The City of New York

POLICE DEPARTMENT

STATEMENT OF FINDINGS

WORLD TRADE CENTER CAMPUS SECURITY PLAN

Project Identification:
CEQR No.: 12NYP001M

Lead Agency:
New York City
Police Department

SEQRA Classification:
Unlisted

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Contact Person:
Assistant Commissioner David Kelly
New York City Police Department Counterterrorism Bureau
One Police Plaza
New York, NY 10038
Phone: (646) 610-4557
Email: WTCEIS@nypd.org

Location: Manhattan, New York
In the vicinity of blocks 52, 54, 56, 58, 84 and 86

The Project Site encompasses the approximately 16-acre parcel bounded by Vesey Street on the north, Liberty Street on the south, Church Street on the east and West Street/Route 9A on the west.

A. INTRODUCTION

This Statement of Findings has been prepared in accordance with the environmental review requirements of Article 8 of the New York State Environmental Conservation Law, the State Environmental Quality Review Act (SEQRA), the implementing regulations set forth in 6 NYCRR Part 617, and the New York City Rules of Procedure for City Environmental Quality Review (CEQR) and Executive Order 91 of 1977 as amended. This Statement of Findings has been prepared to demonstrate that (1) the procedural requirements of SEQRA and CEQR have been met; (2) the Proposed Action was considered among reasonable alternatives; and (3) the potential for adverse environmental effects as disclosed in the World *Trade Center (WTC) Campus Security Plan Final Environmental Impact Statement* (FEIS) and during the review process will be avoided or minimized to the maximum extent practicable by the incorporation of mitigation measures.

Under CEQR, the New York City Police Department (NYPD) is the lead agency responsible for conducting the environmental review that determines whether the Proposed Action will have significant adverse impacts on the environment.

On February 8, 2012, the NYPD issued the Notice of Positive Declaration and Intent to Prepare a Draft Environmental Impact Statement (DEIS) for the WTC Campus Security Plan. The public, governmental agencies, community boards, and elected officials were invited to comment on the Draft Scoping Document either in writing or at the public scoping hearing held on March 14, 2012. Written comments on the Draft Scope of Work were accepted until 5:00 PM on March 26, 2012. The comments received during the comment period were considered and incorporated as appropriate into the Final Scoping Document, which was issued on April 1, 2013.

On April 8, 2013, the NYPD, as lead agency, issued the Notice of Completion for the DEIS for the WTC Campus Security Plan and the DEIS was published and distributed for review. The issuance of the DEIS was followed by a public hearing that was held on April 23, 2013 at the New York City Department of City Planning located at 22 Reade Street, New York, NY. Notices of the DEIS's availability as well as the date and location of the public hearing were advertised in the *City Record*, the *Environmental Notice Bulletin*, and the *New York Post*. Copies of the DEIS documents, including information on the public hearing and comment period, were forwarded to elected officials including Manhattan Borough President Scott Stringer and City Council Member Margaret Chin, Manhattan Community Boards 1 and 2, and the Mayor's Office of Environmental Coordination. Written comments on the DEIS were requested and received by the Lead Agency through 5:00 P.M. on Wednesday, May 22, 2013, the close of the public comment period. The NYPD prepared an FEIS, which considered and addressed all substantive comments made on the DEIS. The FEIS was certified as complete, and a Notice of Completion was issued on August 14, 2013, marking the completion of the project's CEQR environmental review.

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

B. PROJECT BACKGROUND

The Campus Security Plan, described in detail below, would create a comprehensive vehicle security perimeter for the WTC Campus (the "Campus Security Plan") to protect against vehicle-borne improvised explosive devices while ensuring an open environment that is hospitable to remembrance, culture, and commerce. The Campus Security Plan bars unscreened vehicles from entering the WTC Campus and certain areas at the perimeter of the Site and creates increased stand-off distances to reduce the risk of catastrophic damage to persons and property. A vehicle seeking to enter restricted areas would be subject to credentialing to determine whether entry is authorized and screening to ensure the vehicle does not contain dangerous material. The creation of a Trusted Access Program[1] (TAP) is expected to facilitate entry for those vehicles with destinations within the WTC Campus. These would likely include WTC office tenants with parking privileges on site, residents and owners of businesses located in non-WTC buildings within the secure zone (primarily along Liberty Street between Greenwich Street and Trinity Place), delivery vehicle operators, and car service and possibly taxi operators.

The Vehicular Security Center (VSC), planned in conjunction with the WTC development irrespective of the Proposed Action, will control access to the underground traffic network that serves the entire WTC Campus, including the loading docks for each building and parking areas. The on-site parking garage will

[1]The Port Authority of New York and New Jersey is currently developing the TAP program.

not allow general public parking; rather, it will be restricted to use by tenants. All vehicles entering the VSC, including tenants that park on-site, tour buses and delivery vehicles will be processed and screened at the VSC. The Port Authority of New York and New Jersey (PANYNJ) will operate the VSC and will be responsible for screening vehicles that enter the facility. As it is anticipated that demand for on-site delivery, tour bus and private occupancy vehicle parking will be considerable, a management strategy, including the scheduling of tour buses and truck deliveries, is currently being developed to ensure that the VSC can accommodate demand for on-site delivery, and tour bus and tenant auto parking in an orderly and efficient manner.

The NYPD and PANYNJ have coordinated to develop conceptual plans for the design and location of the proposed security infrastructure, which is discussed in more detail in below. The Project Site includes all streets, sidewalks and buildings that would be directly affected by the installation of the WTC site's security infrastructure. This area is generally bounded by Route 9A (West Street) and Barclay, Albany and Church Streets. Four vehicular entry points are planned under the proposed Campus Security Plan at: Washington Street and Barclay Street; West Broadway and Barclay Street; Trinity Place/Church Street and Liberty Street; and Liberty Street and Route 9A. Exits from the secure zone are proposed at the following five locations: Church Street at Vesey Street; Vesey Street at Route 9A; Fulton Street at Route 9A; Liberty Street at Route 9A; and Greenwich Street at Cedar Street. The secure perimeter would consist of various types of vehicle interdiction devices, which would include static barriers (such as bollards) and operable barriers to allow vehicle access, all under NYPD control.

The Proposed Action also includes the reconfiguration of Trinity Place/Church Street from Cedar Street north to Vesey Street to create a northbound lane for screened vehicles within the security zone as well as an exit area north of Vesey Street. This secure lane would be created by constructing a four-foot-wide raised median on Church Street. An approximately 11-foot-wide inner secure lane would provide additional stand-off distance between the planned WTC buildings and the general traffic flow on Church Street. Three lanes of northbound Church Street traffic, having an approximate total width of 33 feet, would remain outside the secure zone.

Construction of the Proposed Action is expected to commence in 2013. It is anticipated that all of the security measures associated with the Proposed Action would be implemented by 2015, with the exception of the Church Street median which would be partially completed by 2015, but would also have sections that are completed concurrent with the adjacent WTC construction (2 WTC and 3 WTC). By 2019, it is anticipated that all buildings on the WTC Campus will have been completed and fully occupied, and the full travel demand generated by the site will have developed. By contrast, it is anticipated that Towers 2 and 3, the Performing Arts Center and a portion of the on-site retail will not yet be completed and/or fully occupied by 2015. Further, with or without the Proposed Action, it is unlikely that the planned street network within the WTC Campus would be completely constructed and publicly accessible prior to 2019. As such, 2019 was selected as the analysis year for the environmental analyses in the EIS, as this would represent a reasonable worst case condition for assessing the Proposed Action's effects at the WTC site and the surrounding street network.

As the City of New York would provide a portion of the funding for the Proposed Action and NYPD is the chief decision maker with regard to its design and implementation, NYPD has conducted an environmental review pursuant to SEQRA and CEQR, and their implementing regulations. The NYPD is acting as lead agency under SEQRA/CEQR. Other City agencies are involved or interested agencies; these include the New York City departments of City Planning (DCP), Environmental Protection (NYCDEP) and Transportation (NYCDOT). The New York State Department of Transportation (SDOT) is also an involved agency. NYPD will continue to work with the City and State in connection with the Proposed Action.

The EIS for the Proposed Action serves as the basis for NYPD's findings pursuant to SEQRA. Because the Proposed Action is entirely within New York City, the *CEQR Technical Manual* generally serves as a guide with respect to methodologies and impact criteria for evaluating the Proposed Action. Therefore, the EIS has been prepared in conformance with applicable laws and regulations, including Executive Order No. 91 of 1977 and the CEQR regulations, and follows the guidance of the 2012 *CEQR Technical Manual*.

