

Hudson Yards Phase 2 Condemnation Technical Memorandum

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Introduction

This Technical Memorandum has been prepared in connection with the proposed condemnation and acquisition of properties for Phase 2 of New York City's Mid-Block Park and Boulevard system (the "proposed action"), a component of the Hudson Yards Development Program. The Hudson Yards Development Program, including the Mid-Block Park and Boulevard system, was analyzed in the *No. 7 Subway Extension – Hudson Yards Rezoning and Development Program Final Generic Environmental Impact Statement (Hudson Yards FGEIS)* that was completed in November 2004. As set forth in the *Hudson Yards FGEIS*, construction of the Mid-Block Park and Boulevard system would require acquisition of certain properties, a process that was contemplated to be undertaken in two phases that were expected to be completed by 2025. Phase 1 is complete and the City is now proposing to undertake the condemnation and acquisition associated with Phase 2.

The proposed acquisition and construction of the Mid-Block Park and Boulevard has not changed materially from the action contemplated by the Hudson Yards FGEIS. However, considerable time has elapsed since that FGEIS, and the City has asked VHB to assess whether other changes to the Hudson Yards Development Program analyzed in the *Hudson Yards FGEIS*, other changes in the Hudson Yards surrounding area, or other material new information would result in the proposed action's having significant adverse environmental impacts that were not previously identified in the *Hudson Yards FGEIS*.

Background

The several actions that were the subject of the *Hudson Yards FGEIS* (CEQR# 03DCP031M) included (1) zoning and related land use actions by the City Planning Commission (CPC) that would allow approximately 28 million square feet (sf) of commercial office, 1.1 million sf of retail, 12,600 residential units, a new Mid-Block Park and Boulevard system between Tenth and Eleventh Avenues, from West 33rd to West 39th Streets and significant open spaces, all to be realized by 2025; (2) the extension by the Metropolitan Transportation Authority (MTA) of the No. 7 Subway Line from Times Square to a new terminus at Eleventh Avenue and West 34th Street; (3) expansion of the Jacob K. Javits Convention Center (the "Convention Center"); and (4) a new multi-use sports, exhibition, and entertainment facility over the western portion of the MTA-Long Island Rail Road John D. Caemmerer Yard, the block bounded by Eleventh and Twelfth Avenues, West 30th and West 33rd Streets (the "Western Rail Yard") along with the associated demapping of West 33rd Street between Eleventh and Twelfth Avenues.

The construction of the Mid-Block Park and Boulevard system requires acquisitions, which were contemplated to be undertaken in two phases, as noted below:

- › Phase 1, West 33rd to West 36th Streets – Acquisition and development by 2010
- › Phase 2, West 36th to West 39th Streets – Acquisition and development by 2025

Upon completion of the *Hudson Yards FGEIS*, the associated City Environmental Quality Review (CEQR) and State Environmental Quality Review Act (SEQRA) Statements of Findings were made by the co-lead agencies CPC and MTA, respectively, in November 2004.

A Determination and Findings statement was then made by the City in 2005 pursuant to New York State Eminent Domain Procedure Law (EDPL) Section 204 with respect to certain properties to be acquired in connection with the No. 7 Subway Extension – Hudson Yards Rezoning and Development Program, including the Mid-Block Park and Boulevard system.

The properties for Phase 1 of the Mid-Block Park and Boulevard system were acquired in 2006 and 2007 and construction was completed in 2015. The Phase 2 properties (see Figure 1) have not been acquired. The condemnation and acquisition of properties associated with the Phase 2 Mid-Block Park and Boulevard and small portions of adjacent properties necessary for construction is now anticipated to be completed by 2024. The last day that properties could be acquired under the 2005 Determination and Findings was in May 2016; the City expects to adopt a new Determination and Findings for the acquisition of the Phase 2 properties.

Description of the Project Site

The project site is the area subject to the condemnation and acquisition by the City of New York for Phase 2 of the Mid-Block Park and Boulevard system for all or portions of the following properties (see Figure 2):

- › Block 708: Lots 17, 20, 48
- › Block 709: Lots 17, 23, 31, 52
- › Block 710: Lots 11, 15, 20

