Vanderbilt Corridor and One Vanderbilt (CEQR No. 14DCP188M)
~~Draft~~ Final Scope of Work for a
Draft Environmental Impact Statement

A. INTRODUCTION

The New York City Department of City Planning (DCP) and a private applicant—Green 317 Madison LLC (317 Madison)—are proposing a series of discretionary actions that would facilitate commercial development along Madison and Vanderbilt Avenues in Manhattan, improve pedestrian circulation within Grand Central Terminal and its vicinity, and allow greater opportunity for area Landmarks to transfer their unused development rights. This ~~Draft~~ Final Scope of Work outlines the technical areas to be analyzed in the preparation of a Draft Environmental Impact Statement (DEIS) for the Vanderbilt Corridor and One Vanderbilt project in East Midtown Manhattan.

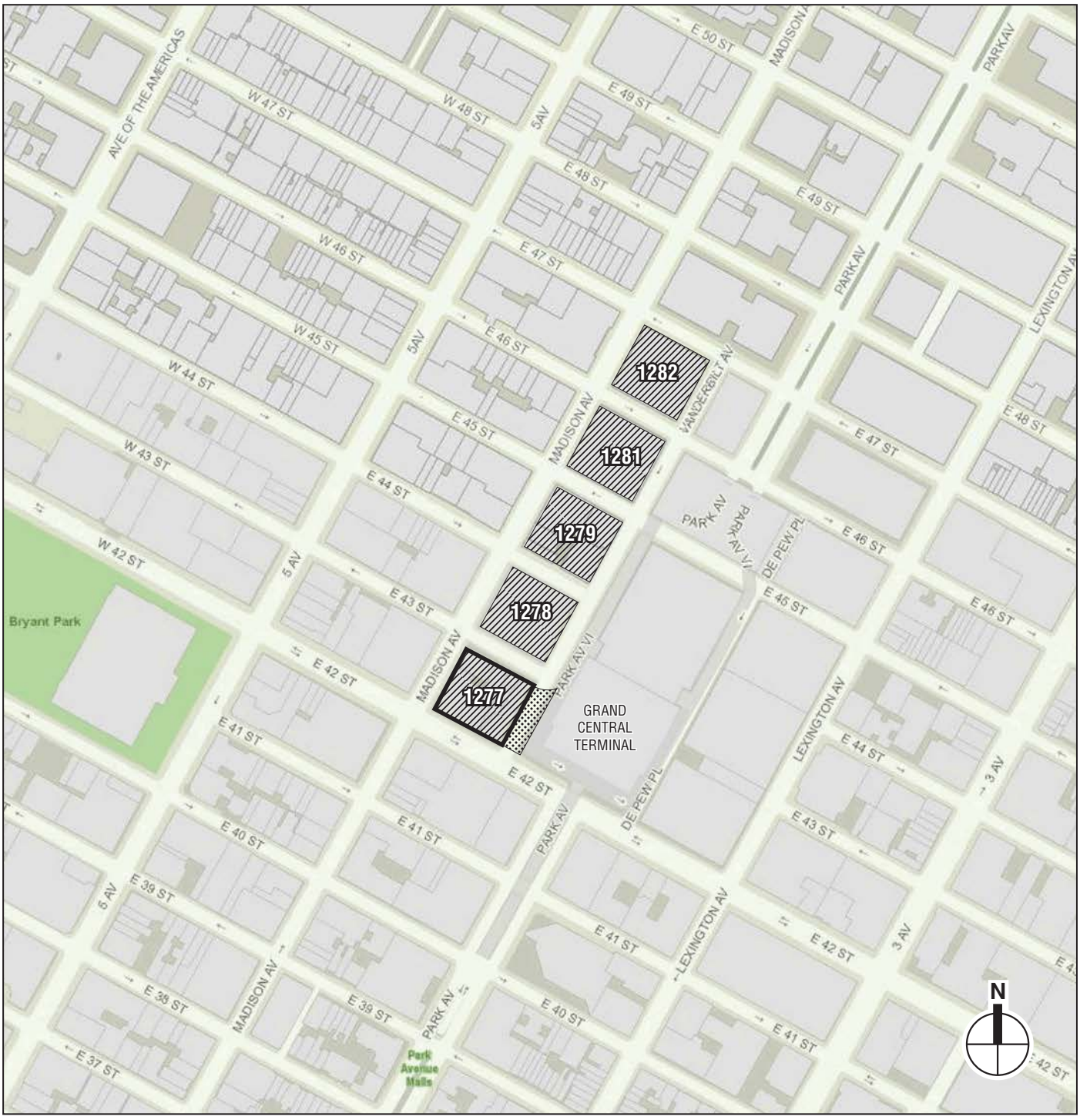
DCP is proposing the following actions:

- Zoning text amendment to: 1) create the "Vanderbilt Corridor" and a new special permit under which the City Planning Commission (CPC) may approve bonus floor area up to a maximum floor area ratio (FAR) of 30.0 (the "Grand Central Public Realm Improvement Bonus") in connection with public space and transit improvements related to development within the Vanderbilt Corridor; 2) increase the maximum ~~floor area ratio (~~FAR~~)~~ of 21.6 to 30.0 for sites in the Vanderbilt Corridor utilizing the existing Landmark transfer special permit available in the Grand Central Subdistrict; and 3) modify the uses permitted in the Vanderbilt Corridor to allow the development, conversion, or enlargement of hotels only by a new special permit established by the proposed text amendment. The proposed Vanderbilt Corridor ~~includes~~ consists of the five blocks along the west side of Vanderbilt Avenue between East 42nd and East 47th Streets (see **Figure 1**).
- A City Map amendment to designate the portion of Vanderbilt Avenue between East 42nd and East 43rd Streets as a "public place" dedicated to pedestrian uses, to ~~be owned by~~ remain under the ownership of the City under the jurisdiction of the New York City Department of Transportation (NYCDOT).

The area subject to these actions includes the five blocks of the Vanderbilt Corridor and the 12,820-square-foot portion of Vanderbilt Avenue between East 42nd and East 43rd Streets.

317 Madison owns the portion of Block 1277 (Lots 20, 27, 46, and 52) in the proposed Vanderbilt Corridor and bounded by East 42nd and East 43rd Streets and Madison and Vanderbilt Avenues (the "One Vanderbilt site"). 317 Madison is proposing to apply for the following:

- Special permits proposed pursuant to the proposed Grand Central Public Realm Improvement Bonus and Landmark FAR transfer to facilitate the redevelopment of the One Vanderbilt site ~~block bounded by East 43rd Street to the north, East 42nd Street to the south,~~



Proposed Vanderbilt Corridor

One Vanderbilt Development Site

Proposed Public Place

0 500 FEET

SCALE

Vanderbilt Corridor and One Vanderbilt

Project Area Location

Figure 1

~~Madison Avenue to the west, and Vanderbilt Avenue to the east~~. The special permits would involve public realm improvements in the surrounding area and the transfer of excess development rights from the New York City Landmark Bowery Savings Bank located at 110 East 42nd Street.

The proposed actions would ~~facilitate a proposal by~~ allow 317 Madison to construct an approximately 1.8 million-gross-square-foot (1,299,390-zoning-square-foot) 30.0 FAR ~~mixed-use~~ building containing a mix of uses including office, trading floors, retail, restaurant, transit access, an enclosed public space at ground level, and rooftop amenity space.

This ~~Draft~~ Final Scope of Work for the preparation of a DEIS contains a description of the proposed actions, the proposed One Vanderbilt development and the adjacent public place, and the tasks that would be undertaken to analyze the potential environmental impacts of the proposed actions and proposed development. On June 16, 2014, CPC issued a Positive Declaration determining that the proposed actions must be analyzed in an EIS prepared pursuant to City Environmental Quality Review (CEQR) with the Department of City Planning (DCP) acting on behalf of CPC as the lead agency. The formal public review process for the proposed actions was initiated at a public scoping meeting for the preparation of an Environmental Impact Statement (EIS) held on July 16, 2014. The public review period for agencies and the public to review and comment on the Draft Scope of Work was open through July 28, 2014.

Subsequent to the public scoping meeting, modifications have been made to the proposed One Vanderbilt development, and the City reviewed and considered comments received during the public scoping process. **Appendix A** to this Final Scope identifies the comments made during the public review period and provides responses. This Final Scope of Work was prepared after consideration of relevant public comments.

B. PROJECT DESCRIPTION

AREA AFFECTED BY THE PROPOSED ACTIONS

As described above, the proposed actions affect the Vanderbilt Corridor, including the development site, and the section of Vanderbilt Avenue that would be mapped as a public place in the East Midtown area of Manhattan in Community District 5. East Midtown is one of the highest-density commercial districts in the city and is centered on Grand Central Terminal, one of the city's primary transportation hubs that serves the Metro-North commuter rail system and several subway lines.

The blocks surrounding this area primarily contain commercial uses (office, retail, and hotel) and include several large office towers, such as the 59-story MetLife Building (200 Park Avenue), the 53-story Lincoln Building (60 East 42nd Street), and the 77-story Chrysler Building (405 Lexington Avenue). The New York Public Library Stephen A. Schwarzman Building and Bryant Park are located in the vicinity.

VANDERBILT CORRIDOR

The proposed Vanderbilt Corridor ~~includes~~ consists of portions of five blocks ~~along the west side of~~ between Madison and Vanderbilt Avenues and East 42nd and East 47th Streets—Block 1277 (Lots 20, 27, 46, and 52), Block 1278 (Lot 20), Block 1279 (Lots 23, 24, 25, 28, 45, and

48), Block 1281 (Lot 21), and Block 1282 (Lot 21).[1] The corridor is well served by public transportation, with underground connections linking all five blocks to the Grand Central Terminal complex. In addition, the Metropolitan Transportation Authority's (MTA) East Side Access project, which will bring Long Island Rail Road customers to East Midtown with a one-seat ride, is currently being constructed below the corridor. ~~A number of access points to this new rail facility will be provided from buildings in the corridor.~~

One Vanderbilt Development Site

The One Vanderbilt development site ~~occupies~~ is the portion of Block 1277 that is bounded by Madison and Vanderbilt Avenues and East 42nd and East 43rd Streets, the southernmost block of the Vanderbilt Corridor. It ~~that~~ is located immediately west of Grand Central Terminal between East 42nd and East 43rd Streets, placing it within the Grand Central Subdistrict of the Special Midtown District (see **Figure 1**). It is zoned C5-3, has a lot area of 43,313 square feet, and is occupied by four low- to mid-rise buildings (between 7 and 22 stories) that are each more than 80 years old. In total, the four existing buildings on the development site contain 772,162 gross square feet (gsf) of commercial space. The buildings all contain retail space on the ground floor and office space on the upper floors.

Proposed Public Place

The section of Vanderbilt Avenue that would be mapped as a public place is currently a one-way, 12,820-square-foot portion of the avenue between East 42nd and East 43rd Streets. It is 60 feet wide and currently carries one lane of northbound traffic. As a public place, it would be public space owned by the City, under the jurisdiction of NYCDOT, and dedicated to pedestrian uses. Following such mapping action, this section of Vanderbilt Avenue would no longer be open to vehicular traffic except for emergency vehicles, and Vanderbilt Avenue between East 43rd and East 44th Streets would be converted from two-way to one-way southbound. This new public space would be located between the proposed One Vanderbilt building and Grand Central Terminal, and would ~~have~~ be improved with public amenities such as seating and lighting.

Other Vanderbilt Corridor Sites

Like the One Vanderbilt development site, the other Vanderbilt Corridor sites discussed in this section are zoned C5-3 and located within the Grand Central Subdistrict of the Special Midtown District.

The portion of Block 1278 within the Vanderbilt Corridor is located between East 43rd and East 44th Streets and has a site area of 43,313 square feet. The block is developed with one building, the Bank of America Plaza at 335 Madison Avenue. Originally built in 1913 as a hotel, the building was thoroughly renovated, reclad, and converted into an office building in 1981–1983. The building is 28 stories and 874,734 gsf. The Bank of America Plaza contains ground-floor retail on Madison Avenue.

The portion of Block 1279 within the Vanderbilt Corridor is located between East 44th and East 45th Streets and has a site area of 43,261 square feet. The block contains five commercial buildings and a ventilation building for MTA's under-construction East Side Access project. The five commercial buildings were constructed between 1916 and 1926 and range in height from 13

[1] Madison Avenue bisects Blocks 1277, 1278, 1279, 1281, and 1282. The western portions of these blocks are located between Madison and Fifth Avenues.

stories to 22 stories. The Yale Club occupies the building at 50 Vanderbilt Avenue, and MTA has offices in the building at 347 Madison Avenue. In total, the five commercial buildings and the vent building contain 700,346 gsf. The five commercial buildings each contain ground-floor retail.

The portion of Block 1281 within the Vanderbilt Corridor is located between East 45th and East 46th Streets and has a site area of 43,313 square feet. The block is developed with the Roosevelt Hotel, which was built in 1922–1924. This 19-story 598,248-gsf hotel contains 1,015 rooms and ground-floor retail along each street frontage.

The portion of Block 1282 within the Vanderbilt Corridor is located between East 46th and East 47th Streets and has a site area of 43,313 square feet. The block is developed with the 383 Madison Avenue building, which opened in 2002. Occupied by J.P. Morgan Chase & Company, this 47-story office building contains approximately 1,174,988 gsf of commercial space. There is ground-floor retail along the Madison Avenue frontage.

PROPOSED ONE VANDERBILT BUILDING

With the proposed actions (described in detail below), ~~317 Madison would demolish the buildings on the development site, and~~ the One Vanderbilt building would be built. It would be a 30 FAR approximately 67-story commercial tower containing approximately 1.8 million gsf of space. The commercial program in the proposed One Vanderbilt building according to 317 Madison is expected to include the following components: approximately 1,079,000 gsf of office space, approximately 246,000 gsf of trading floors, approximately 53,000 gsf of retail, approximately 27,000 gsf of restaurant space, and approximately 55,000 gsf of rooftop amenity space, which may include tenant amenity space, restaurant space, and a public observation deck. This expected program would also include approximately 343,500 square feet of space for circulation, mechanical, core, back-of-house, and loading uses.[1] The building would have two levels below grade: the first level would connect to the pedestrian circulation network serving Grand Central Terminal and the second level would contain a loading dock accessible from East 43rd Street via two truck elevators. It is proposed that most of the new retail space would be located along Madison Avenue at grade, with possible additional retail space on the second floor and on the first below-grade level.

The Grand Central Public Realm Improvement Bonus special permit will define the development's site plan, height, envelope, and exterior materials. The proposed building assessed in the DEIS will reflect the ULURP plans and drawings, which will set forth the proposed building's height, dimensions, site plan, and floor area. To account for further design development, the DEIS will assume a maximum building envelope that is approximately 10 feet beyond the horizontal dimensions and approximately 10 feet beyond the vertical dimensions of the current building design. The zoning envelope will represent maximum building heights to the top of the structure and to the top of the spire.

The building design, which is currently being finalized, would have a tapered form that reaches an approximate height of 1,396 feet to the top of the building structure with a spire above (see **Figure 2**). ~~The approved Grand Central Public Realm Improvement Bonus special permit will define the building's site plan, height, envelope, and exterior materials.~~ The proposed height

[1] The program to be analyzed in the DEIS will represent maximum amounts per uses as set by the ULURP application. The square footages of individual program elements may be less as built.

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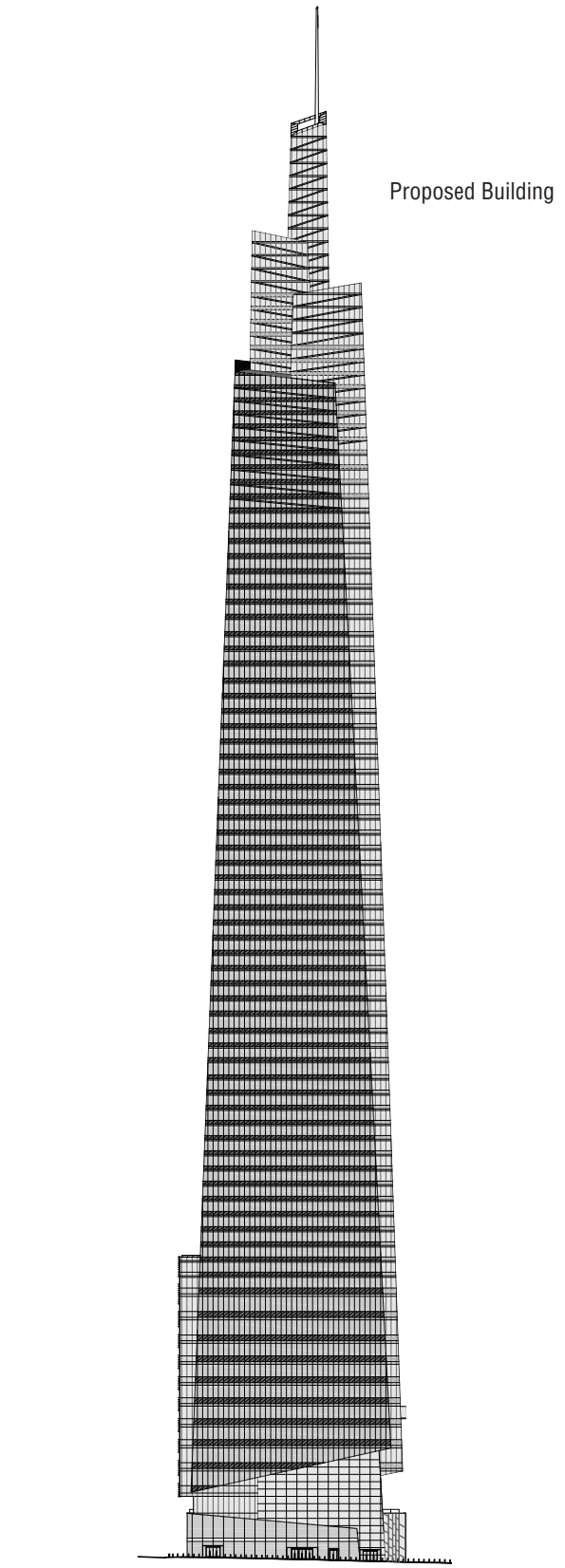

SOURCE: KPF

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

Proposed One Vanderbilt Building
East-West Elevation Looking North

reflects floor-to-floor heights on the office floors averaging 14.5 feet and the floor-to-floor heights of the trading floors averaging 20 feet combined with average mechanical floor heights of 30 feet and a building crown to accommodate the intended program. In addition to the rooftop amenity space, the building would provide several unique public amenities including: below-grade transit connections to the subway system and Grand Central Terminal along East 42nd Street; an approximately 4,500-square-foot enclosed public space fronting on East 43rd Street and Vanderbilt Avenue; and an angled building podium that would provide views of Grand Central Terminal on East 42nd Street (see **Figures 3, 4A, and 4B**). In addition, on Madison Avenue the building would be set back 7 feet from the property line up to approximately the third floor, allowing for a 20-foot-wide sidewalk.

PROPOSED PUBLIC REALM IMPROVEMENTS

Pursuant to the proposed zoning text amendment and special permit, as currently proposed the proposed One Vanderbilt building would include on-site transit-related improvements as follows:

- A new ground-level entrance with stairs, escalators, and an elevator on East 42nd Street, providing direct access to the 42nd Street Shuttle ~~and providing below-grade connections~~ with access to the Nos. 4, 5, 6, and 7 Subway lines, the Metro-North commuter lines, ~~at the Grand Central Terminal concourse level~~ and ~~to~~ the Long Island Rail Road (LIRR) commuter lines ~~at the under-construction East Side Access concourse level~~.
- A new below-grade corridor and escalators connecting to the LIRR East Side Access concourse level currently under construction, providing ~~connections from East Side Access~~ access to the 42nd Street Shuttle, Metro-North trains at Grand Central Terminal, the Nos. 4, 5, 6, and 7 subway lines, and street level.
- A new ground-level indoor public space and waiting area with entrances at East 43rd Street, providing stairway connections to the new below-grade corridor, with connections to Long Island Rail Road East Side Access, the 42nd Street Shuttle, Metro-North trains at Grand Central Terminal, and the Nos. 4, 5, 6, and 7 subway lines.

See **Figures 3, 4A, and 4B** for ground-floor and below-grade plans of the proposed One Vanderbilt building.

~~317 Madison is also undertaking ongoing~~ In consultation with MTA-New York City Transit (NYCT), 317 Madison has agreed to provide ~~regarding the potential provision of~~ off-site pedestrian circulation improvements specific to the IRT Lexington Avenue subway station. The list below includes the ~~type of potential~~ proposed off-site improvements that are being considered:

- A new stair in the basement of the Pershing Building (located at the southeast corner of East 42nd Street and Park Avenue) that would connect the IRT Lexington Avenue subway mezzanine to the platform;
- ~~Two~~ A new street-level subway entrance ~~stairs~~ in the sidewalk at the southeast corner of East 42nd Street and Lexington Avenue that would connect to an existing below-grade passageway;
- Narrowing of stairs and columns ~~in~~ between the IRT Lexington Avenue subway mezzanine paid area and platform level to provide more platform area and improved pedestrian flow;
- Replacement of an existing street-level subway entrance at the northwest corner of East 42nd Street and Lexington Avenue with new stairs and an elevator; ~~and~~

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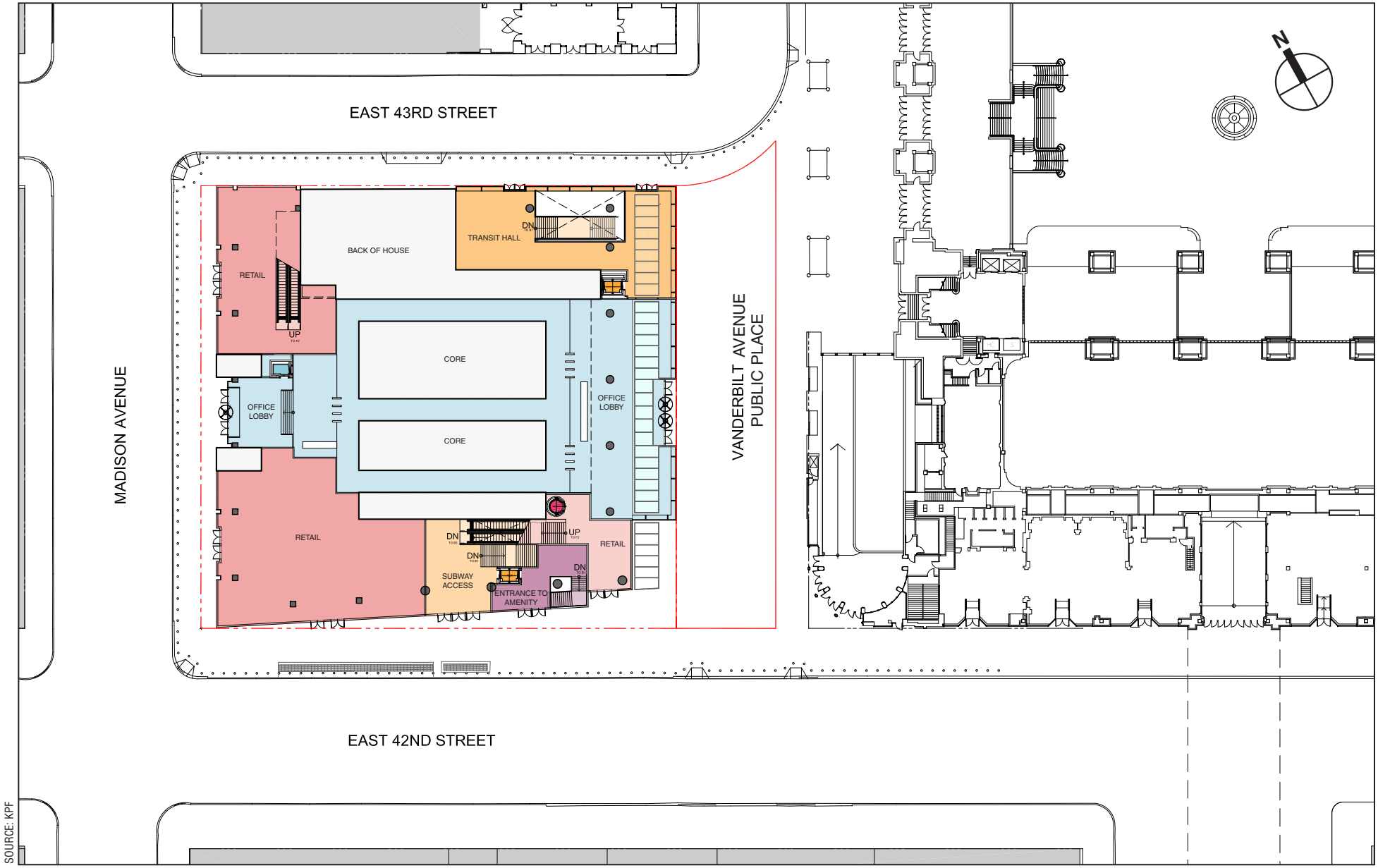

SOURCE: KPF

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

One Vanderbilt Development Site

Proposed Public Place

Proposed One Vanderbilt Building
Proposed Ground-Floor Site Plan
Figure 3

Vanderbilt Corridor and One Vanderbilt

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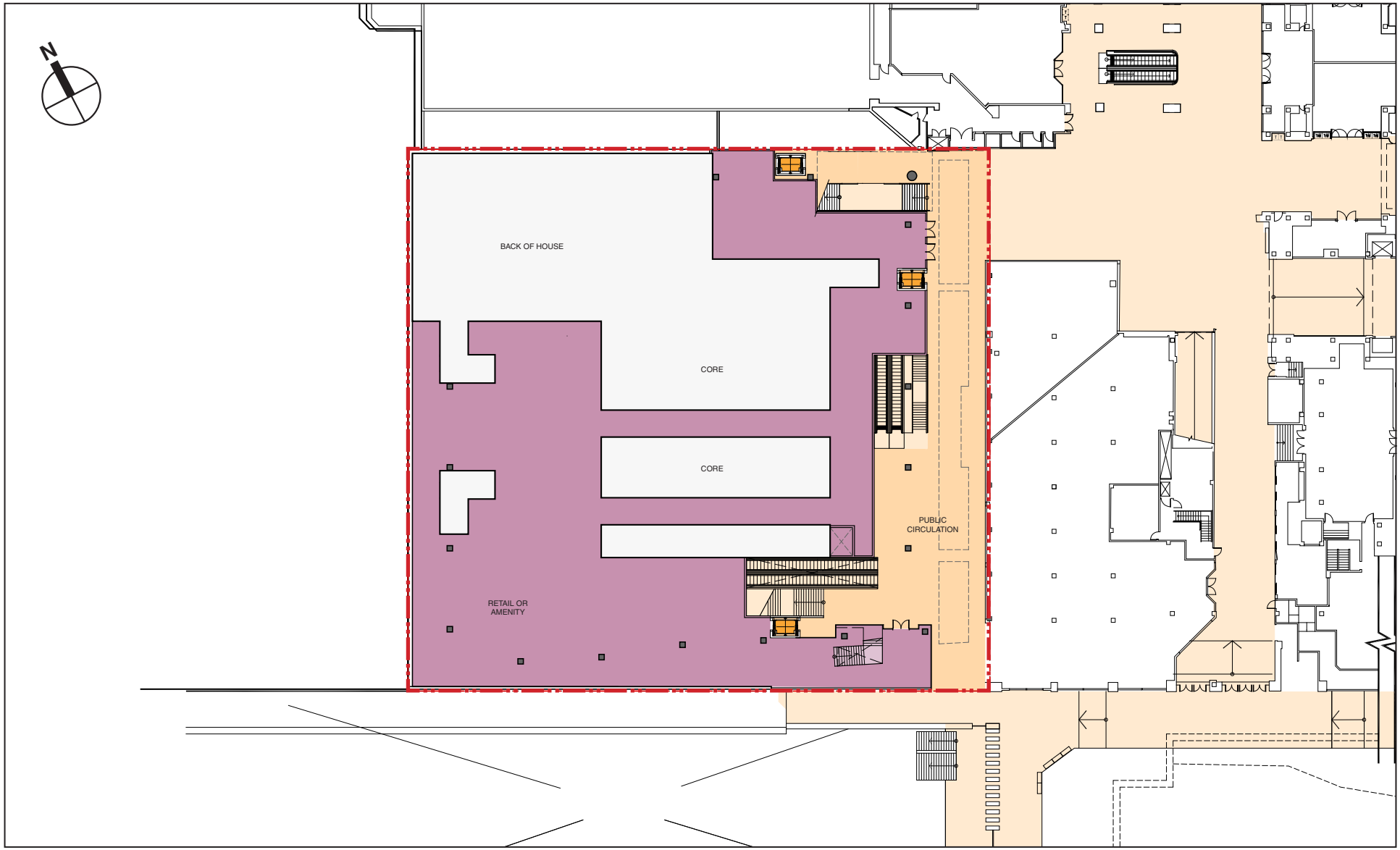