While the NYPD would provide a portion of the funding for the Proposed Action, other potential funding sources include the Federal Emergency Management Agency/U.S. Department of Homeland Security (FEMA/DHS) and PANYNJ. Federal agencies are responsible for complying with the National Environmental Policy Act (NEPA), which has procedural requirements that are similar to, but jurisdictionally distinct from, SEQRA. The information provided in this SEQRA EIS is intended to provide a basis for a subsequent NEPA environmental review by FEMA/DHS if Federal funding is allocated for this project. Accordingly, this SEQRA EIS was conducted in a manner to ensure consistency with Federal review requirements.

The EIS includes review and analysis of all relevant impact categories identified in the 2012 *CEQR Technical Manual*. The EIS contains a description and analysis of the Proposed Action and its environmental setting; the environmental impacts of the Proposed Action, including its short- and long-term effects, and typical associated environmental effects; identification of any significant adverse environmental effects that can be avoided through incorporation of corrective measures into the Proposed Action; a discussion of alternatives to the Proposed Action; the identification of any irreversible and irretrievable commitments of resources that would be involved in the Proposed Action should it be implemented; and a description of any necessary mitigation measures proposed to minimize significant adverse environmental impacts.

C. PURPOSE AND NEED

As described above, the WTC Campus Security Plan was developed in response to the continued security concerns at the WTC site. The Proposed Action bars unscreened vehicles from entering the WTC Campus and certain areas at the perimeter of the WTC site and creates increased stand-off distances between unscreened vehicles and WTC buildings. A vehicle seeking to enter restricted areas would be subject to credentialing to determine whether entry is authorized and screening to ensure the vehicle does not contain dangerous material. As indicated above, the proposed security measures are intended to safeguard the WTC Campus while allowing access for screened vehicles.

D. PROPOSED ACTION

The Proposed Action would control vehicular access to and traffic movement within the WTC Campus. This would be accomplished through the creation of a secure perimeter around the WTC Campus that is intended to prevent unscreened vehicles from driving within close proximity to the National September 11th Memorial plaza and the museum building, commercial towers, and transportation facilities located within the WTC Campus. Therefore, selected portions of streets in and around the WTC Campus are proposed to be restricted access streets that would be closed to general vehicular traffic. No restrictions or controls would be implemented on pedestrians or bicyclists as a result of the Proposed Action. Implementation of the Proposed Action would involve installation and utilization of security infrastructure in the immediate vicinity of the WTC Campus. Vehicles destined for the WTC site seeking entry onto these streets would be subject to credentialing to determine whether entry to the WTC Campus should be permitted, and then screening to confirm that these vehicles pose no threat. The Proposed Action would not

alter the building program that is currently planned for the site. Instead, the Proposed Action would manage vehicular traffic to and through the site.

A conceptual plan was developed by the NYPD in conjunction with the PANYNJ and other stakeholders for the design and location of the security infrastructure that would be installed under the Proposed Action. The Project Area includes all streets and sidewalks that would be directly affected by the installation of this security infrastructure. The Project Area is generally bounded by Barclay Street on the north, Albany Street on the south, Trinity Place/Church Street on the east and Route 9A (West Street) on the west. The perimeter of the WTC Campus would be secured through the installation of various types of vehicle interdiction devices under the control of the NYPD. These could include static and operable barriers and traffic lane delineators. Screening of all vehicles entering the WTC Campus would utilize both mechanical and manual processes, and would be facilitated through the use of sally ports which would consist of a personnel booth controlling a set of two operable barriers with sufficient space between them to accommodate a motor vehicle undergoing screening. An additional personnel booth would be installed at each credentialing location. It is anticipated that the sizes and locations of the booths and any ancillary structures will be refined as project design advances.

The Proposed Action would modify the vehicular access and traffic flow patterns considered in the 2004 *WTC Memorial and Redevelopment Plan Final Generic Environmental Impact Statement* (FGEIS). A secure zone is proposed to provide limited vehicular access on the following streets:

- Greenwich Street from Vesey Street to Cedar Street;
- West Broadway from Barclay Street to Vesey Street;
- Washington Street from Barclay Street to Vesey Street;
- Vesey Street from Church Street to Route 9A;
- Fulton Street from Church Street to Route 9A; and,
- Liberty Street from Trinity Place/Church Street to Route 9A.

Additionally, the Trinity Place/Church Street corridor[2] would be divided by a raised median with a static barrier, from Cedar Street to just north of Vesey Street. It is anticipated that to the east of the median the street would remain open to general traffic with three northbound moving lanes, while one additional moving lane to the west of the median would be located within the security perimeter and would be accessible only to screened vehicles.

The development program for the WTC site has evolved since the publication of the 2004 *World Trade Center Memorial and Redevelopment Plan FGEIS.* PANYNJ Master Plan Version 10.0 reflects the most up-to-date plan for the WTC site. Under PANYNJ Master Plan Version 10.0, a secure zone would be created around 1 WTC. The site plan and vehicle circulation system assumed for the No-Action analyses in the *WTC Campus Security Plan FEIS* are based on the best knowledge available regarding the measures that would be needed to secure 1 WTC in the absence of the proposed Campus Security Plan. Under these measures, both Vesey Street and Fulton Street would need to function as "managed streets" west of Greenwich Street, reflecting security engineering for 1 WTC that requires that unscreened vehicles be prohibited from accessing the portions of these streets adjacent to the building. As such, these street segments would be managed streets irrespective of the Proposed Action.

It is anticipated that Greenwich Street from Barclay Street to Vesey Street would continue to be limited for use only by 7 WTC tenants in the No-Action condition (as outlined in a December 5, 2007 reciprocal easement agreement among the City of New York, 7 WTC ownership, PANYNJ and the Lower Manhattan

2 Trinity Place becomes Church Street north of Liberty Street.

Development Corporation (LMDC)). While it is anticipated that this segment of Greenwich Street will revert to City control prior to 2019, there are currently no plans to change its use. It is therefore assumed that in the No-Action condition this section of Greenwich Street would be a controlled access street and would continue to primarily function as an access corridor for the adjacent 7 World Trade Center, as at present. No changes to Greenwich Street between Barclay and Vesey streets are proposed under the Campus Security Plan.

All vehicles seeking access to the WTC Campus would be subject to screening, and vehicle operators would be required to provide credentials prior to being granted access to the interior of the WTC site. Credentialing zones are proposed at the following locations:

- On West Broadway between Barclay Street and Park Place;
- On Barclay Street in the southern-most lane at the westbound approach to West Broadway;
- On Barclay Street in the southern-most lane at the westbound approach to Washington Street;
- On Trinity Place in the western-most lane at the northbound approach to Thames Street and Cedar Street;
- On Route 9A in the eastern-most lane at the northbound approach to Liberty Street; and,
- On Route 9A in the two southbound left turn lanes at the southbound approach to Liberty Street.

The proposed security sequence for entries consists of three zones: approach zones, credentialing and authorization zones, and screening zones. Approach areas would vary in size, detail and security elements installed depending on the anticipated vehicle volumes and the roadway geometry leading to the security station. It is expected that new signage would be installed to alert vehicles that they are approaching a secure zone and, where possible, to re-direct traffic that does not need to be credentialed.

TAP would allow for expedited vehicle entry into the secure zone. While specific operational details of the TAP program cannot be released for security purposes, a brief overview of the program is provided here. Enrollment in the TAP program would be open to:

- WTC office tenants with parking privileges on site;
- For-hire vehicle operators;
- Delivery vehicle operators; and,
- Residents and owners of businesses located in non-WTC buildings within the secure zone (on Liberty Street between Trinity Place and Greenwich Street).

Both drivers and vehicles would be enrolled in the TAP. TAP credentials would be checked as vehicles approach entry points to the WTC Campus, and authorized vehicles would then be admitted to a sally port for expedited security screening. Drivers and vehicles with business at the WTC site, but not enrolled in the TAP, would be permitted into the WTC Campus; however, these drivers and vehicles would be subject to more rigorous credentialing and screening. This arrangement would help to facilitate access for those who seek entry. Vehicles without the proper credentials would be denied entry per NYPD policy.

Any vehicles making an unscheduled delivery would not be permitted access to the WTC Campus or the VSC, and would be sent away to return once properly scheduled. As tenants, vendors and delivery companies become accustomed to these enhanced security procedures, it is anticipated that there would be relatively few unscheduled deliveries with the Proposed Action. A management strategy, including the scheduling of tour buses and truck deliveries, will be developed to ensure that the VSC can accommodate demand for on-site delivery, and tour bus and auto parking in an orderly and efficient manner.