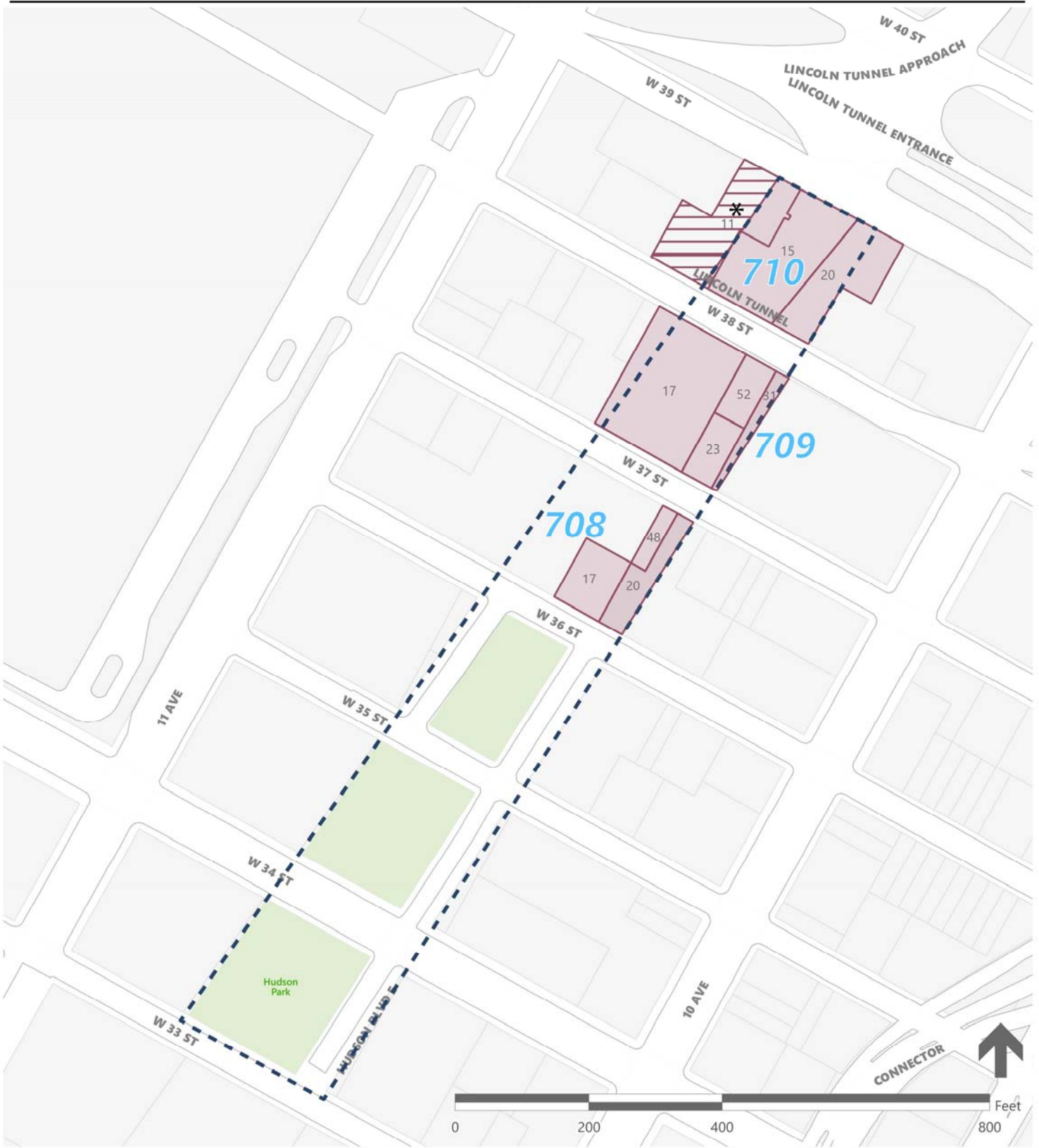
Description of the Proposed Action

Construction of the No. 7 Subway extension commenced in 2007, which is later than the start of construction assumed in the *Hudson Yards FGEIS*. As noted above, the *Hudson Yards FGEIS* assumed acquisition and construction of Phase 2 of the Mid-Block Park and Boulevard system by 2025. As a result of the later completion of the No. 7 Subway extension, the completion date for other components of the Hudson Yards Development Program will also occur later, though it is expected that the proposed action will be completed by 2025, as originally planned.

Phase 2 of the Mid-Block Park and Boulevard would extend from West 36th to West 39th Streets, between Tenth and Eleventh Avenues. The Boulevard would lie on the east and west sides of the Mid-Block Park and include two one-way street segments running from West 36th to West 38th Streets, each having a roadway width of approximately 30 feet. The east side of the Boulevard would operate one-way in the northbound direction and the west side of the Boulevard would operate one-way in the southbound direction. These new street segments would connect with the



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|---|---|---|---------------------|---|--------------------|
|  | Phase II Property to be Acquired |  | Completed Park Area |  | Phase II Park Area |
|  | Phase II Temporary Easement Area |  | Completed Boulevard |  | Phase II Boulevard |
|  | Hudson Boulevard Boundary | | | | |
|  | Easement only for demolition and staging purposes | | | | |



- Phase II Property to be Acquired
- Phase II Temporary Easement Area
- Hudson Boulevard Boundary

- Easement for demolition and staging purposes
- 708 Tax Block No.
- 17 Tax Lot No.

existing portions of the Boulevard, which presently run in the northbound direction from West 33rd to West 36th Streets and in the southbound direction from West 36th to West 35th Streets. The new segment of the Mid-Block Park and Boulevard between West 38th and West 39th Streets would entirely consist of open space.