SOURCE: KPF

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

One Vanderbilt Development Site

Proposed One Vanderbilt Building
Proposed First Below-Grade Level Plan
Figure 4A

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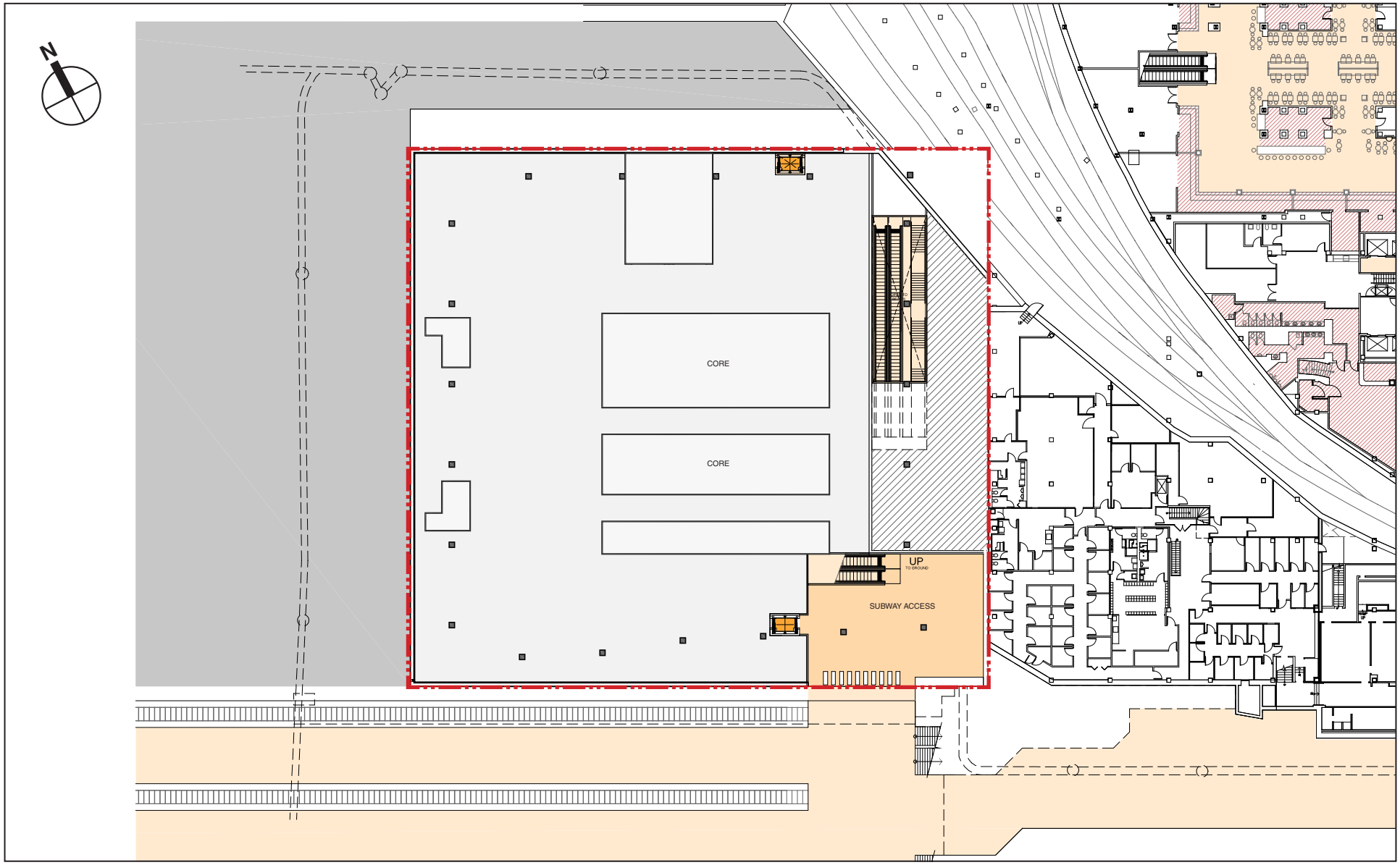

SOURCE: KPF

One Vanderbilt Development Site

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

Proposed One Vanderbilt Building
Proposed Second Below-Grade Level Plan
Figure 4B

- Creation of a new IRT Lexington Avenue subway mezzanine paid area in the basement of the Grand Hyatt Hotel with two new stairs to the subway platform; and
- Conversion of existing enclosed spaces into new circulation areas on the mezzanine level of the IRT Lexington Avenue station.

In addition to the ~~off-site~~ transit-oriented improvements ~~specific to the IRT Lexington Avenue subway station~~, 317 Madison is undertaking ongoing consultation with NYCDOT and DCP regarding design and implementation of improvements and public amenities within the portion of Vanderbilt Avenue that would be designated as a public place as part of the proposed actions. For purposes of the CEQR analysis, the potential off-site improvements will be considered as part of the One Vanderbilt development. The full list of improvements will be finalized by the time the Uniform Land Use Review Procedure (ULURP) application is certified and the public review process begins.

C. PROPOSED ACTIONS

DCP is the applicant for the following actions:

- Zoning Text Amendment to create the Vanderbilt Corridor; establish a new Grand Central Public Realm Improvement Bonus special permit, which would allow up to ~~15~~ 30 FAR of bonus floor area provided that on-site or off-site improvements to the pedestrian circulation network in the Grand Central Subdistrict are provided in connection with the proposed development; increase the maximum FAR from 21.6 to 30.0 for receiving sites in the Vanderbilt Corridor transferring development rights from a Landmark located within the Grand Central Subdistrict; and modify the permitted as-of-right uses in the Corridor.
- City Map amendment designating the East 42nd-East 43rd Street block of Vanderbilt Avenue as a public place.

317 Madison is the applicant for the following actions:

- Special permits pursuant to the proposed Grand Central Public Realm Improvement Bonus and Landmark FAR transfer to facilitate the redevelopment of the One Vanderbilt site. The special permits would involve public realm improvements in the surrounding area and the transfer of excess development rights from the New York City Landmark Bowery Savings Bank located at 110 East 42nd Street.
- ~~Special Permit for additional floor area and modification of regulations with respect to streetwall, height and setback and mandatory district plan elements, per Grand Central Public Realm Improvement Bonus (approximately 12.3 FAR, or 537,000 square feet).~~
- ~~Special Permit to transfer development rights from the Landmark Bowery Savings Bank per ZR Section 81-635 (approximately 2.7 FAR, or 118,000 square feet).~~

D. PROJECT PURPOSE AND NEED

BACKGROUND AND EXISTING CONDITIONS

CURRENT ZONING

As noted above, the blocks of the Vanderbilt Corridor are mapped in a C5-3 (15.0 FAR) district and are located in the Grand Central Subdistrict of the Special Midtown District. The Subdistrict was ~~put in place~~ created in 1992 to allow the transfer of development rights from Grand Central

and other City-designated landmarks to development sites in the vicinity of the Terminal, and to facilitate the creation of an improved pedestrian realm in the area. The borders of the Grand Central Subdistrict were generally drawn around the area where Grand Central Terminal's below-grade pedestrian network then existed.

In the existing ~~core area of the~~ Grand Central Subdistrict Core as set forth in the Special District maps (between Madison and Lexington Avenues from East 41st to East 48th Streets, including the Vanderbilt Corridor) the maximum permitted site FAR can be increased to 21.6 FAR through a transfer from a landmark building and requires a CPC special permit applicable in the Subdistrict (Zoning Resolution [ZR] Section 81-635). The permit requires that a pedestrian improvement be provided as part of the project. Since its adoption in 1992, only one building (383 Madison Avenue) has taken advantage of this ~~provision~~ special permit and significant amounts of unused floor area remain on the zoning lots of landmark buildings in the Subdistrict.

Additionally, 1.0 FAR transfers are permitted through a certification process in the Core and a larger area which includes the western side of Madison Avenue and eastern side of Lexington Avenue. This provision has been used three times but because of the small size of the transfer, has not resulted in significant utilization of unused landmark development rights.

Beyond these transfer mechanisms, two methods exist to obtain higher floor area ratios. First, subway station improvement bonuses of up to 20 percent of the permitted base FAR are permitted for sites directly adjacent to subway entrances and along Vanderbilt Avenue. Second, existing landmarks can transfer their remaining development rights to sites that are adjacent or across streets, with no FAR limits on the receiving site. Both of these bonuses are only permitted through special permits granted by CPC (ZR Sections 74-634 and 74-79, respectively). The 1.0 FAR bonus applicable in Midtown for the provision of public plazas does not apply in the Grand Central Subdistrict.

THE 2013 EAST MIDTOWN PROPOSAL

The area affected by the current proposed text amendment was previously the subject of the East Midtown Rezoning proposal (CEQR No. 13DCP011M). That proposal, for which the City was the applicant, was intended to encourage new predominantly office development in East Midtown in order to protect and strengthen the area's role as a premier business district. To do so, it included modified zoning regulations for a 70-block area of the Special Midtown District to be known as the East Midtown Subdistrict which would have superseded the Grand Central Subdistrict. While containing a number of elements, the East Midtown Subdistrict's primary features included the following:

- *Focused new development around Grand Central Terminal and its concentration of transit access*. To do this, new developments that met specific criteria (defined in the proposal as Qualifying Sites) in the area directly around the Terminal were permitted the highest as-of-right densities in the proposed East Midtown Subdistrict. Specifically, sites around the Terminal (including the Vanderbilt Corridor) would be permitted to achieve a maximum as-of-right density of 24.0 FAR. In addition, sites around the Terminal (including the Vanderbilt Corridor) would also have the ability to utilize a special permit for Superior Development in order to achieve a maximum density of 30.0 FAR. Proposals for the 30.0 FAR permit had to demonstrate the building exhibited superior qualities in terms of (among numerous features) overall design relationship to the street and skyline.

- *Provided a mechanism to fund infrastructure improvements through new development.* To achieve the densities permitted under the proposal, developers would have been required to make a monetary contribution into a new District Improvement Fund for each square foot above the existing as-of-right densities. This District Improvement Bonus mechanism was modeled after similar provisions in the Hudson Yards and West Chelsea special districts and would similarly be permitted as-of-right for density up to 24 FAR. Money in the East Midtown fund would be devoted to making transit and other public realm improvements in the rezoning area as such funding was generated through new development.
- *Created broader process for landmark transfers.* In addition to the District Improvement Bonus, the proposal included provisions that permitted greater opportunities for Landmark buildings to transfer their unused floor area. Two separate transfer districts were created (Grand Central Subarea, Northern Subarea) that permitted transfers from landmarks in those subareas to Qualifying Sites through an as-of-right process. These two subareas expanded on existing zoning provisions which normally permit transfers via a special permit and only to adjacent sites or, in the case of the existing Grand Central Subdistrict, within a designated broader geography.

The proposal was approved by CPC in September 2013, but was withdrawn by the City of New York in November of that year before reaching an expected vote by the City Council. Some of the core concerns raised during the project's public review process included:

- While there was overall agreement that infrastructure improvements were critically needed in the area (with particularly emphasis on the Grand Central subway station), there were ~~strong~~ concerns raised about the effectiveness of the District Improvement Bonus in delivering area improvements.
- The extensive area of the Subdistrict and the permitted densities, with particular emphasis on the as-of-right nature of the zoning mechanisms.
- The need to balance new development with preservation of the area's existing buildings.
- The specific uses that should be allowed in new development in the area, with particular concern about as-of-right hotel development.

Shortly after taking office in January, Mayor Bill de Blasio committed the City to taking a fresh look at the overall area and developing a new plan to ensure the area's long-term success as a business district. In May, the City announced a multi-part approach to developing a new plan for East Midtown. This included a longer-term stakeholder-driven process to determine a new framework for the overall area, as well as a more focused proposal for the Vanderbilt Corridor, which is the subject of this analysis.

PURPOSE AND NEED

DCP is proposing the Vanderbilt Corridor text amendment in order to address the number of development sites along Vanderbilt Avenue that offer the opportunity to provide modern commercial space in the immediate vicinity of Grand Central in the near term, to create a mechanism for linking new commercial development to significant infrastructure improvements to the overall Grand Central area, and <u>to create</u> greater options for the transfer of unused landmark development rights. The proposal builds on the more extensive 2013 East Midtown proposal, but addresses specific concerns raised during the public review process.

THE VANDERBILT CORRIDOR

The City has identified ~~a number of~~ potential development sites along the Vanderbilt Corridor. These include the One Vanderbilt site, which is described separately below, Block 1279 and Block 1281. In addition, the MTA headquarters site along Madison Avenue between East 44th and East 45th Streets (portion of Block 1281) is ~~currently~~ was the subject of a 2013 Request for Proposals (RFP) to transfer the site to a developer as a private redevelopment opportunity. Plans call for MTA to vacate the buildings in 2015 and, when chosen, a developer would then construct a new building on the site. ~~Finally, t~~The full-block Roosevelt Hotel, which has long been considered a possible development site in Midtown, is located between East 45th and East 46th Streets. While no plans for the site have been announced, the owner's representatives gave testimony in favor of the earlier East Midtown proposal last year. Blocks 1278 and 1282 are not considered to be potential development sites because they contain large recently built or renovated office buildings. By focusing on the Vanderbilt Corridor, the proposed zoning allows many of the issues raised about the broader East Midtown area in the 2013 public review process to be explored in the broader planning process to be conducted in the coming months. At the same time, this proposal allows the development, in the short term, of key sites adjacent to the Terminal at appropriate densities.

INFRASTRUCTURE CHALLENGES

For the previous East Midtown proposal, the City identified a number of infrastructure issues in the area that continue to remain unaddressed, including the following:

- Grand Central subway station pedestrian circulation. The Grand Central subway station, a transfer point for regional rail and the Nos. 4, 5, 6, 7 and 42nd Street Shuttle subway lines, is one of the busiest in the entire subway system with nearly half a million daily users. However, this station experiences pedestrian circulation constraints, including platform crowding and long dwell times for the Lexington Avenue line (Nos. 4, 5, and 6), which limits train through-put, creating a subway system bottleneck. Substantial improvements are needed to improve passenger flows in the station. These particularly include providing additional connections between the Lexington Line platform and the station's mezzanine level, as well as additional and improved connections between the mezzanine and street level.
- Sidewalk widths. The sidewalks of Madison and Lexington Avenues are narrow, approximately 12 to 13 feet wide, given the scale of pedestrian use they handle. The effective widths of these sidewalks are even narrower when subway grates and other sidewalk furniture are included. Side street sidewalks in the area are narrow as well.
- Publically controlled open space. While East Midtown includes a number of privately owned public spaces, it contains no significant publicly controlled open spaces even given the particular need for such spaces in the heavily populated area around Grand Central Terminal.
- Vanderbilt Avenue pedestrian experience. Vanderbilt Avenue, once the major taxi access point to Grand Central Terminal, has seen its use drop as taxis have been moved away from the building due to security concerns. In addition, the portion of Vanderbilt Avenue adjacent to the Terminal does not offer a welcoming environment for commuters, residents, and visitors of the iconic Landmark structure and the surrounding area.

As described above, existing zoning regulations applicable in the Vanderbilt Corridor permit additional density through the provision of infrastructure improvements. However, the City believes these provisions are limited in applicability and do not offer adequate opportunity to address the scope and scale of these infrastructure challenges.

Today, sites in the Vanderbilt Corridor are permitted to utilize the existing special permit for subway station improvements (ZR 74-634) which permits up to a 20 percent floor area bonus for the provision of station improvements. This mechanism only allows improvements to subway stations to count toward achieving the bonus, and does not allow for improvements to access to Grand Central Terminal. Improvements to the above-grade public realm—such as through the provision of new open space or an improved pedestrian network—are not applicable.

Further, the existing bonus mechanism is limited to a maximum floor area increase of 20 percent which, given the scale of needed improvements in the area, does not adequately provide the opportunity for improvements on the scale necessary to make substantial improvements. Nor does it reflect an appropriate maximum density given the City's goal of maximizing commercial development in East Midtown and the area's near-unparalleled transit access through Grand Central Terminal, the subway station, and the new East Side Access project, and the unique Vanderbilt Corridor block configuration with streets on four sides of a roughly square block.

Finally, while the existing Grand Central Subdistrict Landmark transfer special permit (described below) requires the design of a proposed development to include a major improvement of the surface and/or subsurface pedestrian circulation network in the Subdistrict, and the existing Citywide Landmark transfer special permit allows CPC to require the design of the development to include provisions for public amenities as a condition of the transfer, these mechanisms ~~do not adequately provide the opportunity for improvements~~ have not resulted in significant improvements to pedestrian circulation in the area (on the scale necessary to be ~~make~~ substantial) ~~improvements given the magnitude of needed infrastructure in the area, particularly in the Grand Central subway station~~.

LIMITED ABILITY FOR LANDMARKS TO TRANSFER

New York City landmarks in the Grand Central Subdistrict are permitted to transfer their unused floor area to non-adjacent sites in the Core area up to a maximum on-site FAR of 21.6 through a special permit process. Grand Central Terminal and the Bowery Savings Bank building include unused floor area on their zoning lot and thus have this ability. However, as described above, only one building—383 Madison Avenue—has ~~taken advantage of the provision~~ used the development rights transfer since it was ~~put in place~~ enacted in 1992, and approximately 1.5 million square feet of development rights remain on these landmarks' zoning lots.

While the 21.6 FAR maximum through the special permit was considered appropriate at the time of the 1992 approval, the City believes this limit does not adequately reflect the Vanderbilt Corridor's potential for high-density development ~~nearly unparalleled transit access through Grand Central Terminal, the subway station, and the new East Side Access project, and the unique Vanderbilt Corridor block configuration, with streets on four sides of a roughly square block~~. In addition, this existing FAR limit is lower than what is permitted through the existing Citywide landmark transfer special permit in high density districts in the Special Midtown District. Transfers in these areas under this provision have no maximum limit, subject to the public review process of the special permit.

Permitting higher densities through the Grand Central Subdistrict's landmark transfer mechanism in the Vanderbilt Corridor would therefore permit greater opportunities for Landmarks in the Subdistrict to transfer their unused floor area.

PERMITTED USES

During the public review process for the 2013 East Midtown proposal, numerous stakeholders raised concerns about the effect that the development of new limited-service hotels would have on the area's status as a premier business district over time. Given the concentration of offices in the area, it was felt that full-service hotels which provide amenities and services to the area's businesses would provide a more appropriate hotel type in the East Midtown area.

VANDERBILT AVENUE PUBLIC PLACE

The mapping of Vanderbilt Avenue between East 42nd and East 43rd Streets as a public place would provide additional pedestrian space at-grade and would further the City's goal to create public open space resources within the right-of-way. NYCDOT has created open spaces in similar areas of high pedestrian activity such as Times Square and Herald Square and nearby at Pershing Square (the west side of Park Avenue between East 41st and East 42nd Streets). Creation of the protected public place on Vanderbilt Avenue would also support the City's "Vision Zero" policy for reducing pedestrian injuries and deaths.

PROPOSED ONE VANDERBILT DEVELOPMENT

The proposed One Vanderbilt building would enhance East Midtown's status as a traditional commercial center and would serve a citywide goal of maximizing commercial development in areas that are well-served by mass transit. According to 317 Madison, the proposed building would include rooftop amenity space that would provide unique views of the City's skyline and Midtown's architectural landmarks, including the Chrysler Building, Grand Central Terminal, the New York Public Library, and the Empire State Building.

Further, the proposed One Vanderbilt building would include substantial connections to the pedestrian circulation network serving Grand Central Terminal, ~~and~~ the subway, and East Side Access; these connections would relieve pedestrian congestion within Grand Central Terminal. The proposed off-site improvements to the Grand Central subway station proposed by 317 Madison, including new stairs leading to street level and narrowing of stairs and columns in the IRT Lexington Avenue subway mezzanine paid area, would enhance the user experience of the nearly half a million daily transit riders. The improvements under consideration would reduce pedestrian circulation constraints, reconfigure the mezzanine, and provide additional, relocated or reconstructed stair connections to the platforms of the Lexington Avenue line from the mezzanine. The new special permit would require other developments in the Vanderbilt Corridor to provide the same sort of improvements and complementary amenities.

The proposed One Vanderbilt building would also support the maintenance of nearby historic resources. The special permit allowing the transfer of development rights from the Bowery Savings Bank to the development site requires commitment to a continuing maintenance program for the Bowery Savings Bank that is approved by the Landmarks Preservation Commission (LPC).

THE PROPOSED ACTIONS

PROPOSED TEXT AMENDMENT

To address the issues described above, DCP is proposing a zoning text amendment to the Grand Central Subdistrict effecting sites along the five-block Vanderbilt Corridor. The amendment would consist of, predominantly, a new special permit for a Grand Central Public Realm Improvement Bonus, along with changes to the existing Grand Central Subdistrict landmark transfer special permit and the uses permitted in the corridor. They are each described separately below.

Special Permit for Grand Central Public Realm Improvement Bonus

The new special permit would be applicable to sites in the Vanderbilt Corridor. The permit would allow density increases, up to a maximum on-site density of 30.0 FAR, through the provision of ~~infrastructure~~ improvements in the Grand Central Subdistrict that support public circulation. These improvements could be located both on- and off-site and could also be located at- or below-grade. The public review process afforded by the special permit will determine the maximum floor area permitted on the site dependent on the public benefit derived from the improvements proposed as part of the project. Similar to the existing subway improvement special permit, the proposal would require the construction of these improvements by the developer. This proven mechanism is considered to provide ~~more certainty~~ that the improvements will be implemented in accordance with a schedule established for their construction.

In addition, applicants for the new special permit would also be required to meet findings regarding the proposed building's ground floor level (including mandatory sidewalk widenings of a minimum width of 20 feet along Madison Avenue and 15 feet along the side streets), proposed massing, and energy performance. These provisions are intended to ensure the overall building plan and distribution of bulk and overall density is appropriate to the surrounding area and contributes to the pedestrian circulation network in the Grand Central Subdistrict, especially in the vicinity of Grand Central Terminal. Finally, through the special permit, a series of the existing bulk and urban design requirements (such as streetwalls) can be modified by CPC, subject to further findings, in order to develop the proposed building. The special permit would be available to new developments, as well as to enlargements of existing buildings.

Given the comparably small sizes of the blocks in the Vanderbilt Corridor, buildings at the maximum permitted density would still, on a square footage basis, be smaller than most recent major office buildings constructed in the City. This includes all of the towers on the World Trade Center Site, One Bryant Park, 200 West Street, Hudson Yards, and many of the office towers constructed around Times Square.

Modification of the Existing Grand Central Subdistrict Landmark Transfer Special Permit

The existing special permit in the Grand Central Subdistrict (ZR Section 81-635) would be modified to increase the maximum permitted FAR on a development site in the Vanderbilt Corridor from 21.6 FAR to 30.0 FAR through the ~~landmark~~ transfer of excess development rights from a designated landmark. Sites surpassing the current 21.6 limit would be required to follow the findings in the Grand Central Public Realm Improvement Bonus special permit regarding the proposed building's ground floor level, proposed massing and energy performance

to also ensure that developments at these densities propose an overall building plan and distribution of bulk appropriate to the surrounding area.

PERMITTED USES

In order to ensure the development of full-service hotels that would support the overall East Midtown business district, development, conversion, or enlargement of hotels in the Vanderbilt Corridor would be restricted and only permitted via a new special permit. The findings for the permit would be focused on ensuring the proposed hotel would be incorporating services and facilities, like meeting facilities, which would be complementary to office uses in the surrounding area.

PROPOSED CITY MAP CHANGE

DCP is also proposing an amendment to the City Map to change the designation of the block of Vanderbilt Avenue between East 42nd and East 43rd Streets from street to "public place." This designation would allow for the permanent improvement of this approximately 12,820-square-foot area into a public space that would provide significant benefits to workers, commuters, and visitors to the surrounding area. As noted above, the developer of the One Vanderbilt building would develop the permanent improvement of this space.

PROPOSED SPECIAL PERMITS FOR ONE VANDERBILT

317 Madison is seeking special permits related to (1) the transfer of development rights from a landmark (ZR Section 81-635) and (2) bonus floor area provided by the proposed Grand Central Public Realm Improvement Bonus to facilitate the redevelopment of the One Vanderbilt site. The special permits would involve public realm improvements to circulation for the East Side Access project in Grand Central, to access to the 42nd Street Shuttle station, to the Grand Central (Lexington Avenue line) subway station, and to create and enhance a new public place on Vanderbilt Avenue. These are all described above in detail under "Proposed Public Realm Improvements."

Transfer of Development Rights from the landmark Bowery Savings Bank

317 Madison is applying for a special permit to allow the transfer of development rights from the Bowery Savings Bank building. Pursuant to ZR Section 81-635, CPC may permit the transfer of development rights to a receiving lot within the Vanderbilt Corridor, provided that the resulting FAR on the receiving lot does not exceed 30.0. The base FAR permitted in this area without a special permit is 15, which would allow 649,695 square feet of zoning floor area (ZFA) on the One Vanderbilt site. The applicant is seeking a special permit that would increase the permitted density by approximately 2.63 FAR or 114,050.25 ZFA. Although modifications of additional bulk regulations may be permitted pursuant to ZR Section 81-635(c), no such modifications are requested as part of this special permit.

Grand Central Public Realm Improvement Bonus

317 Madison is applying for a special permit to increase the maximum permitted floor area and to modify regulations with respect to street wall, height and setback, and the mandatory district plan elements. Pursuant to the new special permit, CPC may permit the basic maximum FAR of 15 to be increased by up to 15 additional FAR provided that the development or enlargement includes: (1) improvements to the pedestrian circulation network; and (2) enhancements to the building's ground-floor level, proposed bulk, and energy performance. In conjunction with such

additional floor area, CPC may permit modifications to the street wall, height and setback regulations, and the mandatory district plan elements. The special permit that the applicant is seeking would increase the permitted density by approximately 12.37 FAR or 114,050.25 ZFA. In conjunction with the transfer of development rights from the Bowery Savings Bank building, the resulting building would be permitted a maximum density of 1,299,390 ZFA or 30 FAR.