Screening would include the visual and physical inspection of vehicles. The physical design of screening areas would vary slightly, depending on the anticipated primary users of each specific screening zone. For example, screening areas that are expected to have high bus or delivery vehicle volumes would be sized to fit these vehicle types, with larger sally ports. Personnel booths at each sally port would house barrier controls, data systems and other equipment. They would be designed to meet these operational requirements while having the smallest possible footprint to minimize potential pedestrian conflicts.

Screening procedures for individuals and vehicles enrolled in the TAP program would differ from screening procedures for non-TAP individuals and vehicles. Credentialing of individuals and vehicles arriving at a security checkpoint would take approximately 10 seconds if enrolled in the TAP and 60 seconds for a non-TAP vehicle. Screening times would be approximately 30 seconds for autos, taxis and black cars enrolled in the TAP, approximately 60 seconds for non-TAP black cars, and approximately 120 seconds for tour buses. (Most delivery vehicles would be screened within the VSC and not at a security station.) Screening of non-TAP vehicles would take longer than TAP screening as it would be more extensive and would require additional manual and mechanical screening processes.

Exit-only security stations would manage all traffic exiting the WTC Campus. The dimensions of sally ports at exits would vary in size based on their location and the size of the primary vehicle type expected to use them.

The following describes the security infrastructure and traffic changes that would be implemented under the Proposed Action.

Trinity Place/Church Street

The western-most lane at the Trinity Place approach to Liberty Street would be an entry-only sally port that would serve as the primary point of entry for tour buses en route to the National September 11th Memorial and Museum. Only buses with reservations to park on-site would be granted access. All others would be turned away in the credentialing zone. This policy would be strictly enforced.

The proposed credentialing and screening locations would be used as flexibly as possible to allow operational decisions to be made in the field so that inbound vehicle traffic could be distributed efficiently to all entry points. For example, during the morning peak period and after the PM peak period, private occupancy vehicles (POVs) and for-hire vehicles would use this entrance to access the WTC Campus as tour bus activity during these time periods is expected to be relatively low.

Vehicles would approach the Trinity Place/Church Street entrance from the south. Credentialing zones associated with this entrance would be delineated in a single lane along the west curb south of Cedar and Thames Streets at the approach to Liberty Street. A personnel booth is proposed on the western sidewalk of Trinity Place/Church Street, on the block between Cedar Street and Thames Street, near the front of the credentialing lane.

The screening zone along Trinity Place would consist of a single northbound lane along the west curb approaching Liberty Street with an approximately 15-foot-wide and 54-foot-long sally port. Operable barriers would be located at the northern and southern ends of the sally port. A personnel booth is proposed on the western sidewalk of Trinity Place adjacent to the sally port. Bollards are proposed between the curb and the building wall along this sidewalk. Bollards would be spaced four feet apart to allow adequate space for pedestrian flow, but also to serve as effective vehicle interdiction devices.

The Trinity Place/Church Street corridor would be divided by a raised median with fixed barriers (possibly bollards), from Cedar Street to just north of Vesey Street. A four-foot-wide north-south median would separate the two sections of Trinity Place/Church Street. It is anticipated that to the east of the median the street would remain open to general traffic with three northbound moving lanes, while the one approximately 11-foot-wide moving lane to the west of the median would be located within the security perimeter and would be accessible only to screened vehicles as a circulating roadway. Additionally, this median would include an operable barrier across Liberty Street which would be used to provide emergency egress by fire trucks stationed at the "Ten House" fire station located within the WTC Campus.

A second sally port would be located on Church Street at the northern end of the WTC Campus, just north of Vesey Street. This sally port would serve as an egress point for all vehicle types exiting onto northbound Church Street from the secure lanes located within the WTC Campus. The exit would be comprised of a single approximately 16-foot-wide lane. The west sidewalk at this location would widened by approximately eight feet extending approximately 125 feet north from Vesey Street to accommodate a personnel booth be staffed by NYPD. The sidewalk extension would allow for the entire width of the existing sidewalk to be maintained at approximately 15 feet wide. Bollards are proposed between the curb and the U.S. Post Office building's streetwall on the western sidewalk adjacent to the personnel booth. Bollards would be spaced four feet apart to allow adequate space for pedestrian flow, but also to serve as effective vehicle interdiction devices.

While pedestrian crosswalks in the vicinity of these security elements would be unimpeded by operable security elements, bollards would be spaced at four-foot intervals to allow pedestrian flow through at all crossings. All operable security devices would be set back from crosswalks to maintain the pedestrian zone. As stated, however, within the Liberty Street intersection, operable barriers would replace the static barriers to allow emergency vehicle access when necessary.

West Broadway

Southbound West Broadway at Vesey Street would function as an entrance to the WTC Campus for for-hire vehicles and POVs arriving from the north for southbound access into the site. While all vehicles with business in the WTC Campus would be granted access, vehicles registered in the TAP would have expedited entry, while non-TAP vehicles would be subject to more rigorous credentialing and screening. All other vehicles would be turned away if proper credentials are not provided in the credentialing zone. This policy would be strictly enforced.

Vehicles would approach the West Broadway entrance from the north and the east. The credentialing/authorization zones associated with this entrance would be delineated in two locations: the two eastern-most lanes on West Broadway north of Barclay Street and a single lane adjacent to the southern curb of Barclay Street at the approach to West Broadway. One personnel booth associated with credentialing/authorization would be located on the eastern sidewalk of West Broadway, just north of Barclay Street; the second personnel booth associated with credentialing/authorization would be located on the southern sidewalk of Barclay Street, just east of West Broadway. Street signs would be placed on the road leading up to the credentialing zones to inform drivers of the upcoming secure zone as they approach the credentialing zones.

Entry to the secure zone would be available from a screening zone located on West Broadway at the approach to Vesey Street. The screening zone would consist of two side-by-side southbound lanes that would each be approximately 14 feet wide. Therefore, this entry point would facilitate access of multiple vehicles simultaneously entering the WTC Campus. The screening zone would consist of two 80-foot-long

sally ports, separated by static barriers. Operable barriers would be located at the northern and southern ends of each of the sally ports to provide ingress and egress.

Bollards would be used to delineate a single travel lane along the east curb adjacent to the sally port but outside of the secure perimeter in order to maintain access to the adjacent loading and service area for the U.S. Post Office building (the width of this lane varies from approximately 11 feet closer to Barclay Street to approximately 15 feet wide). Postal vehicles would enter the building at the south end of the block and utilize an internal roadway to exit the facility onto West Broadway near Barclay Street.

The personnel booth associated with the West Broadway sally port would be located on the west sidewalk of West Broadway adjacent to a pedestrian plaza. Bollards are proposed at the southern end of this plaza as well as along the southern end of the east sidewalk adjacent to the U.S. Post Office to ensure that no vehicles are able to bypass the screening zone. The bollards would be spaced four feet apart to allow adequate space for pedestrian flow, but to also effectively serve as vehicle interdiction devices.

Crosswalks on West Broadway, Barclay Street, and Vesey Street in the vicinity of these proposed credentialing and screening zones would be unimpeded by security elements. All operable security devices would be set back from crosswalks to maintain an unobstructed pedestrian zone.

Greenwich Street

As described above, it is anticipated that Greenwich Street from Barclay Street to Vesey Street would be limited for use only by 7 WTC tenants under future conditions (as outlined in a December 5, 2007 reciprocal easement agreement among the City of New York, 7 WTC ownership, PANYNJ and LMDC); therefore, this section of Greenwich Street would be a controlled-access street irrespective of the Proposed Action and would be closed to through traffic. The installation of operable vehicle barriers near the Vesey Street intersection would permit the use of this block for vehicle entry to the WTC campus in emergency situations when other entrances may be unusable. It is possible that operable barriers may also be installed on Greenwich Street near Barclay Street at the northern end of the block. Operable barriers at the north end of the block (default down) and the south end of the block (default up) would allow vehicular access to the adjacent 7 WTC building, but not into the secure zone. As noted above, the West Broadway entrance would provide the primary access to the segment of southbound Greenwich Street traversing the WTC site.

At the south end of the WTC Campus, a sally port would be located on Greenwich Street approaching Cedar Street to provide egress for fire trucks stationed at the adjacent “Ten House” fire station on the south side of Liberty Street between Greenwich Street and Trinity Place/Church Street as well as for POVs and for-hire vehicles seeking access to the Greenwich South neighborhood and other local destinations.