There are no changes to the design of Phase 2 of the Mid-Block Park and Boulevard system as compared to what was analyzed in the *Hudson Yards FGEIS*. The only change is the later analysis year, in which the acquisition of the project site properties and associated construction is expected to occur by 2024.

The proposed action would not affect the reasonable worst-case development scenario (RWCDs) analyzed in the *Hudson Yards FGEIS* and no additional development would result from the proposed action.

Purpose and Need for the Proposed Action

The purpose of the proposed action is to allow for the development of Phase 2 of the Mid-Block Park and Boulevard system between West 36th to West 39th Streets as contemplated in the *Hudson Yards FGEIS*.

Changes Since the Hudson Yards FGEIS

A number of changes have occurred to the Hudson Yards development program and study area subsequent to the issuance of the *Hudson Yards FGEIS*. These are discussed in further detail below.

Convention Center

In the *Hudson Yards FGEIS*, a significant expansion of the Convention Center was assumed, which included additional exhibition halls, meeting rooms, and ballroom space and the development of a 1,500-room hotel connected to the facility. The proposed expansion also included the closure of West 39th and West 40th Streets between Eleventh and Twelfth Avenues, and a reconfiguration of West 41st Street between Eleventh and Twelfth Avenues, which would effectively close it to through traffic.

Subsequent to the FGEIS, the scale of the Convention Center expansion has been significantly reduced—the 1,500-room hotel on the west side of Eleventh Avenue between West 41st and 42nd Streets is no longer being proposed, and West 40th and West 41st Streets between Eleventh and Twelfth Avenues will remain open to traffic.

Mixed-Use Development on the Western Rail Yard

As noted above, in the *Hudson Yards FGEIS*, a multi-use sports, exhibition, and entertainment facility was assumed over the Western Rail Yard. The Western Rail Yard site will instead be redeveloped as a mixed-use development that is expected

to include commercial (retail and office or hotel) space, residential units, a public school, open space, and accessory parking. The segment of West 33rd Street between Eleventh and Twelfth Avenues will also remain open to traffic.

The effects of the Western Rail Yard project on environmental conditions was analyzed as part of the 2009 *Western Rail Yard FEIS* (CEQR# 09DCP007M), which assumed completion of that project in 2019 and therefore included a 2019 analysis year, including those projects in Hudson Yards that would be expected to be completed by 2019 as part of its No Build analysis. The results of the *Western Rail Yard FEIS* are included in this analysis where relevant to the proposed action.

Eastern Rail Yard Culture Shed

The *Hudson Yards FGEIS* included a development plan over the eastern portion of the MTA-Long Island Rail Road John D. Caemmerer Yard, the block bounded by Tenth and Eleventh Avenues, West 30th and West 33rd Streets (the "Eastern Rail Yard") that comprised approximately 6.6 million gross square feet (gsf) of mixed-use development, including office, residential, hotel, retail, cultural and parking facilities and public open space. The plan included a cultural facility comprised of approximately 100,000 gsf, which was later modified in the 2009 *Western Rail Yard FEIS* to allow for the development of up to 200,000 gsf on the southwestern portion of the Eastern Rail Yard. Subsequently, a 2010 Memorandum of Understanding between the MTA and City of New York regarding the Eastern Rail Yard provided that 100,000 zoning square feet (zsf) on a footprint of 21,625 sf be reserved on the Eastern Rail Yard for the cultural facility.

In 2013, a text amendment to the Hudson Yards Special District was made to facilitate the development of a cultural facility known as the "Culture Shed" on the Eastern Rail Yard. The *Culture Shed EAS* (CEQR# 13DCP083M) was prepared to assess potential environmental impacts, which concluded that the proposed Culture Shed would not result in any new significant adverse impacts

Framework for Analysis

The *Hudson Yards FGEIS* disclosed a number of significant adverse impacts during construction (air quality, noise and historic resources) and after construction (community facilities, architectural and historic resources, archaeological resources, traffic, transit, pedestrian conditions, and noise), many of which could be mitigated either fully or in part through the mitigation measures described in the *FGEIS*. In terms of significant adverse impacts identified in the *Hudson Yards FGEIS*:

- › Community facilities, noise, and construction period air quality and traffic impacts would be fully mitigated
- › Architectural and archaeological resources and construction period noise impacts would remain unmitigated
- › Many, but not all, traffic, transit and pedestrian impacts would also be fully mitigated

