



POLICE DEPARTMENT

**NOTICE OF COMPLETION
OF THE
FINAL ENVIRONMENTAL IMPACT STATEMENT**

World Trade Center Campus Security Plan

Project Identification:

CEQR No.: 12NYP001M
SEQRA Classification: Unlisted

Lead Agency:

New York City Police Department (NYPD)
One Police Plaza
New York, NY 10038

Contact Person:

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

Pursuant to City Environmental Quality Review (CEQR), Mayoral Executive Order No. 91 of 1977, CEQR Rules of Procedure of 1991 and the regulations of Article 8 of the State Environmental Conservation Law, State Environmental Quality Review Act (SEQRA) as found in 6 NYCRR Part 617, a Final Environmental Impact Statement (FEIS) has been prepared for the action described below. Copies of the FEIS are available for public inspection at the Mayor's Office of Environmental Coordination (100 Gold Street – 2nd Floor New York, NY 10038) or on the NYPD website at the following web address:

http://www.nyc.gov/html/nypd/html/crime_prevention/counterterrorism.shtml

The NYPD proposes to implement a Campus Security Plan for the 16-acre World Trade Center (WTC) Campus in Manhattan Community District 1 in collaboration with other New York City agencies, the Port Authority of New York and New Jersey and other WTC stakeholders. A public hearing on the Draft EIS was held on April 23, 2013. Written comments on the Draft EIS were requested and received and considered by the Lead Agency until May 22, 2013. The Final EIS incorporates responses to the public comments received on the Draft EIS and additional analysis conducted subsequent to the completion of the Draft EIS.

A. PROJECT IDENTIFICATION

The Campus Security Plan 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

COURTESY • PROFESSIONALISM • RESPECT

Website: <http://nyc.gov/nypd>

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 Program¹ (TAP), in which WTC office tenants with parking privileges on site, residents and owners of businesses located in non-WTC buildings within the secure zone (Liberty Street between Greenwich Street and Trinity Place), car service and taxi operators, and delivery vehicle operators could enroll, is expected to facilitate entry for those vehicles with destinations within the WTC Campus. It is possible that yellow cabs would also be permitted to enroll in TAP; however, specific criteria have not yet been finalized.

The Vehicular Security Center (VSC) planned in conjunction with the WTC development irrespective of the Proposed Action controls access to the underground traffic network that serves the entire WTC Campus, including the loading docks for each building and parking areas. The parking garage will not allow general public parking; rather, the parking garage 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. PANYNJ will operate and be responsible for screening vehicles entering the VSC and will be responsible for screening there. 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 Area 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 Barclay, West, 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 West Street/Route 9A. Exits from the secure zone are proposed at the following five locations: Church Street at Vesey Street; Vesey Street at West Street/Route 9A; Fulton Street at West Street/Route 9A; Liberty Street at West Street/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). 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. 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

¹ PANYNJ is currently developing the TAP program.

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 has been selected as the analysis year for the environmental analyses in this Environmental Impact Statement (EIS).

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, NYPD, and NYCDOT) would work together to develop and implement a detailed monitoring plan.

During the 2015 through 2019 period, it is expected that construction vehicle access into the WTC Campus will continue to be coordinated by the Port Authority 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. The EIS therefore does not include an interim analysis for 2015.

As described in detail in Chapter 2, "Land Use, Zoning and Public Policy" of the FEIS, a variety of new developments and conversions are anticipated to be completed within the quarter-mile study area by 2019. It should be noted that 5 WTC has not been included as within the Campus Security Plan or as a development that would occur by the time of the Proposed Action. At this time the only building program proposed for 5 WTC is the 57-story, approximately 1.3-million-square-foot office tower that was contemplated in the 2004 *World Trade Center Memorial and Redevelopment Plan FGEIS* with anticipated completion by 2015. Due to the current economic climate, however, it is unlikely that the PANYNJ will pursue development of the 5 WTC site in the near term. With the ongoing construction of 1 WTC and 4 WTC and the recent completion of 7 WTC, demand for new Class A office space is being met in Lower Manhattan in the near term. This EIS conservatively assumes that 2 WTC and 3 WTC would be fully constructed and occupied by 2019 even though the full build-out of 2 WTC and 3 WTC is predicated on the ability to viably market the office space. Therefore, it is unlikely that the demand exists in the current market for construction of the additional 1.3-million square feet of office space that would be made available if 5 WTC were developed as once contemplated.

Any other proposals for development of 5 WTC would be purely speculative at this juncture as no developer has been selected and no alternative plans have been developed for the site at this time. As such,

it is projected that 5 WTC would not be developed by 2019. With so many details surrounding the 5 WTC site unresolved, extending the analysis year beyond 2019 would not be useful because there is no information available that would provide reasonable guidance on when construction of the site could be completed. Additionally, the 5 WTC site is located outside of the security zone as proposed. For the reasons outlined, therefore, 5 WTC is not included in the analysis. However, Appendix F to the FEIS includes a technical memorandum that assesses conditions in the future if 5 WTC were constructed.

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 is conducting an environmental review pursuant to the New York State Environmental Quality Review Act (SEQRA) and City Environmental Quality Review (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 would serve 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 in this Draft EIS. Therefore, this 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.

B. PURPOSE AND NEED FOR THE PROPOSED ACTION

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.

Funding

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.

C. DESCRIPTION OF THE 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 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 West Street/Route 9A 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, as described previously, 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 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 West Street/Route 9A;
- Fulton Street from Church Street to West Street/Route 9A; and,
- Liberty Street from Trinity Place/Church Street to West Street/Route 9A.

Additionally, the Trinity Place/Church Street corridor² 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.

As indicated above, under PANYNJ Master Plan Version 10.0, a secure zone would be created around 1 WTC. As indicated above, 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. 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 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 West Street/Route 9A in the eastern-most lane at the northbound approach to Liberty Street; and,
- On West Street/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:

² Trinity Place becomes Church Street north of Liberty Street.

- 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. Overall screening times for vehicles enrolled in TAP and for non-TAP vehicles are described in Chapter 8, "Transportation" of the FEIS. As described in Chapter 8, screening time for non-TAP vehicles is longer than TAP screening as it is more extensive and requires 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, 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 very 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. As the proposed placement of the credentialing booth along the sidewalk at this location would narrow the pedestrian zone, the sidewalk in this area has been analyzed in the pedestrian section of Chapter 8, "Transportation."