Vehicles exiting the WTC Campus would approach the two side-by-side sally ports from the north. The lanes would each be approximately 11 feet wide and the overall length of the sally ports would be approximately 35 feet. The personnel booth would be located on a western sidewalk extension that would run the length of the block from Liberty Street to Cedar Street (approximately 18 feet wide by 140 feet long). This extension would allow an approximately 22-foot-wide clear zone for pedestrian circulation.

Bollards would be installed on the sidewalks adjacent to the operable barriers proposed within the street; on the eastern sidewalk they would extend to the building streetwall and on the western sidewalk they would extend the width of the sidewalk extension and intersect with the bollard line that is planned in conjunction with the No-Action streetscape plan.

Washington Street

The screening zone at Washington Street between Barclay and Vesey Streets would serve as an entrance and exit point for oversized trucks en route to and from the Performing Arts Center (PAC) at-grade loading dock on Vesey Street, and as a secondary entrance for other vehicles seeking to enter the WTC Campus. Delivery and service vehicles would also continue to use Washington Street to access the 7 WTC loading dock. Access to the PAC at-grade loading dock would only be required infrequently as most PAC deliveries would use below-grade loading docks via the VSC.

The credentialing zone proposed in conjunction with the Washington Street screening zone would be delineated in a single lane along the south curb of Barclay Street east of Washington Street. A personnel booth would be located on the southern sidewalk of Barclay Street just east of Washington Street near the front of the credentialing lane. Street signs would be placed on the road leading up to the credentialing zone to inform drivers of the upcoming secure zone as they approach the credentialing zone.

The Washington Street screening zone would consist of a southbound lane the full width of the roadway that would be approximately 160 feet long in order to accommodate the oversized vehicles that would deliver to the PAC. Operable barriers would be located at the northern and southern ends of the sally port. A personnel booth would be located along the west sidewalk adjacent to the proposed Washington Street sally port.

Additional sidewalk elements would include fixed bollards placed at four-foot intervals between the curb and the building wall on both the eastern and western sidewalks adjacent to the operable barriers at either end of the sally port. Signal poles (for lighting and stop/go signals for vehicles in the sally port) would also be located on both sidewalks at each end of the sally port.

While the With-Action Scenario would introduce new elements to the streetscape, it is important to note that the current site plan and vehicle circulation system for the WTC site incorporates security measures associated with the 2005 redesign of 1 WTC. Under these measures, both Vesey Street and Fulton Street would function as "managed streets" west of Greenwich Street. This would be achieved through the installation of operable barriers and sally ports on Vesey, Fulton and Washington Streets to restrict vehicular access.[3] As such, there would only be a minor incremental change in the appearance of the intersection of Washington and Vesey Streets.

Vesey Street

The portion of Vesey Street that would be located within the WTC Campus extends from Church Street on the east to Route 9A on the west. The block of Vesey Street from Church Street to West Broadway would be converted from eastbound to westbound operation under the Proposed Action. Vesey Street would operate two-way between Greenwich and Washington Streets and one-way westbound between Washington Street and Route 9A. Vesey Street would remain one-way eastbound east of Church Street and vehicles would not be able to travel from the managed corridor on the west side of Church Street onto eastbound Vesey Street due to the proposed configuration of Church Street which would include a raised median that would separate an inner secure lane from the rest of northbound Church Street.

[3] The site plan and vehicle circulation system assumed for the No-Action analyses in the EIS are based on the best knowledge available regarding the measures that would be needed to secure 1 WTC in the absence of the proposed Campus Security Plan.

Vesey Street at Route 9A would consist of a two-lane exit to northbound and southbound Route 9A for all vehicles exiting the WTC Campus. An approximately 62-foot-long sally port is proposed at this location. The sally port would be approximately 24 feet wide, accommodating two-lanes of westbound exiting vehicles. The sally port would be operated from a personnel booth located on an extended portion of the northern sidewalk in the area adjacent to the sally port. Fixed bollards would be installed across the sidewalk at both ends of the sally port at four-foot intervals from the southern edge of the sidewalk extension to the existing building. Security elements within the Vesey Street roadway would be set back from Route 9A to ensure the free-flow of pedestrians in the Vesey Street crosswalk.

While the With-Action Scenario would introduce new elements to the streetscape, it is important to note that the current site plan and vehicle circulation system for the WTC site incorporates security measures associated with the 2005 redesign of 1 WTC. Under these measures, Vesey Street would function as a "managed street" west of Greenwich Street. This would be achieved through the installation of operable barriers and sally ports on Vesey and Washington Streets to restrict unscreened vehicular access adjacent to 1 WTC. As such, there would only be a minor incremental change in the appearance of Vesey Street as a result of the Proposed Action.

Fulton Street

The portion of Fulton Street that would be located within the WTC Campus extends from Church Street on the east to Route 9A on the west. Under the Proposed Action, the block of Fulton Street between Greenwich and Church Streets would be converted from one-way westbound to one-way eastbound operation to facilitate drop-off and pick-up activity at the adjacent 2 WTC and the Transit Hub. The segment of Fulton Street west of Greenwich Street would remain one-way westbound as would Fulton Street east of Church Street (outside of the proposed secure zone). There would be no vehicular access on Fulton Street across the raised median and static barriers that would be installed along Church Street between Vesey Street and Cedar Street, although pedestrian access would be maintained.

A 48-foot-long, 15-foot-wide sally port is proposed on Fulton Street at the westbound approach to Route 9A. It would consist of a single exit lane for vehicles exiting the WTC Campus. A sidewalk extension would be installed along the north side of the roadway for the length of the sally port to accommodate the personnel booth at this location. The sidewalk extension would allow for an approximately 25-foot-clear pedestrian zone on the adjacent sidewalk. Fixed bollards would be placed at four-foot intervals between the curb and the northern end of the sidewalk extension where they would intersect with the bollards planned at the perimeter of each block on the WTC Campus as part of the No-Action condition. The north-south pedestrian crossing on the east side of Route 9A would be located within the sally port so that the required stand-off distance from the western-most barrier to 1 WTC can be provided.

While the With-Action Scenario would introduce new elements to the streetscape, it is important to note that the No-Action site plan and vehicle circulation system for the WTC site similarly incorporates security measures associated with the 2005 redesign of 1 WTC. Under these measures, Fulton Street would function as a "managed street" west of Greenwich Street. This would be achieved in the No-Action condition through the installation of operable barriers and sally ports on Fulton Street at Route 9A on the west and a point west of Greenwich Street on the east to restrict vehicular access. As such, there would only be a minor incremental change in the appearance of the Fulton Street when comparing the No-Action and With-Action conditions.

Liberty Street

The portion of Liberty Street that would be located within the WTC Campus extends from Church Street on the east to Route 9A to the west. Under the Proposed Action two-way operation would continue on Liberty Street, and it would function as the primary point of access and egress for the VSC.

Two sets of sally ports would be installed on Liberty Street to the west of the VSC entrance in the With-Action scenario to accommodate entering and exiting vehicles. The secure access that would be constructed to the west of the VSC would consist of two approximately 11-foot-wide exit lanes and two approximately 11-foot-wide entry lanes. The entry from Route 9A would primarily serve POVs and various delivery and service vehicles entering the WTC Campus's parking areas by way of the VSC. The overall length of the entry and exit sally ports is planned to be approximately 43 feet long for the entry lanes and approximately 48 feet long for the exit lanes. The personnel booth would be located in Liberty Street between the inbound and outbound lanes.

Credentialing zones for the entry sally port would be located on Route 9A, north of Liberty Street along the two southbound left-turn-only lanes, and also south of Liberty Street along the northbound curb lane. Vehicle screening would occur inside of the VSC. The personnel booth associated with the southbound credentialing zone would be located along Route 9A's central median, and the personnel booth associated with the northbound credentialing zone would be located on the eastern sidewalk.

Liberty Street to the east of the VSC entrance and exit would accommodate two-way traffic flow, with two lanes of westbound traffic and one lane of eastbound traffic. An operable barrier would be installed across the eastbound and westbound lanes. This barrier would be in the default up position to prevent unauthorized vehicles from bypassing the VSC screening. A personnel booth would be located in the Liberty Street median between the eastbound and westbound lanes to control access at this location.

Vehicles already within the secure perimeter (tour buses, for example) would be able to enter the VSC from the east on Liberty Street. As indicated above, access to the VSC from the east would be through an operable barrier located immediately to the east of the VSC entrance/exit. Most vehicles departing the VSC would exit onto westbound Liberty Street to reach Route 9A. (A secondary exit would be provided on Cedar Street west of Washington Street to be used primarily in the event that a vehicle was allowed to enter Liberty Street in error from the credentialing zone on Route 9A.)