The proposed action would not alter the size or configuration of development, induce new development, or increase in-ground disturbance due to construction. The proposed action would not have the potential to alter the conclusions of the *Hudson Yards FGEIS* that there would be no significant adverse impacts related to: land use, zoning and public policy; socioeconomic conditions; open space; shadows; urban design and visual resources; neighborhood character; natural resources; hazardous materials; waterfront revitalization program; infrastructure; solid waste and sanitation services; energy; air quality; and public health. Similarly, the proposed action would not have the potential to alter the conclusions of the *Hudson Yards FGEIS* to fully mitigate the impacts related to community facilities, noise, and construction period air quality and traffic or alter the conclusions that significant adverse impacts to architectural and archaeological resources and construction period noise would remain unmitigated to the same extent as previously. Accordingly, no further assessment of these areas of environmental concern is required for this analysis.

However, since Phase 2 of the Mid-Block Park and Boulevard system would change vehicular traffic and pedestrian circulation patterns in the area, an analysis of the proposed action, other changes to the Hudson Yards Development Program analyzed in the *Hudson Yards FGEIS*, other changes in the Hudson Yards surrounding area, or other material new information as it relates to transportation is warranted. Based on the conclusions related to traffic, an assessment related to mobile source air quality and noise will also be provided. As described in more detail below, the analysis concludes that the changed conditions in the surrounding neighborhood would not result in new or substantially different significant adverse transportation, air quality or noise impacts not already identified in the Hudson Yards FGEIS.

Analysis

The potential environmental impacts associated with the proposed action are analyzed below for the following technical areas: transportation, air quality and noise.

Transportation

Phase 2 of the Mid-Block Park and Boulevard itself would not be expected to induce any new vehicular or person trips, and the Mid-Block Park would not be a major attractor of trips, as it would be anticipated to be used by residents and workers in the surrounding area and accessed via walk-only trips. The proposed action would not affect trip-making via transit, nor would it be expected to have an effect on parking conditions, as it would not result in the displacement of any existing off-street parking facilities or the addition of any new off-street parking supply; on-street parking regulations along the Boulevard would be anticipated to conform to regulations currently in effect within Midtown Manhattan. However, the Mid-Block Park and Boulevard would change some vehicular traffic and pedestrian circulation patterns in the surrounding area.

The transportation analyses presented below assess whether the proposed action would result in significant new traffic or pedestrian impacts. The analyses focus on the weekday AM (8-9 AM), Midday (12-1 PM), and PM (5-6 PM) peak hours. Although the *Hudson Yards FGEIS* also included an analysis of a weeknight Special Event peak hour (to assess the potential impacts of a Monday night football game, representing the worst-case weeknight major event, at the proposed multi-use sports, exhibition, and entertainment facility held concurrently with a concert at Madison Square Garden) and a Sunday afternoon Special Event peak hour (to assess the effects of a football game at the multi-use facility and a public show at an expanded Convention Center), as described in detail above, changes to the Hudson Yards development program since the release of the FGEIS include the elimination of the multi-use facility and the essential elimination of the Convention Center expansion that had been originally proposed, making the Special Event peak hours no longer appropriate for analysis. In addition, as described below, the City no longer intends to construct a 950-space public parking garage below the Mid-Block Park and Boulevard.

Hudson Yards FGEIS Analysis and Conclusions

Traffic

The *Hudson Yards FGEIS* analyzed traffic conditions in an extensive study area consisting of 243 intersections for the 2025 future build year in the weekday AM, Midday, and PM peak hours. Highly conservative vehicular trip assumptions were factored into the analysis methodology to ensure the analysis determined potential impacts of the RWCDs, even though it is likely that some of this development would not materialize until after 2025. The analysis also accounted for the effects of the Mid-Block Park and Boulevard (assuming that the portion north of West 34th Street would be completed between 2010 and 2025), other No Build projects in the surrounding area, and an annual increase in background traffic of 0.5 percent for each year from 2003 through 2025.

The FGEIS determined that in the 2025 analysis year the Proposed Action would result in the potential for significant adverse impacts at 122, 100, and 135 intersections in the AM, Midday, and PM peak hours, respectively. Most of these impacts could be mitigated through the implementation of traffic engineering improvements, including installation of traffic signals (at unsignalized intersections), traffic signal timing changes, lane channelization improvements, the elimination of on-street parking within 150 feet of intersection approaches to add a limited travel lane (known as "daylighting"), and prohibition of turn movements. However, a total of six, two, and seven intersections would have unmitigated significant adverse impacts during the AM, Midday, and PM peak hours, respectively.