E. ANALYSIS FRAMEWORK

The analyses contained in the DEIS will be developed in conformance with CEQR regulations and the guidance of the *2014 City Environmental Quality Review Technical Review Manual (CEQR Technical Manual).* Because construction of the proposed One Vanderbilt building is expected to be complete in December of 2020 with full occupancy to follow in 2021, the analysis year will be 2021. The analysis year for the conceptual analysis of Blocks 1279 and 1281 in the Vanderbilt Corridor will be 2033, which is the same analysis year analyzed in the *East Midtown Rezoning and Related Actions Final EIS* (2013). The analysis year in the FEIS was based on long-term projections of the East Midtown area's potential to capture a proportionate share of the City's new office development.

There are no specific proposals to redevelop the four blocks of the proposed Vanderbilt Corridor north of the development site (portions of Blocks 1278, 1279, 1281, and 1282), but it is conceivable that one or more of these sites would be redeveloped in the foreseeable future using the new Grand Central Public Realm Improvement Bonus, the modified Landmark Transfer special permit, or the special permit to allow hotel uses. Recently, MTA issued an RFP for the redevelopment of the MTA's property at 341-347 Madison Avenue (Block 1279, Lots 23, 24, and 48), including the excess development rights from an MTA vent building on East 44th Street (Block 1279, Lot 25). Additional development on these four blocks will be considered at a conceptual level only. The conceptual analysis will be presented in a separate chapter of the DEIS (see Task 20).

For the conceptual analysis, it will be assumed that only Block 1279 (containing the MTA parcels and the building at 52 Vanderbilt Avenue) and Block 1281 (containing the Roosevelt Hotel) in the Vanderbilt Corridor would be redeveloped in the foreseeable future. For analysis purposes, it assumed that the redevelopment of Blocks 1279 and 1281 may be complete by 2033. Those two blocks were analyzed as projected development sites in the 2013 *East Midtown Rezoning and Related Actions Final EIS (FEIS)*. Blocks 1278 and 1282 would not be assumed to be redeveloped in the foreseeable future, as those two blocks contain recently renovated/constructed commercial buildings. Block 1278 contains the Bank of America Plaza that dates to 1983 and is currently developed at approximately 20 FAR. Block 1282 contains the J.P. Morgan Chase & Company building at 383 Madison Avenue from 2002, which is already developed at approximately 21.6 FAR.

EXISTING CONDITIONS

For each technical area to be assessed in the EIS, including the conceptual analysis chapter of the redevelopment of Blocks 1279 and 1281 in the Vanderbilt Corridor, the existing conditions on the development site and in the relevant study areas will be described. The analysis framework begins with an assessment of existing conditions because these can be most directly measured and observed. The assessment of existing conditions does not represent the condition against which the proposed project is measured, but serves as a starting point for the projection of future conditions with and without the proposed project and the analysis of project impacts.

THE FUTURE WITHOUT THE PROPOSED ACTIONS (NO-ACTION CONDITION)

DEVELOPMENT SITE

Absent the proposed actions, 317 Madison would redevelop the 43,313-square-foot One Vanderbilt site with a commercial building under the existing C5-3 and Special Midtown District regulations, which permit commercial development up to a maximum FAR of 15.0. The No-Action building would be approximately 678 feet tall and total approximately 811,034 gsf of space (approximately 649,695 zoning square feet [zsf]) including 636,312 gsf of office space, 83,648 gsf of retail space, and 91,074 gsf of mechanical space. Unlike the proposed One Vanderbilt building, the No-Action building would not contain trading floors, the rooftop amenity space, or the enclosed public space. Existing height and setback controls would not permit floorplates in the No-Action building that would be of a size and configuration sufficient to accommodate modern trading floors. At approximately 678 feet tall, the No-Action building would not be tall enough to provide panoramic views over surrounding buildings. Since it would not be requesting a special permit, 317 Madison would not provide an enclosed public space amenity or transit-related improvements. See **Figure 5** for an east-west section of the No-Action building alongside an east-west section of the proposed One Vanderbilt building.

PROPOSED PUBLIC PLACE

The No-Action condition would not include an amendment to the City Map to map Vanderbilt Avenue between East 42nd and East 43rd Streets as a public place. That section of Vanderbilt Avenue would, therefore, remain in its current condition and open to vehicles.

OTHER VANDERBILT CORRIDOR SITES

The conceptual analysis will assume that the MTA-owned portion of Block 1279 and Block 1281 in the Vanderbilt Corridor could each be redeveloped with a commercial building under the existing C5-3 and Special Midtown District regulations, which permit commercial development up to a maximum FAR of 15.0. Therefore, the 25,051-square-foot MTA-owned portion of Block 1279 could be redeveloped with approximately 375,765 zsf of commercial space (469,706 gsf, assuming a standard gross factor of 1.25 to account for mechanical space), and the 43,313-square-foot Block 1281 could be redeveloped with 649,695 zsf of commercial space (812,119 gsf, assuming a standard gross factor of 1.25 to account for mechanical space). This potential development could occur by 2033, as noted above.

THE FUTURE WITH THE PROPOSED ACTIONS (WITH-ACTION CONDITION)

DEVELOPMENT SITE

With the proposed actions, a 30 FAR building would be constructed on the development site. The proposed 1.8 million-gsf building would be approximately 996,966 gsf larger than the No-Action building. 317 Madison intends for the proposed building to contain approximately 1,079,000 gsf of office space, approximately 246,000 gsf of trading floors, approximately 53,000 gsf of retail, approximately 27,000 gsf of restaurant space, an approximately 55,000-square-foot rooftop amenity at the top of the building, a 4,500-square-foot enclosed public space, and approximately 343,500 square feet of space for circulation, mechanical, core, back-of-house, and loading uses. 317 Madison intends to provide up to six trading floors due to expressed interest from potential tenants. The height of the proposed 30 FAR building provides

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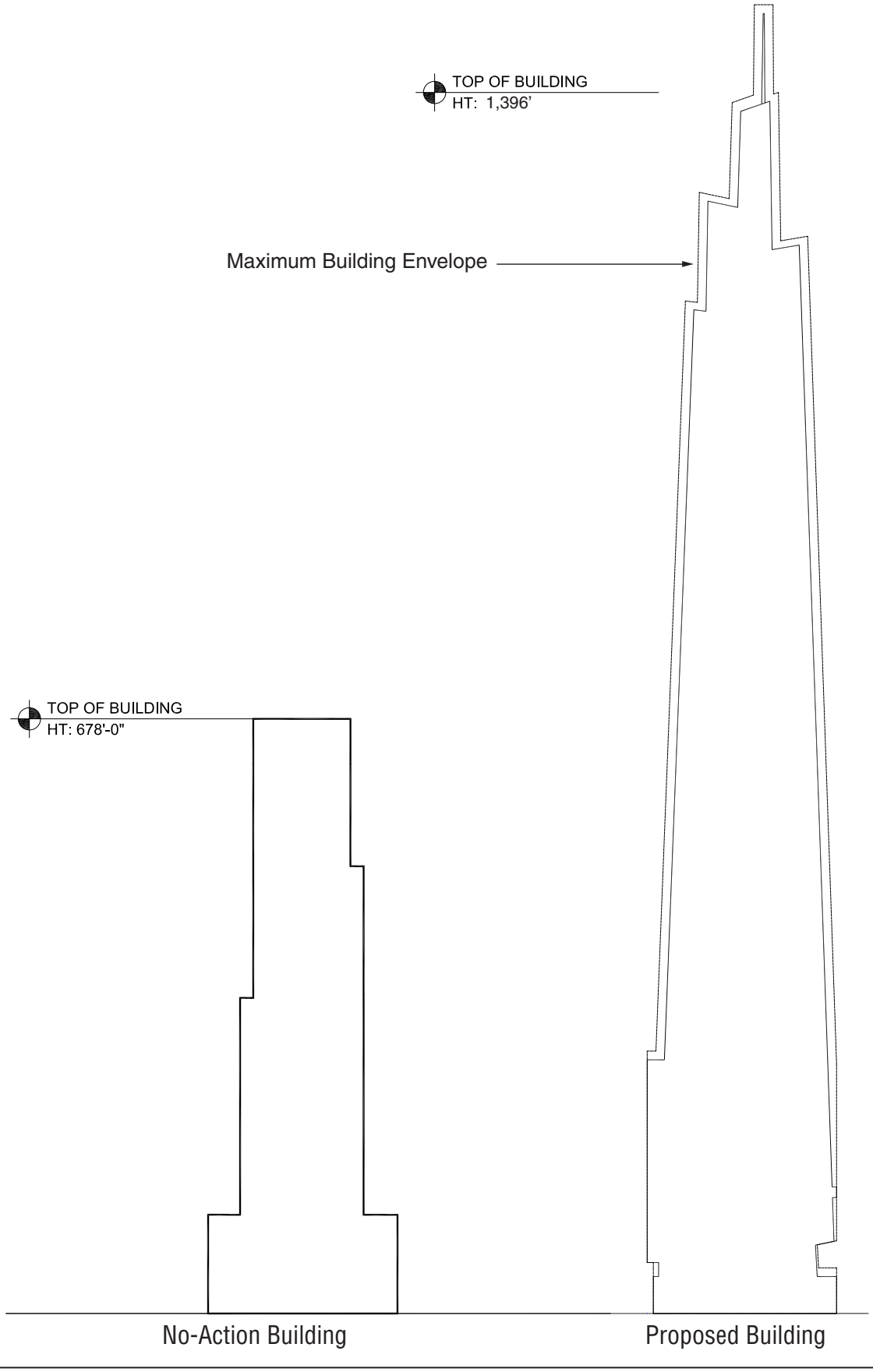


SOURCE: KPF

NOTE: FOR ILLUSTRATIVE PURPOSES ONLY

No-Action and Proposed Buildings
East-West Sections Looking North

the opportunity for a rooftop amenity at the upper levels. The enclosed public amenity at the base of the building would be provided to meet in part the requirements of the special permit.

In addition, development of the proposed One Vanderbilt building would also include the creation of off-site pedestrian circulation improvements specific to the IRT Lexington Avenue subway station.

PROPOSED PUBLIC PLACE

With the proposed actions, the portion of Vanderbilt Avenue between East 42nd and East 43rd Streets would be closed to vehicular traffic and mapped as a public place, and Vanderbilt Avenue between East 43rd and East 44th Streets would be converted from two-way to one-way southbound. The improvements to this area would be provided to meet, in part, the requirements of the One Vanderbilt proposal and would provide amenities to enliven the public place. Since the needed improvements to the public place would be performed by the developer of the One Vanderbilt building, the proposed public place will be considered as part of the One Vanderbilt development for purposes of the CEQR analysis.

OTHER VANDERBILT CORRIDOR SITES

The conceptual analysis will assume that the MTA-owned portion of Block 1279 and Block 1281 in the Vanderbilt Corridor could each be redeveloped with a commercial building of 30 FAR by 2033, as noted above. Therefore, the 25,051-square-foot MTA-owned portion of Block 1279 could be redeveloped with 751,530 zsf of commercial space (939,412 gsf, assuming a standard gross factor of 1.25), and the 43,313-square-foot Block 1281 could be redeveloped with 1,299,390 zsf of commercial space (1,624,237 gsf, assuming a standard gross factor of 1.25). In addition, it is assumed that the 162,330-square-foot building at 52 Vanderbilt Avenue on Block 1279 (Lot 45) would remain at its current built form but would utilize the special permit for hotel use to allow the conversion of the structure from predominately office use.

F. ENVIRONMENTAL REVIEW PROCESS

CPC as lead agency in the environmental review determined that the proposed actions and project have the potential to result in significant environmental impacts and, therefore, pursuant to CEQR procedures, issued a positive declaration requiring that an EIS be prepared in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (SEQRA), the City's Executive Order No. 91, and CEQR regulations (August 24, 1977), as well as the relevant guidelines of the *CEQR Technical Manual*. This ~~Draft~~ Final Scope of Work was prepared in accordance with those laws and regulations and the *CEQR Technical Manual*.

In accordance with CEQR, this ~~Draft~~ Final Scope of Work is being distributed for public review. A public meeting will be held on July 16**,** 2014 in Spector Hall, 22 Reade Street, New York, NY, 10007. The period for submitting written comments will remain open until July 28, 2014. ~~A~~ This Final Scope of Work was ~~will~~ then ~~be~~ prepared, taking into consideration comments received during the public comment period, to direct the content and preparation of a DEIS. As the next step in the process, once the lead agency has determined that the DEIS is complete, it will be subject to additional public review, in accordance with the CEQR and ULURP processes with a public hearing and a period for public comment. An FEIS will then be prepared to respond to

those comments. The lead agency will make CEQR findings based on the FEIS, before making a decision on the proposed actions.

As described in greater detail below, the EIS will contain:

- A description of the proposed One Vanderbilt development and actions and their environmental setting;
- An analysis of the potential for adverse environmental impacts to result from the proposed One Vanderbilt development and actions;
- A conceptual analysis of the potential for adverse environmental impacts to result from potential development on the four Vanderbilt Corridor blocks north of the One Vanderbilt development site;
- A description of mitigation measures proposed to eliminate or minimize any adverse environmental impacts disclosed in the EIS;
- An identification of any adverse environmental effects that cannot be avoided if the proposed actions are implemented;
- A discussion of alternatives to the proposed One Vanderbilt building and actions; and
- A discussion of any irreversible and irretrievable commitments of resources to develop the One Vanderbilt building.

G. ENVIRONMENTAL IMPACT STATEMENT SCOPE OF WORK

As described in the Environmental Assessment Statement, the following technical areas do not meet the CEQR threshold requirements necessitating analysis and will, therefore, not be addressed in the EIS: community facilities, natural resources, solid waste and sanitation services, and energy.[1]

TASK 1. PROJECT DESCRIPTION

The project description introduces the reader to the proposed actions and provides the project data from which impacts are assessed. The chapter will contain a brief history of the uses in the Vanderbilt Corridor; as description of the purpose and need for the proposed actions; the proposed development program for the One Vanderbilt building; a description of the design of the proposed One Vanderbilt building—including the on-site transit-related improvements and the off-site pedestrian circulation improvements—and the proposed public place; figures depicting the proposed One Vanderbilt building; and a discussion of the approvals required, procedures to be followed, and a description of the No-Action condition.

The project description will include appropriate data from the ULURP application and drawings showing the proposed One Vanderbilt building. The role of the lead agency for CEQR will also be described as well as the environmental review process to aid in decision-making. Any need for environmental requirements (e.g., E-designations or Restrictive Declarations) necessary as part of the proposed actions will also be identified.

[1] The conceptual analysis (Task 20) will assess the latter two impact categories for the potential development on the four Vanderbilt Corridor blocks north of the One Vanderbilt development site.

TASK 2. ANALYSIS FRAMEWORK

This chapter of the DEIS will describe the guidelines under which the DEIS will be prepared. It will describe the No-Action condition assumptions and the No-Action 15 FAR building on the development site. This chapter will also describe the No-Action and With-Action conceptual development potential of the four blocks north of the development site (Blocks 1278, 1279, 1281, and 1282) in the Vanderbilt Corridor. Development on these four blocks pursuant to the proposed special permit will be considered in the Conceptual Analysis chapter of the DEIS (see Task 20 below).

TASK 3. LAND USE, ZONING, AND PUBLIC POLICY

A land use analysis characterizes the uses and development trends in the area that may be affected by a proposed action and determines whether a proposed action is either compatible with those conditions or whether it may affect them. Similarly, the analysis considers the action's compliance with, and effect on, the area's zoning and other applicable public policies. The proposed actions include zoning text amendments and a City map amendment and would result in a large increase in density on the One Vanderbilt development site over the No-Action condition. Further, the proposed actions could result in increased density on additional sites within the proposed Vanderbilt Corridor. Therefore, a land use analysis will be prepared that analyzes the potential impacts of the proposed actions on land use, zoning, and public policy pursuant to the methodologies presented in the *CEQR Technical Manual*.

The primary land use study area will consist of the Vanderbilt Corridor, including the development site, and the section of Vanderbilt Avenue that would be mapped as a public place where the potential effects of the proposed actions would be directly experienced. The secondary land use study area will include neighboring areas with a ¼-mile distance from the primary study area, which could experience indirect impacts. The land use analysis will include the following tasks:

- Provide a brief development history of the primary and secondary study areas.
- Describe conditions in the primary and secondary study areas, including existing uses and current zoning.
- Describe predominant land use patterns in the primary and secondary study areas, including recent development trends.
- Provide a zoning map and discuss existing zoning in the primary and secondary study areas.
- Summarize other public policies that may apply to the primary and secondary study areas, including any formal neighborhood or community plans and the City's sustainability/PlaNYC policies.
- Prepare a list of other projects expected to be built in the primary and secondary study areas that would be completed before or concurrent with the proposed actions. Describe the effects of these projects on land use patterns and development trends. Also, describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the primary and secondary study areas.
- Describe the intended purpose and regulations proposed through the zoning text amendment, and describe the potential impacts of the proposed City actions on the Vanderbilt Corridor and the larger secondary study area and the potential impacts of the proposed applicant

actions and the One Vanderbilt development on land use and land use trends, zoning, and public policy. Consider the effects related to issues of compatibility with surrounding land use, consistency with zoning and other public policy initiatives. Prepare a PlaNYC consistency review for the proposed actions and the One Vanderbilt development.

Since the primary study area is not located in the Coastal Zone, an assessment of the proposed actions' consistency with the Waterfront Revitalization Program is not required.

TASK 4. SOCIOECONOMIC CONDITIONS

According to the *CEQR Technical Manual*, the five principal issues of concern with respect to socioeconomic conditions are whether a proposed project could result in significant impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on a specific industry. There are no residential units on the development site, and the proposed development would not result in any direct business displacement, because the development site's existing uses would be displaced irrespective of the proposed development (as part of the No-Action condition). However, the proposed development's increment over the No-Action development would exceed the 200,000-commercial-square-foot threshold requiring assessment of potential indirect business displacement. Therefore, a preliminary assessment will be conducted that describes conditions and trends in employment and businesses within the study area using the most recent available data from public and private sources such as New York State Department of Labor, the U.S. Census Bureau, and local real estate brokers. This information will be used to consider whether the proposed development could introduce trends that make it difficult for businesses that are essential to the local economy to remain in the area. It is anticipated that a preliminary assessment will be sufficient to conclude that the proposed development would not result in significant adverse impacts due to indirect business displacement. However, if necessary based on the results of the preliminary analysis, a more detailed indirect business displacement analysis will be undertaken.

TASK 5. OPEN SPACE

The additional number of employees that would be generated by the proposed One Vanderbilt development compared with the No-Action condition would exceed the 500 worker threshold (the *CEQR Technical Manual* threshold for analysis for projects that are not located in areas defined as under-served or well-served by open space). The methodology set forth in the *CEQR Technical Manual* consists of establishing a study area for analysis, calculating the total population in the study area, and creating an inventory of publicly accessible open spaces within the study area for the development site (which is based on the census tracts and block groups within a ¼-mile radius). This inventory will include examining these spaces for their facilities (active vs. passive), condition, and use. The analysis will project conditions in the future without the proposed actions, and assess impacts of the proposed development based on quantified ratios and qualitative factors. The analysis will begin with a preliminary assessment to determine the need for further analysis. It is expected that based on the results of the preliminary assessment, a detailed open space assessment will be prepared following the guidelines of the *CEQR Technical Manual*. If the results of the impact analysis identify a potential for significant adverse impacts, potential mitigation measures will be discussed.

TASK 6. SHADOWS

The *CEQR Technical Manual* requires a shadows assessment for proposed actions that would result in new structures greater than 50 feet in height and/or adjacent to a sunlight-sensitive resource. A shadows assessment examines whether proposed structures could cast shadows on sunlight-sensitive resources, which include publicly accessible open spaces, important sunlight-sensitive natural features, or historic resources with sun-sensitive features, and assesses the potential effects of any new shadows.

The difference in height between the 15 FAR No-Action building and the 30 FAR proposed One Vanderbilt development would be more than 600 feet; therefore, a shadows assessment is warranted to consider whether project-generated shadow could reach Bryant Park, the Park Avenue malls, or other nearby public open spaces or historic resources with sunlight-sensitive features, such as Grand Central Terminal and the New York Public Library Stephen A. Schwarzman Building. The shadow assessment would be coordinated with the tasks for open space and historic resources and would include the following tasks:

- The DEIS will provide a preliminary shadows screening assessment to ascertain whether the proposed development's shadows may potentially reach any sunlight-sensitive resources at any time of year.
  - Pursuant to CEQR, a Tier 1 Screening Assessment will be conducted to determine the longest shadow study area for the proposed development, which is defined as 4.3 times the height of any new structures including building enlargements (the longest shadow that would occur on December 21, the winter solstice). A base map that illustrates the locations of the proposed development in relation to the sunlight-sensitive resources will be developed.
  - A Tier 2 Screening Assessment will be conducted if any portion of a sunlight-sensitive resource lies within the longest shadow study area. The Tier 2 assessment will determine the triangular area that cannot be shaded by the proposed development, which in New York City is the area that lies between -108 and +108 degrees from true north.
  - If any portion of a sunlight-sensitive resource is within the area that could be potentially shaded by the proposed development, a Tier 3 Screening Assessment will be conducted. The Tier 3 Screening Assessment will determine if shadows resulting from the proposed development can reach a sunlight-sensitive resource through the use of three-dimensional computer modeling software with the capacity to accurately calculate shadow patterns. The model will include a three-dimensional representation of the sunlight-sensitive resource(s), a three-dimensional representation of the proposed development, and a three-dimensional representation of the topographical information within the area being analyzed. Shadow analyses will be conducted for four representative days of the year to determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the proposed development.
- If the screening analysis does not rule out the possibility that action-generated shadows would reach any sunlight-sensitive resources, a detailed analysis of potential shadow impacts on publicly-accessible open spaces or sunlight-sensitive historic resources resulting from the proposed development will be provided in the DEIS. The detailed shadow analysis will establish a baseline condition (No-Action) which will be compared with the future condition resulting from the proposed development (With-Action) to illustrate the shadows

cast by existing or future buildings and distinguish the additional (incremental) shadow cast by the proposed development. The detailed analysis will include the following tasks:

- Document the analysis with graphics comparing shadows resulting from the No-Action condition with shadows resulting from the proposed development, with incremental shadow highlighted in a contrasting color.
- Provide a summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource.
- Assess the significance of any shadow impacts on sunlight-sensitive resources.
- If the results of the impact analysis identify a potential for significant adverse impacts, potential mitigation measures will be discussed.
- Describe the incremental shadow cast by the proposed development on the proposed Vanderbilt Avenue public place. However, the analysis will not make a conclusion as to whether any incremental shadow on the proposed public place is a significant adverse impact, because shadows on project-generated open space are not considered significant under CEQR.

TASK 7. HISTORIC AND CULTURAL RESOURCES

According to the *CEQR Technical Manual*, a historic and cultural resources assessment is required if there is the potential to affect either archaeological or architectural resources.

Archaeological resources are considered only in those areas where new excavation or ground disturbance is likely. In a letter dated July 10, 2014, LPC determined that Blocks 1277, 1278, 1279, 1281, and 1282 and the portion of Vanderbilt Avenue between East 42nd and East 42rd Streets do not have any archaeological significance. Therefore, an analysis of archaeological resources in the DEIS is not warranted. ~~The historic and cultural resources analysis will only consider the potential archaeological sensitivity of the site of the proposed public place and Block 1282 within the proposed Vanderbilt Corridor, because they were not assessed in the *East Midtown Rezoning and Related Actions FEIS* as they were not located on projected or potential development sites. As part of the environmental review for the *East Midtown Rezoning and Related Actions FEIS*, LPC determined there was no archaeological concern for Blocks 1277, 1278, 1279, and 1281 in the proposed Vanderbilt Corridor (Appendix 2, Correspondence from Amanda Sutphin dated September 7, 2012).~~

Architectural resources are defined as buildings, structures, objects, sites or districts listed on the State and National Registers of Historic Places (S/NR) or determined eligible for such listing, National Historic Landmarks (NHLs), New York City Landmarks and Historic Districts, and properties that have been found by LPC to appear eligible for designation, considered for designation ("heard") by LPC at a public hearing, or calendared for consideration at such a hearing (these are "pending" Landmarks, or NYCLs). There are four architectural resources located within the proposed Vanderbilt Corridor: the Vanderbilt Avenue Building (S/NR-eligible) at 51 East 42nd Street (located on the One Vanderbilt development site); the Yale Club (NYCL-eligible) at 50 Vanderbilt Avenue (located on Block 1279); the Vanderbilt Concourse Building (S/NR-eligible) at 52 Vanderbilt Avenue (located on Block 1279); and the Roosevelt Hotel (NYCL-eligible, S/NR-eligible) at 45 East 45th Street (located on Block 1281). Further, there are numerous architectural resources, including Grand Central Terminal (NYCL, S/NR, NHL), in the vicinity of the Vanderbilt Corridor. Therefore, it will be necessary to consider the potential impacts of the proposed actions on architectural resources. Consistent with the *CEQR Technical Manual*, the historic and cultural resources analysis will include the following tasks.

- ~~Request a preliminary determination of archaeological sensitivity for Block 1282 within the proposed Vanderbilt Corridor and the area of Vanderbilt Avenue between East 42nd and East 43rd Streets from LPC. If LPC determines that these areas are not sensitive for archaeological resources, then no further archaeological analysis will be required. If LPC determines that all or part of these areas may be sensitive for archaeological resources, a Phase 1A Archaeological Documentary Study of the affected areas will be prepared to establish the sensitivity of the affected areas to host pre-contact and/or historic period archaeological resources, by providing a historical contextual overview, a development history, an assessment of past disturbance, and the identification of any potential resource types that may be present. The conclusions of the Phase 1A would be summarized in the DEIS.~~
- Select the study area for architectural resources. This scope of work assumes that the study area for architectural resources will be approximately 400 feet beyond the borders of the Vanderbilt Corridor but will also include longer views to the Chrysler Building along West 42nd Street and from Bryant Park.
- Map and briefly describe designated architectural resources in the Vanderbilt Corridor and study area in consultation with LPC. In addition, the Vanderbilt Corridor and study area will be surveyed for potential architectural resources (i.e., properties that appear to meet the eligibility criteria for Landmark designation and/or S/NR listing), referencing the *East Midtown Rezoning and Related Actions FEIS.*
- Assess the potential effects of the proposed actions on architectural resources, including visual and contextual changes as well as any direct physical impacts. Potential effects will be evaluated through a comparison of the future No-Action condition and future With-Action condition. For the additional sites within the Vanderbilt Corridor, potential visual and contextual impacts from redevelopment will be discussed conceptually. There will be detailed discussion of the proposed One Vanderbilt building's contextual and visual relationship to Grand Central Terminal and other surrounding resources such as the Bowery Savings Bank, from which the proposed One Vanderbilt development will receive development rights pursuant to a special permit.
- Develop measures to avoid, minimize, or mitigate any adverse impacts on historic and cultural resources, in consultation with LPC.

TASK 8. URBAN DESIGN AND VISUAL RESOURCES

According to the methodologies of the *CEQR Technical Manual*, if a project requires actions that would result in physical changes to a project site beyond those allowable by existing zoning and which could be observed by a pedestrian from street level, a preliminary assessment of urban design and visual resources should be prepared. A detailed analysis is then prepared if warranted based on the preliminary assessment.