Another operable barrier would be located on Liberty Street in-line with the Church Street median. This barrier would be used to provide emergency egress from the WTC site for fire trucks stationed at the Ten House fire station within the WTC Campus.

Under future conditions with the Proposed Action, it is anticipated that tour bus access would be similar to future conditions without the Proposed Action. It is anticipated that most if not all tour buses entering the WTC Campus with passengers en route to the National September 11th Memorial and Museum and the 1 WTC viewing platform would unload passengers along the north curb of Liberty Street west of Greenwich Street before proceeding to the VSC. Buses departing the VSC were assumed to travel within the WTC Campus to reach potential loading locations along the west curb of Greenwich Street adjacent to the Memorial Plaza and/or the east curb of northbound Route 9A north of Liberty Street.

Cedar Street

Under both the No-Action and With-Action conditions, Cedar Street would be eliminated between Greenwich and Washington Streets, with the segment to the west operating one-way westbound as an outlet

to Route 9A for northbound Washington Street. As noted above, a secondary exit from the VSC would be provided on Cedar Street west of Washington Street to be used primarily in the event that a vehicle was allowed to enter Liberty Street in error from the credentialing zone on Route 9A. The segment of Cedar Street between Greenwich Street and Trinity Place would operate one-way westbound under the Proposed Action.

Barclay Street

As noted above, under the Proposed Action two credentialing zones would be established along the south curb of Barclay Street. One would be located immediately to the east of the screening zone on West Broadway, and the second would be located immediately to the east of the screening zone on Washington Street.

Delivery vehicles en route to the WTC site would need to be scheduled and would undergo a credentialing check as they approach the VSC. Any vehicles making an unscheduled delivery would not be permitted access to the WTC Campus or the VSC, and would be sent away to return once properly scheduled. As tenants, vendors and delivery companies become accustomed to these enhanced security procedures, it is anticipated that there would be relatively few unscheduled deliveries with the Proposed Action. A management strategy, including the scheduling of tour buses and truck deliveries, will be developed to ensure that the VSC can accommodate demand for on-site delivery, and tour bus and auto parking in an orderly and efficient manner. Any vehicles making an unscheduled delivery would not be permitted access to the WTC Campus or the VSC.

Credentialed vehicles, including tour buses, black cars, and delivery vehicles, would be permitted access into the WTC Campus. All private vehicles with reserved parking spaces and prior authorization to park on-site would access the VSC from the east or west via Liberty Street. In the With-Action condition, all tour buses en route to the National September 11th Memorial and Museum and 1 WTC observation deck entering the WTC Campus would typically enter the secure zone via the security station on Trinity Place at Cedar Street, and it is expected that most if not all would unload along the north curb of Liberty Street west of Greenwich Street before proceeding to the VSC. Buses departing the VSC were assumed to travel within the WTC Campus to reach potential loading locations along the west curb of Greenwich Street adjacent to the Memorial Plaza and/or the east curb of northbound Route 9A north of Liberty Street, similar to the No-Action condition.

As indicated above, it is anticipated that all deliveries will need to be scheduled as a result of policies implemented under No-Action conditions. Incoming delivery vehicles would be directed to the dedicated loading area for the appropriate building – through the VSC and below-grade road network, following screening.

Construction of the Proposed Action may require the relocation of utilities in some areas. Areas of potential utility conflicts would be identified, and utilities in these areas would either be relocated or alternate designs would be proposed to avoid conflicts. It should be noted that representatives of the various utility companies (including telecommunications) have been consulted in developing the design of the Campus Security Plan, and coordination is ongoing.

E. REQUIRED APPROVALS

The WTC Campus Security Plan is a direct undertaking by the NYPD and would be paid for, at least in part, with New York City funds. Therefore, the Proposed Action is subject to environmental review pursuant to SEQRA and CEQR.

Additionally, the Proposed Action may require or involve, among others, the following agency notifications, actions, permits and/or approvals or expertise:

Federal
- Department of Homeland Security/Federal Emergency Management Agency – possible funding for all or a portion of the proposed Campus Security Plan
- Advisory Council on Historic Preservation (ACHP)
- Federal Highway Administration (FHWA)
- Federal Transit Administration (FTA)

Bi-State
- Port Authority of New York and New Jersey – possible plan funding and implementation

State
- New York State Department of State (NYSDOS)
- New York State Historic Preservation Office (SHPO)
- New York State Department of Transportation (SDOT)
- New York State Metropolitan Transportation Authority (MTA)

New York City
- New York City Mayor's Office of Environmental Coordination
- New York City Department of Transportation – review of proposed geometric changes, street direction changes, and security elements, as well as construction permits
- New York City Planning Commission acting as the New York City Coastal Commission – Coastal Zone Consistency review
- New York City Department of Environmental Protection

F. POTENTIAL SIGNIFICANT ADVERSE IMPACTS AND MITIGATION

The EIS was prepared in accordance with the guidelines set forth in the *CEQR Technical Manual*. The EIS includes descriptions of existing and future environmental conditions for the Project Site and surrounding study areas, plus assessments of the impacts of the Proposed Action. The assessment is based on a comparison of conditions with and without the proposed WTC Campus Security Plan (No-Action and With-Action conditions). The year 2019 was selected as the analysis year for the environmental analyses in the EIS, as this would represent a reasonable worst case condition for assessing the Proposed Action's effects at the WTC site and the surrounding street network.

The future No-Action condition provided a baseline condition that was evaluated and compared with incremental changes anticipated in the future with the Proposed Action. For analysis purposes, under the No-Action condition, it is anticipated that the WTC Campus would be fully redeveloped.

The current No-Action site plan for the WTC site includes the development of a Vehicular Security Center on the south side of Liberty Street east of Route 9A. All autos and tour buses en route to below-grade

parking at the WTC site would undergo screening at this facility, as would delivery vehicles en route to below-grade loading areas for Towers 1 through 4. Operational controls such as bus reservations and the scheduling of deliveries at the VSC are expected to be implemented under the No-Action condition to ensure that the VSC can accommodate demand for on-site delivery, and tour bus and tenant auto parking in an orderly and efficient manner.

The entrance to the VSC would be located on the south side of Liberty Street. In the No-Action condition, all vehicles departing the VSC would exit onto eastbound Liberty Street. While there would continue to be an entrance/exit ramp to/from the underground road network on Vesey Street (referred to as the "Helix"), current plans call for it to be used primarily for emergency access. There are expected to be a total of up to approximately 500 parking spaces for autos and approximately 67 spaces for tour buses located in below-grade facilities on the WTC site.

With redevelopment of the World Trade Center, both Greenwich Street and Fulton Street would be extended through WTC site and Vesey and Liberty Streets would be reopened to traffic. In the No-Action condition, Greenwich Street is expected to operate one-way southbound with three moving lanes from Vesey Street to Fulton Street, and with two moving lanes and two curbside lanes south of Fulton Street. West Broadway between Barclay and Vesey Streets would remain open to southbound through-traffic, providing access to Greenwich Street through the WTC site. However, it is anticipated that the segment of Greenwich Street between Barclay and Vesey Streets, which is a privately-controlled street pursuant to a December 5, 2007 reciprocal easement agreement between the City of New York, 7 WTC ownership, PANYNJ, and LMDC, would primarily serve as an access point to the adjacent 7 WTC as at present. While it is anticipated that this segment of Greenwich Street will revert to City control prior to 2019, no changes to Greenwich Street between Barclay and Vesey streets are proposed under the Campus Security Plan. As such, this section of Greenwich Street would continue to operate as it currently does.

The parallel segment of Washington Street would operate two-way. It is expected that the intersections of Greenwich Street with Vesey, Fulton and Liberty Streets would be signalized, as would a midblock pedestrian crossing of Greenwich Street at Cortlandt Street.

Fulton Street would operate one-way westbound through the WTC site from Church Street to Route 9A in the No-Action condition. Vesey Street would operate one-way eastbound to the east of Greenwich Street, two-way between Greenwich and Washington Streets, and one-way westbound to the west of Washington Street.

At the south end of the WTC site, Liberty Street would be reopened to traffic between Church Street and Route 9A, and would operate two-way with one to two moving lanes in each direction. The exit from the VSC onto this block of Liberty Street would be stop-controlled, and left-turns from the VSC onto westbound Liberty Street would be prohibited in the No-Action condition. It is expected that the segment of Washington Street between Albany and Cedar Streets would be reopened to northbound traffic, and that the segment of Cedar Street from Washington Street to Route 9A would be reopened to westbound traffic. It is also expected that the segment of Cedar Street between Church and Greenwich Streets would be returned to one-way westbound operation.