Pedestrians

The *Hudson Yards FGEIS* analyzed pedestrian conditions in an extensive study area consisting of 819 pedestrian elements (413 sidewalks, 192 corners, and 214 crosswalks) for the 2025 future build year in the weekday AM, Midday, and PM peak hours. As with the traffic analysis, multiple conservative assumptions were set forth in the analyses.

The FGEIS determined that in the 2025 analysis year, the Proposed Action would result in the potential for significant adverse impacts at a total of 33, 78, and 53 pedestrian elements in the AM, Midday, and PM peak hours, respectively. Many of these impacts could be mitigated through the construction of wider sidewalks and corners, the repainting of crosswalks for additional width, and traffic signal timing changes. However, a total of 15, 41, and 31 pedestrian elements (crosswalks, corners, or sidewalks) would have unmitigated significant adverse impacts during the AM, Midday, and PM peak hours, respectively.

Changes Since the Hudson Yards FGEIS

Changes to the Hudson yards Development Program

As described above, there have been several substantial changes to the Hudson Yards Development Program that would affect traffic conditions, including changes to the expansion of the Convention Center and the development planned for the Western Rail Yard.

Reductions in Auto and Taxi Mode Share

To estimate the modal share for Hudson Yards commuters, the *Hudson Yards FGEIS* used 1990 U.S. Census reverse journey-to-work data for Census Tracts in the Midtown Central Business District (CBD), which is defined as the area bordered by 59th Street on the north, 23rd Street on the south, Third Avenue on the east, and Eighth Avenue on the west. As shown in Table 1, the modal splits for office workers assumed a share of 10.7 percent autos and 2.9 percent taxis. For the 2009 *Western Rail Yard FEIS*, the modal splits developed for the *Hudson Yards FGEIS* were updated using 2000 U.S. Census reverse journey-to-work data, which had reductions in autos and taxi shares (9.9 percent autos and 2.4 percent taxis). The most recent available reverse journey-to-work data available from the 2006-2010 American Community Survey indicate the trend in declining auto and taxi usage has continued and show that the share of autos has reduced to 7.6 percent and the share of taxis has reduced to 2.0 percent. As such, when comparing the modal splits for office workers used in the *Hudson Yards FGEIS* to the 2006-2010 American Community Survey data, there has been a 29.3 percent reduction in auto modal share and a 30.9 percent reduction in taxi modal share.

Table 1: Comparison of Modal Split Data for Office Workers

Source of Modal Split Data	Auto	Taxi	Bus	Subway	Rail	Walk Only	Other	Total
Hudson Yards FGEIS ¹	10.7%	2.9%	16.0%	47.5%	17.0%	5.9%	-	100.0%
Western Rail Yard FEIS ²	9.9%	2.4%	15.8%	43.7%	20.1%	7.2%	0.9%	100.0%
2006-2010 American Community Survey ³	7.6%	2.0%	13.8%	50.8%	18.3%	7.2%	0.3%	100.0%

Notes:

1. 1990 U.S. Census Reverse Journey-to-Work Data for Tracts in the Midtown CBD for the 7:30 - 9:30 am peak period
2. Hudson Yards FGEIS, updated by NYCDOT, NYCDOT and NYCT Working Group with 2000 U.S. Census Reverse Journey-to-Work Data
3. 2006-2010 American Community Survey Reverse Journey-to-Work Data for Tracts in the Midtown CBD for the 7:30 - 10:00 am peak period

The trend in reduced auto and taxi usage also correlates with the more recent traffic volumes collected for the *Western Rail Yard FEIS*; a comparison of 2003 existing traffic volumes from the *Hudson Yards FGEIS* and 2008 existing traffic volumes from the *Western Rail Yard FEIS* revealed a general decline in area wide traffic volumes, and baseline traffic volumes were higher in 2003 than in 2008 at more than 75 percent of the locations studied.

Reduction in Amount of Permitted Off-Street Parking

In the *Hudson Yards FGEIS*, the transportation analyses assumed the enactment of special parking regulations for the Hudson Yards area to ensure that parking capacity displaced through redevelopment of the area would be replaced insofar as possible and that parking demand generated by the new development would be met. These regulations required off-street parking for zoning lots in excess of 15,000 square feet for residential, commercial, and community facility land uses and also permitted additional parking to be provided. Below the Mid-Block Park and Boulevard, from West 34th Street to West 36th Street, a 950-space public parking garage was planned to be constructed to accommodate a portion of the parking demand generated by the new development. Vehicular ingress and egress to the parking garage would be provided at midblock ramps from both West 35th and West 36th Streets. Additional public parking could also be permitted by special permit through the CPC.