Given the nature of the proposed actions that would allow substantial density increases within the proposed Vanderbilt Corridor, it is expected that a detailed analysis will be prepared. As there are no specific development proposals for the additional blocks within the proposed Vanderbilt Corridor, their redevelopment will be assessed in the conceptual analysis chapter (see Task 20). This detailed urban design and visual resources analysis will focus on the proposed One Vanderbilt development. The detailed analysis will draw on information from field visits to the Vanderbilt Corridor and a surrounding study area and visual materials prepared for the proposed development and will present, as warranted, sketches or renderings of the future With-

Action condition for each existing view; context and site plans; floor area calculations; street wall and building heights; average floor-plate sizes; building setbacks; birds-eye views of the proposed development; elevations and sections; and the proposed program and use distribution. The study area for the assessment of urban design and visual resources would be the same as for the historic and cultural resources analysis, delineated by a 400-foot radius around the Vanderbilt Corridor and also including longer views along West 42nd Street and from Bryant Park. Based on field visits, the detailed analysis will describe the urban design and visual resources of the development site and the surrounding area. The analysis will describe the potential changes that could occur to urban design and visual resources with the proposed development in comparison to the future No-Action condition, focusing on the changes that could negatively affect a pedestrian's experience of the area. This analysis will also describe design measures intended to relate the proposed development to Grand Central Terminal and other important buildings in the area, as well as the presence of the proposed tower in the Midtown skyline. If adverse impacts are identified, mitigation measures to avoid or reduce potential significant impacts will be identified.

TASK 9. HAZARDOUS MATERIALS

A hazardous materials assessment determines whether a proposed action may increase the exposure of people or the environment to hazardous materials and, if so, whether this increased exposure would result in potential significant public health or environmental impacts. The potential for significant impacts related to hazardous materials can occur when: a) elevated levels of hazardous materials exist on a site and the project would increase pathways to human or environmental exposure; b) a project would introduce new activities or processes using hazardous materials and the risk of human or environmental exposure is increased; or c) the project would introduce a population to potential human or environmental exposure from off-site sources.

The *East Midtown Rezoning and Related Actions FEIS* recommended that (E) designations be placed on Block~~s~~ 1277 (the proposed One Vanderbilt development site) and Blocks 1278, 1279, and 1281 (within the proposed Vanderbilt Corridor). Therefore, the DEIS will summarize the findings of that FEIS related to those blocks and will determine if the site of the proposed public place and Block 1282, which were not assessed in the FEIS, may have been adversely affected by present or historical uses at or adjacent to the sites.

For the One Vanderbilt development site, specific information related to hazardous materials is available, and the hazardous materials assessment will summarize the findings of Phase I Environmental Site Assessments that have been prepared for the development site, as well as any other pertinent studies (e.g., results of subsurface sampling). Based on Chapter 8, "Hazardous Materials" of the *East Midtown Rezoning and Related Actions FEIS*, the development site historically included petroleum storage~~,~~ and although a spill was reported, the spill was cleaned up to the satisfaction of the New York State Department of Environmental Conservation.

Based on the findings of the Phase I assessments, subsurface investigation may be required (depending on the ~~amount~~ extent of soil excavation that would be required for the ~~project~~ proposed development) and frequently a Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP) are prepared for implementation during project construction.

Given the age of the existing buildings on the One Vanderbilt development site, asbestos-containing materials and lead-based paint are likely present in them. Therefore, the hazardous

materials chapter will address the requirements for addressing these materials prior to and/or during demolition.

For the site of the public place and the Vanderbilt Corridor sites, the assessment will use historical maps, regulatory databases, and other similar information as was obtained for the *East Midtown Rezoning and Related Actions FEIS*. These data sources will enable a determination to be made as to which potential development sites will need further investigation prior to any redevelopment. Any such investigations (and any necessary subsequent steps, such as implementation of a RAP/CHASP) for the Vanderbilt Corridor properties would be performed as part of the special permit review process.

TASK 10. WATER AND SEWER INFRASTRUCTURE

WATER SUPPLY

According to the *CEQR Technical Manual*, an analysis of an action's impact on the water supply system should be conducted only for actions that would have exceptionally large demand for water, such as power plants, very large cooling systems, or large developments (e.g., those that use more than 1 million gallons per day). In addition, actions located at the extremities of the water distribution system should be analyzed. The proposed development does not meet any of these criteria, and therefore an analysis of water supply is not warranted.

WASTEWATER AND STORMWATER CONVEYANCE AND TREATMENT

According to the guidelines of the *CEQR Technical Manual*, a preliminary analysis of wastewater and stormwater conveyance and treatment is warranted if a project is located in a combined sewer area and would have an incremental increase above the No-Action condition of 1,000 residential units or 250,000 square feet of commercial, public facility and institution, and/or community facility space in Manhattan. Since the proposed development would include more than 250,000 square feet of commercial use above the No-Action condition, an analysis of wastewater and stormwater conveyance and treatment will be performed and will include the following:

- The existing stormwater drainage and conveyance system serving the development site and surfaces (pervious or impervious) on the development site will be described, and the amount of stormwater generated on the site will be estimated using DEP's volume calculation worksheet.
- The existing combined sewer system serving the development site will be described based on records obtained from the New York City Department of Environmental Protection (DEP). Records obtained will include available sewer network maps and drainage plans. The existing flows to the Newtown Creek Wastewater Treatment Plant (WWTP) will be obtained for the latest 12-month period, and the average dry weather monthly flow will be presented.
- Any changes to the stormwater drainage and conveyance system serving the development site and surface area on the development site expected in the No-Action condition will be described. An existing 48-by-36-inch ~~foot~~ combined sewer line that crosses the One Vanderbilt site from East 43rd Street to East 42nd Street serving the properties on site in addition to a portion of 335 Madison Avenue, as well as catch basins located along 43rd Street and Vanderbilt Avenue will be removed to construct the proposed One Vanderbilt development and below-grade public improvements. The plan proposed to DEP to reverse

the flow along East 43rd Street to east-west from the current west-east and to construct a new connection into a major existing line in Madison Avenue will be disclosed.

- Any changes to the sewer system expected to occur in the No-Action condition, will be described based on information provided by DEP.

The analysis of project impacts will identify and assess the effects of the incremental sanitary and stormwater flows on the capacity of the sewer infrastructure, as follows:

- Describe any changes to the sewer system expected to occur in the With-Action condition, including any changes to the sewer easements mapped on the One Vanderbilt site and any access agreements required for the proposed public place.
- Assess future stormwater generation from the proposed development and assess its potential for impacts. Any changes to the site's proposed surface area (pervious or impervious and including the site of the proposed public place) will be described, and runoff coefficients and runoff for each surface type/area will be presented. The volume of stormwater runoff from the site will be determined based on the DEP volume calculation worksheet. If required, the development's best management practices (BMP) plan (outlining the proposed on-site detention practices) would be described.
- Sanitary sewage generation for the development will be estimated. The effects of the incremental demand on the system will be assessed to determine the impact on operations of the WWTP.
- Based on the analyses of future stormwater and wastewater generation, the change in flows and volumes to the sewer system due to the proposed development will be determined and measures to avoid impacts, if necessary, will be identified.

TASK 11. TRANSPORTATION

The transportation analysis will be undertaken pursuant to the methodologies outlined in the *CEQR Technical Manual.* This analysis will begin with the projection of travel demand estimates to identify transportation elements that would be subject to the evaluation of potential impacts, will present the collection of baseline data, and will continue with detailed analyses of existing and future conditions. Where necessary, improvement measures will be explored to address significant adverse impacts identified by the detailed analyses.

TRAVEL DEMAND ASSESSMENT

- A ~~draft~~ Travel Demand Factors (TDF) Memorandum has been prepared and is attached to this Scope of Work (see **Appendix B ~~A~~**). The *CEQR Technical Manual* describes a two-tier screening procedure to assess the travel demand characteristics of a proposed project. The preliminary assessment begins with a trip generation analysis (Level-1) to estimate the volume of person and vehicle trips attributable to the project. Based on *CEQR Technical Manual* guidelines, if a project is expected to result in fewer than 50 peak hour vehicle trips and fewer than 200 peak hour transit or pedestrian trips, further quantified analyses are not warranted. When these thresholds are exceeded, detailed trip assignments (Level-2) are performed to estimate the incremental trips that could be incurred at specific transportation elements and to identify potential locations for further analyses. If the trip assignments show that a project would generate 50 or more peak hour vehicle trips at an intersection, 200 or more peak hour subway trips at a station, 50 or more peak hour bus trips in one direction along a bus route, or 200 or more peak hour pedestrian trips traversing a pedestrian element,

then further quantified analyses are warranted to assess the potential for significant adverse impacts.

- Travel demand estimates developed for the proposed One Vanderbilt building compared the trips generated under the No-Action condition to those generated by the proposed development to determine if the proposed actions would necessitate detailed transportation analyses. These estimates will be prepared based on trip generation, modal split, vehicle occupancy assumptions, etc. from the *CEQR Technical Manual*, previously completed EISs and EASs (including the 2013 *East Midtown Rezoning and Related Actions FEIS)*, information provided by the project team, other relevant standard industry-accepted sources, and guidance from NYCDOT.
- The information contained in the ~~draft~~ TDF Memorandum will be used as the basis for establishing various transportation analysis parameters including the selection of traffic, transit, and pedestrian analysis locations[1] and the volume of trips expected to be generated by the proposed development and to be used in the analysis of project impacts.

TRAFFIC, TRANSIT AND PEDESTRIAN STUDY AREAS

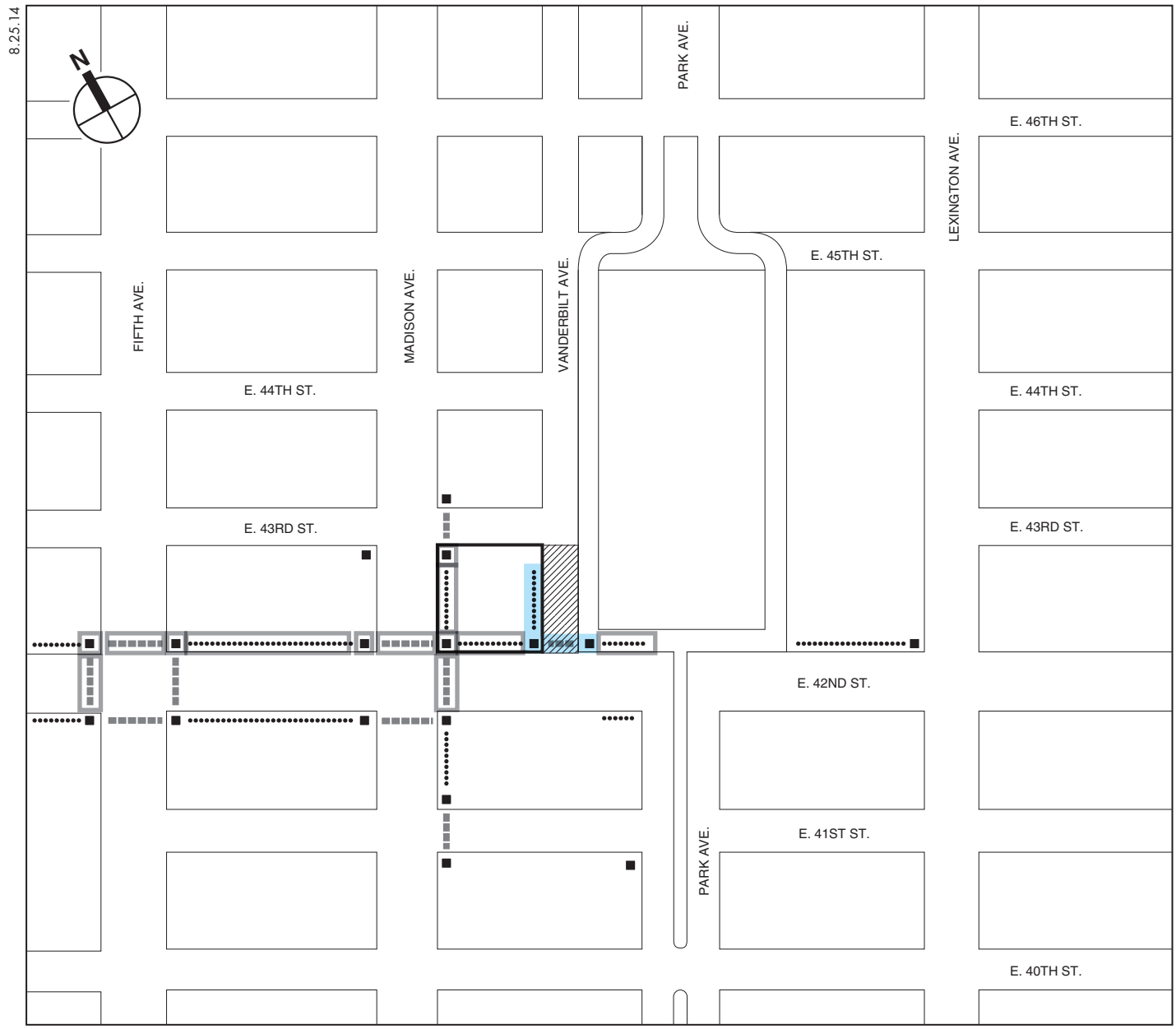
- Based on the ~~draft~~ TDF Memorandum, a traffic study area consisting of ~~30~~ 31 intersections (see **Figure 6**) within the surrounding area and along major routes leading to and from the area would be analyzed for weekday peak hours. For the Saturday peak hour, because incremental trip-making associated with the proposed development would be less in comparison to that of weekday peak hours, a subset of these intersections (10 in total) will be analyzed for potential impacts.
- The subway analysis will focus on the station elements of Grand Central Terminal (located in close proximity to the development site) and those at the 42nd Street and Bryant Park subway station during the weekday AM and PM peak hours. ~~Any necessary analysis of transit generated pedestrian flows within Grand Central Terminal will be conducted in coordination with MTA-NYCT.~~ Baseline pedestrian data and analyses for the 42nd Street and Bryant Park Station will be developed in consultation with MTA-NYCT. Line-haul conditions on selected subway lines that warrant analysis will also be assessed in coordination with NYCT. For travel by bus, there is an abundance of bus routes with stops adjacent to or near the project site, including the M1, M2, M3, M4, M5, M15, M15 SBS, M42, M101, M102, M103, and Q32 local bus routes, express bus routes from the Bronx, Brooklyn, Queens, and Staten Island, and the Port Authority Bus Terminal buses. Therefore, it is expected that the proposed development would not generate sufficient bus trips, per CEQR criteria, to warrant a quantified analysis of bus line-haul conditions.
- Based on the ~~draft~~ TDF Memorandum, a pedestrian study area consisting of critical locations (including crosswalk, sidewalk and corner elements) in the vicinity of the development site will be analyzed (see **Figure 7**). Analyses will be prepared for the weekday AM, midday and PM, and Saturday peak hours. For the Saturday peak hour, because incremental trip-making associated with the proposed development would be less in comparison to that of weekday peak hours, a subset of these locations will be analyzed for potential impacts.

[1] As detailed analysis is conducted, a need for additional analysis locations may be identified; the DEIS will include any such additional analysis and provide an explanation for the additional analysis locations.

Traffic Analysis Locations

Vanderbilt Corridor and One Vanderbilt

Figure 6



Pedestrian Analysis Locations

Vanderbilt Corridor and One Vanderbilt

Figure 7

DATA COLLECTION

Data collection efforts will be undertaken pursuant to *CEQR Technical Manual* guidelines as outlined below. The data set will encompass 2014 data and some data collected in 2013. The 2013 data will be adjusted as needed to establish 2014 existing baseline transportation networks. Traffic volumes and analyses developed as part of the 2013 *East Midtown Rezoning and Related Actions FEIS* will also be reviewed as reference, and where necessary to supplement the more recently collected data.

- Conduct traffic data collection. The traffic count program will include manual turning movement counts at the study area intersections, vehicle classification counts, automatic traffic recorder (ATR) counts, and an inventory of existing roadway geometry and traffic control. In support of the mobile source air quality analyses, travel time and delay surveys will also be conducted to collect existing speeds during peak periods.
- ~~Conduct transit-related pedestrian counts at critical subway station elements at the 42nd Street and Bryant Park subway station.~~
- Conduct pedestrian counts at critical crosswalk, sidewalk, and corner elements along key routes in conjunction with the traffic volume counts to establish the baseline for pedestrian analysis.
- Inventory physical data at each of the analysis intersections needed for traffic and pedestrian analysis, including street widths, number of traffic lanes and lane widths, pavement markings, turn prohibitions, typical parking regulations, signal phasing and timing data, location of street furniture and sidewalk/crosswalk widths. Official signal timing data from NYCDOT will also be obtained.

CAPACITY ANALYSES

- Determine existing traffic, transit and pedestrian operating characteristics at each analysis location including capacities, volume-to-capacity (v/c) ratios, average delays, and levels of service (LOS). The traffic analysis will be performed using the *2000 Highway Capacity Manual* (HCM) procedures and the Highway Capacity Software (HCS+) version 5.5. The pedestrian analysis will be performed using the methodologies presented in HCM 2010 and NYCDOT-approved pedestrian LOS worksheets. Allowances for any on-going construction or temporary road/sidewalk closures will be made. Existing capacities and LOS along or through critical subway station elements will be determined in accordance with the *CEQR Technical Manual* and NYCT design criteria.
- Compute future No-Action traffic, transit, and pedestrian volumes based on the *CEQR Technical Manual* recommended background growth plus trips expected to be generated by major developments (many of which rely on information presented in the 2013 *East Midtown Rezoning and Related Actions FEIS*). Consult with NYCDOT and NYCT to determine whether any changes in traffic, transit and pedestrian infrastructure in the vicinity of development site are envisioned by the project's planned Build year.
- Determine the volume of vehicle, transit, and pedestrian trips expected to be generated by the proposed development and assign those trips in each analysis period accounting for the closure of Vanderbilt Avenue between East 42nd and East 43rd Streets to vehicular traffic and its conversion into a public space. As a result of this change in the roadway network, the Vanderbilt Avenue segment between East 43rd and East 44th Streets will be converted from

two-way to one-way southbound, a condition that will also be accounted for in the trip assignments.

- Determine the resulting v/c ratios, delays, and LOS for the future with the proposed actions and identify any significant traffic, transit and pedestrian impacts based on the 20142 *CEQR Technical Manual* guidelines.
- If significant impacts are identified, develop and evaluate mitigation measures, as necessary.

VEHICLE/PEDESTRIAN SAFETY ASSESSMENT

- Assess vehicle/pedestrian safety conditions. Obtain the most recent three year accident data from the New York State Department of Transportation for the intersections in the vicinity of the development site. Summarize the accident data and determine if any of the intersections are classified as a high-accident location based on CEQR criteria. If high accident locations are identified, recommend mitigation/improvement measures to alleviate the potential safety impacts.

PARKING

- Conduct parking inventories in accordance with the *CEQR Technical Manual* criteria to determine parking supply. On-street and off-street parking inventories will be performed within a ¼-mile radius of the development site. This will include: obtaining on-street parking regulations; locating and mapping existing off-street parking lots and garages; and determining occupancies and capacities for both on-street and off-street parking on a typical weekday.
- Estimate the No-Action condition parking supply and demand levels based on background growth rates and any changes due to nearby development-related projects.
- Estimate the proposed development's parking demand based on modal split and vehicle occupancy data. The proposed development's future parking demand projections will be compared with the available supply to determine whether there is a potential for a parking shortfall in the study area.

TASK 12. AIR QUALITY

The proposed One Vanderbilt development, as compared with the No-Action condition, would likely exceed the 140 vehicle trip screening threshold for conducting a quantified analysis of carbon monoxide (CO) emissions from mobile sources. The proposed development is also expected to exceed the particulate matter (PM) emission screening threshold discussed in Chapter 17, Sections 210 and 311 of the *CEQR Technical Manual.* Therefore, an analysis will be performed to determine whether the net increase in traffic would have the potential for a significant adverse impact on air quality at the local level. The EPA MOVES model will be used to calculate CO and PM emissions. The EPA CAL3QHC intersection model will be used to predict 1-hour and 8-hour average CO concentrations. CAL3QHCR, with 5 years of meteorological data, will be used for the PM microscale analysis of 24-hour and annual average concentrations. The predicted level will be compared with the national ambient air quality standards and the City's CO and $PM_{2.5}$ *de minimis* criteria. The A minimum of two intersections will be selected for analysis based on the change in traffic due to the project, levels of service, and overall traffic volumes. The proposed actions' potential to affect air quality on a regional scale will also be evaluated in the DEIS.

The stationary source air quality impact analysis will determine the effects of emissions from the proposed development's heating, ventilation and air conditioning (HVAC) systems on criteria pollutant levels (i.e., sulfur dioxide, PM and/or nitrogen dioxide concentrations). Screening analyses will be performed to determine whether emissions from on-site fuel-fired HVAC system equipment (e.g., boilers/hot water heaters) are significant. An initial screening analysis will be performed using the procedures outlined in the *CEQR Technical Manual*. The procedure involves determining the distance (from the exhaust point) within which potential significant impacts may occur on elevated receptors (such as open windows, air intake vents, etc.) that are of an equal or greater height when compared with the height of the buildings' HVAC stack(s). The distance within which a significant impact may occur is dependent on a number of factors, including the height of the discharge, type(s) of fuel burned and development size. In addition, a screening analysis will be performed to determine whether there are any potential significant adverse impacts with respect to the new 1-hour nitrogen dioxide (NO_2) and 1-hour sulfur dioxide (SO_2) ambient air quality standards.

If the proposed development's HVAC system(s) fails the screening analysis, a detailed stationary source analysis will be performed using EPA's AERMOD dispersion model. Five years of meteorological data with surface data from LaGuardia Airport and concurrent upper air data from Brookhaven, New York, will be used for the modeling study. Concentrations of nitrogen dioxide and $PM_{2.5}$ (as well as sulfur dioxide and particulate matter if burning fuel oil) will be determined and the predicted values will be compared to national and state ambient air quality standards and other relevant criteria. In the event that a violation of the standards is predicted, design measures will be examined to reduce potential concentrations of applicable pollutants to acceptable levels.

If existing major sources (those located at Title V facilities that require Prevention of Significant Deterioration permits) or large sources (those located at facilities that require a State facility permit) are identified near the proposed development, a stationary source assessment would be perform to determine whether the emissions from such existing sources would have the potential for a significant adverse impact on the air quality at the proposed One Vanderbilt development.

TASK 13. GREENHOUSE GASES

According to the *CEQR Technical Manual*, a greenhouse gas (GHG) consistency assessment is appropriate for projects in New York City being reviewed in an EIS that would result in development of 350,000 square feet or more or in a development that is particularly energy-intense. Therefore, GHG emissions from the proposed One Vanderbilt development will be quantified and an assessment of consistency with the City's GHG reduction goal will be performed. GHG emissions will be estimated for the worst-case development plan in 2021 and reported as carbon dioxide equivalent (CO_2e) metric tons per year. The quantified assessment will include operational emissions (emissions from the operation of the building, including direct and indirect emissions), and mobile source emissions. The construction phase or the extraction or production of materials or fuels needed to construct the project is not likely to be a significant part of total project emissions. Therefore, emissions resulting from construction activity and construction materials will be assessed qualitatively. The proposed development would not fundamentally change the city's solid waste management system. Therefore, a quantified assessment of emissions due to solid waste management is not warranted. Features of the proposed development that demonstrate consistency with the City's GHG reduction goal will be described. The GHG analysis will consist of the following subtasks:

- Direct and Indirect Operational Emissions—Emissions from on-site boilers used for heat and hot water would be quantified, as well as emissions from purchased electricity generated off-site and consumed on-site. Emissions would be based on the carbon intensity factors specified in the *CEQR Technical Manual* or project specific information on energy use.
- Indirect Mobile Source Emissions—Emissions from vehicle trips to or from the proposed development will be quantified using trip distances and emission factors provided in the *CEQR Technical Manual*.
- Emissions from construction and emissions associated with the extraction or production of construction materials will be discussed qualitatively. Opportunities for reducing GHG emissions associated with construction will be considered.
- Features of the proposed development that reduce energy use and GHG emissions will be discussed and quantified to the extent that information is available.
- Consistency with the City's GHG reduction goal will be assessed. While the City's overall goal is to reduce GHG emissions by 30 percent below 2005 levels by 2030, individual project consistency is evaluated based on proximity to transit, building energy efficiency, efforts to reduce carbon fuel intensity or improve vehicle efficiency for project-generated vehicle trips, and other efforts to reduce the project's carbon footprint.
- If a quantified analysis of GHG emissions from construction is required, both construction activity emissions and emissions from the production and transport of construction materials will be included.

TASK 14. NOISE

The *CEQR Technical Manual* requires that the noise study address whether the proposed actions would result in a significant increase in noise levels (particularly at sensitive land uses such as residences) and what level of building attenuation is necessary to provide acceptable interior noise levels within the proposed building.

The proposed One Vanderbilt development would generate vehicular trips and, therefore, a mobile source noise screening analysis will be performed. Given the background conditions and the anticipated project-generated traffic, it is not expected that project-generated traffic would be likely to result in significant noise impacts. It is assumed that outdoor mechanical equipment would be designed to meet applicable regulations and that no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed. Consequently, the noise analysis will examine the level of building attenuation necessary to meet CEQR interior noise level requirements. The building attenuation study will be an assessment of noise levels in the surrounding area associated primarily with traffic and nearby uses and their potential effect on the proposed development.

Specifically, the noise analysis will include the following tasks:

- Select appropriate noise descriptors. Appropriate noise descriptors to describe the existing noise environment will be selected. The L_{eq} and L_{10} levels will be the primary noise descriptors used for the EIS analysis. Other noise descriptors including the L_1, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} levels will be examined when appropriate.
- Based on the traffic studies, perform a screening analysis to determine whether there are any locations where there is the potential for the proposed development to result in significant noise impacts (i.e., doubling of Noise PCEs) due to project generated traffic.

- Select receptor locations for building attenuation analysis purposes. A maximum of ~~four~~ nine receptor locations will be selected for the Vanderbilt Corridor. Receptor locations will include at-grade locations and an elevated location adjacent to the development site.
- Perform 20-minute measurements at each receptor location during typical weekday AM, midday, and PM peak periods. L_1, L_{10}, L_{50}, L_{90}, L_{min}, and L_{max} values will be recorded. Where site access and security permits, a continuous measurement may be performed in lieu of a 20-minute measurement.
- Data analysis and reduction. The results of the noise measurement program will be analyzed and tabulated.
- Determine the level of attenuation necessary to satisfy CEQR criteria. The level of building attenuation necessary to satisfy CEQR requirements is a function of exterior noise levels and will be determined. Noise level decreases due to height will be predicted, and building attenuation will be calculated for higher elevations. Measured values will be compared with appropriate standards and guideline levels. As necessary, recommendations regarding general noise attenuation measures needed for the proposed development to achieve compliance with standards and guideline levels will be made. Due to the relatively high ambient noise levels adjacent to the development site, any development in the area would be expected to require acoustically rated windows together with the provision for some kind of alternate ventilation—that does not degrade the acoustical performance of the façade—to achieve acceptable interior noise levels.
- ~~If the results of the screening analysis indicate that a doubling of Noise PCEs would occur, a~~ A mobile source noise analysis would be performed using either proportional modeling or the Traffic Noise Model (TNM), where appropriate.

