SATURDAY SERVICE**

Please Sign our Petition!

We, the undersigned, live, work, visit, or travel through the Chinatown and Civic Center area around Police Headquarters. We support the call for Community Board 3 for Mayor Bloomberg to:

- Reject the One Police Plaza Draft Environment Impact Statement (DEIS) which claims the street closures have little impact upon Chinatown and other Lower Manhattan neighborhoods.
- Denounce the faulty methodology, poor research & illegal segmentation of the DEIS's analysis which jeopardizes the security & safety of Police Headquarter's neighbors.
- Open Park Row or Present to the Community Real -not Sham-Mitigation.
- Stop Illegal Parking on Lower Manhattan streets & Open the Police Headquarters Parking Garage for government vehicles and employees with legal parking permits.
- Investigate Relocating Police Headquarters by Commissioning an Independent Study by qualified and respected international security experts to find the best possible location for the NYC Police Headquarters in a post 9-11 world.

Name	Affiliation (optional)	E-mail/Phone/Address
Allison Ngan		2221 E27th St Bkly NY
Stephanie Ngan		lilgreenridinghoods825@hotmail.com
Olivia Moy	Oliver St. Block Assn	15 Oliver St NY NY 10038 moy@alumni.princeton.edu
Samatha Moy	275 Pheny St	
Janice Wang	1718 68 Street Brooklyn	
Dr. James C.W. Moy		15 Oliver St
May Jing Moy		15 Oliver St.

Name

Affiliation (optional)

E-mail/Phone/Address

Suk K Kwon

Seung Wung

54 CATHERINE ST

56 ST JAMES PL

Please Sign our Petition!

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Name	Affiliation (optional)	E-mail/Phone/Address
Simon Chan Jr.		
Sophia Chu		411 E. 10th St. Apt 8C 10009
Monica Li		
William Huang		363 Bay Ridge Ave Bklyn, NY 11220
Geoffrey Zheng		35 Henry St 4A10002 1258 Dekalb Ave Bklyn NY 11221

Please Sign our Petition!

We, the undersigned, live, work, visit, or travel through the Chinatown and Civic Center area around Police Headquarters. We support the call to the Community Board 3 for Mayor Bloomberg to:

- Reject the One Police Plaza Draft Environment Impact Statement (DEIS) which claims the street closures have little impact upon Chinatown and other Lower Manhattan neighborhoods.
- Denounce the faulty methodology, poor research & illegal segmentation of the DEIS's analysis which jeopardizes the security and safety of Police Headquarters's neighbors.
- Open Park Row or Present to the Community Real -not Share Mitigation.
- Stop Illegal Parking on Lower Manhattan streets & Open the Police Headquarters Parking Garage for government vehicles and employees with legal parking permits.
- Investigate Relocating Police Headquarters by Commissioning an Independent Study by qualified and respected international security experts to find the best possible location for the NYC Police Headquarters in a post 9-11 world.

Name	Affiliation (optional)	E-mail/Phone/Address
Jeff Zou		40 Monroe St #61 NY NY 100
Judy Wu		
Tiffany Wong		
Yannick Huang		
Cynthia Lee		41 Essex St #14 NY NY 100
Marcus Brown		250 Clinton St NY NY 100

Please Sign our Petition!

We, the undersigned, live, work, visit, or travel through the Chinatown Civic Center area around Police Headquarters. We support the call Community Board 3 for Mayor Bloomberg to:

- Reject the One Police Plaza Draft Environment Impact Statement (DEIS) which claims the street closures have little impact upon Chinatown and other Lower Manhattan neighborhoods.
- Denounce the faulty methodology, poor research & illegal segmentation of the DEIS's analysis which jeopardizes the security and safety of Police Headquarter's neighbors.
- Open Park Row or Present to the Community Real -not Share Mitigation.
- Stop Illegal Parking on Lower Manhattan streets & Open the Police Headquarters Parking Garage for government vehicles and employees with legal parking permits.
- Investigate Relocating Police Headquarters by Commissioning an Independent Study by qualified and respected international security experts to find the best possible location for the NYC Police Headquarters in a post 9-11 world.

Name	Affiliation (optional)	E-mail/Phone/Address
Alan Zhou		littlebay@gmail.com
Hut Yee Loo		cc123456@gmail.com
P.K. Leung		pkleung@hotmail.com
James Leung		James 23 @ yahoo.com
Tommy Au		To 123 @ gmail.com
Jason Medeiros		Help 94 @ hotmail.com

Please Sign our Petition!

We, the undersigned, live, work, visit, or travel through the Chinatown and Civic Center area around Police Headquarters. We support the call by Community Board 3 for Mayor Bloomberg to:

- Reject the One Police Plaza Draft Environment Impact Statement (DEIS) which claims the street closures have little impact upon Chinatown and other Lower Manhattan neighborhoods.
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- Investigate Relocating Police Headquarters by Commissioning an Independent Study by qualified and respected international security experts to find the best possible location for the NYC Police Headquarters in a post 9-11 world.

Name	Affiliation (optional)	E-mail/Phone/Address
Tara Flom		315 W 33 Street
Walter Zhan		Confucius plaza
Felix Mok		162 E 8th St
Vincent Chan		14 Monroe St. #1E6 NY NY 10002
Alec Cheng		283 E 2nd St ^{Brklyn} NY 11218
Dr. Hua Chen		60 Henry St. 7A NY NY 10002
		22 Bay 40 th St.

Name

Affiliation (optional)

E-mail/Phone/Address

Julie Lin

11 Essex St # 8 NY NY 10011

Michelle Szeto

115 Moh St #45 NY NY 10013

Jacklyn Chen

50 Bayard St #70 NY NY 10013

Dreanna Guillaume

718-975-3712

Lisa Chen

230 Clinton St #14H NY NY 10006

Amy Wang

95-29 76 St Jamaica NY 11416

Karen Chan

6340 Bunncke Ct Ridgewood NY 11385

Vonne Moy

303 E 66 St NY NY 10013

Harold Moy

303 E 66 St

Civic Center Residents Coalition 公民中心居民聯盟

ctownissues@gmail.com

連署請願書

本人乃以下簽署人，時常到警察總部附近的華埠及社區中心，是我們生活、工作、探訪及旅遊的地點，我們響應第三社區委員會，向市長彭博作出以下請願：

- 否決警察總部草擬的環境影響報告書(DEIS)的結論，該報告認為關閉柏路對華埠及其他下東城的鄰舍影響輕微。
- 譴責報告中充滿過失的方法學、差勁的研究及非法分割報告，作出偏頗的分析，危害警察總部鄰舍的安全。
- 開放柏路，否則向社區大眾表現真誠的、而非偽裝的門面工作。
- 停止在下東城非法泊車，開放警察總部的停車場，給擁有合法泊車證的政府車輛及其職員。
- 研究遷移警察總部的意向，承諾由有質素及備受敬重的國際安全專家組成獨立研究組，找尋 9/11 後最佳地址，興建紐約市警察總部。

Name 姓名	Affiliation (optional) 所屬組織(可免填寫)	E-mail/Phone/Address 電郵/電話/地址
廖榮光	Chatham Green	APT. 2014
Yip Shau & Ben	Chatham Green	16F
凌怡	CHATHAM GREEN	16F
黎掌榮	Chatham Green	16F
梅轉兒	目林綠	16F
SHU HING CHAN	CHATHAM Green	16F
Yeemon CHAN	South Bridge	333 Pearl St.

Civic Center Residents Coalition 公民中心居民聯盟
ctownissues@gmail.com

Please Sign our Petition!

We, the undersigned, live, work, visit, or travel through the Chinatown and Civic Center area around Police Headquarters. We support the call by Community Board 3 for Mayor Bloomberg to:

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- Investigate Relocating Police Headquarters by Commissioning an Independent Study by qualified and respected international security experts to find the best possible location for the NYC Police Headquarters in a post 9-11 world.