With the completion of towers 2, 3 and 4 and the Transit Hub at the WTC site, lane closures associated with construction activity would no longer be needed along Church Street, and it is anticipated that the street would be restored to four lanes from Liberty Street to Vesey Street. The eastern-most lane would again function as an exclusive bus lane from 7 AM to 10 AM and from 4 PM to 7 PM on weekdays.

It is also expected that the reconstruction of Route 9A in the vicinity of the WTC site would be completed in the No-Action condition. This would include the installation of a traffic signal at a new intersection with Fulton Street. All traffic westbound on Fulton Street would turn onto northbound Route 9A as there would be no access across the median to the southbound lanes. Two crosswalks would be installed at this location, one on Route 9A on the north side of the intersection, and the second on the Fulton Street approach. To the south at Liberty Street, both northbound and southbound double left-turn lanes would be provided. The existing northbound left-turn at Albany Street would be eliminated. Lastly, it is anticipated that a new traffic signal would be installed at the intersection of Barclay Street with northbound Route 9A to accommodate new traffic generated by development at the WTC site.

It should be noted that the 2004 *World Trade Center Memorial and Redevelopment Plan FGEIS* acknowledged a need for security measures such as vehicular screening to secure buildings at the WTC site. The potential need to periodically close street segments within the WTC site was also recognized in the 2004 *FGEIS*, which includes an assessment of the potential traffic effects of closing both Fulton Street and Greenwich Street through the site. The No-Action site plan and vehicle circulation system assumed for the analyses in this EIS reflect the PANYNJ's master plan for the WTC (Version 10) and security measures associated with the 2005 redesign of 1 WTC. Under these measures, both Vesey Street and Fulton Street would function as "managed streets" west of Greenwich Street, reflecting security engineering for 1 WTC that require that unscreened vehicles be prohibited from accessing the portions of these streets adjacent to the building. Implementation of managed street segments adjacent to 1 WTC is therefore reflected in the No-Action condition as restrictions on unscreened vehicles would still be needed to secure 1 WTC in the absence of the proposed Campus Security Plan. (A qualitative discussion of the effects on traffic flow from the managed operation of Vesey Street and Fulton Street in the No-Action condition is provided in Chapter 8, "Transportation" of the EIS.) The site plan and vehicle circulation system assumed for the No-Action analyses in this EIS are based on the best knowledge available regarding the measures that would be needed to secure 1 WTC in the absence of the proposed Campus Security Plan. Each sally port would consist of a personnel booth and equipment house controlling a set of two operable barriers with sufficient space between them to accommodate one or more motor vehicles. In operation, the first barrier would be lowered to permit authorized vehicles to enter, and then raised to prevent entry by other vehicles. After completing a screening process, the second barrier would be lowered to allow vehicles within the sally port to exit. Two sally ports would be located on Fulton Street, one at Route 9A and the second west of Greenwich Street. As it is anticipated that the west barrier on Fulton Street at Route 9A would be installed immediately adjacent to the Route 9A travel lanes, the crosswalk on Fulton Street would likely be located within the sally port.

Two sally ports would also be located on Vesey Street, one to the east of Route 9A (set back from the north-south crosswalk on the east side of Route 9A) and a second sally port would be required west of Greenwich Street in front of the helix access to prevent unauthorized vehicles from approaching 1 WTC. Additionally, an additional operable barrier would be installed on the Washington Street approach to Vesey Street that would remain raised as a default condition, and lowered only as needed to permit entry by authorized vehicles.

Under the No-Action plan as described, there would be unrestricted vehicular access along Greenwich Street between Vesey Street and Liberty Street through the WTC site. Autos and trucks destined for the below-grade parking or loading docks at the WTC would have unrestricted access to the VSC via Liberty Street, while trucks en route to the loading docks at the PAC would likely have to pass through the barriers on Washington Street and/or Vesey Street. It is anticipated that most if not all tour buses entering the WTC Campus with passengers en route to the National September 11th Memorial and Museum and the 1 WTC viewing platform would unload passengers along the north curb of Liberty Street west of Greenwich Street before proceeding to the VSC via Liberty Street. It is possible that tour buses may also drop off curbside on Route 9A. Buses departing the VSC were assumed to travel within the WTC Campus to reach potential

loading locations along the west curb of Greenwich Street adjacent to the Memorial Plaza and/or the east curb of northbound Route 9A north of Liberty Street. Taxi and black (livery) car pick-up/drop-off activity would likely occur along both curbs of Greenwich Street as well as along both sides of Church Street as conditions permit, although there are many bus stops along the east side of Church Street in this area. While black cars would also be expected to traverse the sally ports along Fulton and Vesey Streets to access 1 WTC, taxis would be unlikely to do so, and would be expected to pick-up/drop-off along nearby unrestricted streets such as Greenwich Street and Route 9A (if permitted by the prevailing curbside regulations).

As noted above, there are now expected to be up to approximately 500 underground parking spaces for office-tenant autos and approximately 67 for tour buses at the WTC site compared to 1,200 to 1,400 parking spaces under the original program analyzed in the 2004 FGEIS. It is therefore anticipated that under the current development program, some of the parking demand generated by WTC office tenants as well as all of the parking demand generated by other uses at the WTC site would be distributed among off-street public parking facilities on the periphery. Many of these vehicles would therefore not actually enter the WTC site nor traverse intersections within its boundaries. All on-site parking spaces are expected to be reserved for tenants under an agreement with PANYNJ. No public parking would be permitted.

In addition to reflecting Version 10.0 of the PANYNJ's master plan for the site and the security measures associated with the 2005 redesign of 1 WTC, the No-Action condition assumed for *World Trade Center Campus Security Plan EIS* also reflects other changes made to the WTC redevelopment plan subsequent to the publication of the 2004 *World Trade Center Memorial and Redevelopment Plan FGEIS*. These include changes to the building program now envisioned for the WTC site, including a reduction in the overall size of the program and changes in the uses proposed for the site.

Lastly, in addition to the planned WTC build-out, Lower Manhattan is expected to experience moderate growth in commercial office, retail, residential, hotel and community facility uses by 2019. The developments that are anticipated within the area by 2019 are described in Chapter 2, "Land Use, Zoning and Public Policy" of the EIS.

The EIS analyzes the potential effects of the project in the following environmental areas: land use, zoning and public policy; socioeconomic conditions; community facilities; historic and cultural resources; urban design and visual resources; hazardous materials; transportation; air quality; noise; public health; neighborhood character; construction impacts; and environmental justice. The EIS determined that the proposed WTC Campus Security Plan would have no significant adverse impacts on the following environmental areas of analysis: land use, zoning and public policy; socioeconomic conditions; community facilities; historic and cultural resources; urban design and visual resources; hazardous materials; air quality; noise; public health; neighborhood character; construction impacts; and environmental justice. The EIS discloses that the Proposed Action may have potential significant adverse impacts on transportation, which are discussed below. Mitigation measures for these potential significant adverse impacts on transportation are also described.

As the Campus Security Plan is put into operation, the NYPD would assess the need for the proposed transportation mitigation measures identified in the EIS and would implement them as needed. In order to verify the effectiveness of these mitigation measures, relevant WTC site stakeholders (PANYNJ, NYPD, and NYCDOT) would work together to develop and implement a detailed monitoring plan.

Transportation

Traffic

The traffic impact analysis in Chapter 8, "Transportation," of the EIS indicates that there would be the potential for significant adverse impacts at 16 intersections in the weekday AM peak hour, 9 in the midday, 11 in the PM and three in the Saturday midday peak hour.

WEEKDAY AM PEAK HOUR

- Broadway and Chambers Street – eastbound approach;
- Broadway and Vesey Street/Park Row/Ann Street – southbound through movement;
- Broadway and Fulton Street – westbound left turn;
- Church Street and Chambers Street – eastbound approach;
- Church Street and Fulton Street – westbound approach;
- Church Street and Cortlandt Street – westbound approach;
- Trinity Place and Rector Street – eastbound approach;
- Greenwich Street and Murray Street – eastbound approach;
- Greenwich Street and Battery Place – eastbound left turn;
- Route 9A and Chambers Street – eastbound approach and westbound left-through lane group;
- Route 9A and Warren Street – northbound left turn;
- Route 9A and Murray Street – eastbound left turn and the through-right and left-turn lane groups on the westbound and northbound approaches;
- Route 9A and Liberty Street – northbound through-right and left-turn lane groups;
- Route 9A and West Thames Street – southbound approach;
- Route 9A at the Brooklyn-Battery Tunnel – southbound approach; and
- Route 9A southbound service road at Battery Place – southbound left-turn and left-/right-turn lane groups.