Entry to the secure lane would be available from a screening zone located on Trinity Place at Cedar Street. The screening zone would consist of a single northbound lane that would be approximately 15 feet wide and approximately 54 feet long. 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. Placement of the booth on the western side of Trinity Place would reduce the pedestrian space to approximately 12 feet. Bollards are proposed between the curb and the building wall 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.

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 moving lane of approximately 11 feet 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 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 western sidewalk at this location would be extended to the east by a width of approximately eight feet and would extend approximately 125 feet to the north to accommodate a personnel booth to 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 screening 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. 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. As the placement of the personnel booths at two sidewalk locations adjacent to the credentialing/authorization lanes would narrow the pedestrian zones, a pedestrian analysis is provided for these areas in Chapter 8, "Transportation." Due to the street geometry at these locations, sidewalk extensions would not be possible.

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 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 entrance would be located on the western sidewalk of West Broadway adjacent to and south of the U.S. Post Office exit. Bollards are proposed at the southern limit of the U.S. Post Office access to ensure that no vehicles are able to bypass the screening zone. Bollards proposed to cross the sidewalk from the edge of the curb to the building wall at the northeast corner of Vesey Street and West Broadway 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 each would 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 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. As placement of the personnel booth along the sidewalk would narrow the pedestrian zone to slightly more than seven feet, this location was analyzed in the pedestrian section of Chapter 8, “Transportation.” 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 length 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 western side of the proposed Washington Street sally port. The placement of the personnel booth on the western sidewalk would narrow the pedestrian zone to a width of approximately six feet in the area immediately adjacent to the personnel booth. Based on field observations, this block is not heavily used by pedestrians.

Additional sidewalk elements would include fixed bollards, placed adjacent to the access and denial barriers (operable barriers at either end of the sally port) at four-foot intervals between the curb and the building wall on both the eastern and western sidewalks. Stop and signaling poles (includes lighting and stop and go signals for vehicles in the sally port) would be located at the northern end of the sally port, on both sidewalks as well. At the southern barrier, a light and equipment pole would be placed on both sides 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 West Street/Route 9A to 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 West Street/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.

Vesey Street at West Street/Route 9A would consist of a two-lane exit to West Street/Route 9A (northbound and southbound) 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. The proposed sidewalk extension would allow the sidewalk to be maintained for unobstructed pedestrian flow.

Fixed bollards would be installed across the sidewalk at both ends of the sally port. These bollards would be placed at four-foot intervals, from the southern edge of the sidewalk extension north across the sidewalk where they would end adjacent to the existing building.

The proposed sidewalk extension would be approximately 13 feet wide and it would run the entire length of the proposed sally port. Placement of the personnel booth on the sidewalk extension would minimize potential pedestrian conflicts along the sidewalk in this area. As detailed in Chapter 8, “Transportation,” the sidewalk extension would maintain the existing sidewalk width for pedestrian circulation on the northern sidewalk. Further, the security elements would be set back from West Street/Route 9A to ensure free-flow of pedestrians in the 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

³ 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.

“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 West Street/Route 9A to 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 West Street/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 West Street/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 West Street/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 West Street/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 West Street/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 West Street/Route 9A, north of Liberty Street for the two southbound left-only designated turning lanes and also south of Liberty Street in the eastern-most lane for vehicles that make the northbound right turn into the site. Vehicle screening would occur inside of the VSC. The personnel booth associated with the southbound credentialing zone would be located along West Street/Route 9A's central median, and the personnel booth associated with the northbound credentialing zone would be located on the eastern sidewalk, allowing a clear pedestrian zone of approximately 18 feet wide.

Liberty Street 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 West Street/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 West Street/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 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 West Street/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 West Street/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 West Street/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.

Bus and Delivery/Service Vehicle Scheduling

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 Site. 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 West Street/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. 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.

D. APPROVALS REQUIRED

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.

E. PROBABLE IMPACTS OF THE PROPOSED ACTION

Land Use, Zoning and Public Policy

No significant adverse impacts on land use, zoning, or public policy, as defined by the guidelines for determining impact significance set forth in the 2012 *CEQR Technical Manual*, are anticipated in the future with the Proposed Action on the Project Site or within the quarter-mile Study Area. The Proposed Action

would not generate land uses that would be incompatible with underlying zoning, nor would it cause a substantial number of existing structures to become non-conforming. Furthermore, the Proposed Action would not result in land uses that conflict with public policies applicable to the Project Site or Study Area.

The Proposed Action would implement a vehicle security overlay at the perimeter of the WTC Campus, but would not introduce any new buildings other than personnel booths that would be installed at all vehicular entries and exits and near the front of each credentialing zone. When compared to future No-Action conditions, the Proposed Action is not expected to result in any significant land use changes on the Project Site or within the Study Area. Residents and businesses located on the block bounded by Liberty Street, Trinity Place, Cedar Street, and Greenwich Street could encounter some inconveniences related to vehicular access to their homes and businesses as well as receiving deliveries, service and guests. However, residents could choose to enroll in the planned TAP program to make arrangements for vehicular access within the secure perimeter. The TAP program would allow the residents residing within the security zone to obtain expedited vehicle entry through the security stations and into the secure zone. If delivery vehicle or service vehicle access into the WTC Campus would be necessary, this would be accommodated with prior arrangement. In situations where access into the WTC Campus would not be required, delivery or service vehicles would find legal on-street or off-street parking spaces in the area. While the Proposed Action would result in minor land use changes in the Project Site and Study Area, these changes would not be significant as detailed in Chapter 2 of the EIS.

Socioeconomic Conditions

The detailed analysis finds that the Proposed Action would not result in any significant adverse impacts as measured by the five socioeconomic areas of concern prescribed in the *CEQR Technical Manual*. The following summarizes the conclusions drawn from the analysis.

Direct Residential Displacement

Direct residential displacement (sometimes called primary displacement) is the involuntary physical displacement of residents from the site of (or a site directly affected by) a proposed project. The Proposed Action would not directly displace any residents, and therefore, would not result in significant adverse direct residential impacts. The Proposed Action is a comprehensive Campus Security Plan for the WTC site that involves the installation and utilization of security infrastructure to restrict the access of unauthorized vehicles from the roadways adjacent to and within the WTC site. Infrastructure related to the Proposed Action would be located within some streets and on select sidewalks at the periphery of the WTC Campus, and would not entail any new development, or introduce new land uses to the Project Site.