Subsequent to the FGEIS, changing conditions led the City to revisit some of the assumptions underlying the required and permitted parking ratios applicable to the Hudson Yards area. These changes include a decline in auto mode share for commuters to Manhattan (based on trends in U.S. Census data), City policies aimed to reduce congestion and promote more sustainable forms of transportation, a much smaller expansion of the Convention Center, and flexibility sought by developers in providing parking. Through enactment of the Hudson Yards Parking Text Amendment in 2010 (CEQR# 10DCP008M), off-street parking is no longer required in the study area and the amount of permitted parking allowed for new developments has been reduced. Consistent with this policy, the City will no longer proceed with the construction of the 950-space public parking garage below the Mid-Block Park and Boulevard.

Changes to Roadway Network

Since publication of the *Hudson Yards FGEIS*, there have been several changes to the roadway network in the vicinity of the Mid-Block Park and Boulevard. Bus lanes have been added to southbound Eleventh Avenue (from 42nd Street to 34th Street), both directions of 42nd Street (from Dyer to Third Avenues), and both directions of 34th Street (from Eleventh to First Avenues). The bus lanes on 34th Street are part of the 34th Street Select Bus Service (SBS) project, which also includes bus bulbs (sidewalk widenings) at bus stops, turn prohibitions, and signal timing modifications.

It is noted that in 2017 the New York City Department of Transportation (NYCDOT) converted the segment of Eleventh Avenue between 34th and 37th Streets from a one-way street in the southbound direction to a two-way street. However, this street conversion does not represent a change to the roadway network that requires analysis because Eleventh Avenue previously operated as a two-way street between 34th and 37th Streets, and this bidirectional configuration existed in 2004 and was analyzed for the 2025 analysis year in the *Hudson Yards FGEIS*.

As part of the Clinton–Hell’s Kitchen Neighborhood Traffic Study completed in 2014, NYCDOT implemented turn restrictions near approaches to the Lincoln Tunnel, including banning the eastbound left turn from 36th Street to Dyer Avenue and the westbound left turn from 37th Street to Ramp C (the ramp leading to the Lincoln Tunnel from the west side of Ninth Avenue). Signal timing changes were also modified in the area, including at intersections along Ninth, Tenth, Eleventh, and Twelfth Avenues. These modifications included the addition of Lead Pedestrian Intervals, increased time for pedestrians to cross wide avenues, and offset changes to improve traffic progression. NYCDOT has committed to monitor the improvement measures identified in the Clinton–Hell’s Kitchen Neighborhood Traffic Study after they are implemented.

Other changes to the roadway network that have occurred subsequent to publication of the *Hudson Yards FGEIS* include Green Light for Midtown project, which involved the closure of Broadway to vehicular traffic in Herald Square (between 33rd and 35th Streets) and in Times Square (between 42nd and 47th Streets) to create new pedestrian areas, the reopening of 41st Street between Eighth and Ninth Avenues under the Port Authority Bus Terminal, and the addition of bicycle lanes to 29th, 30th, 39th, 40th, 43rd, and 44th Streets and Sixth, Eighth, and Ninth Avenues, and Broadway.

Changes to Transit Services

Since publication of the *Hudson Yards FGEIS*, a new bus route has been created by MTA New York City Transit (NYCT) to enhance service on the Far West Side of Manhattan. This local bus route—the M12—operates along Eleventh and Twelfth Avenues. The M34 bus route has been converted to an SBS route, which uses high capacity Bus Rapid Transit (BRT) vehicles and off-board fare payment, and the western terminus of the route has been modified so that buses no longer circulate around the Convention Center. Additionally, MTA NYCT has modified the terminus of the M42 bus route so that all buses terminate at the Circle Line Pier at Twelfth

Avenue and 42nd Street (previously some of the M42 buses would terminate adjacent to the main entrance of the Convention Center and circulate around the facility).

Assessment

Traffic

Upon review of the changes that have occurred to the study area, it is evident that the traffic volumes analyzed in the *Hudson Yards FGEIS* are highly conservative in nature. A comparison of the modal split data from the 1990 U.S. Census (used for the travel demand projections for office land uses in the *Hudson Yards FGEIS*) and 2006-2010 American Community Survey (the most recent comparable modal split data available from the U.S. Census Bureau) indicates that auto and taxi usage among commuters in the Midtown CBD has each decreased by approximately 30 percent. As such, the amount of vehicular traffic generated by development sites in the Hudson Yards rezoning area would now be expected to be substantially less than what was originally projected and analyzed in the FGEIS. Similarly, with the reductions that have been made to the amount of permitted off-street parking in the study area and the elimination of the 950-space public parking garage below the Mid-Block Park and Boulevard, there would be fewer auto trips to and from off-street parking facilities in the study area compared to what was previously analyzed in the FGEIS.