Name	Affiliation (optional)	E-mail/Phone/Address
M. Fong	Chatham Green	212-962-1056
Elena Fong	" "	FOGN@aol.com
Suzanna Puckett	20 E	Chatham Green
Debbie Chu	10D	Chatham Green
Charlie Chu	10D	Chatham Green
Connie Yee	13A	Chatham Green
Jean Grillo	CB#1	jbgnyc@aol.com
Pat Collins	15D	212 349 4679
Miriam Pastore	7C	Chatham Green

Civic Center Residents Coalition
ctownissues@gmail.com

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

We, the undersigned, do hereby oppose the planned reversal of the direction of traffic on Oliver Street, which is now eastbound to westbound. The Draft of Environmental Impact System ("DEIS") gives no reason for, no study of, nor the environmental impact of such a traffic change. The entire plan is, therefore, defective, and is arbitrary and capricious, and must be rejected as a matter of law. We also believe that such a traffic change would detrimentally change the character of Oliver Street, which is now a quiet residential street into a major thoroughfare. It would invite trucks, buses, trailer trucks, and other commercial traffic into the street from Chatham Square on which many of these types of vehicles traverse on a constant and regular basis. This would pose a safety hazard for children attending P.S. 1, which is located on Oliver Street as well as for the parishioners of Mariner's Temple Baptist church, which is also on the street. For safety reasons, any large vehicle traversing Oliver Street would have difficulty exiting the street because of the narrowness of the street. A turn must be made either into Henry Street, or into Madison St. Presently we observe several trucks a week being stuck and colliding with parked cars by not being able to make the required turns. If traffic flows into Madison St. from Oliver St., as may be expected, vehicles making a right turn would be returning into the Chatham Square traffic flow at St. James Place and therefore, would not alleviate the Chatham Square traffic which we believe this direction change is supposed to do. Furthermore, expected normal Church, and school activity, which may restrict traffic flow on Oliver Street causing backups of traffic into Chatham Square would create tie-ups of the major traffic flows through that intersection. For these reasons we oppose this proposed traffic change, and plan to mobilize all available community groups to oppose it.

Finally, if the proposed Oliver Street direction change is to help alleviate traffic in Chatham Square, we believe that that this situation is best accomplished by reopening Park Row and restoring it to its former condition. Therefore, we also oppose in total the proposed Security Plan.

<u>NAME</u>	<u>ADDRESS</u>
Andy Hong	201 West 72 nd St. NY NY, 10023
Jan L	848 Ethe Avenue S-I NY 10024
<i>[Signature]</i>	15 OLIVER ST. NEW YORK, NY 10038
<i>[Signature]</i>	211 East 53 rd St NY, NY 10022

以字为明工字路告已 17/12

OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
[Signature]	26 Henry St.
[Signature]	47 Catherine St
[Signature]	44. Henry St.
Monica Chen	10 Monroe St
STEVE SCHAFFER	10 MONROE ST
Mai chou Liu	505 Rt 32 Highland mls 10930
Mary Leaf	9. Monroe St
Choi [Signature]	124 Madison St
Peter Leaf	9. Monroe St
[Signature]	101 本面 [Signature]
Kwong Christ Lee	33 HENRY St. APT 14 ^{NY} 10002
[Signature]	100 Madison St
Kempy [Signature]	100 Madison St
	50 HOO
[Signature]	32 Henry St.

OLIVER STREET BLOCK ASSOCIATION
 PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Xuesh	32 Monroe St.
XIAN TAN	32 Monroe St
Johny Moore	20 Catherine
Ron Young	29 Linden St
Amelin	1276 Tabor Ct, Bklyn
Cecilia	in in in in
Chin, Keong	1216, Tabor Ct, Bklyn
Alice Chin	1214, Tabor Ct, Bklyn
Lee ngen fah	37 Henry St NY 10002
James elene	17. CATHERINE St
Whitney Tang	82 Madison St
GAO XIANGGE	美里街 114
Yang cheng	37 Henry St NY 10002
Daisy Gao	11 E. Broadway 10002

反對柏路長期封鎖居民簽名

OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Scott Xie	102-12 65th Ave # A86 Forest Hills 11375
Ama Liew	84-25 Elmhurst Ave #311 Elmhurst NY
[Signature]	83-18 97th Ave Ozone Park NY 11416
Winnie Mai	1028 East 99th Street Brooklyn, NY 11236
Patrick Fung	10 Confucius Plaza BPT80 New York, NY 10002
Aria Niuta	1624 West 9th Street, Apt. Brooklyn, NY 11235
[Signature]	65 ABLE AVE. #6 NY, NY 10040
[Signature]	22 1/2 Catherine St. NY, NY 10038
Karen Zhou	30 Montrose Ave Apt 3S Brooklyn NY 11206
Diana Liu	54 Boerum St. Apt. 201K Brooklyn, NY 11206
John Ng	40-15 102nd APT 3A Long Island City NY 11101
[Signature]	221 Prospect Park West Brooklyn NY 11215
Jifer Puy	16 Montrose St, JF11 NY, NY 10002

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
John X. Li	218 Lanton ave 07010 NJ.
Siu Sing Lei	60 Henry Street Apt 5B 10002 NY
Angie	51 Catherine Apt 36 10014 NY
Ricky Li	50 Mott #15
Vincent Cheng	515 East 11 th Ave A Apt C4 10009 NY
Emily Zhou	13 Market St. Apt 15 NY, NY 10002
Yue Ping Chen	211 HENRY ST 2A NY 10002
Xiu Ping Wang	245 CANAL STREET 5th FL
Sheng Lin	2101 Nostrand Ave.
Wayne Tay	1027 63RD ST, Brooklyn, NY 11219
Tony Lee	48-71 37 th LIC 11101
Jason Chan	41 Worth St Apt 18 G 10015
Jennifer Shyue	556 Dohill Rd. Apt #10 Brooklyn NY 11218

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

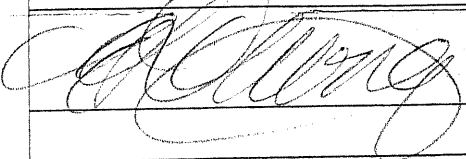
In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Nancy Chan	77 Columbia St. #11H New York N.Y. 10002
Samuel Chen	8763 16 AVE 11214 BK NY
Min Hui Lian	16 Sharon Street Brooklyn NY 11211
Cynthia Chan	645 Water st 19D NY NY 10002
Shirley Chan	549 55 th St Brooklyn NY 11220
Eric Wong	27-29 Monroe St. Apt 25 NY N.Y. 10002
Ava Chee	221 Bay Ridge Pkwy Brooklyn, NY 11209.
Ricky Ramcharan	240 Madison St. New York, N.Y. 10002
Olivia Chen	8763 16 AVE 11214 BK NY
Melody Lin	15 Elmgrove St Apt#6 NY NY 10002
Wei Hao	Herry St # 229 NY NY 10002
Jing Chao Lin	65 Street 50 Avenue BK NY 11377.
Janice Ling	188 Monahan ave Staten Island, NY 10314

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Jessie Ling	188 Monahan ave Staten Island NY
MIRET WEISSBERG	8 Otego Place Greenlawn, NY, 11740
Lin Lee	1348 CC St Brooklyn, N.Y.
Mitchelle Chung	2353 E. 16 St. NYC
Rita Chung	2353 E. 16 St. NYC
Alex Wong	1759 74 St Brooklyn, NY
Marlina Nguyen	2107 E 23 St 2nd FL Brooklyn NY 11229
Gina Yu	6203 Ft. Hamilton PKWY Brooklyn, NY 11219
Essye Klempner	520 E 12th St. # 6F NY NY 10009
Lachry Chen	8763 16 AVE 11214 Brooklyn
P. Vivant.	1123 West 2nd St BK NY 11223
Carmen Jin	160-170 Madison street APT 1-I NY, N.Y., 10002
 E.D. WONG	9 STUYVESANT OVER, APT 9B NEW YORK, NY, 10009

OLIVER STREET BLOCK ASSOCIATION
 PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Kang Chung	25 HENRY ST. NY 10002
shee xia zhu	45 HENRY ST NY 10002
Seymour	27 MONROE ST NY 10002
CHIN SIU WAH	65-75 PIKE ST NY 10002
zhen zhe	23 East Broadway NY 10002
KAM KIA CHAN	1813 76 th St. Brooklyn, NY 11214
Can X Li	21 Catherine St Apt 10 N.Y. N.Y. 10038
YUZARHO BL.	154 Broadway N.Y. 10002
Nan zhu Liao	40 madison ST 100 ^{NY} 10038
zhang zhen	26 MADISON ST 10038
Huan ying Li	182 South ST #16D NY 10038
ZHU WEI HUANG	27 HENRY ST. #2 NY 10002
Li Hua mei	1738 Lexington Ave #46 N.Y. N.Y. 10029