TASK 15. PUBLIC HEALTH

According to the *CEQR Technical Manual*, public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability and premature death; and reducing inequalities in health status. The goal of CEQR with respect to public health is to determine whether adverse impacts on public health may occur as a result of a proposed project, and if so, to identify measures to mitigate such effects.

According to the guidelines of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified for the proposed actions in any of these technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas.

TASK 16. NEIGHBORHOOD CHARACTER

The character of a neighborhood is established by numerous factors, including land use patterns, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other physical features that include traffic and pedestrian patterns, noise etc. The proposed actions have the potential to alter certain elements contributing to the affected area's neighborhood character. Therefore, a neighborhood character analysis will be provided in the EIS. As suggested by the *CEQR Technical Manual*, the study area for neighborhood character will be coterminous with the ¼-mile land use study area.

A preliminary assessment of neighborhood character will be provided in the EIS to determine whether changes expected in other technical analysis areas—land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; transportation; and noise—may affect a defining feature of neighborhood character. The preliminary assessment will:

- Identify the defining features of the existing neighborhood character.
- Summarize changes in the character of the neighborhood that can be expected in the future With-Action condition and compare to the future No-Action condition.
- Evaluate whether the proposed actions have the potential to affect these defining features, either through the potential for a significant adverse impact or a combination of moderate effects in the relevant technical areas.

If the preliminary assessment determines that the proposed actions could affect the defining features of neighborhood character, a detailed analysis will be conducted in accordance with the *CEQR Technical Manual* guidelines.

TASK 17. CONSTRUCTION IMPACTS

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as on people passing through the area. This assessment will describe the construction schedule and logistics, as well as discuss anticipated on-site activities, site safety measures, and maintenance and protection of traffic requirements. Construction impacts are usually important when construction activity could affect traffic conditions, community noise patterns, air quality conditions, and mitigation of hazardous materials. Based on data from the construction manager, the construction schedule and an estimate of activity on site for both the No-Action building and the proposed One Vanderbilt development will be described. The analysis will consider the construction of East Side Access and other projects expected to be under construction concurrently in the surrounding area, as relevant. Based on this information, a detailed assessment of the potential impacts of construction activities will be prepared ~~comparing the two construction scenarios~~. If necessary or warranted, quantitative analyses may be conducted. While the analysis of construction impacts will be prepared for the 2021 analysis year, it will account for the fact that construction of some of the proposed transit improvements may continue beyond 2021. The potential for construction impacts to result from development on the other blocks within the proposed Vanderbilt Corridor will be discussed in the conceptual analysis (see Task 20). Technical areas to be analyzed include:

- *Transportation Systems*. This assessment will consider losses in lanes, sidewalks, off-street parking on the development site, and effects on other transportation services (i.e., transit and pedestrian circulation), if any, during the construction periods, and identify the increase in vehicle trips from construction workers and deliveries. Based on the trip projections of activities associated with peak construction, an assessment of potential impacts during construction will be provided by comparing the project-generated construction trips between the proposed and No-Action buildings on the One Vanderbilt development site (Level 1 screening assessment). Where appropriate, the relevant mitigation measures will be discussed. Due to the development site's proximity to Grand Central Terminal and the Grand Central subway station and the inclusion of transit improvements in the One Vanderbilt development, construction coordination that will be undertaken with MTA-NYCT will be discussed.

- *Air Quality*. The construction air quality impact section will contain a discussion of both mobile source emissions from construction equipment, worker and delivery vehicles, and fugitive dust emissions. It will discuss measures to reduce impacts and may include components such as: diesel equipment reduction; clean fuel; best available tailpipe reduction technologies; utilization of equipment that meets specified emission standards; and fugitive dust control measures, among others. The analysis will review the projected activity and equipment in the context of intensity, duration, and location of emissions relative to nearby sensitive locations~~,~~ and, if necessary, quantitative analyses may be conducted. As warranted based on the analysis, ~~identify any~~ project-specific control measures required to further reduce the effects of construction ~~and~~ will be identified to ensure that significant impacts on air quality do not occur.
- *Noise and Vibration*. The construction noise impact section will contain a discussion of noise from each phase of construction activity for the One Vanderbilt development. Appropriate recommendations will be made to comply with DEP Rules for Citywide Construction Noise Mitigation and the New York City Noise Control Code. The analysis will review the projected activity and equipment in the context of intensity, duration, and location of noise relative to nearby sensitive locations~~,~~ and, if necessary, quantitative analyses may be conducted. As warranted based on the analysis, ~~identify any~~ project-specific control measures required will be identified to further reduce construction noise. The potential for vibrations caused by construction activities to damage nearby buildings and other resources will be discussed, and, if necessary, mitigation measures to minimize vibrations will be examined.
- *Socioeconomics.* The construction socioeconomics section will contain a discussion of the effects of the proposed project's construction activities on nearby existing businesses.
- *Open Space.* The construction open space section will document the potential effects of construction staging and construction activities on the quality (including air quality, construction noise, and other safety concerns) and access to public open space.
- *Hazardous Materials.* In coordination with the hazardous materials summary, determine whether the construction of the project has the potential to expose construction workers and the community to contaminants. If necessary, appropriate health and safety measures such as community air monitoring during soil disturbance activities will be described.
- *Other Technical Areas*. As appropriate, other areas of environmental assessment—such as historic and cultural resources~~, hazardous materials,~~ and neighborhood character—will be analyzed for potential construction-related impacts.

TASK 18. ALTERNATIVES

CEQR requires an analysis of a No-Action Alternative (without the proposed action), which in this case assumes that a 15 FAR building consistent with existing zoning would be constructed on the development site. The DEIS will also assess a 20.7 FAR Alternative that utilizes a subway improvement bonus and development rights from the Bowery Savings Bank, but does not include a mass transit improvement bonus or mapping of Vanderbilt Avenue between East 42nd and East 43rd Streets as a public space. The 20.7 FAR Alternative represents the use of existing special permits and would represent a lesser density alternative. Additional alternatives and variations of the project may be identified based on any significant adverse impacts identified in the EIS. Other alternatives to be analyzed would include an alternative or alternatives to reduce or avoid any significant adverse impacts of the proposed actions. The

analysis of each alternative will be qualitative, except where impacts of the project have been identified.

TASK 19. MITIGATION

Where significant adverse impacts have been identified in the analyses discussed above, measures will be described to mitigate those impacts. Where impacts cannot be mitigated, they will be identified as unavoidable adverse impacts.

TASK 20. CONCEPTUAL ANALYSIS

As discussed above in E. "Analysis Framework," two of the additional sites within the proposed Vanderbilt Corridor could be redeveloped in the foreseeable future pursuant to the proposed actions. The conceptual analysis will evaluate the redevelopment of the MTA-owned portion of Block 1279 with approximately 939,412 gsf of commercial space, the conversion of the 162,330-square-foot building at 52 Vanderbilt Avenue on Block 1279 from office to hotel use, and the redevelopment of Block 1281 with approximately 1,624,237 gsf of commercial space. Because there are no specific proposals for development on these two blocks and because each development using the bonus would be subject to CEQR and ULURP, conceptual analyses will be undertaken. The Conceptual Analysis chapter of the DEIS would contain the following sections and analyses: Principal Conclusions; Methodology and Analysis Framework (including increment for conceptual analysis); Land Use, Zoning and Public Policy; Socioeconomic Conditions; Open Space; Historic and Cultural Resources; Urban Design and Visual Resources; Hazardous Materials; Water and Sewer Infrastructure; Solid Waste and Sanitation Services; Energy; Transportation; Air Quality; Greenhouse Gas Emissions; Noise; Public Health; Neighborhood Character; and Construction. It is expected that quantitative analyses will be prepared for the technical areas that rely on numerical data such as open space, water and sewer infrastructure, solid waste and sanitation services, energy, transportation, air quality mobile source emissions, and mobile source noise. Qualitative analyses will be prepared for the other technical areas.

TASK 21. SUMMARY CHAPTERS

Several summary chapters will be prepared, focusing on various aspects of the EIS, as set forth in the regulations and the *CEQR Technical Manual*. They are as follows:

1. *Executive Summary*. Once the EIS technical sections have been prepared, a concise executive summary will be drafted. The executive summary will utilize relevant material from the body of the EIS to describe the proposed development and actions, their environmental impacts, measures to mitigate those impacts, and alternatives to the proposed development and actions.
2. *Unavoidable Adverse Impacts*. Those impacts, if any, that could not be avoided and could not be practicably mitigated, will be listed in this chapter.
3. *Growth-Inducing Aspects of the Proposed Project*. This chapter will focus on whether the proposed actions have the potential to induce new development within the surrounding area.
4. *Irreversible and Irretrievable Commitments of Resources*. This chapter focuses on those resources, such as energy and construction materials, that would be irretrievably committed if the project is built. ✷

APPENDIX A

Responses to Comments on the Draft Scope of Work

Appendix A:
Responses to Comments on the Draft Scope of Work for the Draft Environmental Impact Statement for the Vanderbilt Corridor and One Vanderbilt

A. INTRODUCTION

This document summarizes and responds to comments on the Draft Scope of Work, issued on June 16, 2014, for the Vanderbilt Corridor and One Vanderbilt (the proposed One Vanderbilt development).

Oral and written comments were received during the public meeting held by the Department of City Planning (DCP) at Spector Hall, 22 Reade Street, New York, NY 10007 on July 16, 2014. Written comments were accepted through the close of the public comment period, which ended at close of business on Monday, July 28, 2014.

Section B lists the organizations and individuals that provided relevant comments on the Draft Scope of Work. Section C contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the Draft Scope of Work. Where more than one commenter expressed similar views, those comments have been grouped and addressed together.

B. LIST OF ORGANIZATIONS AND INDIVIDUALS THAT COMMENTED ON THE DRAFT SCOPE OF WORK

ELECTED OFFICIALS AND COMMUNITY BOARDS

1. Hon. Daniel R. Garodnick, New York City Council, oral and written comments submitted July 16, 2014 (Garodnick)
2. Nancy Goshow, Manhattan Community Board 5, written comments submitted July 31, 2014 (Goshow)
3. Michael Levine, Manhattan Community Board 5, written comments submitted July 31, 2014 (Levine)
4. Wally Rubin, District Manager, Manhattan Community Board 5, speaking for Tri-Board Task Force on East Midtown, oral and written comments submitted July 16, 2014 (Rubin)

INTERESTED PUBLIC AND ORGANIZATIONS

5. Cate Contino, NYPIRG Straphangers Campaign, Permanent Citizens Advisory Committee to the MTA, Pratt Center for Community Development, Riders Alliance, and Tri-State Transportation Campaign, oral and written comments submitted July 16, 2014 (Contino)
6. Colleen Curtis, written comments submitted July 26, 2014 (Curtis)

7. Michael Goldberg, Service Employees International Union, Local 32BJ, oral comments July 16, 2014 and written comments submitted July 24, 2014 (Goldberg)
8. Andrea Goldwyn, New York Landmarks Conservancy, oral and written comments submitted July 16, 2014 (Goldwyn)
9. George Haikalis, president, Institute for Rational Urban Mobility, Inc. and public member of Manhattan Community Board 5, written comments submitted July 27, 2014 (Haikalis)
10. Jordan Isenstadt, Association for a Better New York, oral comments submitted July 16, 2014 (Isenstadt)
11. Paimaan Lodhi, Real Estate Board of New York, oral and written comments submitted July 16, 2014 (Lodhi)
12. Duane Loft, Boies, Schiller & Flexner, representing Midtown Tracking Ventures, oral and written comments submitted July 16, 2014 (Loft)
13. Municipal Art Society, written comments submitted July 28, 2014 (MAS)
14. Duane Roggendorff, Grand Central Partnership, oral and written comments submitted July 16, 2014 (Roggendorff)
15. Paul Selver, Kramer, Levin, Naftalis, & Frankel LLP, representing Midtown Tracking Ventures, oral and written comments submitted July 16, 2014 (Selver)
16. Kate Slevin, Municipal Arts Society, oral comments submitted July 16, 2014 (Slevin)
17. Tri-Board Task Force on East Midtown, written comments submitted July 28, 2014 (Tri-Board)

C. COMMENTS AND RESPONSES ON THE DRAFT SCOPE OF WORK

PROJECT DESCRIPTION

CEQR PROCESS

Comment 1: I am concerned about the inappropriate timing of these hearings. July, as you know, is vacation time for CB6 (for instance) and not a good time for all of us to get together. (Curtis)

Response: City Environmental Quality Review (CEQR) and the Uniform Land Use Review Procedure (ULURP) are public processes that are ongoing throughout the year and provide multiple occasions for public comment.

PROPOSED ACTIONS

Comment 2: The Vanderbilt Corridor amendment should not be assessed as a standalone amendment but rather one that could set precedents for future amendments to the Special Midtown District. (Tri-Board)

Response: On May 30, 2014, the City announced that Council Member Garodnick, Borough President Gale Brewer, and City Planning Commission (CPC) Chairman Carl Weisbrod would begin a ground-up planning process for Greater East Midtown. A task force chaired by Councilman Garodnick and Borough President Brewer will work closely with DCP and other public agencies. Since the work of the task force has just started, there are no specific proposals for future amendments to the Special Midtown District and, therefore, any analysis

of potential future amendments would be speculative. Further amendments would be subject to environmental review under CEQR.

Comment 3: Commenting on the zoning amendment for the Vanderbilt Corridor without having the specific zoning text is severely limiting. Minimally, the zoning text for the Vanderbilt Corridor should be available to the public. (MAS)

Response: Although the proposed zoning text amendment was not provided in the Draft Scope of Work (Draft Scope) as the specific zoning text is still being drafted, a description of the proposed zoning text and its purpose and need were included in the Draft Scope in sufficient detail for the purpose of scoping. The proposed zoning text amendment in its entirety will be made available for public comment in the Uniform Land Use Review (ULURP) application and the Draft Environmental Impact Statement (DEIS), both of which are subject to public review during the ULURP and CEQR processes.

Comment 4: The scoping document states that the applicant is applying for multiple special permits. 317 Madison should be required to list the individual special permits needed to complete the One Vanderbilt project within the project description. (MAS)

Response: The project description included in the Draft Scope provided sufficient detail of the proposed actions, including the special permits, for the purpose of scoping. Since the public scoping meeting, the proposed special permits have been further defined. This additional information regarding the special permits is provided in the Final Scope of Work (Final Scope) and will be included in both the DEIS and the ULURP application, both of which are subject to public review during the ULURP and CEQR processes.

Comment 5: An explanation of the proposed actions' purpose and benefits should be included here. A thorough explanation of the planning background and rationale for the actions will increase clarity around the need for the proposed actions, particularly for the 5-block rezoning proposal. (MAS)

It remains unclear to the task force what the justification is for the proposed actions regarding the corridor. (Rubin)

We need to see an updated study showing the need for several 30 FAR towers in one of the City's densest areas. (Goldwyn)

Response: The Draft Scope fully described the purpose and need of the proposed actions. As noted in the Final Scope, this discussion will also be included in the DEIS.

Comment 6: MAS questions the rationale behind rezoning five blocks of Vanderbilt Avenue, because one of the purposes of the proposal is to link new development to infrastructure needs in the area. The City should include the specific needs that each development should be required to address. (Slevin)

The DEIS needs to discuss how the transportation bonus for One Vanderbilt was determined and how bonuses for future developments would be set. (Goldwyn)

What is the total scope of improvements that need to be made to the infrastructure of the area to justify the increased density in the corridor? The special permits for the Vanderbilt Corridor should be written to make it clear which density-justifying characteristics are acceptable, and to whom, for a future developer to get to 30 FAR. (Garodnick, Rubin, Tri-Board)

Demonstrate how the amount of FAR that is awarded to a project relative to the improvement(s) is determined. The criteria used here will also be used in the Corridor where each site has its own unique attributes and probably throughout Midtown, one might assume. In other words, how was the 12.3 FAR for the "improvements" for SL Green development determined and how would the improvement bonus be applied to the other sites? (Tri-Board)

317 Madison has proposed a number of worthy and necessary public improvements including enhanced transit connections to subways and Grand Central, new waiting areas, and a new public plaza along Vanderbilt Avenue. These are vital improvements, and we applaud the developer, MTA, and the City for working together to improve conditions for transit riders in the area. But going forward, the most important question is whether the public is getting the best deal possible. Are the promised projects enough to justify the enormous potential value realized from the increased height and density? How was the $200 million in public benefits agreed upon, and what will the criteria be to require public improvements for future development in the Vanderbilt Corridor? The City needs to be clear about the relationship between FAR bonuses and the level of public investment. There needs to be assurance that any new development in the rezoned Vanderbilt Corridor is required to provide infrastructure and public realm investments. Detailing how these decisions will be made will help the public evaluate whether the City is getting the appropriate level of public investment in exchange for new developments. (Slevin, MAS)

Response: These issues do not relate directly to the scope of CEQR. The scale of the development as it relates to the public realm improvements will be determined through the ULURP process. The density granted will be a discretionary determination by CPC based on findings related to the public benefit derived from a project's proposed improvements, which will take into account the results of the analyses presented in the Environmental Impact Statement. This is the same process as the existing Subway Station Improvement Bonus (Section 74-634 of the Zoning Resolution) that applies in high-density areas of the City (including the Grand Central Terminal area). In reviewing applications for floor area bonuses pursuant to this provision, the CPC has repeatedly demonstrated its ability to determine the extent to which the benefits provided by the public improvements support the amount of floor area bonus granted.

Comment 7: The terms of the special permit offer no "hard" basis for determining the scope and cost of public improvements necessary to generate the maximum bonus. It is up to the City to negotiate the bonus and the required improvements on a case-by-case basis. The result is a classic "zoning-for-dollars" situation in which the allowable development is determined not in accordance with an established "well-considered" plan for the neighborhood, but by the skill of each developer in negotiating its deal with the City. (Selver)

Response: The amount of density granted will be a discretionary determination by CPC based on findings related to the public benefit derived from a project's proposed improvements. This is the same process as the existing Subway Station Improvement Bonus (Section 74-634 of the Zoning Resolution) that applies in high-density areas of the City (including the Grand Central Terminal area). Since its institution in 1982, a number of improvement projects have undergone public review and led to subway station improvements. CPC has repeatedly demonstrated under this provision the ability to determine the extent to which the benefits provided by the public improvements support the amount of floor area bonus granted based on the facts presented and public testimony.

Comment 8: The opacity of the Special Permit makes it impossible to be sure that the City and the public receive fair value for the development rights being granted. And if the One Vanderbilt proposal is any indication of the benefits package for which the full bonus will be granted, that opacity works to the benefit of the developer. This is because, it appears, SL Green has made a very good deal for itself, and the City has made a very bad deal for the public. Surprisingly, the Draft Scope says nothing about the potential impacts of this bargain basement deal on the City's ability, in the context of other discretionary actions, to obtain fair value for the zoning benefits it is granting. (Selver)

Response: CPC will consider the extent to which the proposal meets the findings of the special permit during the public review. See also response to Comment 7.

Comment 9: The failure of the EIS to recognize that the actions it is addressing are unnecessary and overbroad and will pervasively undermine the quality and honesty of its analyses—whether regarding specific areas of environmental concern that are adversely affected by the proposed actions or regarding the inclusion of the proper range of alternatives. (Selver)

Response: As stated in the Draft and Final Scopes, the DEIS will review the proposed actions in accordance with the requirements of CEQR and will include a review of all required areas of analysis, as well as a review of alternatives.

Comment 10: The draft scope is fundamentally flawed because of the material mischaracterization of the purpose and need for the proposed rezoning. The draft scope states that the purpose of the rezoning is to generate additional transit and pedestrian circulation improvements by allowing additional density

and because the existing bonus mechanisms are "limited in applicability." (Selver)

Response: The Draft Scope was not flawed. The purpose and need of the proposed zoning text amendment, as described in the Draft Scope, accurately characterized the existing Subway Station Improvement Bonus special permit as being limited in applicability, because the special permit applies only to locations set by the Zoning Resolution and does not provide for above-grade pedestrian circulation improvements.

Comment 11: The existing bonus mechanisms, the subway improvement bonus, the Grand Central Subdistrict transfer provisions, and the general landmark transfer provisions have been used over many years to generate investments in onsite and offsite transit and pedestrian improvements that are equal to or superior to those that have so far been publicly proposed by One Vanderbilt. If it is truly necessary to provide a bonus mechanism to allow large buildings and to provide for private financing of more substation subway improvements, then a simple text change would be sufficient, modifying the transit improvement bonus in the Grand Central Terminal Subdistrict to permit it to be used as a supplement to the transfer provisions of Sections 81-635 or Section 74-79. The subway improvement bonus already can be used to generate offsite improvements. The Grand Central Subdistrict transfer of development rights and Section 74-79 can be used to generate onsite public amenities, while also protecting the integrity and constitutionality of the landmark process. And Section 74-79 can be used to generate up to 30 FAR on the One Vanderbilt site and the site to its north. (Selver)

Response: The Draft Scope included a detailed discussion of the purpose and need of the proposed actions. CPC will consider the need for the proposed zoning text amendment during the public review.

Comment 12: How do the public realm benefits compare with similar past projects, such as 383 Madison and the Philip Morris Building? What is the need for the proposed rezoning if those projects also included significant infrastructure investments achieved through current means, including transfer of development rights and the public realm bonus? (Tri-Board)

Response: No zoning map amendment is proposed as part of the proposed actions. The proposed actions are a zoning text amendment and an application for a special permit under the revised text. A comparison to past projects is not an issue that is addressed by CEQR. As noted in the Draft and Final Scopes, the improvements to pedestrian circulation resulting from the One Vanderbilt development will be analyzed in the DEIS.

Comment 13: The Draft Scope fails to address the proposed rezoning's unprecedented interposition of the City as a competitor with one of two parties in a private free

market real estate transaction, the extraordinarily large and flexible, and equally unprecedented bonus that the City gave itself to use in that competition, and the practical policy and legal effects of the City's willingness to use that flexibility to subsidize the One Vanderbilt project at the expense of the public and Grand Central Terminal. The One Vanderbilt proposal trades bonus development rights with a market value in the range of $250 million for publicly identified offsite improvements estimated to cost only a fraction of that amount. (Selver)

Response: This issue is outside the scope of CEQR. CPC will consider the necessity for the proposed zoning text amendment and special permit during the public review through the ULURP process.

Comment 14: The proposal would cause an unconstitutional taking of our client's property. The development rights above Grand Central are property rights, and the constitution protects those rights from being taken without just compensation.

Grand Central is landmarked, so that the development rights exist only if they can be transferred. Thus, for the redevelopment that SL Green has proposed, which sits next to Grand Central Terminal, under existing zoning SL Green would have to acquire development rights from Grand Central's owners, yet the proposed rezoning would allow that very redevelopment without the transfer of a single Grand Central development right.

What is the value of that redevelopment allowance? Even conservative estimates are in the hundreds of millions of dollars. (Loft, Selver)

Response: This issue is outside the scope of CEQR.

Comment 15: The Draft Scope fails to address the direct effects on Grand Central Terminal of the City's financially attractive alternative to the purchase of the Terminal's development rights—an alternative that has already cost the Terminal the opportunity to sell up to 530,000 square feet of development rights—and of the precedent set by the City's willingness to settle for less than a fair return on the development rights it is creating. (Selver)

The City created a Grand Central subdistrict to expand opportunities for the terminal to transfer its air rights. The owners of Grand Central Terminal are rightly concerned that the terminal's development rights will now be set aside. (Goldwyn)

Response: This issue is outside the scope of CEQR.

Comment 16: It is critical that any buildings that are afforded the 30 FAR designation are representative of the City's most extraordinary architecture. (Garodnick)

Response: As noted in the Final Scope, the proposed Grand Central Public Realm Improvement Bonus special permit will include a requirement for CPC to make certain findings related to the architecture of the proposed building. As

described in the Draft and Final Scopes, the DEIS will include an analysis of urban design following the methodology in the *CEQR Technical Manual*.

Comment 17: Special attention needs to be directed towards the narrow sidewalk limits on Madison Avenue, Vanderbilt Avenue, and East 43rd Street. We know that most Avenues are 100 feet wide, building to building, each sidewalk 20 feet. Yet on Madison, sidewalks are only 13 feet. The current text requires sidewalk widenings for sites with wide street frontage. Why not retain this text for the Vanderbilt Corridor? (Rubin, Tri-Board)

Response: As a condition of the grant of the new Public Realm Improvement special permit, minimum sidewalk dimensions will be required. The DEIS, as described in the Draft and Final Scopes, will include an analysis of pedestrian circulation following the methodology in the *CEQR Technical Manual.*

Comment 18: Clearly, a more thoughtful allocation of street space between motor vehicles and other street users is needed. However, advancing proposals for widening sidewalks or setting new buildings back from the building line cannot be just a series of ad hoc actions without some relationship to an overall plan. In a November 11, 2009 letter to Manhattan DOT Borough Commission Margaret Forgione, Manhattan CB5 requested that the City develop a comprehensive Surface Transportation Plan. CB4 and CB6 made similar requests. No response has been received. DCP should be reminded of this request to NYCDOT. (Haikalis)

Response: The proposed zoning text amendment will provide an overall framework for sidewalk widenings within the Vanderbilt Corridor.

Comment 19: One proposal, advocated by a number of civic and business interests, calls for closing 42nd Street to motor vehicles and placing a modern low-floor light rail light, river-to-river in the center of this street, would dramatically change the urban landscape at Grand Central. It is important to note if this proposal, called vision42 by its advocates, were implemented the design of One Vanderbilt could be changed to take advantage of this new environment. The main pedestrian entrance to this towering structure would be on 42nd Street while truck and other vehicular access would be on 43rd Street. Walking on an auto-free 42nd Street remade into a magnificent "pedestrian boulevard" would afford workers and visitors heading to or from One Vanderbilt an extraordinary walking experience, with vistas of the Terminal itself and other nearby buildings. (Haikalis)

Preserving 51 East 42nd Street and advancing an auto-free light rail boulevard on 42nd Street would greatly change options for the transit amenities incorporated into One Vanderbilt. An underground passageway linking the lobby of One Vanderbilt to the magnificent "great room" concourse of Grand Central Terminal would find little use, except perhaps during inclement

weather. Direct subsurface passageways to the shuttle concourse and to the Lexington Avenue and No. 7 subways would be useful. However, with an auto-free 42nd Street, many other options for linking surface and subsurface pedestrian pathways become possible. Direct sidewalk-to-concourse or even sidewalk-to-platform escalators and elevators become possible, using the full street width of 42nd Street as a pedestrian concourse. An auto-free 42nd Street is a real game-changer and a thoughtful review of all feasible options should be considered. Grand Central is one of New York City's most prominent hubs and many surface/subway options merit thoughtful consideration. CB5's proposed comprehensive Surface Transportation Plan could be an important setting for re-examining subway station access throughout the Manhattan CBD. (Haikalis)

The long-delayed plans to upgrade the Times Square-Grand Central Shuttle could be reassessed in light of the suggested 42nd Street auto-free light rail boulevard. The improved walking environment and reliable surface rail line would substantially alter the market for the shuttle. (Haikalis)

Response: Comment noted.

Comment 20: A car-free Madison Mall was once advanced by the Lindsay Administration. More recently transit advocates have suggested a grid of auto-free light rail boulevards for Manhattan. Others have called for cordon tolls around the Manhattan CBD as a potential revenue stream for MTA capital projects as well as a means to reduce traffic overloads in Midtown. Clearly, these individual initiatives complement each other, and the new Administration should find ways to incorporate these concepts into the proposed a comprehensive the Surface Transportation Plan suggested by CB5. The Multi-Board Task Force has been a forceful advocate for this kind of planning. (Haikalis)

Response: Comment noted.

