



## 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. As lead plaintiffs, the Chinatown Civic Center Residents Coalition retained Community Consulting Services to continue its critique that persuaded the court of the need for an 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 3<sup>rd</sup> 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 | 2000     |            | 2006 With | 2006 With NO |            |
|--|---------|--------------|----------|------------|-----------|--------------|------------|
|  |         | Action       | Baseline | Difference | Action    | Action       | Difference |
| <b>PARK ROW AT WORTH STREET/BOWERY</b>         |         |              |          |            |           |              |            |
| 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        |
| <b>AVENUE OF THE FINEST AT ST. JAMES PLACE</b> |         |              |          |            |           |              |            |
| 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        |
| <b>CHAMBERS STREET AT CENTRE STREET</b>        |         |              |          |            |           |              |            |
| 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        |
| <b>WORTH STREET AT CHURCH STREET</b>           |         |              |          |            |           |              |            |
| 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        |
| <b>WORTH STREET AT BROADWAY</b>                |         |              |          |            |           |              |            |
| 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         |
| EXITING BROOKLYN BRIDGE NB ON PARK ROW   |         |       |              |       |       |       |              |
|  |         | 137   | Not Reported |       | 0     | 137   | -137         |
| EXITING BROOKLYN BRIDGE SB ON PARK ROW   |         |       |              |       |       |       |              |
|  |         | 422   | Not Reported |       | 467   | 422   | 45           |
| TOTAL MOVEMENTS ACCOUNTED FOR (Excluding Brooklyn Bridge)                              |         |       |              |       |       |       |              |
|  |         | 13889 | 16729        | -2840 | 13910 | 13889 | 21           |
| TOTAL MOVEMENTS ACCOUNTED FOR (Excluding Brooklyn Bridge St. James Pl./Ave. of Finest) |         |       |              |       |       |       |              |
|  |         | 11974 | 14711        | -2737 | 11814 | 11974 | -160         |
| 1993 Foley Sq. FEIS vs. 2000 Baseline  |         |       |              |       |       |       |              |
| PEAK HOUR TRAFFIC ON BROOKLYN BRIDGE (EB+WB)   |         |       | 8000         |       | 8700  |       | 9% Increase  |
|  |         |       | Est.         |       | Est.  |       |              |
| PEAK HOUR TRAFFIC ON MANHATTAN BRIDGE (EB+WB)  |         |       | 4330         |       | 4800  |       | 11% Increase |
|  |         |       | Est.         |       | Est.  |       |              |

**TABLE 2: COMPARISON OF TRAFFIC VOLUMES  
ONE POLICE PLAZA SECURITY PLAN EIS  
PM PEAK HOUR**

|  |         | 2006 With NO<br>Action | 2000<br>Baseline | Difference | 2006 With<br>Action | 2006 With NO<br>Action | Difference |
|--|---------|------------------------|------------------|------------|---------------------|------------------------|------------|
| <b>PARK ROW AT WORTH STREET/BOWERY</b>         |         |                        |                  |            |                     |                        |            |
| 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        |
| Park Row NB                                    | Right   | 198                    | 228              | -30        | 309                 | 198                    | 111        |
|  | Left    | 5                      | 0                | 5          | 0                   | 5                      | -5         |
|  | Through | 273                    | 352              | -79        | 25                  | 273                    | -248       |
| Bowery SB                                      | Right   | 10                     | 18               | -8         | 3                   | 10                     | -7         |
|  | Left    | 116                    | 250              | -134       | 116                 | 116                    | 0          |
|  | Through | 190                    | 148              | 42         | 15                  | 190                    | -175       |
| Mott Street SB                                 | Right   | 139                    | 139              | 0          | 314                 | 139                    | 175        |
|  | 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        |
| <b>AVENUE OF THE FINEST AT ST. JAMES PLACE</b> |         |                        |                  |            |                     |                        |            |
| 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        |
| <b>CHAMBERS STREET AT CENTRE STREET</b>        |         |                        |                  |            |                     |                        |            |
| 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        |
| <b>WORTH STREET AT CHURCH STREET</b>           |         |                        |                  |            |                     |                        |            |
| 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         |
| Church Street NB                               | Right   | 130                    | 169              | -39        | 130                 | 130                    | 0          |
|  | 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         |
| <b>WORTH STREET AT BROADWAY</b>                |         |                        |                  |            |                     |                        |            |
| 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         |
| Broadway SB                                    | Right   | 0                      | 0                | 0          | 0                   | 0                      | 0          |
|  | 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

EXITING BROOKLYN BRIDGE NB ON PARK ROW

220 Not Reported      0      220      -220

EXITING BROOKLYN BRIDGE SB ON PARK ROW

151 Not Reported      317      151      166

TOTAL MOVEMENTS ACCOUNTED FOR  
(Excluding Brooklyn Bridge)

13175      16993      -3818      12826      13175      -349

TOTAL MOVEMENTS ACCOUNTED FOR  
(Excluding Brooklyn Bridge St. James Pl./Ave. of Finest)

10779      13909      -3130      10478      10779      -301

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**

|                         | 1993   | 2000   | 2001   | 2002   | 2003   | 2004   | Estimated Avg.<br>2003/2004 Growth |        |
|-------------------------|--------|--------|--------|--------|--------|--------|------------------------------------|--------|
|                         |        |        |        |        |        |        | 2005                               | 2006   |
| Holland Tunnel          | 92685  | 101137 | 43377  | 92557  | 101097 | 96171  | 100215                             | 104424 |
| Brooklyn Battery Tunnel | 57561  | 63242  | 13762  | 56976  | 56271  | 54488  | 56779                              | 59164  |
| Brooklyn Bridge         | 134793 | 147767 | 95586  | 121145 | 134444 | 137563 | 143348                             | 149368 |
| Manhattan Bridge        | 74526  | 75684  | 73064  | 66152  | 73767  | 79129  | 82456                              | 85920  |
| Williamsburg Bridge     | 86591  | 108376 | 82202  | 103364 | 100243 | 110528 | 115176                             | 120013 |
| TOTALS                  | 446156 | 496206 | 307991 | 440194 | 465822 | 477879 | 497975                             | 518889 |
| Growth from 1993        |        | 11.2%  | -31.0% | -1.3%  | 4.4%   | 7.1%   | 11.6%                              | 16.3%  |
|                         |        |        |        |        | 1.058  | 1.026  | 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 guestimate.
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 126<sup>th</sup> 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 3<sup>rd</sup> 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.