Direct Business and Institutional Displacement

Direct business and institutional displacement (sometimes called primary displacement) is the involuntary physical displacement of businesses or institutions from the site of (or a site directly affected by) a proposed project.

The Proposed Action would not result in significant adverse direct business or institutional impacts. As noted above, the Proposed Action is a security plan which involves the installation and utilization of security infrastructure to restrict vehicular access from roadways situated adjacent to the WTC site (i.e., Project Site). The Proposed Action, which would be located within some streets and sidewalks at the perimeter of the WTC Campus, does not entail any new development, and does not involve any involuntary displacement of business or institutions within the security zone. Although the Proposed Action would establish a credentialing zone on the east side of West Broadway between Barclay Street and Park Place

zone where the Downtown PATH Greenmarket currently operates every Tuesday throughout the year, according to GrowNYC this is a temporary location for the PATH Greenmarket. It is anticipated that the City will work with the relevant stakeholders, including the PATH Greenmarket and PANYNJ, to identify a suitable location in the vicinity at which this market could continue to operate. Formerly, the Greenmarket had operated at the World Trade Center prior to 9/11, and most recently the Greenmarket had been located at Zuccotti Park, which is located to the southeast of the WTC site, and bounded by Liberty Street, Broadway, Cedar Street, and Trinity Place. The Proposed Action would also result in the displacement of a newsstand currently located on the southwest corner of the intersection of Liberty Street and Trinity Place/Church Street. City agencies would work with the operator(s) of the newsstand to identify a new location. Therefore, the Proposed Action would not result in any direct business or institutional displacement and no further analysis is warranted.

Indirect Residential Displacement

Indirect residential displacement (sometimes called secondary displacement) is the involuntary displacement of residents that results from a change in socioeconomic conditions created by a proposed project. Pursuant to *CEQR Technical Manual* guidelines, the potential for indirect residential displacement is based on whether a project could result in rising property values, and thus rents, making it difficult for some residents to afford their homes.

A preliminary assessment found that the Proposed Action would not result in significant adverse impacts due to indirect residential displacement. As none of the residential units within the primary study area house populations at risk of involuntary displacement (i.e., residents that have incomes sufficiently low to be vulnerable to sharp rent increases), the Proposed Action would not result in significant adverse impacts due to indirect residential displacement in the primary study area. Furthermore, as the Proposed Action is a Campus Security Plan that would not result in any new development or introduce any new land uses, it would not result in an indirect residential displacement in the secondary study area.

The proposed Campus Security Plan would limit vehicular accessibility within the primary study area, and would result in some changes in vehicular accessibility for the residents of three multi-unit residential buildings (located at 110-112 Liberty Street, 114 Liberty Street, and 120-122 Liberty Street) containing a total of 47 dwelling units within the primary study area. Residents of these three residential buildings and businesses located on the block bounded by Liberty Street, Trinity Place, Cedar Street, and Greenwich Street could choose to enroll in the planned TAP program to make arrangements for vehicular access within the secure perimeter. The TAP program would allow the residents residing within the security zone to obtain expedited vehicle entry through the security stations and into the secure zone. Deliveries, service calls and guests of the residential buildings that need to enter the security zone in a vehicle would have to be pre-arranged and/or scheduled. In situations where access into the WTC Campus would not be required, delivery or service vehicles would have to find legal on-street or off-street parking spaces in the area. It should also be noted that access to Cedar Street would be unrestricted by the Proposed Action.

As the future traffic network with the Proposed Action would somewhat resemble the existing street network (in terms of free-flow traffic), the proposed security perimeter is not expected to significantly affect accessibility in the secondary study area, as compared to existing conditions. Most of the streets within and immediately adjacent to the WTC site either have not been built, are presently closed to through traffic or have reduced capacity due to construction activity.

Potential Effects on Property Values

Lower Manhattan is a dense urban environment that contains a concentration of high profile corporations, financial headquarters, the City's civic center, as well as an increasingly vibrant residential community. It is

also home to a number of museums, cultural venues and historic landmarks. In the aftermath of 9/11, the issue of security surrounding major corporate entities, civic operations, and prominent New York landmark locations has become of increased importance and various security measures have been implemented as well as further enhanced to protect these potential targets, especially in Lower Manhattan. There are three multi-block security zones that have been effectuated and maintained south of Canal Street in Lower Manhattan, and all three of these security zones are closed to unauthorized vehicle traffic. Two of the existing security zones, the New York Stock Exchange (NYSE) Security Zone and One Police Plaza Security Zone, encompass buildings that include residential uses. The establishment and maintenance of these controlled security perimeters in Lower Manhattan did not seem to have resulted in the indirect displacement of residents from within these two security zones.

As described in Chapter 3 of the FEIS in the discussion of indirect residential displacement, the nearby security zones contain market-rate residential uses, not at-risk populations. As such, the nearby security zones were evaluated to determine if the introduction of the security measures had adverse effects on the value of residential property values. Based on the available information, the introduction of these nearby security zones did not appear to hinder positive trends, impede efforts to attract residential investment, or create a climate for disinvestment. Therefore, as the Project Site also contains market-rate residential uses and no at-risk populations, it is anticipated that the security measures implemented in the future with the Proposed Action would not result in any indirect residential displacement.

Indirect Business and Institutional Displacement

Indirect business and institutional displacement (sometimes called secondary displacement) is the involuntary displacement of businesses, institutions, or employees that results from a change in socioeconomic conditions created by a proposed project.

A preliminary assessment found that the Proposed Action would not result in significant adverse impacts due to indirect business and institutional displacement. As the Proposed Action is a comprehensive security plan, it would not introduce any new economic activity or alter existing economic patterns, nor would it add to the concentration of a particular sector of the local economy. The Proposed Action also would not directly displace uses of any type that directly support businesses in the area or bring people to the area that form a customer base for local businesses. The study areas already have well-established commercial and residential markets. The Proposed Action would not result in any direct residential displacement and limited business displacement, and the Proposed Action is also not expected to indirectly displace a substantial number of residents, business establishments/institutions, workers, or visitors who form the customer base of existing businesses in the study areas.