OLIVER STREET BLOCK ASSOCIATION
 PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Qiu Hao Du	13 DIVISION ST. APT. 3. NY. NY 10002
yan Han chio	40 WELSON ST
Laura Huie	26 Henry St. NY NY
Rui Jiang Joo	40 madison st NY NY
Qing Peng Lu	477 ... NY NY
Tina Chen	50 HENRY 3A N.Y. N.Y. 10002
Bai Chung Tao	93. Madison St 4B New York NY 10002
Xiao Chimei	51 CATHERINE ST 10 N.Y. N.Y. 10038
Yao Ling Si	33 Henry St NY NY
Mock Jan	7 ST. James PL N.Y. NY 10038
Sam Yuf Wang	106 ¹⁰⁷ Madison St 3D N.Y. NY 10002
Wu Ling Ni	404 W 56th #17 NY, NY 10019
Tom Berlin	601 73 St Brooklyn

OLIVER STREET BLOCK ASSOCIATION
 PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
HUAN XIE	
Yueon J	15 ST. James pl #8A N/ NY 10038
YAO WEN LI	126 Eileen 19# N.Y 10013
YAN JUN WU	
Yee Fei WOO	46 Madison
Yoshiko X	1268 W 13 BROOKLYN
YUANSI TAN	45 Madison St. NY NY 10038
Fanny Kuek	17 17 Catharine ST. NY NY 10038
SU YONG ZHAO	26 BAY 34 ST BROOKLYN NY 11214
ZHU Yi mei	23 Henry ST NY 10002
Aisling	18 ST. James pl NY NY 10038
Chow Yung	106 Madison ST AP 4D
Phong	

OLIVER STREET BLOCK ASSOCIATION
 PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Mr. Ma Fung	135-27 Goolidge Ave Kew Garden N.Y. 11435
Mr. Gao Guo	71 Madison St Apt New York N.Y. 1002
Mr. Ma Hua	St Henry St
Mr. Chang	29 CAMPBELL ST
Mr. Li Hua	22 Catherine St
Yan Yan Li	38 Henry St
Su Mei Huang	8 HENRY ST NY 10013
Pe Chang	25 Henry St. 10012
TAN LI	7 HENRY ST.
Sun Jian Li	7 HENRY ST
Gao Xue Hua	83 HENRY ST. NY 10012
Yin Jie Lou E	374 Pearl St NY 10014
Ye Peng Hua	45 - Rice St.

d. g.

OLIVER STREET BLOCK ASSOCIATION
 PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
YUE QIKU BI	154 EAST Broadway
Rui QING WU	
Whitney Jones	82 MADISON ST
Yan Fen Huang	14 MADISON ST.
Xiu Hua ni	20 MCKIBBIN COURT
Dun Ci Chen	106 madison st.
Maria Alvarado	10 Cathine slip.
Liang Bao zh	14 Monroe St I BQ
Li Juan Mei	43 HENRY ST
MEI CHEN	12 MONROE ST
CHUN YIN HUI	7 ST. JAMES PL.
CHEN Xiu Qin	27 ST. James PL
ZHENG Li ying	165 PARK Row

OLIVER STREET BLOCK ASSOCIATION
 PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Mia Ling Li	521 FDR DR NY 10002
Kwan Chan / Amy	825 161 ST NY
Wong Si May	154 Mott St
Shing wai Chen	120 COLUMB ST
GUAN BUI YU	APPEX
Mie cheng	385 Pearl St
Yuet Yuen Fung	24 James St 10013
SONG J LIN	882 Dekalb St Brooklyn
Lin YAN QING	47 ST James
YONG	167 BROOKLYN
Yu Supis	26 HENRY ST #18
Kao Ti un	664 53 rd BROOKLYN
YUE cheng TIP	154 EAST Broadway

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
YONGGROW THYE	12 MONROE ST. #1C
	JIANQI LANG
HUI LING HU	30 MONROE ST APT A19
Lu Chen	56 HENRY ST APT 11
MA YANG ZOU	31-33 OLIVER ST 2B NEW YORK NY ¹⁰⁰³⁸
YU PING LIN	109 MADISON ST #5 N.Y. 10002
CHEN QIU FANG	37 CATHERINE #5 NY NY/10038
NG Cheong MENG	29 OLIVER ST #3F NY. 10038
WANG FANG MEI	167 SANDS ST APT 603 NY. ¹¹²⁰¹ 10001
BAO YIN W JIANG	23 HENRY ST #7 N.Y. 10002
LI XIN HUA	77 MADISON ST APT. 23 NY NY/10002
HUI FAI CHAN	105 MADISON ST #5 NY 10002
SHI JI LI	23 HENRY ST #13 N.Y. 10002

OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Liao xiao yu.	127 Henry ST #4
Xin zhen zhuo	165 SANDS ST APT 504
di di hu	182 South ST #10 NY 10038
Xing hong zhu	80 madison S
J Chen	30 Henry ST apt #
Evelyn Rosa	180 South St #101
Xiao Bing Li	32 Henry ST # apt 10002

OLIVER STREET BLOCK ASSOCIATION
 PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
SHAANG MEZ	106 Madison ST NY 100038
PING LIN	23 HENRY ST 12 1/2 # NY 10002
XIA LIAN NI	35 HENRY ST
ZHU QIN HONG	57 Division ST N.Y. 10002
JIM HO KOZ	10 Catharine ST NY NY 10002
LUCAS CHU	23 Henry St NY NY
Kim Manson	16403 O'Connell Rd
JUDY CHIA	23 HENRY ST N.Y. 10002
Wilson Li	
XUE YING	23 HENRY ST # NY 10002
Liao zhi ping	127 Henry ST #4

OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Yan King Lau	8 HENRY ST.
Aren Liang.	8 HENRY ST.
SING KWAI WONG	105 MADISON ST # 5
Amya Jan	8 HENRY ST.
Ser Chung	8 HENRY ST.
SAI YING LILL	34 MONRE ST.

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Yu Siping	26 Horley St #19 NY 10002
Woon Fee Wong	29 Catherine St #7 NY NY 10038
Chen Hau Fai	2358 W 13 St Brooklyn NY 11223
Chen Hui Yin	105 Madison St #5 NY NY 10002
Sam C Li	374 Pearl Street New York 10038
William Grayson	191 Dwight St BRKLYN
Wong Jan	34 Monroe St Apt CC4
Lynn Ly	89-18 248 St. Belair NY 11426
Claire Kim	165 Park Row

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
May Cui	54 Catherine St. NY 10038
E Qin mei	1147 33 th Apt 11 NY Brooklyn 11213
Yan Zheng	1042 60 th St. Brooklyn, NY 11219
Ki Cheong Knok	1108 Findlay Bronx, NY 10456
Sandy Chen	912 64 th St Brooklyn, N.Y. 11219
DAVID MARK	2120 E 69 th Street, Brooklyn, NY 11234
Sarah Mei	2871 West 36 Street
Raymond Wu	8102 17 Ave Brooklyn NY 11214
Min Huang	138-15 Franklin Ave. Flushing NY 11355
Tracey H Wong	2871 W. 36 St. Brooklyn, NY 11224
Curtter Li	7 Allen Street Apt 4D NY NY 10002

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Yullin Chui	YULLIN CHUI 101 MADISON ST. APT #1 NEW YORK, NY 10002
Camille Griffith	10511 AVENUE J BROOKLYN, NY 11236
Lee	275 CHERYL ST. NEW YORK, NY 10002
Catherine Collier	1000 TRINITY AVE BRONX, NY 10454
Xiao Ming	94 MADISON ST #13 NEW YORK NY 10002
Mia Brantley	1721 Grand Ave Apt 3K Bronx NY 10453
XIU YU ZHANG	54 Henry St Apt 8 New York NY 10002
ZHIZHONG LI YIZHONG	165 PARRY ROCE
WANG JIJIAN YING	9 Monore St. Apt 14. N.Y. NY 10002
YUE CHUN LIN	20 Monore St. Apt B9 NY NY 10002
Zhenq	
Mun Chen Liu	
Ken Liu	31-15 38 St Astoria NY 1103