Comment 21: East Midtown faces a new challenge in the form of an aging infrastructure of commercial properties that no longer meet the needs of Class A and high-tech firms in the growing 21st Century world economy. In our view, the Vanderbilt Corridor and One Vanderbilt proposal represents an important step forward in addressing this challenge. DCP has put forth a thoughtful plan that will help modernize East Midtown's aging building stock while also providing much needed improvements to the area's transit and pedestrian network and public realm so that the area can remain competitive for future generations. (Roggendorff, Lodhi)

Response: Comment noted.

Comment 22: MTA ignored CB5's plea to consider an alternative for LIRR East Side Access, developed by the Delcan Corp., Canada's leading engineering firm. That alternative that would make use of existing tracks and platforms leading to the

Upper Level Loop at Grand Central Terminal, the world's largest railway station. MTA was unable to persuade its two commuter railways to collaborate on a plan to share the terminal's existing 46 platform tracks and instead chose to advance a deep cavern plan some 150 feet below Park Avenue. This option adds three to four minutes of travel time in each direction for LIRR passengers. Its 47 escalators and four large vent plants will greatly increase MTA operation cost. CB5 adopted a resolution during the discussion on the 50th Street Vent Plant reaffirming its support for the Upper Level Alternative. Fire safety egress experts have pleaded with MTA to reduce risk by using the Upper Level option. Now, with its completion more than eight years away and many billions more needed to complete this project, transit advocates have again asked MTA to revisit the Upper Level Loop Alternative. While first year MBA students would be quick to dismiss the billions already spent on the deep cavern as "sunk cost" and not relevant to a benefit-cost reassessment of moving forward with a better plan, the emotional cost of changing direction is enormous.

The irony is that the five-block Vanderbilt Corridor lies directly above the five-track Upper Level Loop platforms. The current deep cavern platforms are several blocks to the north of the Vanderbilt Corridor. Four banks of 90 foot long escalators—more than twice the length of those in the 53rd St subway stations at 5th and Lexington Avenues—will reach a LIRR low-ceilinged concourse fitted into track beds at the western end of Lower Level of the Terminal.

The emphasis on the lobby of One Vanderbilt as the "gateway" to the LIRR deep cavern station is misguided. The four banks of escalators from the deep cavern plan spread LIRR passengers over many crosstown streets, where they can head either west or east. Getting between the LIRR deep cavern platforms and the Lexington Avenue subway platforms will require a long walk. Using the proposed One Vanderbilt "public room" would increase the length of this walk. (Haikalis)

Response: Comment noted.

Comment 23: The Penn Station-Grand Central connection, developed during the planning phase for new Hudson River passenger rail capacity, remains a viable option, but it requires forceful intervention by the Governors of New Jersey and New York to reign in the separate transit institutions that report to them. While NJ Governor Christie killed the ARC deep cavern plan, it was really NJ Governor James McGreevey who killed the Penn Station-Grand Central plan after his NJ Transit Executive Director George Warrington strongly objected to a plan that required him to cooperate with MTA. Manhattan CB5 opposed the NJ Transit deep cavern plan under Macy's and favored the connection plan. Transit advocates continue to urge NJ Transit and MTA to advance the connection plan.

The region's three commuter rail lines, plus Amtrak converge on Midtown Manhattan and CB5 is the proud host of the region's two main railway stations. Connecting the two stations would improve mobility in the region, and would have a positive impact on the economic viability and livability of the CB5 District and all of the districts participating in the Multi-Board Task Force effort. While Community Boards have traditionally played an important role in raising awareness of harmful negatives of many region initiatives, in the absence of a coherent and progressive planning process, it remains for the Community Boards to call attention to positive initiatives that would not only benefit their constituencies, but the City and the region as well. (Haikalis)

Response: Comment noted.

GRAND CENTRAL PUBLIC REALM IMPROVEMENTS

Comment 24: Note that the Draft Scope on page 5 states that the full list of improvements won't be provided until ULURP. They must be provided before the project is certified. (Tri-Board)

Response: The descriptions of the purpose and need for the improvements and the broad outline of the improvements provided in the Draft Scope were sufficient for scoping. The improvements are described in more detail in the Final Scope and will be described in detail in both the DEIS and the ULURP application. ULURP will provide ample review of the proposed actions by the public at the Community Board, City Planning Commission, and City Council hearings.

Comment 25: East Midtown is already incredibly congested. We continue to have major concerns about congestion in the transit system, particularly overcrowding on the Nos. 4/5/6 subway lines and the introduction of an estimated 160,000 additional commuters to the area when East Side Access is completed. There needs to be assurance that any new development in the rezoned Vanderbilt Corridor will be required to provide substantial infrastructure and public realm improvements. The Department of City Planning should include a list detailing the necessary infrastructure improvements in the EIS that have been identified by the MTA and others for the neighborhood. This will help give a better sense of just how helpful the proposed improvements will be overall. (MAS)

We want to hear the MTA's reaction to the transit-related proposals as well as the community board's evaluation of the public realm improvements. (Contino)

In the interest of allowing for thoughtful future planning, we should consider whether there are opportunities here to better define public realm and infrastructure expectations at the outset. We hope that the MTA would work with the City to do just that. (Garodnick)

Response: DCP and 317 Madison are working with the MTA to develop a suite of improvements that will address the issues of congestion in the study area, and they will be disclosed and analyzed in the DEIS as noted in the Final Scope.

Comment 26: Regarding the off-site improvements, the DEIS should address the following:

- Who would manage the construction of the transit-related improvement?
- Would MTA issue the RFP for transit-related improvement?
- Would MTA be reimbursed for construction cost for transit improvement under its control?
- What is the estimated cost for these improvements?
- What happens if cost-overruns occur for transit improvements?
- Would MTA funds be used for these improvements, if so how much?
- Would the construction meet MTA's construction standards?
- How would these transit-related improvements increase the flow of an estimated 500,000 commuters in the transit system?
- Would the cost of adding additional structural capacity (to bed rock) for the proposed 67 story project be part of transit-related project? (Tri-Board)

Response: Issues relevant to the environmental review, including those pertaining to the off-site improvements, will be disclosed and, as warranted, analyzed in the DEIS as noted in the Final Scope.

Comment 27: Many of the improvements being proposed for the Nos. 4,5,6,7 subway complex have previously been identified as mitigation for the extension of the No. 7 line and for East Side Access. These mitigations should be paid for as part of these projects through the agencies, respectively NYC and MTA, which are responsible, and not transferred through the proposed zoning to other parties.

It would greatly help to understand this situation if the environmental analysis includes a chart showing each of the proposed improvements to the subway station complex and identifying:

- Whether it is already a mitigation measure for the extension of the No. 7 line, for East Side Access or some other project;
- Whether it is mitigation for the Vanderbilt Corridor or for One Vanderbilt; and
- Whether, if it was mitigation for one of the transit projects and is now to be provided earlier by One Vanderbilt, NYC or MTA have undertaken a substitute responsibility. (Tri-Board)

Response: Two of the proposed off-site improvements described in the Draft Scope were previously identified as mitigation for other projects—the new stair in the basement of the Pershing Building that would connect the IRT Lexington Avenue subway mezzanine to the platform was identified as mitigation for the

East Side Access project[1]; and the creation of a new IRT Lexington Avenue subway mezzanine paid area in the basement of the Grand Hyatt Hotel with two new stairs to the subway platform was identified as mitigation for the No. 7 Subway Extension—Hudson Yards Rezoning and Development Program (Hudson Yards).[2] Because the timing of those two projects has changed and the current development trend within the Hudson Yards Rezoning area is more toward residential than commercial development, the projected need for the mitigation measures may not materialize until a later point and the identified mitigation measures would not be implemented until that time. The proposed One Vanderbilt development's transit improvement investment would allow for these measures to be implemented within a definitive timeframe that is tied to the development of the One Vanderbilt site. In addition to these two specific improvements, the proposed One Vanderbilt development would construct several other newly conceived transit improvements that would, together with the two previously identified for East Side Access and Hudson Yards, provide a more effective circulation improvement program for the Grand Central subway station. The Final Scope provides more detail, in narrative form, on these future transit improvements and, as noted in both the Draft and Final Scope, the DEIS will analyze conditions in the future with and without the proposed One Vanderbilt development.

Comment 28: There needs to be greater clarity on the mechanism and timing for the public improvements. What mechanism will be used to ensure that the projects are successfully completed? (Slevin)

New York City transit projects are known for their extraordinarily high price tags, delays, and cost overruns—see the recent examples of East Side Access, the Second Avenue Subway or the 7 train extension. There must be a guarantee from the developers of One Vanderbilt that work on the proposed infrastructure improvements – especially those happening off-site—will be completed, even if cost estimates rise, as they likely will. (MAS)

We are concerned about the sequencing of the transit improvements, and it is important that these proposed improvements be largely in place before the tenants and visitors start coming to One Vanderbilt. (Contini)

No certificate of occupancy will be granted until all agreed-upon public improvements are completed. This requirement should be even stronger. The

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[1] *East Side Access—Final Environmental Impact Statement* (Federal Transit Administration and the Metropolitan Transportation Authority of the State of New York, in cooperation with the MTA Long Island Rail Road, March 2001).

[2] *No. 7 Subway Extension—Hudson Yards Rezoning and Development Program Final Environmental Impact Statement* (Metropolitan Transportation Authority of the State of New York and City Planning Commission of the City of New York, November 2004, CEQR No. 03DCP031M).

feasibility of not granting a temporary certificate of occupancy until all committed public improvements are delivered to the public should be considered. (Garodnick)

It is essential that the developers are held fully accountable for the timely and complete implementation of the public improvements they have promised, even if delays or cost overruns occur, as they often do in MTA projects. (Slevin)

Response: The zoning text for the Grand Central Public Realm Improvement Bonus special permit will be fully described in the DEIS and included in its entirety as an appendix to the DEIS. As described in the Final Scope, the text will include requirements for binding commitments with respect to completion of the proposed improvements.

Comment 29: How will the offsite transit improvements be financed and implemented? Who is responsible for construction? If it's the MTA, will these projects be put in their 2015 to 2019 capital program? If the developer is responsible, how will that occur? The mechanism for the agreement should be identified in the EIS. (Slevin)

Would there be any MTA funds to be included for underground transportation infrastructure improvements in addition to SL Green's contribution? (Tri-Board)

Will the funding for the transit improvements be sufficient to do what needs to be done? There's a dire need to improve transit in the area and address crowding at Grand Central Terminal. (Contino)

Response: The proposed off-site improvements are expected to be funded and implemented by the developer of the One Vanderbilt project. The zoning text for the Grand Central Public Realm Improvement Bonus special permit, which will be included in the DEIS, will require binding commitments with respect to completion of the proposed improvements.

Comment 30: The infrastructure improvements that SL Green would undertake are little beyond the pedestrian and subway improvements that already would be required under the existing special permit and subway bonus process. (Loft)

Response: This issue does not relate directly to the scope of CEQR. During the ULURP process, CPC will determine whether the proposed improvements warrant the higher density permitted through the Grand Central Public Realm Improvement Bonus, which will also be described in the DEIS. The Draft and Final Scopes list the specific improvements, which will also be described in the DEIS.

Comment 31: The Midtown community, the City, and the region as a whole stand to gain from the substantial investments in the public transit network and public realm that will occur as a result of the proposed actions. (Roggendorff)

Response: Comment noted.

Comment 32: Investing $200 million in transit infrastructure and public realm improvements, the plan for One Vanderbilt offers greater connectivity to the country's most celebrated train terminal. The plan also pays homage to the iconic landmark and the surrounding Midtown business district. (Isenstadt)

Response: Comment noted.

Comment 33: We need a master plan for what is required for a world-class 21st Century transportation hub, including one-stop access to our airports and a link to not only East Side Access but Penn Station. (Rubin)

Response: Comment noted.

PROPOSED ONE VANDERBILT BUILDING

Comment 34: One Vanderbilt is a prime example of transit-oriented development, as the site is located immediately adjacent to Grand Central Terminal and its regional and metro mass transit systems. (Isenstadt, Lodhi)

Response: Comment noted.

Comment 35: In addition to the proposed Vanderbilt public plaza and the enclosed public space in One Vanderbilt, the scoping document mentions the possibility of an observation deck. MAS calls for a site of this significance to have any observation decks be open and accessible to the public. (Slevin, MAS)

The second story of the proposed building provides a unique outdoor space that wraps around the building's exterior. It's unclear from the public documentation whether this space is only open to building tenants. If not, because that space offers a unique, new viewing opportunity of Grand Central Terminal, the potential for opening it to the public should be explored. (MAS)

As part of the proposal, the Environmental Impact Statement (EAS) (page 1b) states that the rooftop amenity space may include tenant amenity space, restaurant space, and a public observation deck; however, the language in the Draft Scope does not describe this space as a public space. The EIS should analyze the space as a publicly accessible amenity to help ensure it becomes a meaningful part of the proposal. (MAS)

What is the intended use of the rooftop amenity space at One Vanderbilt and who will be allowed to use it? The Draft Scope suggests the roof "may" include several different types of private, public or semi-public uses (Page 4). Some part of it should be open and accessible to the public, and it should be clarified what "unique views" will be provided (Draft Scope, Page 10). (Tri-Board)

Response: As described in the Draft and Final Scopes, the specific programming for the rooftop amenity has not been finalized, but 317 Madison has indicated that it expects the observation deck to be a paid attraction. The second-story space noted in the comment is intended solely for use by building tenants. Therefore,

these spaces in the proposed One Vanderbilt development will not be assessed quantitatively as public open space in the DEIS following the guidance in the *CEQR Technical Manual.*

Comment 36: We urge the developer to include attractive wayfinding in the project and to outline its wayfinding plans in the environmental review documents. (Slevin)

Response: Although large exterior building signs are considered in a CEQR Urban Design and Visual Resources analyses, pedestrian wayfinding signage found in building interiors or near building entrances is not analyzed. 317 Madison has indicated that it expects to provide wayfinding signs at the proposed One Vanderbilt development and for the off-site improvements under MTA's direction and in conformance with MTA standards.

Comment 37: Current zoning regulation 81-621 states, "On 42nd Street, the street wall shall be at the street line." Furthermore, section 81-625 states "within the Subdistrict, a sidewalk widening may be provided only for a building occupying an Avenue frontage, provided that such sidewalk widening extends for the length of the full block front." In other words, no setbacks from the property line are currently allowed on the East 42 Street frontage thus no sidewalk widening is permitted. However, Figure 3 of the DEIS suggests that at least the ground floor street wall will have a gradual setback from the property line on East 42 street. Currently there is no mention in any of the scoping documents about any proposed amendments to the zoning text to permit a street wall setback on East 42 Street.

1) Is the street wall of One Vanderbilt cantilevered over the ground floor to allow for the ground floor wall to be recessed from the street line?

2) If this cantilevered design is in effect does this create an arcade as defined by section 37-80 of the zoning resolution? "An arcade shall be developed as a continuous covered space extending along a street line, or publicly accessible open area. An arcade shall be open for its entire length to the street line or publicly accessible open area, except for building columns. "However, it must be noted that section 81-625 of the zoning resolution states, "no arcade shall be allowed within the Subdistrict."

3) The Grand Central Public Realm Improvement Bonus description states, "Finally, through the special permit, a series of the existing bulk and urban design requirements (such as streetwalls) can be modified by CPC, subject to further findings, in order to develop the proposed building" (page 11). With regards to the above comment and questions is the street wall of One Vanderbilt being modified to be set back from the street line with CPC approval?

4) If the sidewalks are widened along East 42 Street and Madison Avenue, what is the appropriate width to handle current and projected pedestrian circulation needs?

5) Are there any urban design features that will help pedestrian navigation? For example, wayfinding signage and pavement designs to help guide tourists to Grand Central and other points of interest/transportation. (Tri-Board)

Response: As described in the Draft and Final Scopes, "through the special permit, a series of the existing bulk and urban design requirements (such as streetwalls) can be modified by CPC, subject to further findings, in order to develop the proposed building." These modifications will insure that the design of the proposed building is consistent with the bulk strategy of the Special Midtown District. As described in both the Draft and Final Scopes, the DEIS will include analyses of land use and urban design in accordance with the *CEQR Technical Manual.*

Comment 38: Zoning resolution section 81-621 permits, "buildings with frontage on Park, Lexington, Madison and Vanderbilt Avenues, or Depew Place, shall have a street wall within 10 feet of the street line of such streets." Why is there not a setback from the street line on the Madison Avenue frontage of One Vanderbilt (please refer to Figure 3 in the Draft Scope)? This is an especially important question as the Draft Scope itself (page 8) under "Infrastructure Challenges" laments the narrow sidewalk width on Madison Avenue and the street's poor pedestrian circulation. (Rubin, Tri-Board)

Response: The proposed zoning text amendment will include a requirement that all developments provide for widened sidewalks in the heavily trafficked area along Madison Avenue (a minimum width of 20 feet). The podium on the western side of the proposed One Vanderbilt development would be set back from the property line by 7 feet, with the building extending over the setback area above the third floor by a cantilever. As noted in the Final Scope, the DEIS will assess the sidewalk widening and analyze pedestrian circulation in accordance with the *CEQR Technical Manual*.

Comment 39: One Vanderbilt is a prime example of a sound economic development. The project, as proposed by SL Green, will provide good jobs that are easily accessible as the site is located immediately adjacent to Grand Central Terminal and its regional mass transit systems. It will also create direct transit connections and an important series of transit improvements, all of which will have a positive impact. (Goldberg)

Response: Comment noted.

Comment 40: Currently, the proposed design for the waiting room/foyer shows the two main entrances on the north side of the room fronting East 43rd Street. Why is there not an entrance located on the east side of the waiting room/foyer fronting Vanderbilt Avenue? Providing an entrance that fronts the Vanderbilt Avenue Public Space is a great opportunity to help activate the space and ensure that pedestrians use the space instead of having a street wall fronting the Public Space. (Tri-Board)

The proposal for One Vanderbilt includes the creation of Vanderbilt Plaza—a public space that was included as part of the City's 2013 proposed rezoning. The current proposal places the main entrance for employees of One Vanderbilt on the Vanderbilt Plaza side of the building and the public waiting room with transit access off of 43rd Street. We suggest analyzing ways for better connecting the interior public space to the Vanderbilt side of the building to create a more integrated and beneficial public space. This might be achieved through redesigned or relocating One Vanderbilt's main entrance. (MAS)

The current design has the main entrance of One Vanderbilt fronting the Public Space. There are no other uses fronting the Public Space (such as the retail spaces), which risks having the current design create a "grand entrance" for the tenants of One Vanderbilt without creating any real uses for the public. Alternative locations for the main building entrance should be assessed, since, as per the drawings, One Vanderbilt's entryway occupies almost two thirds of the frontage of the Vanderbilt "public realm improvement." This location essentially appropriates the public realm "improvement" as a plaza in front of an office building while relegating the public space to the corner of East 43rd Street and Vanderbilt Avenue. (Tri-Board)

Figure 3 in the Draft Scope and the text on page 4 suggests that the waiting room/foyer will only include a staircase to the concourse level and not include an elevator or escalators. What parameters were used to determine the placement of the elevator at the East 42 Street subway entrance in One Vanderbilt? Why not place the elevator inside the East Side Access waiting room/foyer? (Tri-Board)

Response: The DEIS, as noted in the Draft and Final Scopes, will analyze pedestrian circulation and urban design in connection with the proposed One Vanderbilt development in accordance with the *CEQR Technical Manual*. Transit access and the proposed improvements are being developed in consultation with MTA. Details of the design of interior public spaces and transit access will be included in the ULURP application materials and will be subject to public review under ULURP and CEQR. The design of the proposed One Vanderbilt development will be described in the DEIS, as noted in the Draft and Final Scopes.

Comment 41: It should also be clarified what the proposed capacity for the waiting room/foyer is proposed to be, and how the space will be programmed: 1) How many seats will be provided and what will be seating capacity? 2) Will there be any public art? (this could be a potential opportunity to include public art that celebrates the heritage of Grand Central and surrounding landmarked buildings); 3) If the "vegetation wall" is not provided, what will be put in its place? 4) Will there be any commercial/retail uses allowed to operate in the waiting room/foyer? and 5) Who is going to furnish, manage, maintain, and finance the functioning of the waiting room? (Tri-Board)

Response: Transit access and the proposed improvements are being developed in consultation with MTA. Details of the design of interior public spaces and transit access will be included in the ULURP application materials and will be subject to public review under ULURP and CEQR. The design of the proposed One Vanderbilt development will be described in the DEIS, as noted in the Draft and Final Scopes.

Comment 42: The Draft Scope states that One Vanderbilt will include one elevator between ground level and the Shuttle subway and connection corridors to subways on East 42nd Street. It is proposed (pursuant with talks with MTA) that an additional elevator will be installed on the NW corner of East 42 Street and Lexington Av (page 5). Given the potential demand for pedestrian circulation for this location, installing two elevators as part of public realm improvements should be explored. Some additional questions: Will the proposed elevators be ADA accessible?; and Will the proposed elevator on Lexington Av and East 42 Street have an adjoining elevator between mezzanine and platform levels? (Tri-Board)

Response: The DEIS, as noted in the Draft and Final Scopes, will analyze pedestrian circulation in connection with the proposed One Vanderbilt development, including its public realm improvements, in accordance with the *CEQR Technical Manual*. If it is determined that there would be significant adverse pedestrian impacts related to the number of elevators at the location noted in the comment, mitigation measures—including potentially having two or more elevators—will be identified in the DEIS. Details of the proposed off-site improvements will be included in the ULURP application materials and will be subject to public review under ULURP.

Comment 43: The One Vanderbilt project appears to be constructed entirely of glass. Glass seems to me to be an inferior material. One that melts easily—with heat if it were ignited by a bomb or a plane. (Curtis)

Response: The Grand Central Public Realm Improvement Bonus special permit will define the building's exterior materials as well as other design elements. As currently proposed, the building façade would use a combination of materials. The building would be designed to meet all applicable safety codes.

VANDERBILT AVENUE PUBLIC PLACE

Comment 44: We're eager to consider designs for the new Vanderbilt Avenue public space and trust the City to work closely with the Community Board and the City Council on a design that is most appropriate in the area. (Garodnick)

Response: Comment noted.

Comment 45: DOT in conjunction with DCP should create design principles to help guide the design and construction of the Public Space. This is critical for two reasons: 1)

It is currently unclear to the Tri-Board Task Force what exactly the Public Space will look like with regards to the design of pedestrian circulation realm and what (if any) amenities will be provided in the space; and 2) If the Public Space is to be expanded north of 43rd Street, it's imperative to have urban design principles in place to help ensure a harmonious and continuous Public Space. (Tri-Board)

Response: The design for the improvements to the block of Vanderbilt Avenue between East 42nd and East 43rd streets would be developed as part of the Plaza Program administered by the New York City Department of Transportation (NYCDOT). This block is the only portion of Vanderbilt Avenue being contemplated for improvement into a public space at this time. As described in the Draft and Final Scopes, the public place would be owned by the City under the jurisdiction of NYCDOT and would be improved with public amenities such as seating and lighting.

Comment 46: This Vanderbilt Avenue public space has the potential to be one of the most heavily used DOT pedestrian public spaces in the City. Though this public space is not technically a "plaza," other DOT pedestrian plazas, which are similar to this space, often suffer from lack of maintenance. To ensure proper upkeep and funding for continued maintenance, can we stipulate that the new zoning text amendment mandate a capital improvement program (CIP)? Who would be responsible for the funding of a proposed CIP—New York City or SL Green/future owner? A request for a CIP for the public space would be a requirement similar to one found in the current zoning text for landmarks that requires "a program for the continuing maintenance of the landmark...[be] established" under section 81-635, "Transfer of development rights by special permit" in the Grand Central Subdistrict. CIP program should also be proposed for the ESA foyer/waiting room. What plan does SL Green have for future maintenance? (Tri-Board)

Response: Arrangements for maintenance of the public place are currently being determined. It is expected that the owner of One Vanderbilt, the Grand Central Partnership, or a combination of both parties would be responsible for funding or performance of maintenance of the public place. The determination of the responsible party or parties is expected to be made prior to the publication of the DEIS.

Comment 47: It would make good sense to immediately eliminate motor vehicular traffic on the block of Vanderbilt Avenue between 42nd Street and 43rd Street. The NYCDOT and the Grand Central Partnership could develop an "interim" plan that would make good use of this pedestrian space, without any substantial capital investment. This would be like the spaces released at Times Square and Herald Square in the past several years and the 41st–42nd street segments of Park Avenue now being developed. A longer-range plan could be prepared with all affected parties. (Haikalis)

Response: Comment noted.

ANALYSIS FRAMEWORK

Comment 48: I request a reasonable worst-case scenario study, done to understand the impact on transit capacity and pedestrian circulation if all sites within the corridor were built to 30 FAR. If you add all the new occupants from all the potential new 30 FAR sites to all the people who already traffic the vicinity, what will be required by way of transit and pedestrian circulation improvements to create a net addition to the area? (Garodnick, Rubin, Tri-Board)

Because the proposed rezoning would include five blocks, the conceptual analysis framework should include a worst-case development scenario for all four blocks based on the maximum development potential of the with-action option. (MAS)

At 30 FAR at least the four southern blocks of the Vanderbilt Corridor become likely development sites. Therefore, the conceptual analysis should consider all four blocks north of One Vanderbilt. It should explain why the most northern block, 383 Madison, is considered unlikely to be redeveloped or enlarged, and it should explore the "worst case" redevelopments of the middle three blocks. (Tri-Board)

Response: As described in the Draft and Final Scopes, it is not reasonable to assume that all four blocks within the Vanderbilt Corridor north of the One Vanderbilt development site would be redeveloped in the future pursuant to the proposed text amendment. As stated in the Draft and Final Scopes, Blocks 1278 and 1282 are unlikely to be redeveloped in the foreseeable future, as those two blocks contain recently renovated or constructed commercial buildings. Block 1278 contains the Bank of America Plaza that dates to 1983 and is currently developed at approximately 20 FAR. Block 1282 contains the J.P. Morgan Chase & Company building at 383 Madison Avenue from 2002, which is already developed at approximately 21.6 FAR. The DEIS, as stated in the Draft and Final Scopes, will include a conceptual analysis of the potential transit and pedestrian impacts that could result from potential development on two of the four blocks in the Vanderbilt Corridor, Blocks 1279 and 1281, where redevelopment can reasonably be assumed to occur in the foreseeable future.

Comment 49: Why was Block 1278, the site of Bank of America Plaza at 335 Madison Avenue, left out of the list of other projects expected to be built in the primary and secondary study areas that would be completed before or concurrent with the proposed actions be part of DEIS scope of work? The building on Block 1278 would be over 50 years old by 2033. (Tri-Board)

Response: As described in the Draft and Final Scopes, the Bank of America Plaza on Block 1278 is currently developed at approximately 20 FAR. In 1981–1983, the building on the block was thoroughly renovated, reclad, and converted into an

office building. In determining the appropriate reasonable worst-case development scenario for the *East Midtown Rezoning and Related Actions FEIS,* an assessment of all existing buildings in the area was undertaken to identify sites within the proposed East Midtown rezoning area that could utilize the proposed zoning mechanisms. Block 1278 was not identified as a projected development site in the rezoning area, because it met one of the established exclusion criteria—a post-1982 construction (given the recent construction).