The Proposed Action could alter accessibility for vehicles picking up or dropping off people and making pickups from and deliveries to existing residents, businesses, and institutions within and immediately adjacent to the proposed secure zone, potentially disrupting established business routines and customer patterns. Moreover, the Proposed Action could affect conditions in the real estate market due to the introduction of security measures and changes in vehicular accessibility. However, it should be noted that much of the curbside space that would be occupied by credentialing or security zones under the Proposed Action is governed by no standing anytime regulations or currently unavailable for general parking due to ongoing construction activity. Therefore, businesses and institutions that would potentially be affected by the Proposed Action do not currently have direct curbside access and are served from nearby blocks. This condition would continue in the future with the Proposed Action and would not represent a change in established business routines or existing customer patterns.

The proposed Campus Security Plan would not restrict individuals from passing through the secure perimeter if they have a purpose for entering the site, including access to homes and businesses located along Liberty Street between Greenwich Street and Trinity Place. Vehicles seeking access into the secure perimeter would be inspected and those with business within the WTC Campus would have the option of enrolling themselves and their vehicles in TAP, which 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 with business on the site;
- Delivery vehicle operators; and
- Residents and owners of businesses located in non-WTC buildings within the secure zone (Liberty Street).

It is anticipated that the program would help to accommodate the needs of businesses and residents located within and immediately adjacent to the secure zone. 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 but would be subject to more rigorous credentialing and screening. This arrangement would help to facilitate access for those who seek entry. The NYPD policy for all vehicles without the proper credentials would be to deny entry.

The Proposed Action is not expected to significantly affect vehicular accessibility in the secondary study area as compared to current conditions. The future traffic network with the Proposed Action would somewhat resemble the existing street network (in terms of free-flow traffic).

Adverse Effects on Specific Industries

It may be possible that a given project may affect the operation and vitality of a specific industry not necessarily tied to a specific location. The Proposed Action would not result in significant adverse impacts on specific industries within the study areas, or in the City more broadly. The Proposed Action is not expected to significantly affect business conditions in any industry or any category of business within or outside of the study areas, and would not substantially reduce employment or impair economic viability in any industry or category of business.

Community Facilities and Services

The Proposed Action would not have a significant adverse impact on community facilities. This conclusion is drawn from the comparison of conditions in the future with the Proposed Action in 2019 (With-Action conditions) to the future without the Proposed Action in 2019 (No-Action conditions), when full development is expected, and therefore the potential for impacts is greatest. This analysis examines potential impact of the Proposed Action under current conditions, and takes into consideration development that is currently planned, proposed, or underway.

The Campus Security Plan would introduce security measures at the perimeter of the WTC Campus to eliminate unscreened vehicles from entering the site. The Proposed Action is a result of extensive measures that have been taken on local, state, and national levels to reduce the likelihood of another terrorist attack and increase emergency preparedness. These measures include: the relocation of the city's Office of

Emergency Management (OEM) from 7 WTC in Lower Manhattan to a new location; street closings and increased security in Lower Manhattan; increased training and coordination among emergency response providers including NYPD, FDNY, and PAPD; increased security in building design; and legislation such as the Homeland Security Act. However, even with these measures, the possibility exists for large-scale emergencies in the future. The Proposed Action would not interfere with the emergency service response to such an event and is intended to decrease the likelihood of future threats.

As no new population would be introduced to the area as a result of the Proposed Action, no new demands would be placed on the delivery of the existing community services.

New York City Fire Department

It is anticipated that the Proposed Action would not have an adverse impact on FDNY services or operations. It is expected that the FDNY response within the WTC Campus from Engine Company 10, Ladder Company 10 (“Ten House”) would be comparable to the No-Action condition. Response from the Ten House outside the WTC Campus may even improve over No-Action conditions due to the low traffic volumes anticipated within the WTC Campus that would allow for more expedited circulation through the proposed secure zone, even when taking into account the potential for increased traffic surrounding the WTC Campus under the Proposed Action. FDNY response units other than the Ten House would be facilitated through coordination at a centralized emergency response command center, checkpoints and responding units. The Proposed Action would not physically alter any station house. As described in Chapter 4, the Proposed Action includes measures to give priority to emergency vehicles so that the WTC Campus Security Plan would not alter operations of or access to or from any engine or ladder company.

New York City Police Department

The WTC Campus will be a heavily policed area with virtually instantaneous police response under future conditions with and without the Proposed Action. NYPD response by non-WTC Command units would be facilitated through coordination at a centralized emergency response command center, checkpoints and responding units. Overall emergency service delivery to WTC campus would not be affected. As NYPD continually evaluates its level of service and makes changes as they are deemed necessary, no significant adverse impacts are expected as a result of the Proposed Action.

Port Authority Police Department

The Proposed Action would not result in any changes to PAPD staffing or allocation of resources as the NYPD would staff the proposed screening and credentialing locations. As PAPD will be located on the WTC Campus, the perimeter security plan would not create any impediments to the PAPD services and would not be expected to result in slower response times. As such, the Proposed Action is not expected to adversely impact PAPD services or operations.

Health Care Facilities

The demand for health care facilities in the future with the Proposed Action would be no greater than the demand for health care facilities in the future without the Proposed Action. Ambulances and other emergency vehicles would be granted expedited access into and through the site with the assistance of the central operations coordination center and the NYPD-controlled operable barriers. Private occupancy vehicles headed to local health care facilities would likely avoid the credentialing and screening zones associated with the Proposed Action as the people utilizing these facilities would be familiar with the area and understand the traffic patterns. Instead, most health care facilities would likely be accessed by using the

routes that are currently available. As discussed below, patients may have to alter established routines to access the privately funded Medhatten Immediate Medical Care urgent care facility at 106 Liberty Street by vehicle; however, pedestrian access would remain largely unchanged from future No-Action conditions to future conditions with the Proposed Action. As no parking is provided on-site at the Medhatten Immediate Medical Care urgent care facility, people who utilize this facility typically utilize available public parking options in the area or are dropped off in the area. No impacts are anticipated to health care facilities as a result of the Proposed Action.

Other Community Facilities

No changes to other area community facilities are expected as a direct result of the Proposed Action. As indicated in Chapter 4 of the FEIS, no significant new population would be added to the WTC Campus as a result of the Proposed Action. As such, there would be no new demand on other community facilities associated with the Proposed Action.

These proposed security elements would not obstruct pedestrian crosswalks and would introduce limited obstructions on sidewalks, medians, or sidewalk extensions adjacent to select screening and credentialing zones. Pedestrian flow into, out of, and throughout the WTC Campus would generally be unimpeded. Further, all operable barriers that are proposed within the street right-of-way would be set back from pedestrian zones and would include safety features to prevent safety hazards. Vehicle access to the area's existing community facilities is expected to remain similar to the routes currently taken.