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
A Wood	43-12 Liberty Ave N. Bergen NJ 07047
Binyan Chen	109 Madison St APT 15 New York NY 10002
Lisa Andrews	105 Monroe St Brooklyn NY 11216
SONG J Lin	880 De Kalb Ave Brooklyn NY 11221
Aileen Rivera	2022 Washington Ave NY NY 10457
Lai Kuen	44 Henry APT 5 NY NY 10002
Liu Yeh Hui	53 Monroe NY NY 10002
Laura Hui	26 Henry St #17 New York NY 10002
Zhao	57 Divisi St 4R, 10002
Mr. Jianfeng Lu	48-15 66th Woods St NY 11537
Fung Lin	9 Spring St APT 10 10012
zhou Li Yuan	54 Henry St APT #8 New York NY 10002
Molly	77 Madison St Apt 14 NY 10002

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**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Tan Beng Kong	56 Mulberry St Apt 14 10003 N.Y.
Huo Sin Huo Lin	50 Henry St # 70
Gao Ping Huang	24 JAMES #1B
Xi Li Feng	55 DELANCEY ST #5A
Zou Jun	283 BOMME ST
Gao Li FANG	720 E. 6th ST #1B N.Y. N.Y. 10009
Cheng Han cheng	265 Cherry St # 24A
Laurie Chan	20 Monroe St #4A
Junfan Li	30 Henry St #4A
YAP CHOW PENG	29 Oliver St # 3F ^{N.Y.} N.Y. 10038
Wang Fong mei	167 SAWDOX ST Apt 603 Brooklyn
Wai May Chan	1571 65th St. Brooklyn ¹¹²²⁷

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Shamala Miller	46 Madison St NY NY 10388
Mazoo Fung Ben	521 FOR DRIVE NY NY 10022
YUE Ting Yu	81 MADISON ST #1A
James Li	46 Madison St #53
Maurice Gosh	25 Oliver St.
Cecelia Fung	3028 Wallace Ave Bronx 10312
Chen Ann Ying	18 Mott, #4R
Rosalia Rosario	54 Catherine St 17K
YOW YAU YU	47 Catherine St. 3rd fl.
Sav Len Tom	40 Madison #10H
Amy Yu	37 CATHERINE
Deiz Mueller	40 Madison St.
Annette Roman	40 Madison St.

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

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Finally, if the proposed Oliver Street direction change is to help alleviate traffic in Chatham Square, we believe that that this situation is best accomplished by reopening Park Row and restoring it to its former condition. Therefore, we also oppose in total the proposed Security Plan.

<u>NAME</u>	<u>ADDRESS</u>
<i>Ann Daley Casale</i>	<i>7 Oliver St #3</i>
<i>Scott Casale</i>	<i>7 Oliver #3</i>
<i>Barbara Field</i>	<i>7 Oliver #2</i>
<i>Julia Gold</i>	<i>7 Oliver #2</i>
<i>Joe J</i>	<i>7 OLIVER #1</i>

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Justin Fong	9 Oliver Street
Wendy Chey	90 Oliver Street # 2
Martin Panedimay	Oliver St
Vivian Lai-Chen	Oliver St.
Richard Szeto	17 Oliver St.
Julie Szeto	17 Oliver St
Sam Chan	300 E 33rd St NYC
Martina Chan	300 E 33rd St. NYC.
Christine Song	14 Stuyvesant Ave
Craig Chesek	14 Stuyvesant Ave
Edna Gong	11 OLIVER ST NYC.
JEFFREY GONG	11 OLIVER ST NYC.
Richard Wong	9 OLIVER ST

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Valerie E. Curry Jones	201 Butler Blvd.
EVER Wood	116
Sonia Andrews	120 E. 19th St.
Hyacinth Jeffers	
Pat Dunn	
Cheryl Moore	3215 Ave H, Bklyn 11210
Marlene Perry	
Dorrie Jones	801 N. Highby Ave Bklyn NY 11208
Coreen Parks	826 Hendrix St Bklyn NY 11207
Calista Parks	35 Stratford Rd, Mt. Pleasant, NY 11003
Muriel Cox	
Brenda Frost	PO Box 2544 NY NY 10008
Joanna Lawrence	15 St James Pl 91 NYC 10038

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Ann Eng	17 Oliver St. NY 10038
Ernest Eng	17 OLIVER ST NYC 10038
Kristina	180 Park Row NYC 10038
W. S.	19 Olive
Rafael G. Comil	21/23 Olive St. NY 10038
Dolly Cruz	21/23 Oliver St. NYC 10038
Walter Lewis	31/33 Oliver St NYC 10038
man jin li	31/33 oliver st NYC 10038
Rong Ju zhan	31-33 oliver st NY 10038
Lily's	31-33 oliver NY 10038
zhang ju	31-33 oliver NY 10038
Crystal Williams	2 Oliver street NY 10038
James Gong	9 OLIVER ST

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

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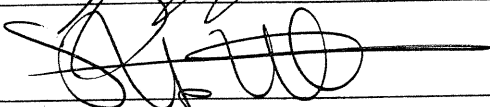


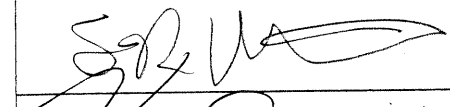

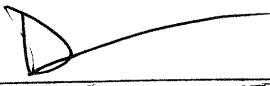
Finally, if the proposed Oliver Street direction change is to help alleviate traffic in Chatham Square, we believe that that this situation is best accomplished by reopening Park Row and restoring it to its former condition. Therefore, we also oppose in total the proposed Security Plan.

<u>NAME</u>	<u>ADDRESS</u>
<i>Dominic Thom</i>	<i>#28L 20 Confucius Plaza NYC 10002</i>
<i>Thomas K. Thom</i>	<i>#28L 20 Confucius Plaza NYC 10002</i>
<i>Rutha Alessi</i>	<i>17 Oliver St. NYC 10038</i>
<i>Lily E.</i>	<i>17 Oliver St, NYC 10038</i>
<i>Candace</i>	<i>17 OLIVER ST. NYC 10038</i>

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
	7 OLIVER ST #4
	75 LEONARD ST.
	436 8 th St. Brooklyn
Alan Jones	35 JANE ST.
	208 THOMPSON ST.
Liliana Greenfield-Sanders	348 E. 10 th ST.
	213 145 ST
	285 15 th ST 3A BROOKLYN
	1845 7 th Ave - Harlem
Paul Carn	489 Eastern Pkwy - Brooklyn 11216
Tim Ferraro	439 16 th St. Brooklyn 11215
	565 Prospect Pl. #10A Brooklyn 11238
Michele Rizzetti	2808 36 th Ave, L.I.C., NY 11106
Jared White	15 Devoe St., Brooklyn, NY, 11211

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
<i>John Wong</i>	56 Coles St. #1R
<i>Patricia</i>	235 26 th St. #2, BK
<i>Doris</i>	721 Broadway NYC 10013 10 th Flr #80
<i>John</i>	7 OLIVER ST. #5
<i>John</i>	157 W. 106 St #5A
<i>Mary Joe</i>	5 OLIVER ST.
<i>Carwyn Joe</i>	5 OLIVER ST.
<i>Richard Joe</i>	5 OLIVER ST.
<i>Suzanne Chan</i>	100 Beekman St NYC.
<i>Peter Chin</i>	10 Beekman St.
<i>Jessie Chin</i>	10 Beekman St.
<i>George Leung</i>	10 Confucius Plaza
<i>John Leung</i>	10 Confucius Plaza

OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Karz Soong 28	31 HENRY ST
CHAN F LEUNG	10 CHATHAM SQUARE
Ben Chen	10 MONROE ST
Ng Cheong Meng	29 - OLIVER ST
Xiu Fun Wang	
Ting hui Mei	
Ying Tan	115 HENRY
King Lee	113 HENRY
Carolyn Choy	Oliver St
Robert Choy	Oliver St
Cindy Chiu	Oliver St
Stanley Chiu	
Peter Lee	

反对长期封锁柏路群众签名运动.