Comment 50: The Draft Scope states the No-Action building "would not be tall enough to provide panoramic views over surrounding buildings" (page 13). It further states that the No-Action building would also not be able to contain trading floors or the ESA foyer/waiting room, which are both pertinent to the future tenant of the building and for pedestrians to access the transportation network in Grand Central. Why is a lack of "panoramic views" considered a loss or negative feature? In other words, why is this feature being equated with the same importance as other essential uses for One Vanderbilt i.e. foyer and trading floors? (Tri-Board)

Response: A No-Action condition represents the future condition in which the proposed actions are not granted. In the case of the Vanderbilt Corridor and One Vanderbilt project, absent approval of the proposed actions, 317 Madison would develop the One Vanderbilt development site as described in the Draft and Final Scopes. Since it would not be requesting a special permit, 317 Madison would not provide the transit-related improvements, including the East Side Access connection. In addition, due to existing zoning regulations, it would be difficult, if not infeasible, for the No-Action building to provide suitable floorplates for trading floors or achieve a sufficient rooftop height for an observation deck. Both trading floors and an observation deck are features that 317 Madison intends to provide in the proposed One Vanderbilt development.

The proposed rooftop observation deck is not being equated with the same importance as the Grand Central Public Realm Improvements as suggested by the comment.

Comment 51: The "worst case" for the MTA site is different from that described in the draft scope. A case that should be considered, to the extent that the eventual proposal would allow it, would:

- Build a new building on the MTA's half of the block;
- Preserve the Yale Club and 52 Vanderbilt;
- Develop 30 FAR on the entire block; and
- Use only TDRs, no floor area from the public realm bonus. (Tri-Board)

Response: As described in the Draft and Final Scopes, there are no specific proposals to redevelop the four blocks of the proposed Vanderbilt Corridor north of the

development site (portions of Blocks 1278, 1279, 1281, and 1282), but it is conceivable that one or more of these sites would be redeveloped in the foreseeable future using the new Grand Central Public Realm Improvement Bonus, the modified Landmark Transfer special permit, or the special permit to allow hotel uses. Since the development of these blocks cannot be predicted with certainty, as stated in the Draft and Final Scopes, the DEIS will provide a conceptual analysis to generically assess potential environmental impacts that could result from development on these four blocks pursuant to the proposed actions. The conceptual analysis in the DEIS will provide a reasonable estimate of possible future use and potential impacts resulting from such future use to provide guidance to CPC in their consideration of the proposed actions. Specific future development on these four blocks, if pursued, would be subject to individual environmental review under CEQR and to public review under CEQR and ULURP.

The development scenario for Block 1279 as presented in the Draft and Final Scopes is a reasonable assumption. Since the MTA recently issued an RFP for the redevelopment of the agency's property at 341-347 Madison Avenue (Lots 23, 24, and 48), the conceptual analysis will assess a 30 FAR building constructed on the MTA-owned portion of the block. Both the Yale Club (Lot 28) and the building at 52 Vanderbilt Avenue (Lot 45), which are each under separate ownership, would be preserved under the reasonable worst-case development scenario, although the conceptual analysis in the DEIS will assess the conversion to hotel use of the office building at 52 Vanderbilt Avenue.

SUSTAINABILITY

Comment 52: Any new buildings that arise from this rezoning should be held to the highest environmental standards. In the City's Central Business District we should study the most aggressive and innovative solutions to keep our buildings efficient. (Garodnick)

Response: As described in the Final Scope, under the proposed Grand Central Public Realm Improvement Bonus, CPC may permit the basic maximum FAR of 15 to be increased by up to 15 additional FAR provided that the development or enlargement includes enhancements to the building's energy performance along with improvements to the pedestrian circulation network and enhancements to the building's ground-floor level and proposed bulk. A detailed review of what is currently known regarding specific design measures for the proposed One Vanderbilt development will be presented in the Greenhouse Gas Emissions chapter of the DEIS as noted in the Draft and Final Scopes. Development on the other Vanderbilt Corridor sites pursuant to the text amendment will be discussed in the Conceptual Analysis chapter of the DEIS.

Comment 53: The lead agency for this EIS must ensure that sustainability is given the same weight as design of infrastructure improvements by codifying regulations that

all new buildings within the Vanderbilt Corridor improve the environment by generating all of their own energy from renewable energy sources. (Goshow)

Response: See response to Comment 52.

Comment 54: What green infrastructure and amenities are proposed? Will the zoning text provide guidelines or incentives for green infrastructure? (Garodnick)

Sustainable zoning incentives should focus on performance based and life-cycle analysis requirements and not simply on exceeding a NYC Code minimum. Sustainable zoning incentives should be based upon performance standards which require reporting the actual performance of the water and energy conservation systems over the life of the building. (Goshow)

Response: No incentives for green infrastructure are included in the proposed text amendment. Instead, applications for the new and modified special permits will be required to demonstrate building energy performance exceeding applicable building code requirements and integrate 'green' building elements. The Greenhouse Gas Emissions analysis in the DEIS will describe the green infrastructure and amenities planned as part of the One Vanderbilt development. As described in the Draft and Final Scopes, the Greenhouse Gas Emissions analysis will follow the methodology in the *CEQR Technical Manual*.

Comment 55: Zoning incentives should offer increased FAR in exchange for a variety of performance-based building design elements over the life of the building, not just energy performance at the time of building permit. Such performance-based building design elements would include: water use reduction, construction activity pollution prevention, light pollution reduction, reduced heat island effect, storm water runoff management, indoor and outdoor air quality, daylight, and thermal comfort. (Goshow)

Other performance based building design elements to include in the EIS are requirements for increased management of waste water outflows into an already overloaded NYC combined sewer system, preservation and enhancement of open space, minimum building envelope performance requirements and use of non-toxic building and finish materials. (Goshow)

Response: See response to Comments 52 and 54. As described in the Draft and Final Scopes, the Greenhouse Gas Emissions and Water and Sewer Infrastructure analyses in the DEIS will describe such building design elements that will be incorporated into the One Vanderbilt development. Further, one of the proposed actions is the creation of a new public place on Vanderbilt Avenue between East 42nd and East 43rd Streets.

Comment 56: If NYC wants to compete at the global level with other sustainable cities in the US and around the world, then the EIS needs to include a more comprehensive look beyond modestly exceeding existing energy conservation codes. (Goshow)

Response: This issue is beyond the scope of this CEQR analysis.

Comment 57: There should be an explicit discussion of the temperature conditions that are projected to occur in Manhattan over the next 50 years, and the effect of this on air conditioning loads and hence on electricity service and consumption. Recent projections of protracted episodes of extreme high temperature make this a real concern. (MAS, Tri-Board)

Response: The potential increase in electric load due to future increases in degree-days is a concern for regional electric generation policy development and is beyond the scope of CEQR analysis. Future conditions will likely be different when accounting for potential increases in electricity consumption for cooling; decreased fuel consumption for heating; and cleaner electricity, cars, and fuels; therefore, these effects are not known in sufficient detail and are beyond the scope of CEQR methodology. As described in the Draft and Final Scopes, the DEIS will include a GHG analysis that will quantify GHG emissions from the proposed One Vanderbilt development and assess its consistency with the City's GHG reduction goal. GHG emissions will be estimated for the worst-case development plan in 2021 and reported as carbon dioxide equivalent (CO_2e) metric tons per year. While changes in future consumption may be relevant for citywide energy planning, they are not relevant to the evaluation of the project's consistency with the City's GHG reduction goal.

Comment 58: Negative attributes of NYC's new high-performance tall buildings include:

- Producing more greenhouse gases and using more energy per square foot than any comparable office building in Manhattan;
- Using more than twice as much energy per square foot as the 80-year-old Empire State Building;
- Energy performance worse than the new Goldman Sachs headquarters, a similar recently built NYC office tower. (Goshow)

Response: Comment noted.

Comment 59: The EIS should include the first sustainability requirement proposed in a New York City Zoning Resolution and address the following important issues:

- Because sustainability is much more than energy performance, the EIS should embrace sustainability initiatives for new building development in a much broader, more comprehensive way;
- There is a sustainable "sweet spot" between building height and population density. The EIS needs to find the public benefit of building tall buildings compromised by the high cost of embodied energy in steel and concrete, high heat gain and heat loss, and various other factors, including social and psychological effects. The EIS needs to discover that balance and incorporate it into the Scope of Work;

- "Embodied Energy," (the sum of all the energy required to produce a material, as if that energy was incorporated or 'embodied' in the product itself), determines the effectiveness of energy-producing or energy-saving devices, or the "real" replacement cost of a building. Because energy-inputs usually entail greenhouse gas emissions, in deciding whether a product contributes to or mitigates global warming, the EIS needs to answers the question: "Do the materials and methods used in the building of these super tall buildings actually save more energy and if so how are the energy savings accomplished; and
- If NYC is to compete with sustainable cities around the world, then sustainability requirements for these super tall buildings need to be much more comprehensive in their sustainable design goals and objectives. (Goshow)

Response: The DEIS will be prepared in accordance with CEQR. As stated in the Draft and Final Scopes, sustainability issues and City policies will be addressed in the following analyses, which will follow the methodologies of the *CEQR Technical Manual*: Land Use, Zoning, and Public Policy; Water and Sewer Infrastructure; and Greenhouse Gas Emissions.

LAND USE, ZONING, AND PUBLIC POLICY

Comment 60: The Draft Scope's second principal flaw is its failure both to recognize the proposal's radical departure from the City's land use and zoning policies and to propose a methodology to address the effects of these significant changes in public policy. (Selver)

Response: The City zoning regulations and public policies applicable to the One Vanderbilt development site, the Vanderbilt Corridor, and a study area that includes the area within a ¼-mile radius of the Vanderbilt Corridor will be analyzed in the Land Use, Zoning, and Public Policy chapter of the DEIS as stated in the Draft and Final Scopes. This analysis will describe the current zoning regulations, including the Grand Central Subdistrict of the Midtown Special District, and the intended purpose of previous zoning changes. As stated in the Final Scope, the chapter will also describe the intended purpose and regulations proposed through the zoning text amendment. Finally, as stated in the Draft and Final Scopes, the chapter will assess the proposed actions' compatibility with these current or proposed zoning policies, as well as their compatibility with other public goals for the Grand Central Terminal/East Midtown area.

Comment 61: The proposed action eliminates a core protection of the New York City Landmarks Law; that is, the transferability of development rights. Facilitating landmark preservation through the use of transferable development rights is a hallmark of the City's long-standing land use policies. (Selver, Loft)

Response: The proposed actions include an amendment to the text of the Zoning Resolution (ZR) modifying the existing landmarks transfer special permit

included in the Grand Central Subdistrict regulations (ZR 81-635). This special permit allows New York City landmarks in the Grand Central Subdistrict to transfer their unused floor area to non-adjacent sites in the Grand Central Subdistrict Core (between Madison and Lexington Avenues from East 41st to East 48th Streets). The proposed modification would increase the maximum floor area ratio (FAR) for sites in the Vanderbilt Corridor utilizing the existing landmark transfer special permit from 21.6 to 30.0, and for such transfers to relax the requirements to provide pedestrian circulation improvements so as to create incentives for such transfers. As stated in the Draft and Final Scopes, this modification and its compatibility to existing policies and other public goals for the Grand Central Terminal/East Midtown area will be analyzed in the Land Use, Zoning, and Public Policy chapter of the DEIS.

Comment 62: Transferable development rights are a time-tested method for the City to preserve important resources while respecting constitutionally protected property rights and ensuring the appropriate development of a neighborhood. The proposed amendments depart from this approach to zoning, and interpose the City between Grand Central Terminal and potential development rights purchasers. They do this by creating a competing vehicle for the generation of additional floor area. Both the purpose and size of this bonus are unprecedented. Yet the draft scope is silent on the impacts of this sudden, inexplicable and untimely break with past policies and its direct adverse effects on landmark preservation. It is also silent on the longer term, indirect effects of the City's action on the real estate market—effects that include a loss of confidence engendered by the City's failure to pursue consistent zoning and land use policies. (Selver)

Response: Assessing whether the proposed actions depart from what the comment claims is a time-tested approach to zoning is beyond the scope of CEQR. The proposed One Vanderbilt development would utilize transferable development rights from a New York City landmark, and the DEIS will assess the potential for the proposed actions to result in significant adverse impacts to historic and cultural resources, as described in the Draft and Final Scopes. Further, assessing "a loss of confidence engendered by the City's failure to pursue consistent zoning and land use policies" is beyond the scope of CEQR.

Comment 63: According to the draft scope of work, the secondary land use study area will include neighboring areas within a ¼-mile distance from the primary study area. Because this is only the first step in a process that will likely result in further actions that will add much more density to the East Midtown area, the study area should be expanded to include the relevant projected development sites identified by the City in the 2013 East Midtown rezoning proposal. We suggest increasing the secondary boundary to a .5 mile radius. Doing so would include important projected development sites, such as the very large previously identified site located on 42nd Street between Second and Third Avenues. An

expanded boundary will provide a much clearer sense of the projected impact of the proposed actions. (MAS)

Response: The proposed actions would apply to the Vanderbilt Corridor only. As described in the Draft and Final Scopes, the analysis of land use, zoning, and public policy will consider a study area that includes the area within a ¼-mile radius of the Vanderbilt Corridor, which is the area in which the proposed One Vanderbilt development and development on other Vanderbilt Corridor sites pursuant to the proposed actions could reasonably be expected to potentially result in significant adverse impacts. Any future actions in the East Midtown area will require discretionary approval and their own environmental review.

Comment 64: If the Vanderbilt Corridor amendment is the first step in a larger reconsideration of the Special Midtown District then the land use assessment should include a study of:

1. Potential segmentation by separating this amendment from a more comprehensive amendment covering the entire Special Midtown District; the implications of the precedent that will be set in terms of FAR (30.0 FAR), public improvement bonuses, and area-wide TDR from GCT and other Midtown landmarks on the current and future Special Midtown District; and

2. The implications for the other sites in the Vanderbilt Corridor, which front on only one wide street (80 ft. Madison Avenue), and the larger Special Midtown District of the modification and/or waiver of the Special District's height and setback regulations and Mandatory Plan elements to accommodate the SL Green development. (Tri-Board)

Response: The proposed actions would apply to the Vanderbilt Corridor only. As described in the Draft and Final Scopes, the land use analysis will describe known changes to land use, zoning, or public policy within the study area expected to occur in the future, such as the proposed East Midtown Rezoning. The DEIS will not speculate on unknown future zoning actions that the City may undertake.

The proposed actions include an amendment to the ZR text creating the Grand Central Subdistrict Public Realm Improvement Bonus special permit, which would allow density increases for developments in the Vanderbilt Corridor that provide improvements in the Grand Central Subdistrict that support public circulation. The Public Realm Improvement Bonus special permit would also permit bulk and urban design requirements (such as streetwalls) to be modified by CPC. As described in the Draft and Final Scopes, the DEIS will include a conceptual analysis to consider the potential impact of developments within the Vanderbilt Corridor that utilize this special permit. However, any future development that utilizes the special permit will be subject to a separate environmental review process, which will identify the full potential impacts.

Comment 65: The modifications to the height and setback regulations (both tiers) should be comparatively analyzed, e.g., complying as-of-right at 30 FAR, and proposed non-complying at 30 FAR. This methodology exists in the special district and should be used to understand the impact of the proposed modifications - see ZR 81-277, Special Permit for Height and Setback Modifications. Note that ZR 81-635 does not permit the modification of Height and Setback for new developments—see ZR 81-635(c). If that is the case, then the only way to modify Height and Setback under current regulations is ZR 81-277, short of seeing the proposed zoning text. (MAS)

Response: The proposed building and its needed modifications to existing height and setback controls will be analyzed in the Urban Design and Visual Resources chapter of the DEIS as described in the Draft and Final Scopes. The proposed zoning text amendment, which will be appended in its entirety to the DEIS, will be available to the public when the DEIS is completed. ZR 81-635 permits the modification of height and setback regulations for full block sites of more than 40,000 square feet.

Comment 66: In section D of the Draft Scope, pages 6 and 7 discuss the 2013 East Midtown Proposal that would have provided "a mechanism to fund infrastructure improvements through new development," which was withdrawn by the City of New York in November of that year. Why is there not discussion in the land use task of the Draft Scope; since the One Vanderbilt developer (SL Green) has promised to spend $200 million for below and above ground public realm improvements? (Tri-Board)

Response: As described in the Final Scope, the DEIS will include a description of the proposed improvements to be constructed as part of the One Vanderbilt development.

Comment 67: What is the regulatory definition of "public space" with regards to this rezoning proposal? Is the Vanderbilt Avenue Public Space governed by regulations/design principles that are similar to current NYCDOT Plaza Program regulations? (Tri-Board)

Response: NYCDOT will maintain jurisdiction over the public place, and the design will be subject to review by NYCDOT and the Public Design Commission.

SOCIOECONOMIC CONDITIONS

Comment 68: The EIS should include a detailed assessment of the small businesses that would be displaced by the proposed actions. It should be determined if these businesses could be relocated if directly displaced and whether the product or service they provide would continue to be available in the area. (MAS)

Response: As stated in the Draft and Final Scopes, the proposed development would not result in any direct business displacement, because the development site's

existing uses would be displaced irrespective of the proposed development (as part of the No-Action condition).

Any potential direct displacement as a result of the redevelopment of the other sites in the Vanderbilt Corridor will be assessed in the Conceptual Analysis chapter of the DEIS. The direct business displacement assessment will consider whether the products or services provided by the displaced businesses would continue to be available in the area.

Comment 69: An indirect business displacement analysis should be done to determine whether the proposed actions may introduce trends, such as increased rents, that would make it difficult for smaller businesses to remain in the area. The EIS should identify specific areas nearby and elsewhere in the City that would provide adequate affordable space for all potentially displaced businesses. If these displaced tenants move elsewhere, what impact might that have on future East Midtown land use actions? (MAS)

Response: As stated in the Draft and Final Scopes, the proposed development's increment over the No-Action development would exceed the 200,000-commercial-square-foot threshold requiring assessment of potential indirect business displacement. Therefore, a preliminary assessment will be conducted to consider whether the proposed development could introduce trends that make it difficult for businesses that are essential to the local economy to remain in the area. If necessary and based on the results of the preliminary analysis, a more detailed indirect business displacement analysis will be undertaken. In accordance with the *CEQR Technical Manual*, the detailed assessment would determine whether the project would increase property values and thus increase rents for a potentially vulnerable category of businesses, and whether relocation opportunities exist for those firms.

Comment 70: Rezoning the area to promote taller buildings with large floorplates in an effort to attract the highest rent-paying tenants means fewer spaces available for smaller businesses. The majority of the businesses in the area have fewer than 10 employees. The DEIS should perform a thorough analysis investigating how small business might be directly displaced or negatively impacted by the proposed actions through indirect means like rising rents. The DEIS should identify ways to support those impacted businesses, including the potential of helping them relocate to other nearby commercial spaces. (Tri-Board)

Response: See responses to Comments 68 and 69, above. Also, if the direct or indirect business displacement analyses identify the potential for significant adverse impacts, then mitigation will be considered, and as specified in the *CEQR Technical Manual* (page 5-22 and 5-23), opportunities for mitigation include "helping to seek out and acquire replacement space inside or outside the study area."

OPEN SPACE

Comment 71: The draft scope states that the public space inventory will include an examination of spaces for their facilities (active vs. passive), condition, and use. The EIS should also include an assessment of the quality of these spaces. CEQR concludes that the quality of open space is important in the assessment of the usability of the open space. Understanding how well public spaces are used will help the City determine what types of new public spaces would be beneficial to the area and should be required of future developments moving forward. (MAS)

Response: As described in the Draft and Final Scopes, open spaces in the study area will be analyzed in the DEIS in accordance with the *CEQR Technical Manual*.

Comment 72: The area around Grand Central is significantly deficient in traditional open spaces such as parks and plazas. This is perhaps proven by the proposals to pedestrianize Vanderbilt Avenue, landscape Pershing Square, and enlarge or reuse the Park Avenue median. An inventory of spaces comprising the public realm in and near Grand Central would usefully consider not only traditional open spaces but also enclosed or covered spaces open to and useful to the public. This would depart from conventional environmental analysis to provide a more meaningful inventory of existing conditions. Moreover, it would set a foundation for allowing a wider range of opportunities to provide new open spaces in such a densely developed urban situation. (Tri-Board)

Response: The quantitative open space analysis will include indoor or covered spaces within the study area, such as arcades or atriums that are accessible to the public for recreational use. In particular, the analysis will consider indoor spaces maintained as Privately Owned Public Spaces (POPS) under zoning regulations.

Comment 73: The existing zoning resolution provides for public open spaces that are open to the sky, such as plazas, and others that are covered, such as arcades, or even enclosed, as covered pedestrian spaces. The environmental analysis could productively consider the reintroduction of such spaces to this part of East Midtown. (Tri-Board)

Response: This is beyond the scope of this CEQR analysis.

SHADOWS

Comment 74: Per the *CEQR Technical Manual*, building interiors that are State/National Register listed or LPC designated are included in the types of resources that may receive potential shadow impacts and should be evaluated. Grand Central is one of the world's most renowned public spaces, famous for its windowed east and west elevations. Because the proposed development will be located directly west of this major historic landmark, a careful shadow analysis should be conducted to determine how Grand Central's interior landmarked space will be affected. (MAS)

Grand Central is not indicated as a site that will be assessed for the shadow impact study (page 18). Why is this? (Tri-Board)

Response: The shadows analysis in the DEIS will identify Grand Central Terminal as a historic resource with sunlight-sensitive features and will assess the potential shadow increments from the One Vanderbilt development on Grand Central Terminal. The Final Scope of Work identifies Grand Central Terminal as a historic resource with sunlight sensitive features.

Comment 75: Shadow impacts should also be evaluated for the proposed new public space on Vanderbilt Avenue as any impacts will affect the quality of this space and should therefore be considered in its final design. (MAS)

The proposed Public Place on Vanderbilt Avenue and 42nd Street would benefit from a detailed shadow analysis, particularly in the colder months of the year when direct solar radiation (sitting in the sun) would provide human comfort. Detailed shadow analyses should be performed for November and March and be used to analyze and inform the design of the Public Place. (Tri-Board)

Response: As noted in the Final Scope, the shadows analysis in the DEIS will describe the incremental shadow cast by the One Vanderbilt building on the proposed public place. However, the analysis will not make a conclusion as to whether any incremental shadow on the proposed Vanderbilt Avenue public place is a significant adverse impact as shadows on project-generated open space are not considered significant under CEQR.

HISTORIC AND CULTURAL RESOURCES

Comment 76: The draft EIS barely acknowledges that there are four buildings along Vanderbilt Avenue eligible for listing on the State and National Register of Historic Places, two of which the Landmarks Commission is considering for designation. (Goldwyn)

These fine buildings were designed by significant architects, and some were part of the historic Terminal City, which rightly recognized Grand Central as a focal point. Any new plan for this area should consider how they can be reused and supported. (Goldwyn)

Response: The Draft and Final Scopes identify the following four architectural resources located within the proposed Vanderbilt Corridor: the Vanderbilt Avenue Building at 51 East 42nd Street; the Yale Club at 50 Vanderbilt Avenue; the Vanderbilt Concourse Building at 52 Vanderbilt Avenue; and the Roosevelt Hotel at 45 East 45th Street. As noted in the Draft and Final Scopes, the DEIS will map and describe these resources, along with all other historic and cultural resources in the study area, and it will assess the potential effects of the proposed actions on historic and cultural resources. For any identified significant adverse impacts, the DEIS will propose measures to avoid, minimize, or mitigate any adverse impacts on historic and cultural resources in

consultation with the New York City Landmarks Preservation Commission, as described in the Draft and Final Scopes.

Comment 77: Focusing on the One Vanderbilt project, historic preservation advocates have voiced concern about the possible loss of 51 East 42nd Street. This long, narrow trapezoidal-shaped building has a unique facade on Vanderbilt Avenue that harmonizes well with the iconic Grand Central Terminal right across the street. It is one of several remaining structures of a suite of handsome buildings—Terminal City—that make New York so unique as a business center. Two alternatives for preserving this building should be given careful consideration. One would be to incorporate the façade into the new building. The other would retain the historic building and build One Vanderbilt on a smaller footprint. Preserving this building would mean the proposed angled south face of the new building could be set flush with the building line on 42nd Street, preserving one of the many the street walls that make New York City so unique. (Haikalis)

We wish the developers would have considered a scheme that reuses the existing façade of Warren and Wetmore's 51 East 42nd Street. (Goldwyn)

Response: Retaining just the façade of a historic building for incorporation in a new development is not generally considered to be an acceptable preservation treatment. Building the One Vanderbilt development on a smaller footprint would not create floorplates of a sufficient size to provide trading floors, which is a key goal of the proposed development.

As described in the Draft and Final Scopes, the DEIS will assess the potential effects of the proposed actions on architectural resources and will propose measures to avoid, minimize, or mitigate any identified adverse impacts on architectural resources.

Comment 78: Study the contextual and visual relationship between any future Vanderbilt Avenue buildings and Grand Central Terminal. (Garodnick)

Response: As described in the Draft and Final Scopes, the DEIS will include a conceptual discussion of the potential visual and contextual impacts on surrounding historic and cultural resources including Grand Central Terminal from redevelopment within the Vanderbilt Corridor.

Comment 79: What measures will be implemented to ensure that Grand Central Terminal is protected during demolition and construction of One Vanderbilt and any future buildings in the corridor? (Garodnick, Rubin)

The EIS needs to clearly articulate the steps that will be taken to avoid negatively impacting Grand Central during demolition and construction. (MAS)

Response: As described in the Draft and Final Scopes, the DEIS will assess the potential for the One Vanderbilt development to result in direct physical impacts on

historic and cultural resources and will discuss measures to avoid, minimize, or mitigate any such direct impacts.

Comment 80: MAS has identified four buildings worthy of landmark designations, located in the proposed Vanderbilt Corridor: The Yale Club, the Vanderbilt Concourse Building, the Poston Building, and the Roosevelt Hotel. It is critical to landmark these buildings now. (Slevin)

Response: The designation of New York City landmarks is the purview of the New York City Landmarks Preservation Commission.

Comment 81: The remaining four blocks of the Vanderbilt Corridor include three historic structures that merit preservation. The historic Roosevelt Hotel is a cultural landmark, having hosted numerous social and cultural events and is long associated with the visitor experience of travelers arriving on long distance trains at Grand Central Terminal. The Yale Club and the Vanderbilt Concourse Building occupy the eastern half of the block that also includes several buildings that MTA plans to sell. One alternative for this block would be for MTA to sell its current headquarters building at Two Broadway in Lower Manhattan and construct new headquarters space on Madison Avenue, while preserving the two abutting historic structures on Vanderbilt Avenue. MTA has unique powers as a state agency relative to City zoning laws, and building a new structure for its own use would give it many options. (Haikalis)

Response: The disposition and redevelopment of its property is the purview of the MTA. As described in the Draft and Final Scopes, there are no specific proposals to redevelop the four blocks of the proposed Vanderbilt Corridor north of the One Vanderbilt development site. Further, the DEIS will include a conceptual discussion of the impacts on historic and cultural resources from redevelopment within the Vanderbilt Corridor as noted in the Draft and Final Scopes.