Historic and Cultural Resources

The Proposed Action would not be expected to result in significant adverse impacts to the WTC site. The proposed security components would be small in scale (i.e., operable and static barriers would be below pedestrian eye level and personnel booths of up to 11 feet in height would have a relatively small footprint). Further, they would be located largely at the perimeter of the WTC site and would not obstruct views or significantly alter the context of the WTC site. The project components also would not eliminate or substantially screen publicly accessible views from the Project Area to nearby architectural resources. Therefore, the Proposed Action would not be expected to adversely affect any architectural resources within the Project Area.

The proposed security checkpoints and credentialing zones would not be expected to adversely affect the context of the study areas' architectural resources. However, as described below, a Construction Protection Plan (CPP) would be developed and implemented prior to the commencement of any construction-related activities in the Project Area to protect the architectural resources described in Chapter 5 of the FEIS that are located within 90 feet of proposed construction activities. The CPP would follow the New York City Department of Buildings (DOB) Technical Policy and Procedure Notice (TPPN) #10/88, regarding procedures for the avoidance of damage to historic structures resulting from adjacent construction, and would be prepared in consultation with the New York State Historic Preservation Office (SHPO) and the New York City Landmarks Preservation Commission (LPC). TPPN #10/88 requires a monitoring program to reduce the likelihood of construction-related damage to adjacent architectural resources (within 90 feet) and to detect at an early stage the beginnings of damage so that construction procedures can be changed.

Overall, the Proposed Action is not expected to result in any significant adverse impacts to cultural resources on the project site or in the study areas.

Urban Design and Visual Resources

According to the 2012 *CEQR Technical Manual*, in terms of streetscape elements, a significant adverse impact would result if a project would add to, eliminate, or alter a critical feature of a streetscape. As described above, new security elements would be installed at the perimeter of the WTC Campus within some street beds and on the sidewalks that are immediately adjacent to the proposed credentialing and screening zones. The design of the proposed streetscape elements has been developed to ensure clear pedestrian zones by widening the sidewalk, where possible. According to the NYPD, the proposed security measures are necessary to protect the WTC Campus from a vehicle-borne improvised explosive device as it is considered a potential terrorist target. Because there have been two previous attacks on the WTC site, the implementation of increased security precautions is necessary at the WTC Campus.

While security elements are not typically considered to be aesthetically pleasing, they have become more commonplace throughout the City since 2001. The proposed security plan would implement a uniform design approach with standardized security components such as static barriers and booths that resemble commonly used designs, intended to blend with streetscape elements widely-used around the City. However, the Proposed Action also includes some unique design elements that are intended to minimize the visual impact of the Proposed Action. Therefore, the proposed addition of security elements at the perimeter of the WTC Campus has the potential to alter the urban design characteristics of the area. While the changes to the urban design of the area resulting from the Proposed Action could be considered adverse negative impacts, they would not be significant because the plan would implement a cohesive design with elements that are intended to be consistent with other street furniture that is commonly seen around the City. A conscious effort has been made during the initial design phases to use the latest available technology for the security elements and to use materials and finishes that would blend with the surroundings for personnel booths and static and operable barriers. The Proposed Action would not result in any changes to street pattern, block form, or building arrangement. Therefore, the Proposed Action is not expected to result in any significant adverse impacts to urban design in the quarter-mile study area surrounding the WTC Campus.

As detailed in Chapter 6 of the EIS, the Proposed Action would not have a significant adverse impact on visual resources or view corridors on the WTC Campus (Project Site) or within the Study Area. Major visual resources in the Project Site and Study Area include historic buildings, such as the Woolworth Building, the Barclay-Vesey Building, and Trinity Church, modern buildings, such as the World Financial Center (WFC) and the WTC towers (many of which are under construction), and open space and natural features, such as the WTC memorial, Zuccotti Park, the Battery Park City (BPC) esplanade and Hudson River. Personnel booths located at screening and credentialing zones would have small footprints and would be located on sidewalk extensions where possible. All proposed security elements have a low-scale design. As such, the proposed security elements would not adversely affect public views to any visual resources.

Hazardous Materials

The Phase I ESA identified potential sources of contamination, including: historical fill materials of unknown origin; debris and releases (e.g., petroleum and dielectric oil) associated with the collapse of the WTC, including the electrical substation at 7 WTC, a laboratory and petroleum storage; historical uses in the vicinity of the Property, such as manufacturing and filling stations; and off-site regulatory listings (spills, petroleum storage, etc.). Previous studies conducted for the reconstruction of the WTC area indicated that debris associated with the collapse and historical petroleum storage tanks have been removed, significant remediation of soils and groundwater has occurred, and any residual contamination at the WTC Campus would be encapsulated (e.g., beneath structures or pavement) to prevent potential exposure. Soil

testing conducted in the 2000s in the eastern portion of the WTC Campus and on streets to the south (i.e., in or near the Project Area) indicated no evidence of petroleum impacts or elevated concentrations of asbestos or dioxins. Surface soils in this area contained slightly elevated concentrations of semi-volatile organic compounds (SVOCs) and metals, possibly associated with fill materials and/or the WTC collapse, and groundwater samples in this area contained slightly elevated concentrations of petroleum and solvent-related volatile organic compounds (VOCs). Soils in the vicinity of the former 7 WTC contained no elevated concentrations of polychlorinated biphenyls (PCBs), but soil and groundwater in this area showed evidence of petroleum and/or dielectric oil contamination; however, the testing was conducted prior to the construction of the new 7 WTC building and associated remediation.

Based on the above, soil and groundwater beneath the Project Area may have been affected by past and present, on- and off-site uses. However, significant remediation has occurred as part of WTC Campus redevelopment. Soil disturbance for the Proposed Action is expected to be limited to soils well above the water table – soils at or below the water table have a greater potential for being contaminated as moving groundwater can carry contaminants.

To reduce the potential for human or environmental exposure to contamination during and following construction of the Proposed Action, a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP) would be prepared and submitted to NYCDEP for review and approval. The RAP and CHASP would be implemented during project construction. The RAP would address requirements for items such as soil stockpiling, soil disposal and transportation; dust control; quality assurance; and contingency measures, should petroleum storage tanks or contamination be unexpectedly encountered. The CHASP would identify potential hazards that may be encountered during construction and specify appropriate health and safety measures to be undertaken to ensure that subsurface disturbance is performed in a manner protective of workers, the community, and the environment (such as personal protective equipment, air monitoring, and emergency response procedures).