OLIVER STREET BLOCK ASSOCIATION PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Wan Chon Nam	257 Clinton St. #6P NYC 10002
KAM SHAU TAM	20 Henry St NYC
Bun Zee	26 Henry St NYC
Lin Cui Sheng	26 Henry St
Ping Chen	30 街 (30 St)
Wokun Lee	HENRY 27#
Shuy	Henry Chin
GUAN BUI YU	HENRY CHIN
Bu Bu	19 HENRY
Wai Yi Lam	19 HENRY CT
Wooking	27 Cath St
Peter Moy	16 Monroe St
Fu Chong Long	27 Cath St
KEE CIRAC	

CHENO SUM WAN
Cindy Sun

Shirley Wong
22 1/2 Catherine St. 3
chang zhiqiang

OLIVER STREET BLOCK ASSOCIATION
 PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME		ADDRESS
Polly	cheung	23 Chatham Sq NY NY 10038
F. Mene	KOO	333 Pearl St #3 NY NY 10038
Ricky	Min	23 Chatham Sq NY NY 10038
Natalie	chen	23 Chatham Sq NY NY 10038
Jeff	lei	23 Chatham Sq NY NY 10038
Sandy	ehow	23 Chatham Sq NYC 10038
Shirley	Tsang	23 Chatham Sq N.Y. 10038
Mark	Cao	23 Chatham Sq. N.Y. 10038
	chen	23 Chatham Sq NY 10038
Jing	Jiang	23 Chatham Sq NY 10038
KITTY	LAM	23 CHATHAM SQ. NYC 10038

OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Sam Choong	41-07, Bowne St. NY
Wendy	52 Henry St. #4RE, N.Y.
Tim Lee	56 Henry #2, NYC
David	52 Henry St.
Eric Tang	645 Water St, NYC
Liting Lee	723 54th Brooklyn
HAK cheong chiu	54 Henry Apt 5 10002
C. JOHN	9052 HENRY ST.
Vincent Zheng	32 Monrose street
Anthony NY cheng	40 Monrose street
Carol	79 street Brooklyn
Anning Wang	
Vicki Wong	34 Edinger St

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Kaho Liang	West 62 nd St 214 Apt 4B NY, NY
Austria Chan	65 St 3 av
Allen Yau	30 Monroe Street Ph, Ph
Johnny Lin	Manhattan NY 19 West 114 th St, NY
Minglong	NY, NY
Kenny	NY, NY
Anny Zheng	Madison St Apt 3 NY, NY
Lois Tsa	16 Monroe St. NY, NY
Danny Chun	
Tom Lee	
Phil Lee	
Justin	
Justin	

反对长期封锁柏路群众签名运动.

OLIVER STREET BLOCK ASSOCIATION PETITION IN OPPOSITION OF

Changing the direction of traffic On Oliver Street

In Opposition of the Proposed Security Plan

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NAME	ADDRESS
Elma S. Moy	15 Oliver Street NYC
Kevin Hong Lau	36 Henry #15 NYC
XIU YU ZHANG	54 Henry #8 NY 10002
Bonita Sok	65 18 38 th Ave NY 10377
Joan Zheng	1230 Amsterdam Ave. 10027.

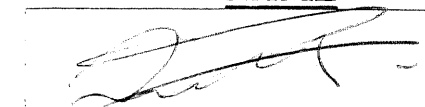
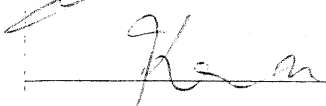

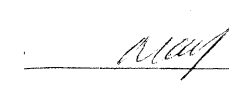
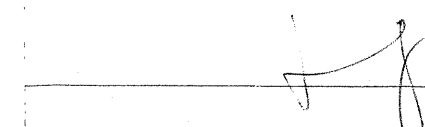
**OLIVER STREET BLOCK ASSOCIATION
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Finally, if the proposed Oliver Street direction change is to help alleviate traffic in Chatham Square, we believe that that this situation is best accomplished by reopening Park Row and restoring it to its former condition. Therefore, we also oppose in total the proposed Security Plan.

<u>NAME</u>	<u>ADDRESS</u>
	61 St James Pl
	206E FIRST AVE. NYC.
	61 St James Pl
	61 St James Pl
	61 St James Pl

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

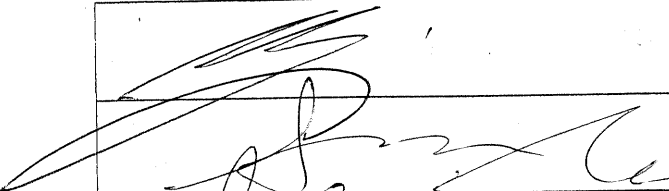
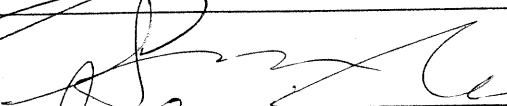
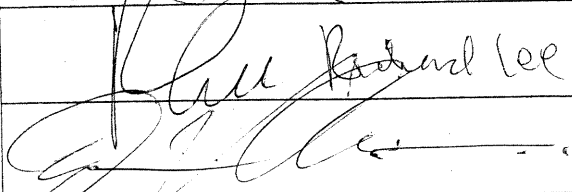

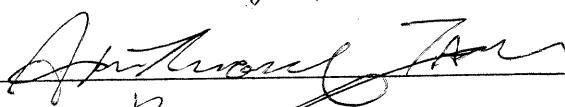
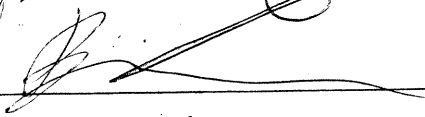
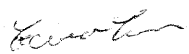

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
<i>H. Jpl.</i>	61 St James
<i>DA</i>	61 St James
<i>George Yu</i>	61 St James
<i>F. J.</i>	46 SLAYTON AVE STATEN ISLAND NY 10314
<div style="border: 1px solid black; padding: 5px;"> <p align="center">檢驗齋 專業美妝美髮用品中心 B&S Beauty Supply 61 Saint James Place, New York, NY 10038 Tel.: 212-693-2646 Fax: 212-693-2659</p> </div>	61 SAINT JAMES PL NYC, NY 10038
<i>[Signature]</i>	61 SAINT JAMES PL NEW YORK, NY 10038
<i>[Signature]</i>	2528 HARWAY AVE
<i>[Signature]</i>	943 56th ST. BROOKLYN, NY 11219
<i>[Signature]</i>	
<i>[Signature]</i>	83-35 Victor Ave Elmhurst, NY 11373
<i>[Signature]</i>	61 St James Pl

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
	259 MULBERRY ST APT #8
	45-25 162nd St #202
Lee Richard Lee	43 Motet St NYC 10013
	2016 E. 27th St. B.K. NY.
Chen	60 Henry Street 3B.
Min Li	67 Manhattan Ave
	61 St James Pl
Cho ying Tom	1163 ROCKLAND AVE
	46 slayton ave
	124 FORTTHYS. ST
Daniel	61 St James Pl
	39 rock st.
	5 Plumer St

0014 -

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PETITION IN OPPOSITION OF**

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<u>NAME</u>	<u>ADDRESS</u>
Jian feng mei	75 PIKE ST
CHU. ONWAH	24 MADISON ST
Qin Xia li Tan	113 HENRY ST
Mon Kuen Leon	7 ST James
Yao xiang fang	PO MADISON ST # 5-B

**OLIVER STREET BLOCK ASSOCIATION
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**Changing the direction of traffic
On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Nick Mei	5 Oliver St
Lee Ching Tai	185 Park Row #14-A
Joe Zeng	414 Madison St. #4
Liu	15 St James #5
Angie Y Mei	154-03 58 th Ave.
Chun Han Sooh	133 E. Broadway
Jean Ling Lee	27. MONROE ST. #28
Pete Tan	31 OLIVER. St #6
Wai Yee Chan Jay	215 Park Row #20H
WEE K. WONG	350 PARK ROW RD. Blyn, N.Y. 11210
AN-PU CHEN	167 SANDS ST. BROOKLYN, N.Y. 11201
John Chin	46 Madison Street NY, NY 10038
LAI CHIN	46. MADISON ST. N.Y. N.Y. 10038
Zi Rong Wai	110 Madison St NY, NY
SITU CHIN LAM	14 MONROE ST N.Y.C. 10002

**OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF**

**Changing the direction of traffic
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In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Poy Hing Ng	46 madison ST # 4-J
Chek Shu Sam	58 MULBERRY ST
YAN	388 pearl ST 8 D NY
YAP CHOW PENG	29 Oliver ST # 3F NY NY 10038
Lee Kuo Toy	31 Oliver st
MILWA TUNG	31 OLIVER ST
Li Xian Chen	51 madison st
Xing Liu Chen	51 madison ST
Quan Boman	31 Oliver st
Sheng To	7. ST James P'
Wu	27 Catherine st
Wu	27 Catherine ST
wing Li	113 Henry ST

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On Oliver Street**

In Opposition of the Proposed Security Plan

<u>NAME</u>	<u>ADDRESS</u>
Henry	
Sam Lam	27 Catho St NY, 10038
Nee Kung Sun	52 1/2 Catho St - 10038
241 West 7th	113 HENR- ST
A.S.	23. Chatham Squ. NY 10038
Ray	23 Chatham SQ NY 10038
All	23 Chatham SQ NYC 10038
JTB	23 Chatham SQ NYC 10038
wis	23 " "
jea	23 CHATHAM SQ NYC 10038
ST-g	23 Chatham SQ NY 10038
lu	23 Chatham SQ
L	23 Chatham SQ

OLIVER STREET BLOCK ASSOCIATION
PETITION IN OPPOSITION OF

Changing the direction of traffic
On Oliver Street

In Opposition of the Proposed Security Plan

NAME	ADDRESS
Thomas Lin	14 Henry Street 60 apartment 1C
William Huang	35 Henry St, NYC
Weichun Peng	52 Henry St. NYC.
GUAN RUI YU	25 Henry St. 2F

**Mariners' Temple Baptist Church
Petition in Opposition of
Changing The Direction of Traffic
On Oliver Street**

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<u>NAME</u>	<u>ADDRESS</u>
Sandra Bender	14772 28 th St Roseville 11422
Yolga Cadore	115 Chryse Ave 3rd Fl. NY 10002
B. Inles	1570 Sequoia Ave #13C 10453
E. Boston	869 Putnam Ave.
Mary Sinclair	178 South St #512
Bessie Williams	66 St. Nicholas Place NY 10032
Uarda Cruz	943 E 85 th St BK NY 11234
Rev. Dr. Yon Looze	27504 1073 New York 10013
Teri Collins	180 South St NYC 10038
Shelia Wheeler	1033 East 54 th St Brooklyn, New York 11234
Keisha D. Hoggans	121st 964-2840 opt EC-12 58 Monroe St, NY, NY, 10002

MTBC

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<u>NAME</u>	<u>ADDRESS</u>
maria Fernandez	250 Broadway
Alfreda Lewis	220-20 121 Ave Cambria hgh NY
LeVar Erik Arrington	2156 Strauss St. / apt. 2B Brooklyn, NY 11212
Jessica Taylor	40 Worth Street NYC 10013
Cornelius S. Av. Agr.	40 Worth St. NYC 10013
Thomas Kemp	125 Worth Street
Cory Royster	125 Worth St.
Isabel Holm	61 Henry St
Sade Gonzalez	644 Water St QB NY NY 10002
Stacyra Wakey	644 Water St QB NY NY 10002
Dalcinia Edwards	125 Worth Street
Telma Barnes	280 Broadway
Angele Nyde	250 Broadway
Ki Young Gandel	250 Broadway, NXXNY 10007
Orolena Johnson	100 Gold St. N.Y. N.Y. 10023
Toni Utendahl	100 Gold St. N.Y. 10023

MYTC

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<u>NAME</u>	<u>ADDRESS</u>
Luck Brantley	250 Broadway N.Y. N.Y. 10007
Patricia Norman	20-45 Sargent Blvd Far Rockaway NY
Margaret Clouder	100 Centre St 2nd Flr NY NY 10013
Ricky Joseph	390 E 21st LC Brooklyn 11226
Brenda Jeffes Davis	430 E. 105 th St 2F N.Y. 10029
Theresa Coleman	1 St. Andrews New York, NY 10007
Meryl Blackman	175 East 62 nd St - 11A New York, NY 10021 #
Christine E. Westbrook	1901 MADISON AVE UNIT 320 New York NY 10035
Dana Taylor	605 PUTNAM AVE #3 BROOKLYN, N.Y. 11221
STEPHANIE VELEZ	744 E 231 Street BLK X NY 10466
Sherry Muddins	456 DEKALB AVE, #7A BKLN, NY 11205
Margie Hammett	620 Baychester Ave Brooklyn, N.Y. 10475
Margaret J. Jolly	P.O. Box 170 N.Y. 10035
Osaka Brown	140 Alcatraz Pl. Bx 10475
Vivian T. Beckford	444 2nd Ave. N.Y.C. 10070
Jeorothy Perry	290 N. Center St. Orange, N.J.

704

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<u>NAME</u>	<u>ADDRESS</u>
Michele Witherspoon	204 Clairmont Ave ^{range NT} 01080
Slane J. Fields	172-12 133 rd Ave Jamaica N.Y 11434
Kathleen Scott	626 E 35 th St B'klyn NY 11203
Brenda Frost	P.O. Box 2544, N.Y. NY 10008
Teei Collins	180 South St NYC 10038
MAUREEN BROWN	610 E. 5 th St. #7 NYC 10009
Reginald Pector	
John Lerner	131 East 21 st Street
Benoit Murray	86 Evan Rd, Warwick, NY 10990
Melanie Smallwood	195 Willoughby Ave. BK, N.Y. 11225
Charles Quigley	943 E 85 th St B.K. N.Y. 11236
Evelyn Clark	1330 E. 100 th B'klyn 11236
Paul Williams	680 JEFFERSON AVE TH IE BKLYN, NY
Dorothy Townsend	33 E. 16 th way 10002

M-1130

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<u>NAME</u>	<u>ADDRESS</u>
Bernadette Turner	568 Grand Street #7602 New York, NY 10002
Jennifer Sinclair	77 Denahan Street Brooklyn, NY 11221
Brenda W. Peterson	1700 Bedford Ave Brooklyn, NY 11225
Kevin Rogers	2335 5th Ave 18B New York, NY 10037
Agnes Jenkins	260 Hawthorne St. B-5 Brooklyn, New York 11225
Patricia Walker	1 Centre St, NY NY 19th Fl. 10007
Edmond Hicks	961 ST. JOHNS PLACE BROOKLYN, NY 11213
Mary Sinclair 18B	South St, N.Y. N.Y. 10038
Evilyn Fuentes	39-06 65th St #3C Woodside N.Y. 11377
Jane Smith	880 Boylston Ave BR, NY 10473 6E
CARINE Bros	619 Linden Blvd Brooklyn NY 11203
Sharon Jones Capital House	130-40 22nd St Manhattan NY 10413
Jamara Selman	125 W. 142nd St. #2C NYC 10031
	490 Watkins St. Bklyn, NY 11212

MTBC

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<u>NAME</u>	<u>ADDRESS</u>
Jannier R Deas	54 Catherine St
Leah A Williams	23063 Edgewood Ave
Wichi Pede	3277 Emerald Blvd.
Martin Head	180 Water St, NYC 10038
Isoua Songle	2 Lafayette St. NYC 10007
Sadie Johnson	790 Concourse by Bronx
Rachel Rayford	150 William St, NYC
TAWANNA RANDOLPH	150 WILLIAM ST NY NY 10038
Ramona Parrilla	150 William St. NY 10038
Graciela Bennett	687 Drew St Brooklyn, NY 11208
Spring Jones-Sims	30 Rockaway Ave Bklyn, NY 11233
HAROLYN HUDSON	163-47 130 AVE. 8A JAMAICA, NY. 11434
LYDIA McRAE	7 HART ST. BKLYN, N.Y. 11206
VALERIE GIDDENS	3709 AVENUE J BRKLYN, NY 11210