WEEKDAY MIDDAY PEAK HOUR

- Broadway and Chambers Street – eastbound approach and southbound left-through lane group;
- Broadway and Vesey Street/Park Row/Ann Street – southbound through movement;
- Church Street and Chambers Street – eastbound approach;
- Church Street and Barclay Street – westbound approach;
- Church Street and Fulton Street – westbound approach;
- Church Street and Cortlandt Street – westbound approach;
- Route 9A and Chambers Street – northbound approach;
- Route 9A and Warren Street – northbound left turn; and
- Route 9A and Murray Street – eastbound, westbound and northbound left turns.

WEEKDAY PM PEAK HOUR

- Broadway and Chambers Street – eastbound approach and westbound left turn;
- Broadway and Warren Street – eastbound approach;
- Broadway and Vesey Street/Park Row/Ann Street – southbound through movement;
- Broadway and Fulton Street – westbound left turn;
- Church Street and Chambers Street – eastbound approach;
- Church Street and Fulton Street – westbound approach;
- Church Street and Cortlandt Street – westbound approach;
- Greenwich Street and Murray Street – eastbound approach;

- Greenwich Street and Battery Place – eastbound left turn;
- Route 9A and Murray Street – eastbound approach, westbound through-right lane group and northbound left turn; and
- Route 9A and Liberty Street – eastbound right turn and northbound and southbound through-right lane groups.

SATURDAY MIDDAY PEAK HOUR

- Broadway and Fulton Street – westbound approach;
- Church Street and Fulton Street – westbound approach; and
- Church Street and Cortlandt Street – westbound approach.

As outlined below in "Unavoidable Significant Adverse Impacts," all but six of these significant impacts in the AM peak hour, three in the midday, two in the PM and one in the Saturday midday could be fully mitigated through a combination of traffic signal timing/phasing modifications, lane restriping, and changes to curbside parking regulations. There would be no additional significant impacts to pedestrian or parking conditions as a result of the proposed mitigation measures.

Pedestrians

The pedestrian impact analysis in Chapter 8, "Transportation" of the EIS indicates that installation of security infrastructure associated with the Proposed Action would result in significant adverse impacts due to reductions in pedestrian space in the weekday AM, midday and/or PM peak hours at a total of one sidewalk and three crosswalks. Recommended mitigation measures, which are subject to review and approval by NYCDOT, generally consist of sidewalk and crosswalk widening and minor signal timing changes. All of the significant adverse sidewalk and crosswalk impacts would be fully mitigated with the recommended pedestrian mitigation measures.

2015 Through 2019 Conditions

As noted above, construction of the Proposed Action is expected to commence in 2013. It is anticipated that all of the security measures associated with the Proposed Action would be implemented by 2015, with the exception of the Church Street median which would be partially completed by 2015, but would also have sections that are completed concurrent with the adjacent WTC construction (2 WTC and 3 WTC). An analysis year of 2019 was selected as this would represent a reasonable worst case condition for assessing the Proposed Action's effects at the WTC site and the surrounding street network.

During the 2015 through 2019 period, it is expected that construction vehicle access into the WTC Campus will continue to be coordinated by PANYNJ and NYCDOT. Construction vehicles en route to the WTC Campus will continue to be screened off-site as at present and would therefore not require screening at security stations. It is also expected that queuing and staging locations will be provided on-site and not along the surrounding street network to the maximum extent practicable. In addition, it should be noted that the VSC is expected to have been completed by 2015 and will therefore be available to accommodate construction vehicles as needed. Further, the peak periods for construction vehicle trips (trucks and worker autos) are typically not expected to coincide with the periods of peak travel demand at the WTC site or on the overall street system.

With respect to pedestrian conditions, the proposed Campus Security Plan would not change pedestrian access routes in the vicinity of the WTC site. Pedestrian access through the WTC Campus during construction of new buildings will be dependent on the No-Action construction staging plans for the various buildings on the site.

Given the factors described above, conditions in 2015 when the security measures associated with the Proposed Action are implemented are not expected to be as severe as they would be in 2019 when buildings at the WTC site are expected to be fully developed and occupied, and traffic through the security checkpoints fully realized. Consequently, the Proposed Action is not expected to result in any significant adverse impacts in 2015 that would not otherwise occur in 2019, and mitigation measures would be implemented beginning in 2015 as conditions warrant.

G. ALTERNATIVES

The EIS analysis examined reasonable and practical options to avoid or reduce project-related, significant adverse impacts. These included: the No-Action Alternative, in which the WTC Campus Security Plan is not constructed as proposed; a No Unmitigated Significant Adverse Impact Alternative, in which components of the Proposed Action are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Action; and an Unrestricted Liberty Street Alternative, in which the vehicle restrictions proposed in conjunction with the Proposed Action would be modified to allow unscreened traffic to flow east-west on Liberty Street with no security controls.

No-Action Alternative

The No-Action Alternative examines future conditions within the Study Area, but assumes the absence of the Proposed Action. Under the No-Action Alternative, the proposed Campus Security Plan would not be implemented, but Vesey Street and Fulton Street between Greenwich Street and Route 9A would operate as managed streets, as described in Chapter 1, "Project Description" of the EIS. It is anticipated that development within the perimeter of the proposed WTC Campus would be completed, including 1 WTC through 4 WTC, the Vehicular Security Center, the Performing Arts Center, a new PATH terminal (the Transit Hub) and the National September 11th Memorial and Museum, and that Lower Manhattan would remain a vibrant mixed-use community with one of the largest central business districts in the U.S. In the future without the Proposed Action, the Study Area would continue to experience growth in commercial, office, retail, residential, hotel, and community facility uses by 2019, including almost forty new developments, conversions, and street improvement projects discussed in further detail in Chapter 2, "Land Use, Zoning and Public Policy" of the EIS.

The technical chapters of the EIS have described the No-Action Alternative as the "Future Without the Proposed Action." The significant adverse impacts anticipated for the Proposed Action would not occur with the No-Action Alternative. However, the No-Action Alternative would not meet the needs and goals of the Proposed Action, and the benefits expected from the proposed Campus Security Plan would not be realized. The World Trade Center has been the target of two terrorist attacks in the past, and terrorist attacks are expected to remain a threat in the future. Therefore, implementation of the No-Action Alternative would not be feasible as it would fail to meet the objective of protecting the World Trade Center against vehicle-borne threats.

No Unmitigated Significant Adverse Impact Alternative

The No Unmitigated Significant Adverse Impact Alternative examines a scenario in which components of the Proposed Action are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Action.

The Proposed Action would result in unmitigated significant adverse traffic impacts at three intersections during each of the weekday AM and midday peak hours, two intersections during the weekday midday

peak hour and one intersection during the Saturday midday peak hour, as detailed below in Section H, "Unavoidable Significant Adverse Impacts."

The Proposed Action's significant adverse traffic impacts are generally a consequence of the redistribution of traffic associated with the closures of various street segments within the WTC Campus to unscreened traffic, and the installation of a median along Church Street and curbside credentialing lanes on the perimeter of the Campus. These features are integral to providing the level of security deemed necessary to safeguard the World Trade Center, and the need to maintain traffic flow capacity to the greatest extent possible was considered in their design. Modifying the scale or the design of the proposed security measures to eliminate all of the unmitigated significant adverse traffic impacts would therefore not be practicable, as such modifications would likely compromise the Proposed Action's ability to provide the needed level of security. Consequently, the No Unmitigated Significant Adverse Impacts Alternative is not a practicable alternative to the Proposed Action as it would fail to meet the objective of protecting the World Trade Center against vehicle-borne threats.

Unrestricted Liberty Street Alternative

Under this alternative, the vehicle restrictions proposed in conjunction with the Proposed Action would be modified to allow unscreened traffic to flow east-west on Liberty Street with no security controls. This would provide an additional east-west route in Lower Manhattan.