Lead-based paint, asbestos-containing materials (ACM) and PCB-containing electrical equipment and fluorescent lighting fixtures may be present on the Project Area. During and following construction for the Proposed Action, regulatory requirements pertaining to ACM, lead-based paint and PCBs and chemical use and storage would be followed.

With these above-described measures, the Proposed Action would not result in any significant adverse impacts related to hazardous materials.

Transportation

Traffic

Weekday AM, midday and PM peak hour traffic conditions with the Campus Security Plan were evaluated at a total of 42 intersections generally located along the Broadway, Trinity Place/Church Street, West Broadway, Greenwich Street and Route 9A corridors from Chambers Street to Battery Place. A more limited study area was also analyzed for the Saturday midday focusing on a subset of 12 key intersections in the immediate vicinity of the World Trade Center that are most likely to be affected by diverted trips and weekend demand from visitors to the National September 11th Memorial and Museum.

The traffic impact analysis indicates that there would be the potential for significant adverse impacts at 16 of the 42 analyzed intersections in the weekday AM peak hour, nine in the midday and 11 in the PM peak hour, and three of the 12 analyzed intersections in the Saturday midday peak hour. The lane groups impacted in each peak hour are summarized below. Chapter 15, “Mitigation,” discusses measures to

mitigate these significant adverse traffic impacts.

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.

Transit

The proposed Campus Security Plan would not result in any significant adverse transit impacts with respect to subways and buses based on *CEQR Technical Manual* criteria. Much of the access between transit facilities and new and existing development in the vicinity of the World Trade Center will occur below-grade and would not be directly affected by physical changes to the surface street network associated with the Proposed Action. Increased traffic congestion along some corridors such as Broadway and Chambers Street and increased taxi pickup and drop-off activity along the west curb of Church Street as a result of the Proposed Action may, however, lengthen travel times for the local and express bus services operating along these corridors.

The Proposed Action would not result in the development of new land uses that would generate additional demand on the transit systems serving the World Trade Center, although it is possible that the restrictions on vehicular access resulting from the Proposed Action may potentially reduce vehicular travel for persons en route to and from the WTC and its environs. However, any potential increase in transit trips is expected to be relatively small in the context of the overall demand on the PATH system and the numerous subway, bus and ferry routes serving the site, and the numbers of such trips would be unlikely to exceed *CEQR Technical Manual* analysis thresholds for either the rail or bus modes at any one rail transit station or bus route.

Pedestrians

The Proposed Action would not generate new pedestrian demand or change pedestrian access routes in the vicinity of the World Trade Center. However, the installation of security infrastructure (e.g., static barriers, personnel booths, etc.) would reduce the amount of space available for pedestrian circulation at some locations. In addition, the Proposed Action may also result in some relatively small changes in pedestrian flow due the relocation of some taxi pickup/drop-off activity. Conditions in the weekday AM, midday and PM peak periods in the future with the Proposed Action were therefore analyzed at a total of 12 sidewalks, three corner reservoir areas and 10 crosswalks in the vicinity of the WTC site. The results of the analysis indicate that the installation of security infrastructure associated with the Proposed Action would significantly adversely impact the south sidewalk on Barclay Street between West Broadway and Church Street in all periods. The installation of static barriers such as bollards within crosswalks in conjunction with the proposed median along Trinity Place/Church Street is also expected to result in significant adverse impacts in one or more peak hours at a total of three analyzed crosswalks along this corridor. These include:

- The north crosswalk at Vesey Street in the AM;
- The north crosswalk at Fulton Street in the midday; and
- The north crosswalk at Cortlandt Street in the midday and PM.

Chapter 15, “Mitigation,” discusses measures to mitigate these significant adverse pedestrian impacts.

Vehicular and Pedestrian Safety Evaluation

Four intersections in proximity to the WTC site experienced five or more pedestrian and/or bicyclist injury crashes in one or more years from 2008 through 2010 and are therefore considered high accident locations.

These locations include three intersections along Chambers Street at Broadway, West Broadway and Route 9A, and the intersection of Route 9A with Murray Street. None of these intersections (nor any within the traffic and pedestrian study areas) are located within a designated Senior Pedestrian Focus Area (SPFA).

The Campus Security Plan is not expected to generate substantial new vehicular or pedestrian demand within the study area, nor alter pedestrian flow patterns at any of the four intersections identified as high accident locations. However, all four intersections would likely experience changes in traffic flow patterns due to street closures associated with the Proposed Action. Some approaches at these intersections would experience increases in the numbers of turning vehicles conflicting with pedestrians in crosswalks while others would experience decreases.

The Proposed Action would also result in a substantial decrease in vehicular traffic along streets within the WTC Campus, as only pre-authorized vehicles with business at the World Trade Center would be allowed access. The potential for conflicts between vehicular traffic and pedestrians at intersections within the WTC Campus, including the many tourists expected to be visiting the National September 11th Memorial and Museum, would therefore likely be reduced compared to the No-Action condition.

Parking

The proposed Campus Security Plan would not result in any significant adverse impacts with respect to off-street or on-street parking based on *CEQR Technical Manual* criteria. The Proposed Action would not result in the development of new land uses that would generate additional parking demand, nor displace any existing or future off-street public parking capacity. The installation of credentialing locations and security stations would, however, potentially displace an estimated 14 curbside spaces designated for authorized vehicle parking (Postal Inspector), 12 to 16 spaces for truck loading/unloading and four spaces for bus layover along Trinity Place/Church Street, Barclay Street and West Broadway. In addition, some curb space adjacent to Ten House on Liberty and Greenwich streets that is governed by a no standing fire zone regulation and currently used for personal vehicle parking by FDNY personnel may no longer be available for this use with implementation of the Proposed Action. Overall, the displacement of this number of authorized vehicle parking spaces would not be considered a significant adverse impact under *CEQR Technical Manual* criteria, and it is anticipated that NYPD would coordinate with affected agencies and NYCDOT to identify alternative locations for this displaced authorized vehicle, truck and bus parking. The PATH Greenmarket that currently occupies curbside space along the east curb of West Broadway north of Barclay Street on Tuesdays would likely need to be relocated to accommodate the installation of a credentialing zone at this location. It is anticipated that the City would work with relevant stakeholders, including the Greenmarket and the Port Authority of New York and New Jersey, to identify a suitable location in the vicinity at which this market could continue operation.