The *Hudson Yards FGEIS* assessed traffic conditions according to the guidelines recommended in the *2001 CEQR Technical Manual*. These included an annual increase in background traffic of 0.5 percent for each year through 2025 (that is, a cumulative background increase of approximately 11 percent). Since then, the background growth rates in the *CEQR Technical Manual* have been updated, and the 2014 edition of the *CEQR Technical Manual* recommends an annual background growth rate for this area of Manhattan of 0.25 percent for the first five years and 0.125 percent for years six and beyond. When applied to the 2003-2025 period, this would only represent a cumulative background growth rate of approximately 3.4 percent, which is approximately 70 percent lower than the background growth rate used in the *Hudson Yards FGEIS*.

The reduction to the scale of the Convention Center expansion will result in fewer auto, truck, and taxi trips assigned to the study area in the 2025 analysis year, compared to what was previously analyzed in the *Hudson Yards FGEIS*. Furthermore, because the segments of West 40th and West 41st Streets between Eleventh and Twelfth Avenues are no longer being demapped and will instead remain open to traffic, there would be no associated vehicular diversions to alternate routes, such as the segment of Eleventh Avenue adjacent to the Convention Center.

In the *Hudson Yards FGEIS*, the Western Rail Yard was assumed to be developed as a multi-use sports, exhibition, and entertainment facility, but instead it will now be developed as a mixed-use development with commercial space and residential units. To determine if the redevelopment of the Western Rail Yard site would result in an increased level of traffic in the study area above what was previously analyzed in the

Hudson Yards FGEIS, a high-level comparison of vehicular trip generation was made, accounting for the changes in travel patterns that have occurred for office workers (the reductions in auto and taxi mode shares), the elimination of the multi-use facility on the Western Rail Yard site, and the elimination of the 1,500-room Convention Center hotel.

Table 2 provides a comparison of the anticipated reduction in vehicle trips generated in the Hudson Yards area with the total number of vehicle trips that would be generated by the mixed-use development on the Western Rail Yard site. The table shows that the reduction in Hudson Yards vehicle trips would far outweigh the new trips added by the Western Rail Yard development in the AM and PM peak hours. Although the table shows the Western Rail Yard development would generate approximately 118 more vehicle trips in the Midday peak hour, it is highly unlikely that 50 or more of these trips would occur at a single intersection in the vicinity of the second phase of the Mid-Block Park and Boulevard.

Additionally, the comparison in Table 2 does not account for the reduction in the scale of the Convention Center expansion (other than the elimination of the hotel), which would amount to even further reductions in Hudson Yards vehicular trips.

Table 2: Comparison of Total Vehicle Trips Generated

Analysis Hour/ Vehicle Type	Office 27,835,556 sf (Trip Generation from Hudson Yards FGEIS) ¹			Office 27,835,556 sf (Trip Generation with Updated Modal Splits) ²			Reduction In Hudson Yards Trips									Net Reduction In Hudson Yards Trips			Total Trips Generated by Western Rail Yard ³		
							Office			Multi-Use Facility ¹			Convention Center Hotel ¹								
	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
AM	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
Auto	3,681	153	3,834	2,601	108	2,709	-1,080	-45	-1,125	-63	0	-63	-21	-33	-54	-1,164	-78	-1,242	308	147	455
Taxi	1,176	49	1,225	812	34	846	-364	-15	-379	-143	-1	-144	-32	-49	-81	-539	-65	-604	114	146	260
School Bus	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	2	4
Truck	200	200	400	200	200	400	0	0	0	-5	-5	-10	-5	-5	-10	-10	-10	-20	23	23	46
Total	5,057	402	5,459	3,613	342	3,955	-1,444	-60	-1,504	-211	-6	-217	-58	-87	-145	-1,713	-153	-1,866	447	318	765
Midday	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
Auto	437	474	911	437	474	911	0	0	0	-51	-18	-69	-50	-43	-93	-101	-61	-162	112	113	225
Taxi	773	837	1,610	773	837	1,610	0	0	0	-116	-43	-159	-71	-61	-132	-187	-104	-291	162	166	328
School Bus	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0
Truck	230	230	460	230	230	460	0	0	0	-9	-9	-18	-4	-4	-8	-13	-13	-26	22	22	44
Total	1,440	1,541	2,981	1,440	1,541	2,981	0	0	0	-176	-70	-246	-125	-108	-233	-301	-178	-479	296	301	597
PM	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total	In	Out	Total
Auto	223	4,229	4,452	157	2,989	3,146	-66	-1,240	-1,306	-59	-141	-200	-60	-32	-92	-185	-1,413	-1,598	156	384	540
Taxi	71	1,351	1,422	49	933	982	-22	-418	-440	-8	-298	-306	-90	-48	-138	-120	-764	-884	168	177	345
School Bus	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1	2
Truck	21	21	42	21	21	42	0	0	0	-1	-1	-2	0	0	0	-1	-1	-2	6	6	12
Total	315	5,601	5,916	227	3,943	4,170	-88	-1,658	-1,746	-68	-440	-508	-150	-80	-230	-306	-2,178	-2,484	331	568	899