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<u>NAME</u>	<u>ADDRESS</u>
Cynthia Royster	2026 Pacific St. Bklyn
Catherine Cunningham	192 Sands St. Bklyn
Adele Bowie	355 East 29 St, Bklyn
Darlene Jeffrey	80 Centre st 6 th Fl NY
Natavie Jeffrey	23 Brownell Street Staten Island NY
Ethel Harley	50 Amst. Ave. NYC 10023
Lillie Grant	355 Clinton Avenue Brooklyn, N.Y. 11238
Amiah Alicia Smith	20 Catherine Slip NYC 10038 Apt 13H
Matteline Stanton	30 Catherine Slip 14 th Fl NYC
Alana Noyes	100 Centre Street
Michelle Fields	100 Centre Street Room N.Y. N.Y. 10013 329
Shirley Lutz	337 18 100 Street Corona, N.Y. 11368
Keisha D. Hogans	38 Monroe St apt. 8C12 New York, N.Y. 10002

ATPC

Mariners' Temple Baptist Church
Petition in Opposition of
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<u>NAME</u>	<u>ADDRESS</u>
LINCOLN BONNER	4421 SEON AVE BRONX NY 10466
Millie Beedell	207 388 people st
Phyllis Marchison-Mclean	975 Washington Ave 1F BROOKLYN NY 11225
Eliza Thomas	460 Grand St apt 4-B. NY. CI 10003
Marilyn McClain	741 St. Ann's Ave Bx 10466
Judith P. Outlaw-Walker	77 SULLIVAN PL #216 BKLYN 11225
Edith L. Lane	120 Benchley Pl, Bx 10475
Barbara Hofer	2321-7th Ave.
Joyce Bornwell	1 Centre St, 2160 North NY, NY
C. E. Page	1 P.P., NYC
Linn Storey	1PP, NYC
Edna Lee	1 Bklyn, N.Y. 11236 108-11 Flatlands 9th
Yvonne Squires	108 - LENNOR ST NYC 10013

4734

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<u>NAME</u>	<u>ADDRESS</u>
Debra Sue Huley	149-43 Huron St. Co. Pk, NY 11417
Sheredme James	9280 1st Ave NY 1002
Elizabeth Watson	421 E. 102nd St. NY NY 10029
Robin Houl	5800 Arlington Cr. Bx 100471
Ivery Scott	5 Lindner Lane, Howell, NJ. 07731
STEDMUND D HANSON	333 Bronx River Rd, Yonkers, NY 10704
Justo	120 DEKORF PLACE BX 74 10475
Gazzi Dr Thomas	675 Water St. #10C NYC 10002
Janice Johnson	35 Montgomery St. NYC 10002
Ronald Johnson	35 Montgomery St. NYC 10002
Dee's Mortimer	645 Water St. NYC 10002
Michael Neil	3 Henry St. NY NY 10038
Bruce Martin	675 Water St #15C NY, NY 10002

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

Dear Inspector Tria:

I live in the area around St. James Church. I travel through Chinatown and the Civic Center Area around Police Headquarters. I reject the Draft Environmental Impact Statement (DEIS) on Park Row which claims that the closing of Park Row has little impact on our neighborhood.

The traffic on St. James Place since 9/11 has been horrible to say the least. We put up with it for a while because we knew that our city had been attacked. However, now the Police Department wants to take away parking on St. James Place between Madison Street and Oliver Street and make additional lanes of traffic on that street. This is because even though a court of law has ruled that you must open Park Row to traffic again, you have refused. You seem to think that more traffic on St. James Place will not have a terrible effect on an already overburdened neighborhood. St. James School is on St. James Place in that block. The children at the school have no gym, and are forced to play on James Street at St. James place. The air quality will be severely negatively impacted by your plan. There is also a children's playground across the street behind Chatham Green Housing Development. The asthma rate in this neighborhood is very high among children, and the traffic has made it worse.

In addition, your study recommends changing the traffic direction on Oliver Street so that the cars and trucks will go down onto Madison Street. Oliver Street is a residential street on one side, and has a school, church, and home for disabled on the other side. Madison Street is already severely over crowded due to rerouting of busses in the past and due to the many businesses further up the street. Smith Houses and Hamilton Madison House and another children's playground are on one side of Madison Street, and the P.S. 1 playground is on the other side.

Please open Park Row to traffic as it was before 9/11. Please also restrict the parking of private police vehicles and judges' and court officers' private vehicles to the parking garage that you took away from the neighborhood several years ago.

Sincerely,

Name



Address

388 Pearl St.

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Mandy Otero

Address

388 Pearl St

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October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
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Please open Park Row to traffic as it was before 9/11. Please also restrict the parking of private police vehicles and judges' and court officers' private vehicles to the parking garage that you took away from the neighborhood several years ago.

Sincerely,

Name

Address

Rosario Valz
30 Monroe St
New York ny 10002 #11A

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

Dear Inspector Tria:

I live in the area around St. James Church. I travel through Chinatown and the Civic Center Area around Police Headquarters. I reject the Draft Environmental Impact Statement (DEIS) on Park Row which claims that the closing of Park Row has little impact on our neighborhood.

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Sincerely,

Name

Address

Maralinda Lugo
180 South St. Apt 8C
NY, C. 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
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Email: atria@nypd.org

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Sincerely,

Name

Mrs. Eva Rieck

Address

100 Beekman St. NY, NY 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Rosa Velz

Address

30 Monroe St

new york ny

*#111A
10002*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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NYPD
620 Circle Drive, Suite B
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Fax: 718.281.1593
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Sincerely,

Name

Mateilda Esteviz

Address

20 Catherine St

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
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Sincerely,

Name Josafel LOTA

Address 374 Park St

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name VITALEO VATA

Address 374 Park St

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Vanessa Vora

Address

374 Pearl St

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
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Sincerely,

Name Jessenia Vera

Address 374 Pearl St

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Charles Johnson

Address

*7 St. James Pl #101
New York 10038*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
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Sincerely,

Name Mary Reitan

Address 35 Montgomery St.
NYC

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Wanda Perez

Address

11 Maiden Lane Apt

3E NY NY 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Shawn Feques

Address 10 Catherine St 9A

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Arthur Fornari

Address 195 Garfield Pl.
Brooklyn NY 11215

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
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Sincerely,

Name

Rev. Raphael Conner

Address

22 Park St., NY, 10038

212 233-0161

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

Dear Inspector Tria:

I live in the area around St. James Church. I travel through Chinatown and the Civic Center Area around Police Headquarters. I reject the Draft Environmental Impact Statement (DEIS) on Park Row which claims that the closing of Park Row has little impact on our neighborhood.

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Sincerely,

Name

Address

Sylvia Eng

40 Madison St

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Sincerely,

Name

Address

Large P.S.
140 MADISON ST #10A

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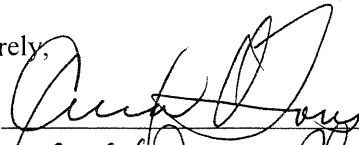
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Sincerely,

Name

Address


7 St. James Pl #51

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Sincerely,

Name

Sandra Genovese

Address

*40 Madison St 1
New York, 10002*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

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NYPD
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Sincerely,

Name

Joseph Kestelch

Address

*418 West 17th St. #7B
N.Y.C. 10011*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

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Sincerely,

Name

ALDO HARQUEZ

Address

299 PEARL ST 125.

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Sincerely,

Name

Address

Al Bay
249 Pearl St

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Sincerely,

Name

Uba Feliciano

Address

55 Rutenes St

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Sincerely,

Name Conan [signature]
Address 180 South St. #85
N.Y.N.Y 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

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Sincerely,

Name Rayten Allen

Address 2443 21st. Astoria, N.Y. 1102

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Name Ray Morris

Address 15 St. James pl. #15B

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Name

Address

V. Ambrosio
182 South St

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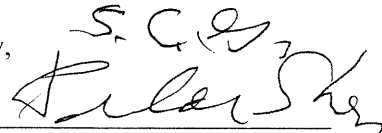
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Name

Address

S. C. B.


26 Madison St.

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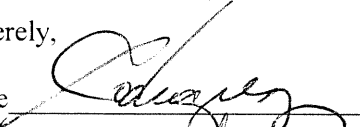
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Sincerely,

Name

Margaret T. Amos

Address

65 Park Row NYC

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

DR PAUL COMPTON

Address

26 MADISON ST

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
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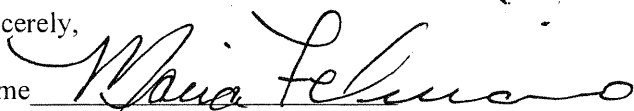
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Sincerely,

Name

Address


182 South st #8G

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Address

Isabel Santiago
182 South St.