Air Quality

The air quality analysis concluded that maximum predicted pollutant concentrations and concentration increments from mobile sources with the Proposed Action would be below the corresponding guidance thresholds and ambient air quality standards. The Proposed Action would have an insignificant impact on region-wide criteria pollutant and greenhouse gas emissions, and would not require an analysis of conformity with the New York State Implementation Plans (SIP). Thus, the Proposed Action would have no significant adverse impact on air quality.

Noise

The noise analysis determined that traffic diversions associated with the Proposed Action and stationary noise sources (i.e., operation of security barriers) would not result in any predicted exceedances of the suggested incremental thresholds in the city's CEQR Technical Manual at the selected receptors. Therefore, there would be no predicted significant adverse noise impacts from the Proposed Action.

Public Health

The 2012 *CEQR Technical Manual* states that a public health assessment is not necessary for most actions. Where no significant unmitigated adverse impact is found in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise, no public health analysis is warranted. If, however, an unmitigated significant adverse impact is identified in any of these other CEQR analysis areas, the lead agency may determine that a public health assessment is warranted for that specific technical area. As described in the relevant chapters of the EIS, the Proposed Action would not result in unmitigated significant adverse impacts in technical areas such as hazardous materials (Chapter 7), air quality (Chapter 9), and noise (Chapter 10). Furthermore, as described in Chapter 13, "Construction," the Proposed Action would not result in any significant adverse impacts related to construction noise levels or construction air quality. Therefore, the Proposed Action would not result in significant adverse public health impacts.

Neighborhood Character

The Proposed Action is a physical and operational security infrastructure overlay that would be incorporated into the planned World Trade Center streetscapes. The proposed security elements would be installed on City streets and sidewalks in a well-developed area of Lower Manhattan. As described in earlier chapters in this EIS, the Proposed Action would not cause significant adverse impacts regarding land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; shadows; or noise. The redistribution of traffic due to the closure of street segments within the WTC site to unscreened vehicles under the Proposed Action would, however, result in unmitigated significant adverse traffic impacts in the AM, midday, PM and Saturday midday peak hours. These unmitigated impacts would occur primarily at intersections along Broadway, Church Street and Route 9A, all of which are known as heavily trafficked corridors. Additional traffic volumes on these streets would not significantly adversely affect the character of these major thoroughfares or the neighborhood's defining features.

The introduction of personnel booths and other proposed security infrastructure elements along sidewalks and crosswalks in the vicinity of the WTC site is not expected result in unmitigated significant adverse pedestrian impacts, nor alter pedestrian flow patterns or the ability of pedestrians to freely and safely access the Campus compared to the No-Action condition. The Proposed Action would, however, result in a decrease in vehicular traffic along streets within the WTC Campus, as only pre-authorized vehicles with business at the World Trade Center would be allowed access. The potential for conflicts between vehicular traffic and pedestrians at intersections within the WTC Campus, including the many tourists expected to be visiting the National September 11th Memorial and Memorial Center, would therefore likely be reduced compared to the No-Action condition. The Proposed Action is therefore not expected to significantly adversely affect the character of pedestrian travel in the vicinity of the WTC site.

Overall, the Proposed Action would help to provide a secure and safe environment for visitors and workers at the World Trade Center while also ensuring that the site is hospitable to remembrance, culture, and commerce. It is not expected to have significant adverse neighborhood character impacts, as discussed in further detail in Chapter 12 of the FEIS.

Construction

Where possible, the Proposed Action would be constructed in sections of the roadways and sidewalks that would be closed for construction of the WTC towers and street system before those spaces are open to the public. Construction activities would be coordinated to ensure that the Proposed Action would be taken into consideration when streets and sidewalks are constructed within the WTC site so newly constructed streets and sidewalks would not have to be disturbed to accommodate the proposed security elements. Security elements proposed on streets and sidewalks outside of the WTC Campus which are accessible to the public would be constructed in halves so that no sidewalk or street would be completely closed to pedestrian or vehicular traffic as a result of the Proposed Action.

The inconvenience and disruption arising from the construction of WTC Campus Security Plan would likely result in some limited temporary diversions of pedestrians and vehicles, and would result in additional truck traffic in the area related to construction activities. Some of the construction would occur within the WTC site in locations that would still be construction zones that are off limits to the public (e.g., Vesey Street, Fulton Street, Liberty Street, and portions of Church Street), while construction would also occur in some areas that would remain publicly accessible (e.g., West Street/Route 9A, Washington Street, West Broadway, Trinity Place and Greenwich Street south of Liberty Street). Given the limited nature of the proposed security measures and the potential to complete some of the elements of the Campus Security Plan while the construction of the WTC buildings, streets and sidewalks is ongoing and the areas of disturbance would be part of the larger WTC construction site, the Proposed Action would not directly result in lengthy street closures or diversions. However, as the Proposed Action has the potential to affect elements of the City's transportation system at several locations, a preliminary assessment of potential construction impacts was prepared in accordance with the guidelines of the *CEQR Technical Manual*, and is presented in Chapter 13. As detailed in that chapter, construction for the Proposed Action has the potential to result in some short-term construction-period impacts related to traffic and pedestrian circulation.

Throughout the construction period, access to surrounding residences, businesses, institutions, and open spaces in the area would be maintained. In addition, throughout the construction period, measures would be implemented to control noise, vibration, and dust on the construction sites and minimize impacts on the surrounding areas in conformance with the City's building code. These measures would primarily include the erection of construction fencing and permitting to restrict work hours. Even with these measures in place, temporary impacts are predicted to occur. However, because none of these impacts would be continuous in any one location or permanent, they would not create significant impacts on land use patterns or neighborhood character in the area.

As discussed in Chapter 13 of the FEIS, construction would likely begin in 2013 with all secure entries and exits completed by 2015 with the exception of the Church Street median, which would be completed concurrent with the adjacent WTC construction (2 WTC and 3 WTC). As detailed below, construction of the proposed Church Street security measures would advance through 2019 as the WTC street system is constructed and as the adjacent WTC buildings are completed. It is anticipated that much of the activities and traffic specifically related to the construction of the Campus Security Plan would occur in 2014 and 2015, with both years expected to have similar levels of construction activity. At peak construction, a maximum of 28 workers would be on-site to construct the proposed security measures (includes approximately ten workers per block, with up to ten additional trade workers required for some phases of construction and up to eight workers related to deliveries). With less than one third of the workers expected to drive to work on a typical work day, there would be less than ten new vehicle trips related to construction workers commuting to and from the area during the 6:00 to 7:00 AM and 3:00 to 4:00 PM peak hours.