Sources:

1. Hudson Yards FGEIS, Table 19-6
2. Hudson Yards FGEIS trip generation updated with modal splits from 2006-2010 American Community Survey Journey-to-Work Data for Tracts in the Midtown CBD.
3. Western Rail Yard FEIS, Table 17-6

While several changes have been made to the roadway network, such as the 34th Street SBS project, Green Light for Midtown project, and turn prohibitions in the vicinity of the Lincoln Tunnel as part of the Clinton–Hell’s Kitchen Neighborhood Traffic Study, these changes have been studied, implemented, and monitored by NYCDOT and do not materially affect the existing network and the potential for significant adverse impacts from the proposed action.

In conclusion, the changes that have occurred to the Hudson Yards development program and study area subsequent to the issuance of the *Hudson Yards FGEIS* would not be expected to result in any new significant adverse traffic impacts not already identified in the FGEIS. By completing the Mid-Block Park and Boulevard, the proposed action would improve vehicular circulation by providing new access routes for vehicles, which would likely alleviate some potential congestion on parallel existing routes, including Tenth and Eleventh Avenues.

Pedestrians

The reduction in the scale of the Convention Center expansion would result in fewer pedestrian trips assigned to the area in the vicinity of Phase 2 of the Mid-Block Park and Boulevard in the 2025 analysis year, compared to what was previously analyzed in the *Hudson Yards FGEIS* (this assumed an increase of 12,694 daily attendees for a weekday trade show at the expanded Convention Center). Meanwhile, the redevelopment of the Western Rail Yard site would not be expected to have a noticeable effect on pedestrian volumes on the northern end of the Mid-Block Park and Boulevard since it is located nearly a quarter of a mile away.

With respect to pedestrians, the reductions in auto and taxi mode shares for office workers would not affect the total number of person trips generated by projected development sites; instead some trips would be shifted to alternate modes and there would be some redistribution of walk trips between parking facilities, subway entrances, railroad stations, and bus stops. However, any such redistributed pedestrian trips would be widely dispersed throughout the study area and would be unlikely to lead to any new or substantially different significant adverse impacts than those already identified in the FGEIS. Furthermore, completion of the Mid-Block Park and Boulevard will allow for a more efficient distribution of pedestrians in the area. By providing a new north-south pedestrian corridor, the Boulevard would improve circulation patterns, offering an alternative pedestrian path over potential congestion along the corridors along Tenth and Eleventh Avenues.

Air Quality

As noted above, the changes that have occurred to the Hudson Yards development program and study area subsequent to the issuance of the *Hudson Yards FGEIS* would not be expected to result in any new significant adverse traffic impacts not already identified in the FGEIS. Completion of Phase 2 of the Mid-Block Park and Boulevard would improve vehicular circulation by providing new access routes for vehicles, which would likely alleviate potential congestion on parallel existing routes, including Tenth and Eleventh Avenues. Therefore, there would be no new significant adverse mobile source air quality impacts as a result of the proposed action.

Noise

As noted above, the changes that have occurred to the Hudson Yards development program and study area subsequent to the issuance of the *Hudson Yards FGEIS* would not be expected to result any new significant adverse traffic impacts not

already identified in the FGEIS. Completion of Phase 2 of the Mid-Block Park and Boulevard would improve vehicular circulation by providing new access routes for vehicles, which would likely alleviate potential congestion on parallel existing routes, including Tenth and Eleventh Avenues. Accordingly, there would be no significant adverse noise impacts not previously identified in the FGEIS as a result of the proposed action.

Conclusion

The proposed action would not alter the size or configuration of development, induce new development, or increase in-ground disturbance due to construction as compared to that analyzed in the *Hudson Yards FGEIS*. Therefore, the proposed action would not alter the conclusions of the *Hudson Yards FGEIS* that there would be no significant adverse impacts related to: land use, zoning and public policy; socioeconomic conditions; open space; shadows; urban design and visual resources; neighborhood character; natural resources; hazardous materials; waterfront revitalization program; infrastructure; solid waste and sanitation services; energy; air quality; and public health. Similarly, the proposed action would not change the conclusions of the *Hudson Yards FGEIS* that the significant impacts related to community facilities, noise, and construction period air quality could be fully mitigated, that traffic impacts could be partially mitigated and that significant impacts to architectural and archaeological resources and construction period noise would remain unmitigated.

Based on the assessment described above, the proposed action would not result in significant adverse environmental impacts that were not previously identified in the *Hudson Yards FGEIS*.