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Mita Canapa

Address

*185 PARK Row 19c
New York NY 10038*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
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Sincerely,

Name 

Address 90 Belknap St

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
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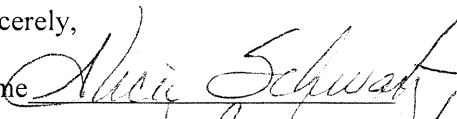
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Sincerely,

Name

Address


90 Beekman St. N.Y.C.

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Fort Totten, NY 11359
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Sincerely

Name

Pete Puligay

Address

15 S. AVENUE JAMES

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

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NYPD
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Sincerely,

Name

Carmelo Ortiz

Address

20 Catherine Slip

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Stephanie Ortiz
Address 20 Catherine Slip 121
NYC NY 10038

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Sincerely,

Name



Address

531 D GRAND ST.
NY NY 10002

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
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Sincerely,

Name

Carlina Lopez

Address

7 ST James Pl

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name ADA Gonzalez

Address 10 Catherine Slip # 1214
New York, NY 10238

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
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Sincerely,

Name

Eleonora Wishart

Address

333 Pearl St 18M

N.Y. 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

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Capital Construction
NYPD
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Sincerely,

Name

Yvette M. M...

Address

110 Catherine Slip
New York NY 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Edwin A. Quinn

Address

*46 Madison Street #15-J
New York, NY 10038*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
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Sincerely,

Name

Maria A. Martini

Address

7 St. James Place #4F

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Maria Alvarado

Address

10 Catherine slip

10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
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Sincerely,

Name

Address

Hipilita Espada
182 South St-16E
N.Y. N.Y. 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Edwin Quiroz Jr.

Address

*46 Madison Street #15J
New York, N.Y. 10038*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
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Email: atria@nypd.org

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Sincerely,

Name

Marion J. Quina

Address

*46 Madison St. #15J
New York, N.Y. 10038*

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NYPD
620 Circle Drive, Suite B
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Sincerely,

Name

Ramona Muniz

Address

20 Catherine St #12-A
New York, N.Y. 10038

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Sincerely,

Name Maria Bamiree

Address 374 Pearl St #17-F

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Ludmila Colta do

Address 46 Madison St #16E NY
NEW YORK 10038

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Capital Construction
NYPD
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Sincerely,

Name Felisa Serda

Address 180 Saw St apt 14 G

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
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Sincerely,

Name

Address

Ocasio Vargas
70 JAME PEZI

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
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Sincerely,

Name

Juan Cancel

Address

40 Madison St. #23

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Lore Padua

Address

100 Madison Place 4F

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
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Please open Park Row to traffic as it was before 9/11. Please also restrict the parking of private police vehicles and judges' and court officers' private vehicles to the parking garage that you took away from the neighborhood several years ago.

Sincerely,

Name

Reservato Lopez

Address

10 Catharine St apt 17-J

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

Dear Inspector Tria:

I live in the area around St. James Church. I travel through Chinatown and the Civic Center Area around Police Headquarters. I reject the Draft Environmental Impact Statement (DEIS) on Park Row which claims that the closing of Park Row has little impact on our neighborhood.

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Sincerely,

Name

Maria Torrey

Address

7 Saint James Pl #6-2H

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
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Email: atria@nypd.org

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Sincerely,

Name

Susan M. Reiss

Address

*180 South Street 3-F
New York, N-Y 10038*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Steve Arosa

Address

180 South Street

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Margarita Boye

Address

*7 St James Pl #16 F
New York, N.Y. 10038*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Mariana Chuz

Address 20 Catharine slip #1-5
New York, N.Y.

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name *Lincoln Zepf*

Address *96 Madison Street*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Address


180 South St. Apt. 4A
N.Y.C. 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Fax: 718.281.1593
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Sincerely,

Name

Elba Lopez

Address

374 Pearl St 4c

nyc. 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Carmen Codenzo
Address 20 Catherine Slip NY 1038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Ana Balbonado

Address 7 Saint James Place Apt 814 New York NY
10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name EUF. ENT. Tria

Address 7 St James Place # 8A New York NY
10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Delfina Vargas

Address

7 ST JAMES pl.

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Elba Matos

Address 374 Pearl St. #111 NYC 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
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Sincerely,

Name

Address

Josephine Gony
90 Old St 2 #

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

Dear Inspector Tria:

I live in the area around St. James Church. I travel through Chinatown and the Civic Center Area around Police Headquarters. I reject the Draft Environmental Impact Statement (DEIS) on Park Row which claims that the closing of Park Row has little impact on our neighborhood.

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Sincerely,

Name Caroline Zboron

Address 76 Madison St Apt. 13F

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Sincerely,

Name

Paulina Cruz

Address

15 St James Pl. 6E N.Y.C.N.Y. 10038

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Sincerely,

Name

Address


Name Juliana Barton
Address 40 Madison

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NYPD
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Sincerely,

Name

Josefina Torree

Address

*172 Marlborough St #9
New York, NY 10013*

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Sincerely,

Name:

Address:

Lydia Bernudez
40 Madison St. 14B

NYC 10038

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NYPD
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Sincerely,

Name

Dominga Paulino

Address

15 St James Pl # 84

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Sincerely,

Name

Pedro B. Díaz

Address

180 SOUTH ST. #6-I
NEW YORK, N.Y. 10038

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Sincerely,

Name

Maria Schae

Address

374 West 52

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NYPD
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Sincerely,

Name

Richard Minto

Address

15 Homestead Av

W 4c

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Sincerely,

Name Mary Rietan

Address 35 Montgomery St
NYC

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Sincerely,

Name Marlene Jardenkive

Address 10 Catherine Slip #13B

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NYPD
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Sincerely,

Name

Margarita Rivea

Address

10 Catherine Slip #126
New York, N.Y. 10038

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Sincerely,

Name Christine Amore

Address 46 Madison Street 15-J

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Sincerely,

Name Alex Ramos

Address 182 South Street

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Please open Park Row to traffic as it was before 9/11. Please also restrict the parking of private police vehicles and judges' and court officers' private vehicles to the parking garage that you took away from the neighborhood several years ago.

Sincerely,

Name Arthur Fornari

Address 195 Garfield Pl.
Brooklyn NY 11215

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Wanda Perez

Address

11 Maiden Lane Apt
3E NY NY 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Shawn Feques

Address

10 Catherine St 9090

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Angela Turner

Address 20 Catherine Slip #9B

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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*July NA 1/2
Observation*

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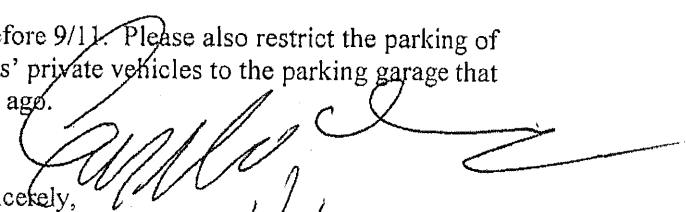
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Sincerely,

Name

Address



Emilio Velazquez

37 W 04 004 St CSF

*N.Y. N.Y. 10002
10-18-06*

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Jamie Newton
Address 10 Catherine St. NY NY 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Maria Martinez

Address

20 Catherine Slip #131F

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name Elizabeth Marcano

Address 34 MONROE ST APT # CH12
NY NY 10002

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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NYPD
620 Circle Drive, Suite B
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Sincerely,

Name Yudelka Rodriguez
Address 180 South Street Apt 4A
New York, NY 10038

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

Inspector Anthony Tria
Capital Construction
NYPD
620 Circle Drive, Suite B
Fort Totten, NY 11359
Fax: 718.281.1593
Email: atria@nypd.org

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Sincerely,

Name

Address

Nancy Lauer
75 West Street #5A
NY NY 10006

CONCERNED RESIDENTS OF ST. JAMES CHURCH & SCHOOL

October 15, 2006

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Capital Construction
NYPD
620 Circle Drive, Suite B
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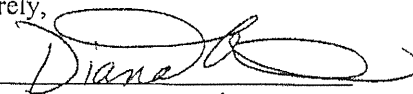
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Name



Address

7 St James Pl - 90