Further, the peak hours related to construction trips would not occur during the peak hour for general traffic in this area. As such, no new intersections are expected to experience significant adverse traffic impacts during the peak construction activities.

Due to the limited scope of the construction activities that would be required to install the security elements associated with the proposed Campus Security Plan on existing or planned streets and sidewalks, it is unlikely that any inadvertent damage would occur to local historic (architectural or archaeological) resources. However, the protective measures of the DOB's *TPPN #10/88* would apply and indirect significant adverse impacts resulting from construction would be avoided.⁴

It should be noted that, based on observations made at the Project Site, and on documentation provided in previous environmental impact statements which were conducted for the redevelopment of the WTC site, for the reconstruction of West Street/Route 9A, and for the permanent WTC Port Authority Trans-Hudson (PATH) Terminal (Transit Hub), the Proposed Action would not affect any natural resources or endangered species. The proposed Campus Security Plan would be constructed in a dense urban environment on existing or planned streets and sidewalks in areas that have previously been disturbed. While the site is partially located within the City's coastal zone boundary, the Waterfront Revitalization Plan (WRP) assessment conducted for the Proposed Action concluded that the Campus Security Plan would not conflict with the goals of the WRP policies.

As also discussed in Chapter 13, construction-related activities resulting from the Proposed Action are not expected to have any long-term significant adverse impacts on transit or pedestrian conditions, air quality, noise, archaeological resources, or hazardous materials conditions, and a detailed analysis of construction impacts is not warranted. Moreover, the construction process in New York City is highly regulated to ensure that construction period impacts are reduced.

Environmental Justice

As there are no large minority or low-income communities located within the Study Area, the Proposed Action is not expected to result in any disproportionately high or adverse effects on minority or low-income populations. In addition, the Proposed Action would be in compliance with applicable NEPA regulations related to environmental justice protections. Therefore, there are no environmental justice concerns anticipated with the Proposed Action.

F. MITIGATION

The significant adverse impacts listed in the FEIS and the number of impacts that could be mitigated through the implementation of practicable mitigation measures are described below. Impacts were identified in the area of transportation.

⁴ *TPPN #10/88* was issued by DOB on June 6, 1988, to supplement Building Code regulations with regard to historic structures. *TPPN #10/88* outlines procedures for the avoidance of damage to historic structures resulting from adjacent construction, defined as construction within a lateral distance of 90 feet from the historic resource.

Transportation

Traffic

The traffic impact analysis in Chapter 8, “Transportation,” 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. As outlined below, 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. 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.

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 World Trade Center site stakeholders (the Port Authority of New York and New Jersey, the New York City Police Department and the New York City Department of Transportation) would work together to develop and implement a detailed monitoring plan.

Pedestrians

The pedestrian impact analysis in Chapter 8, “Transportation,” 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.

G. ALTERNATIVES

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 West Street/Route 9A would operate as managed streets, as described in Chapter 1, “Project Description” of the FEIS. 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 FEIS.

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 the weekday AM and midday peak hours, two intersections during the weekday midday peak hour and one intersection during the Saturday midday peak hour. The specific lane groups with unmitigated significant impacts in each peak hour would include the following:

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 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 West Street/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 Chapter 15, “Mitigation” and as 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. No other unavoidable significant adverse impacts are anticipated in any other technical areas analyzed in this EIS.

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 identified in Chapters 15 and 17 of the FEIS.

I. GROWTH-INDUCING IMPACTS OF THE PROPOSED ACTION

Growth-inducing aspects of a proposed action generally refer to "secondary" impacts of a proposed action that trigger further development. Proposals that add substantial new land use, new residents, or new employment could induce additional development of a similar kind or of support uses (e.g., stores to serve new residential uses). Actions that introduce or greatly expand infrastructure capacity (e.g., sewers, central water supply) might also induce growth.

The environmental consequences of the anticipated growth related to the Proposed Action are the subject of Chapters 2 through 17 of the FEIS. No new residential or worker population would result from the Proposed Action as it is a security overlay that would be staffed by NYPD who would otherwise be working on the WTC Campus under No-Action conditions.

The Proposed Action would not result in more intensive land uses. However, it is expected that the enhanced safety measures would help to create a secure environment that would be supportive of existing and planned land uses on the WTC site. As stated in Chapter 3, "Socioeconomic Conditions," the Proposed Action would not introduce a new economic activity that would alter existing economic patterns within the study area. As the study area already has a well-established residential market under existing conditions and a critical mass of non-residential uses, including retail, office, hotel and community facility uses, the Proposed Action would not create the critical mass of uses or populations that would induce additional development. Moreover, the proposed WTC Campus Security Plan does not include the introduction of new infrastructure or an expansion of infrastructure capacity that would result in indirect residential or commercial development. Therefore, the Proposed Action would not induce significant new growth in the surrounding area.

J. 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

World Trade Center Campus Security Plan FEIS
CEQR No. 12NYP001M
August 14, 2013

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.



Lieutenant Thomas Ferramosca
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
Douglas Durst, The Durst Organization, Inc.
Betty Cohen, Century 21
Mitch Rudin, Brookfield Properties
Joseph Moinian, The Moinian Group
Janno Lieber, Silverstein Properties
John M. Genovese, Westfield World Trade Center
George Giaquinto, Jr., Westfield World Trade Center
Isaac Hera, Brack Capital Real Estate
Alfred Martinez, The Millenium Hilton Hotel
Postmaster, USPS Church Street Station
Cathy Chambers, GrowNYC/Council on the Environment
Joseph Daniels, National September 11 Memorial & Museum at the World Trade Center
John M. Vazquez, Verizon
Greek Orthodox Archdiocese & St. Nicholas Church
Kimberly Flynn, World Trade Center Health Program Survivors Steering Committee
Marian Freed, WilmerHale, LLP
Daniel L. Alterman, Alterman & Boop LLP
Albert K. Butzel, Albert K. Butzel Law Offices
Carl (Antoun) Houck / Todd Fine, Save Washington Street