This proposed alternative was reviewed and evaluated by NYPD's Counterterrorism Bureau with respect to achieving the objective of protecting the World Trade Center against vehicle-borne explosives, and it was determined that this alternative would not provide sufficient protection for the WTC Campus. This proposed alternative would allow unscreened trucks and buses of all sizes unrestricted access onto Liberty Street between Church Street and Route 9A. This, in turn, would allow the largest potential threat vehicles unfettered access to the entrance to the VSC, and would run counter to the strategy of the Campus Security Plan which is to provide layered security, with vehicles undergoing a credential check to ensure that they are authorized to enter the WTC Campus before allowing access. Furthermore, the loss of the Trinity Place sally port and secure lanes on Liberty Street would not allow for a cohesive vehicular circulation system within the WTC Campus and would severely reduce access to the Campus and circulation within the Campus for emergency vehicles. The Unrestricted Liberty Street Alternative is therefore not considered a practicable alternative to the Proposed Action as it would not meet the objective of protecting the World Trade Center against vehicle-borne threats.

H. UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

Unavoidable significant adverse impacts occur when significant adverse impacts would be unavoidable if a project is implemented regardless of the mitigation employed (or if mitigation is impossible). As discussed in the EIS in Chapter 15, "Mitigation" and indicated in Chapter 17 "Unavoidable Significant Adverse Impacts," significant adverse traffic impacts have been identified in each analyzed peak period, and it is anticipated that some of these traffic impacts would remain unmitigated at several study area intersections listed below. No other unavoidable significant adverse impacts are anticipated in any other technical areas analyzed in the EIS.

Based on *CEQR Technical Manual* criteria, the following significant adverse impacts would remain unmitigated:

AM Peak Hour
- Fulton Street at Church Street – westbound right turn;
- Chambers Street at Route 9A – Eastbound approach and westbound left-through lane group; and
- Route 9A at Murray Street – eastbound left turn, westbound left-through lane group and northbound through-right lane group.

Midday Peak Hour
- Chambers Street at Broadway – eastbound approach;
- Fulton Street at Church Street – westbound approach; and
- Murray Street at Route 9A – westbound left-through lane group.

PM Peak Hour
- Fulton Street at Church Street – westbound approach; and
- Route 9A at Liberty Street – southbound through-right lane group.

Saturday Midday Peak Hour
- Fulton Street at Church Street – westbound approach.

The Proposed Action's significant adverse traffic impacts are generally a consequence of the redistribution of traffic associated with the closures of various street segments within the WTC Campus to unscreened traffic, and the installation of a median along Church Street and curbside credentialing lanes on the perimeter of the Campus. These features are integral to providing the level of security deemed necessary to safeguard the WTC Campus, and the need to maintain traffic flow capacity to the greatest extent possible was considered in their design. Modifying the scale or the design of the proposed security measures to eliminate the unmitigated significant adverse traffic impacts would therefore not be practicable, as such modifications would likely compromise the Proposed Action's ability to provide the needed level of security. Consequently, the Proposed Action would have the potential to result in unmitigated significant adverse traffic impacts at the locations listed above.

As the Campus Security Plan is put into operation, the NYPD would assess the need for the proposed mitigation measures identified in the EIS and would implement them where needed. In order to verify the effectiveness of these mitigation measures, relevant WTC site stakeholders (PANYNJ, the NYPD and NYCDOT) would work together to develop and implement a detailed monitoring plan.

I. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Resources, both natural and man-made, would be expended in the construction and operation of the Proposed Action. These resources include the building materials used during construction; energy in the form of gas and electricity consumed during construction and operation of the proposed security elements by various mechanical and processing systems; and the human effort required to construct and operate various elements of the Campus Security Plan.

The building materials, energy, and human efforts used to construct and operate the proposed WTC Campus Security Plan are considered irretrievably committed because their reuse for some other purpose would be highly unlikely. The security elements that would be implemented in the Proposed Action are

intended to safeguard the WTC Campus while allowing access for screened vehicles. While their use would be considered a short-term environmental loss, they would produce long-term benefits in enhancing public safety in and around the WTC Campus. The use of public roadway and sidewalk space to accommodate these proposed security elements could be considered a resource loss, though these areas would continue to be shared with vehicular and pedestrian traffic, respectively. Further, funds committed to the design, construction, and operation of the proposed security elements under the Proposed Action would not be available for other projects. However, the use of these irretrievable resources is necessary in order to maintain a secure and safe environment in the WTC Campus.

J. CERTIFICATION OF FINDINGS

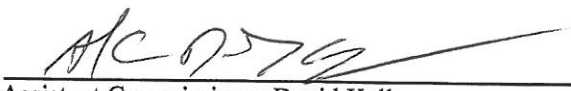
Having considered the relevant environmental impacts, facts, and conclusions disclosed in the FEIS and weighed and balanced relevant environmental impacts with social, environmental, public health, economic, and other essential considerations as required in 6 NYCRR 617.11, the New York City Police Department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

- The requirements of SEQRA, and its implementing regulations, 6 NYCRR Part 617, have been met and fully satisfied;

- Consistent with social, environmental, economic, and other essential considerations from among the reasonable alternatives thereto, the Proposed Action, the WTC Campus Security Plan, is one which minimizes or avoids adverse environmental impacts to the maximum extent practicable, including the impacts disclosed in the FEIS and set forth in this Findings Statement; and

- Consistent with social, environmental, economic, and other essential considerations, the significant adverse environmental impacts of the WTC Campus Security Plan revealed in the environmental impact statement process and set forth in this Findings Statement, will be minimized or avoided to the maximum extent practicable by incorporating the mitigative measures identified as practicable as conditions to this decision.

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



August 26, 2013
Date

Assistant Commissioner David Kelly
New York City Police Department Counterterrorism Bureau
One Police Plaza
New York, NY 10038
Phone: (646) 610-4557
Email: WTCEIS@nypd.org

Cc: Fred M. Holycross, DHS/FEMA/OEHP
Lynn Bagorazzi, DHS/FEMA
Sebastian E. Heath, DHS/FEMA

Jonathan McDade, U.S. Department of Transportation, Federal Highway Administration
Anthony Carr, U.S. DOT - Federal Transit Administration
Paul LeBrun, Federal Transit Administration, Lower Manhattan Recovery Office
John M. Fowler, U.S. Advisory Council on Historic Preservation
Judith Enck, U.S. Environmental Protection Agency, Region 2
Patrick Foye, Port Authority of New York and New Jersey
Timothy G. Stickelman, Port Authority of New York and New Jersey
Consistency Review Unit, Office of Communities and Waterfronts, NYS Dept. of State
Rose Harvey, New York State Office of Parks, Recreation and Historic Preservation
Douglas Mackey, NYS Office of Parks, Recreation & Historic Preservation, Bureau of Historic Preservation
Joseph Martens, New York State Department of Environmental Conservation
Venetia Lannon, NYS DEC, Region 2
Thomas F. Prendergast, Metropolitan Transportation Authority
Joseph Brown, Region 11—New York State Department of Transportation
Director, New York State Department of Transportation Route 9A Project Office
Heidi Rubinstein, NYC Law
Amanda Burden, NYC Department of City Planning - City Planning Commission
Robert R. Kulikowski, Ph.D., NYC Mayor's Office of Environmental Coordination
David Burney, New York City Department of Design and Construction
Carter Strickland, NYC DEP - Office of Environmental Planning and Assessment
Janette Sadik-Kahn, New York City Department of Transportation
Luis Sanchez, New York City Department of Transportation
Naim Rasheed, New York City Department of Transportation
Veronica M. White, New York City Department of Parks and Recreation
Joshua Laird, NYC Department of Parks and Recreation
Salvatore Cassano, FDNY Fire Commissioner
Lt. Simon Resner, FDNY
David Emil, Lower Manhattan Development Corporation
Robert Tierney, New York City Landmarks Preservation Commission
Seth Myers, NYC Economic Development Corporation
Dennis Mehiel, Battery Park City Authority
Kimberly Spring, Library Manager, New Amsterdam Library
Alliance for Downtown New York
Scott Stringer, Manhattan Borough President
Jerrold Nadler, Congressman, U.S. House of Representatives - District 8
Catherine McVay Hughes, Manhattan Community Board 1
Noah Pfifferblitt, Manhattan Community Board 1
David Gruber, Manhattan Community Board 2
Bob Gormley, Manhattan Community Board 2
Daniel Squadron, State Senator, 26th District, The Senate, State of New York
Margaret Chin, New York City Council Member - District 1
Sheldon Silver, New York State Assembly Speaker, District 65
Deborah J. Glick, New York State Assembly Member, District 66
Kirsten Gillibrand, Senator, U.S. Senate
Charles Schumer, Senator, U.S. Senate
David Yassky, Taxi and Limousine Commission