Comment 82: If fully implemented, this plan could irreparably damage one of New York's great historic commercial zones and greatly lessen the context and significance of Grand Central Terminal for future generations. (Goldwyn)

Response: As described in the Draft and Final Scopes, the DEIS will assess the potential effects of the proposed actions on historic and cultural resources, including visual and contextual changes as well as any direct physical impacts.

Comment 83: Our public policy committee received a briefing on One Vanderbilt that focused on whether the design has a harmonious relationship with Grand Central. The committee thought that would be difficult to find, as the building of 1,300 plus feet will likely overwhelm and shadow the landmark. (Goldwyn, Curtis)

Response: As described in the Draft and Final Scopes, the DEIS will assess the potential visual and context effects of the proposed actions on historic and cultural resources, which include Grand Central Terminal.

Comment 84: We feel that the visual connection between Grand Central Terminal and One Vanderbilt could be even stronger. A simplified base, pulled further back, would be a better background and provide a better view. (Goldwyn)

Response: Comment noted.

Comment 85: The tapered design of One Vanderbilt combines the best modern architecture with sensitivity to the historic nature of Grand Central Terminal. (Isenstadt)

Response: Comment noted.

Comment 86: With regard to the public realm, the activation of an exterior public area adjacent to Grand Central Terminal enhances the perimeter of the iconic landmark and celebrates its historic status. (Roggendorff)

Response: Comment noted.

Comment 87: During the previous rezoning, the Landmarks Conservancy, the Municipal Art Society and the Historic Districts Council released a list of the 16 most important historic buildings in East Midtown. These resources should be evaluated for their potential as New York City landmarks. It should be clear which historic resources are to be preserved.

From this list, there are three buildings in the proposed re-zoned area: The Yale Club, 50 Vanderbilt Avenue 1915, James Gamble Rogers; Roosevelt Hotel, 45 East 45th Street 1925, George B. Post; and 52 Vanderbilt Avenue (Manhattan Savings Bank Building) 1915, Warren and Wetmore.

There are six buildings within the 400-foot study area: Pershing Square Building, 125 Park Avenue (Also known as 100 East 42nd Street) 1923, York and Sawyer, with John Sloan (calendared); Postum Building, 250 Park Avenue 1925, Cross and Cross; Lincoln Building, 60 East 42nd Street (Also known as One Grand Central Place) 1930, James Edwin Ruthven Carpenter, Jr.; Grand Rapids Furniture Co.,18-20 East 50th Street (New York Health & Racquet Club) 1915, Rouse & Goldstone; Joseph L. Steinman; Union Carbide Building, 270 Park Avenue (JPMorgan Chase Tower) 1960, Skidmore, Owings & Merrill Gordon Bunshaft, Design Partner, Natalie de Blois, Senior Designer; and 400 Madison Avenue 1929, H. Craig Severance.

There are three buildings on the boundary of the 400-foot study area: Graybar Building, 420 Lexington Avenue 1927, Sloan & Robertson (calendared); Chemists Club (Dylan Hotel) 50-52 East 41st Street 1910, York & Sawyer; and InterContinental NY Barclay Hotel, 111 East 48th Street 1927, Cross and Cross (calendared).

There are also several buildings that are not impacted by the current proposal, but should be taken into account when the City revisits a larger rezoning of East Midtown. These buildings include: Benjamin Hotel (former Beverly Hotel), 125

E 50th Street (Also known as 557 Lexington Avenue) 1927, Emery Roth (calendared); Lexington Hotel, 511 Lexington Avenue 1928, Schultze and Weaver (calendared); Shelton Hotel (Halloran House), 525 Lexington Avenue (New York Marriott East Side) 1924, Arthur Loomis Harmon (calendared); and Girl Scouts of America, 830 Third Avenue 1957, Roy O. Allen of Skidmore, Owings and Merrill with William T. Meyer. (Tri-Board)

Response: The identification of historic and cultural resources in the DEIS will be made in consultation with the New York City Landmarks Preservation Commission, as noted in the Final Scope. The list of resources in the *East Midtown Rezoning and Related Actions FEIS* will be referenced in the DEIS analysis.

URBAN DESIGN

Comment 88: One Vanderbilt's detailed analysis should include images presenting before and after depictions of the view corridors along 42nd Street, particularly from Bryant Park, where over 5 million visitors per year are able to experience views of the distinguished Chrysler Building. This will facilitate a better understanding of how the development will impact these significant view corridors. (MAS)

Response: Views along 42nd Street, particularly from Bryant Park, will be included in the Urban Design and Cultural Resources analysis.

Comment 89: The Chrysler Building is also a "landmark" in the "Image of the City" sense—people navigate, orient, and identify with the Chrysler Building. View corridors and the impact of the SL Green development on the Chrysler Building should therefore be analyzed, particularly along East 42nd view corridor west of Madison Avenue, especially these three intersections: East 42 Street and 6th Avenue (Bryant Park); East 42 Street and Fifth Avenue (NYPL); and East 42 Street and Madison Avenue (One Vanderbilt). (Tri-Board)

Response: As noted in the Draft and Final Scopes, the Urban Design and Visual Resources analysis in the DEIS will assess the potential for the proposed actions and the proposed One Vanderbilt development to result in significant adverse impacts on visual resources located in the study area.

Comment 90: MAS appreciates the gestures the designers have taken to acknowledge One Vanderbilt's important position adjacent to Grand Central. Setting the building back from the lot line along 42nd Street will provide new views of the terminal. While we think the building is contextually appropriate, we urge the developer to consider architectural and community opinions about the angled element on 42nd Street and Vanderbilt Avenue. (Slevin)

The design features of One Vanderbilt serve to complement East Midtown's existing class of architecture and the iconic Grand Central Terminal. Specifically, the intricate use of terra cotta throughout the façade and the setback of the façade and the use of low-iron glass along 42nd Street pay

homage to our neighborhood's architectural history and improve overall visibility from street level. (Roggendorff)

Response: Comments noted.

Comment 91: What are the potential canyon effects that will be created for pedestrians from 30 FAR buildings between 42nd and 47th Streets? (Garodnick, Rubin)

Response: As noted in the Draft and Final Scopes, the Conceptual Analysis chapter of the DEIS will include an assessment of urban design and visual resources. Following *CEQR Technical Manual* methodologies, this assessment will analyze the pedestrian experience of the Vanderbilt Corridor.

Comment 92: What ways must we mitigate the canyon effect through the creation of open spaces and other public realm improvements in and around the corridor? (Garodnick, Rubin)

Response: As noted in the Draft and Final Scopes, the Conceptual Analysis chapter of the DEIS will include an assessment of urban design and visual resources. Following *CEQR Technical Manual* methodologies, this assessment will analyze the pedestrian experience of the Vanderbilt Corridor. If a significant adverse urban design and visual resources impact is identified, potential mitigation measures will be discussed. Any future development within the Vanderbilt Corridor would be studied in separate environmental reviews; those reviews would include detailed assessments of the potential for significant adverse urban design and visual resources impacts and would propose mitigation measures for such identified impacts.

Comment 93: What will be the collective environmental impact of all this concentrated new development in an already extraordinarily dense environment? (Rubin, Tri-Board)

Response: Following *CEQR Technical Manual* methodologies, the Urban Design and Visual Resources analysis in the DEIS will consider the future No-Action and With-Action conditions of the both the project site and the surrounding area, including other known future development projects anticipated to be constructed before the proposed actions.

Comment 94: Pedestrian level winds should be assessed as the proposed SL Green development is a shear tower with no setbacks to mitigate wind impacts. The methodology needs to include the potential build-out of the other sites in the Vanderbilt Corridor and the adjacent block at a minimum in order to be useful. (Tri-Board)

Response: According to the *CEQR Technical Manual*, a study of wind conditions and their effect on pedestrian level safety may be warranted under certain circumstances for projects involving the construction of large buildings. The Vanderbilt

Corridor is not located on the waterfront or in a location that experiences high wind conditions. Therefore, as noted in the EAS, a study of wind conditions and their effect on pedestrian level safety is not warranted for the proposed actions.

Comment 95: The height of One Vanderbilt is 1,350 feet. Perhaps it is more monumentally disturbing because it dwarfs Trump World Tower, which is only 861 feet. (Curtis)

Response: Comment noted.

Comment 96: Evaluate glare and reflectivity to alternatives to the proposed curtain wall which will result in less glare but will have high reflectivity. (Tri-Board)

Response: As described in the Draft and Final Scopes, the DEIS will assess the design of the proposed One Vanderbilt development in conformance with the methodology of the *CEQR Technical Manual*.

HAZARDOUS MATERIALS

Comment 97: The study should address asbestos removal from buildings built before 1970. Air sampling monitors locations should be identified during demolition of pre-1970 buildings in the DEIS. (Tri-Board)

Response: As described in the Draft and Final Scopes, the DEIS will address the potential for asbestos to be present in the existing buildings. Any demolition or renovation activities in buildings that contain or could contain asbestos are strictly regulated in New York City (e.g., by the New York City Department of Environmental Protection and the New York State Department of Labor) and the DEIS would discuss that compliance with these regulatory requirements, including requirements related to air monitoring, would need to be followed to avoid a potential for significant adverse effects. However, the DEIS cannot include monitoring locations as these would depend on the exact locations and types of asbestos, the type of containment used, and other information that will not become available until shortly before demolition. Once that information is available, air monitoring requirements would be determined per RCNY Title 15, Chapter 1, Section 1-41.

WATER AND SEWER INFRASTRUCTURE

Comment 98: According to draft scope of work (page 22), the EIS will not conduct an analysis of water supply. This would be inconsistent with its commitment to factor in future developments (of potential FAR 30) on four building Blocks (1279, 1281, and 1282) in any analysis to be conducted. In addition, future development on Block 1278 should be included in the analysis. All these future developments could potentially consume more than 1 million incrementally which would require analysis as per CEQR.

Response: The EAS provided an estimate of the One Vanderbilt development's water demand, which would be less than 1 million gallons per day, the CEQR threshold for conducting an analysis of an action's impact on the water supply system. As noted in the Draft and Final Scopes, the Conceptual Analysis chapter in the DEIS will include a water and sewer analysis. Following *CEQR Technical Manual* methodologies, this analysis would present a conceptual assessment of the water demand generated by potential future development on Blocks 1279 and 1279 in the Vanderbilt Corridor. As described in the response to Comment 48, it is not a reasonable assumption that all four blocks within the Vanderbilt Corridor north of the One Vanderbilt development site would be redeveloped in the future pursuant to the proposed text amendment.

Comment 99: On page 22 of the scope of work it cites that an existing 48-by-36-foot combined sewer line that crosses the site from East 43rd Street to East 42nd Street serving the properties on site in addition to a portion of 335 Madison Avenue, as well as catch basins located along 43rd Street and Vanderbilt Avenue will be removed to construct below-grade public improvements. The plan proposed to DEP to reverse the flow along East 43rd Street to east-west from the current west-east and to construct a new connection into a major existing line in Madison Avenue will be disclosed.

- - How would this action affect surrounding buildings?
- - Would there be disruption of sewer drainage service
- - Would this action affect City traffic?
- - Would this action affect the transportation system?
- - Who is paying for this construction?
- - Why is this construction necessary?
- - What affect would this construction have on local business? (Tri-Board)

Response: This aspect of the One Vanderbilt development will be described and assessed in the Water and Sewer Infrastructure chapter of the DEIS in accordance with CEQR methodologies as described in the Draft and Final Scopes.

Comment 100: Analysis of future stormwater generation from the proposed development and potential future developments should include contribution from future development of Blocks 1278 and 1282. (Tri-Board)

Response: As noted in the Draft and Final Scopes, the Conceptual Analysis chapter in the DEIS will include a water and sewer analysis. Following *CEQR Technical Manual* methodologies, this analysis would conceptually assess the potential stormwater generation from future development on Blocks 1278 and 1282.

Comment 101: The volume of storm water runoff from each of the building sites must include peak discharge rates. The EIS should also analyze a separate scenario that

identifies the amount of waste water and stormwater that could be reduced if the projected development sites are required to strictly adhere to best stormwater management practices, including green roofs and other strategies. (Tri-Board)

Response: The proposed One Vanderbilt development would be designed to meet DEP's stormwater management requirements included in the DEP Guidelines for the Design and Construction of Stormwater Management Systems, dated July 2012, and the DEP Criteria for Detention Facility Design, dated June 6, 2012. This would include the incorporation of Best Management Practices (BMPs) for stormwater detention and release. The BMPs will be discussed in the Water and Sewer Infrastructure analysis as noted in the Draft and Final Scopes.

Comment 102: PlaNYC's stated goal to address the root cause of Combined Sewer Overflows by investing in green infrastructure to capture storm water before it overwhelms the sewer system should be included in this EIS Scope of Work. (Tri-Board)

Response: The compatibility of the proposed actions and the proposed One Vanderbilt development with PlaNYC will be assessed in the Land Use, Zoning and Public Policy chapter of the DEIS as noted in the Draft and Final Scopes.

Comment 103: If efficient stormwater management measures are not implemented, the proposed One Vanderbilt and the Vanderbilt Corridor projects will increase stormwater runoff into the City's overflowing sewer system, increasing existing conditions such as street flooding, surcharging sewers downstream, sewer back-ups or combined sewer overflows in surrounding water bodies, all of which are public health and natural resources concerns. The EIS should investigate the application of blue and green roofs, subsurface detention systems that allow for infiltration while slowing the release of stormwater to the sewer system, roadway alterations that allow runoff to soak or infiltrate into the ground particularly along Vanderbilt Avenue, and cisterns that can store excess stormwater during warm weather months. Stormwater capture through green infrastructure and other controls will reduce combined sewer overflow volumes and improve water quality while providing substantial sustainability benefits such as reducing energy use and mitigating the urban heat island effect. (Tri-Board)

In both combined sewer and separate sewer areas, on-site stormwater best management practices must be included to treat and retain or detain and release with controlled discharge rates to slow peak runoff rates, and develop a concept plan that identifies general types, locations sizing and anticipated runoff reductions. Stormwater management systems must be incorporated into the project to mitigate potential significant impacts from stormwater. These systems include techniques, such as subsurface stone beds, storm chambers and perforated pipes that allow the stormwater to seep into the ground and be slowly released to the sewer system or blue and green roofs that also store stormwater and gradually release it during off-peak periods. (Tri-Board)

Response: As described in the Draft and Final Scopes, the DEIS will include a stormwater analysis in the Water and Sewer Infrastructure chapter of the DEIS. This analysis will describe any BMPs that are proposed for incorporation into the design of the One Vanderbilt development.

Comment 104: The EIS should identify water conservation measures, such as low-flow plumbing fixtures, and develop a concept plan that identifies general types, locations and anticipated demand reductions. (Tri-Board)

Response: 317 Madison has indicated that the proposed One Vanderbilt development will pursue LEED certification, and it is expected that certain water efficiency measures would be included in the project to achieve certification. Such measures as known would be described in the DEIS.

SOLID WASTE AND SANITATION SERVICES

Comment 105: Although the solid waste and sanitation services technical area does not meet the CEQR requirements necessitating analysis, it should still be addressed. According to EAS (page 8), the proposed actions are estimated to generate 210,501 pounds per week of solid waste which is over the 50 ton per week threshold cited by CEQR requiring an impact analysis of solid waste generated by proposed actions. Also, it should be clarified how and where garbage being picked up. Throughout the City, sidewalks have heaps of plastic bags on the sidewalks, which is not a pleasant experience in the late afternoon or evening. (Tri-Board)

Response: The EAS included a screening analysis to determine if a detailed analysis of solid waste and sanitation services was warranted for the proposed One Vanderbilt development. The screening analysis concluded that, compared with the 13,000 tons per day that private carters handle, the amount of solid waste that would be generated per week by the proposed One Vanderbilt development over the No-Action condition would be minimal (160,905 pounds per week or about 80 tons). Therefore, the proposed One Vanderbilt development would not result in any significant adverse impacts to solid waste and sanitation services and no analysis in the DEIS is required. A conceptual analysis of the potential for impacts to result from development on Blocks 1279 and 1281 within the Vanderbilt Corridor will be included in the DEIS as described in the Draft and Final Scopes.

Comment 106: There should be an impact analysis of solid waste to be generated from future development on the other four blocks of the Vanderbilt Corridor (1278, 1279, 1281 and 1282). (Tri-Board)

Response: A conceptual analysis of the potential for impacts to result from development on Blocks 1279 and 1281 within the Vanderbilt Corridor will be included in the DEIS as described in the Draft and Final Scopes. As noted in the response to

Comment 48, the reasonable worst-case development scenario does not include potential development on Blocks 1278 and 1282 within the Vanderbilt Corridor.

ENERGY

Comment 107: In 2011 NYC peak demand was about 14,000 megawatts (MW) of electrical energy. According to NYISO, NYSERDA and NYCEDC, New York City has 9,000 MW installed and 4,000 MW imported capacity (5,000 MW max.) They estimate that NYC will require between 6,000 and 8,000 MW of increased capacity over the next 20 years keeping up with demand. This does not consider the impact of DCP's proposed action. A study should be conducted to determine if our electrical capacity could accommodate ever increasing demand for electrical energy by the proposed actions and future projects in the Vanderbilt Corridor to the year 2033. (Tri-Board)

Response: The EAS included a preliminary screening analysis for energy, which determined that the additional energy demand generated by the proposed One Vanderbilt development would not be expected to overburden the energy generation, transmission, and distribution system, and would not result in a significant adverse energy impact and that, therefore, no further analysis of the proposed One Vanderbilt development is required. As described in the Environmental Assessment Statement and the Draft and Final Scopes, the Conceptual Analysis chapter in the DEIS will assess the potential for development on Blocks 1279 and 1281 within the Vanderbilt Corridor to result in impacts on the City's energy generation, transmission, and distribution system following *CEQR Technical Manual* methodology.

TRANSPORTATION

Comment 108: In the vicinity of Grand Central, transportation, for the vast majority of people, means trains and feet. There is not much to be done about the subway or commuter rail line haul capacity in the context of five blocks and there is no room to make new lanes for automotive traffic. It would, therefore, produce a more relevant environmental analysis of transportation if the traditional vehicular analysis gave way to a pedestrian oriented analysis. (Tri-Board)

Response: As described in the Draft and Final Scopes, the proposed actions will incorporate a pedestrianized public place (on existing Vanderbilt Avenue between East 42nd and East 43rd Streets), on-site connections to the subway system and future East Side Access, and off-site improvements within Grand Central subway station, all of which are intended to enhance pedestrian flow surrounding the project site, both at and below grade. As described in the Draft and Final Scopes, the transportation analyses for the DEIS will include assessments of traffic, transit, pedestrian, and parking conditions for appropriate study areas in accordance with *CEQR Technical Manual* guidelines.

Comment 109: Transit and Pedestrians analysis must provide more detailed estimates of how many additional commuters are likely to be coming into the area resulting from the proposed actions and potential future projects. (Tri-Board)

Response: As described in the Draft and Final Scopes, detailed trip estimates (the projection of trip-making by autos, taxis, transit, and walk, etc.) have been prepared for the proposed actions. These estimates were used to determine the appropriate study areas for the analysis of the surrounding transportation network (i.e., roadways, transit facilities, pedestrian elements, and parking resources). In accordance with *CEQR Technical Manual* guidelines, this impact analysis also accounts for trip-making from other projects in the area that are expected to be completed by the proposed actions' anticipated Build year.

TRAFFIC

Comment 110: It is important to study in detail any impact of permanently closing 42nd to 43rd Streets. (Garodnick)

Response: The permanent closing of Vanderbilt Avenue between East 42nd and East 43rd Streets, as well as the consequent conversion of the segment between East 43rd and East 44th Streets from two-way to one-way southbound, will be incorporated as part of the DEIS's transportation analyses, as noted in the Draft and Final Scopes.

Comment 111: I also ask for a study of the traffic flow along Vanderbilt Avenue from 42nd to 47th Streets, as well as each of the cross streets that connect Vanderbilt to Madison Avenue.(Garodnick)

Response: As shown on Figure 6 of the Draft and Final Scopes, all intersections along Vanderbilt and Madison Avenues between East 42nd and East 47th Streets, with the exception of those along East 45th Street, have been included in the traffic study area for analysis in the DEIS. In accordance with *CEQR Technical Manual* guidelines, a detailed analysis of the two East 45th Street intersections is not warranted based on the incremental vehicle trips projected to traverse those two locations.

Comment 112: Since DCP's proposed action estimates an additional 4,859 workers being brought into the Midtown area, with some of these workers driving into the area, an analysis should be made as to what impact that would have on East Midtown area traffic. The study should include projected workers from future development along the Vanderbilt Corridor through the year 2033. (Tri-Board)

Response: The number of additional workers cited in the comment was an estimate provided in the EAS; a more refined number will be provided in the DEIS, which will assess the potential traffic impacts of workers generated by the proposed One Vanderbilt development. Further, as stated in the Draft and Final Scopes, the study of future 2033 conditions to analyze potential impacts,

included traffic and transportation, associated with the development along the entire Vanderbilt Corridor will be undertaken and presented in the Conceptual Analysis chapter of the DEIS.

PEDESTRIANS

Comment 113: Study the narrow sidewalk limits (13 feet) on Madison Avenue. We know that most avenues are 100 feet wide, building to building, with each sidewalk 20 feet, yet on Madison, sidewalks are only 13 feet. Why isn't One Vanderbilt recessed seven feet back from the street line on Madison Avenue? (Garodnick)

Response: As a condition of the grant of the special permit, minimum sidewalk dimensions will be required on Madison Avenues and specific side streets (see response to Comment 38). As shown on Figure 7 of the Draft and Final Scopes, the DEIS will assess potential pedestrian impacts on this sidewalk. If significant adverse impacts are identified, potential mitigation measures will be explored to address these impacts.

Comment 114: We need a comprehensive plan to improve the corridor's pedestrian circulation. (Garodnick, Rubin)

Response: As described in the Draft and Final Scopes, the proposed actions will incorporate a pedestrianized public place (on existing Vanderbilt Avenue between East 42nd and East 43rd Streets), on-site connections to the subway system and future East Side Access, and off-site improvements within Grand Central Station, all of which are intended to enhance pedestrian flow surrounding the project site, both at and below grade.

Comment 115: Pedestrian circulation space along Madison Avenue, East 42nd Street, and East 43rd Street should be addressed in the Scope for both the SL Green development and the blocks in the Vanderbilt Corridor. The current text requires sidewalk widenings for sites with wide street frontage, but given the Vanderbilt Corridor's location next to GCT and Eastside Access, should include narrow east/west streets as well.

Under what conditions is this and other Mandatory Plan elements modified or eliminated, e.g., As-of-right with pedestrian circulation should be compared with the special permit modification of the Mandatory Plan elements. The draft Scope mentions pedestrian circulation as a challenge (p. 8) but the SL Green development drawings do not show sidewalk widenings other than a slightly skewed building wall along East 42nd Street. And how is the additional density generated from the Vanderbilt Corridor to be accommodated on the same existing sidewalks which currently are already inadequate and overcrowded. (Tri-Board)

Response: As stated above, the DEIS will assess potential pedestrian impacts on pedestrian elements surrounding the project site following methodologies in the *CEQR*

Technical Manual. If significant adverse impacts are identified, potential mitigation measures will be explored to address these impacts. Potential impacts associated with the build-out of the entire Vanderbilt Corridor in a more distant timeframe will also be addressed and presented in the Conceptual Analysis chapter of the DEIS as noted in the Draft and Final Scopes.

Comment 116: The transportation analysis should consider where people want to go and how to get there most conveniently and graciously. Levels of service are useful in establishing minimum dimensions for pedestrian circulation; however, minimums should not become maximums. Particularly in Terminal City the spaces through which people move, and perhaps linger, should emulate the scale and amenity of Grand Central Terminal. (Tri-Board)

Response: Comment noted.

Comment 117: It is probably an error to think of the redesign of Vanderbilt Avenue as the solution to pedestrian transportation in the Vanderbilt Corridor. It is not that Vanderbilt Avenue should not be changed as a "complete street" to better serve its various users. It is, however, that most current trips cross Vanderbilt or are below Vanderbilt and future trips to and from East Side Access are between the LIRR concourse below Vanderbilt Avenue and street level at points along Madison Avenue and along 42 Street, to and from the upper and lower concourses of Grand Central, and the subway station complex below 42 Street.

A relevant environmental analysis of transportation would address how people use the public realm to circulate among their destinations. It would be both quantitative and qualitative. This is a significant challenge to our existing formulaic approach; however, the existing formulas do not adequately address the issues in an urban place as dense and complex as Terminal City. (Tri-Board)

Response: In accordance with the *CEQR Technical Manual* and as stated in the Draft and Final Scopes, the transportation analyses presented in the DEIS will provide projections of trip-making by various modes of transportation, describe how these trips would connect to/from area parking facilities, Grand Central Terminal, and other nearby transit stations/stops, and analyzed potential impacts associated with trip-making from the proposed actions.

TRANSIT

Comment 118: Study and delineate the specific impacts of the proposed infrastructure improvements on the mass transit system, pedestrian flow, both within and around the perimeter of Grand Central. (Garodnick)

Response: The proposed infrastructure improvements are part of the proposed One Vanderbilt development program. Therefore, their impacts will be studied together with the proposed One Vanderbilt development's projected trip-making.

Comment 119: Study the extent to which new workers at One Vanderbilt Avenue would burden existing mass transit infrastructure. (Garodnick)

Response: A detailed transit analysis documenting potential impacts from the proposed actions will be presented in the DEIS as described in the Draft and Final Scopes.

Comment 120: The scope of work has identified the following transit-related improvements:

"A new ground-level entrance with escalator and elevator on East 42nd Street, providing direct access to the 42nd Street Shuttle and providing below-grade connections to the Nos. 4, 5, 6, and 7 Subway lines at the Grand Central Terminal concourse level and to the Long Island Rail Road at the under-construction East Side Access concourse level."

"A new below-grade corridor and escalators connecting to the East Side Access concourse level, providing connections from East Side Access to the 42nd Street Shuttle, Grand Central Terminal, the Nos. 4, 5, 6, and 7 subway lines, and street level."

The study should give more details as to how these would be accomplished. What is the estimated commuter usage at this entrance and this connection? How would commuters be guided to use this entrance and this connection; at ground level and underground? (Tri-Board)

Response: DCP and 317 Madison are coordinating with MTA NYCT on these transit improvements. As noted in the Final Scope, the DEIS will provide a description of how these improvements would enhance transit access and connection within and around Grand Central Terminal and incorporate these improvements as part of the impact analyses. As the design for these connections will continue to evolve beyond this environmental process, specifics on wayfinding will be addressed as part of that effort and will not be addressed in the DEIS.

PARKING

Comment 121: Future potential development of all five Blocks along the Vanderbilt Corridor should be included in the scope of work for parking analysis. (Tri-Board)

Response: As noted in the Draft and Final Scopes, the Conceptual Analysis chapter of the DEIS will include a transportation analysis. Following *CEQR Technical Manual* methodologies, this analysis will assess parking conditions resulting from development within the Vanderbilt Corridor. As noted above, the reasonable worst-case development scenario for the proposed actions only includes potential future development within the Vanderbilt Corridor on Blocks 1279 and 1281.

AIR QUALITY

Comment 122: A study of all the pollutants in *CEQR Technical Manual*, 2012 Edition (Revised 6/18/12), must be included in the EIS. Nitrogen Oxides (NOx) levels should

checked during the mobile analysis (both the screening and detailed analysis portions), all of the stationary source analysis screening types and the garage analysis screenings. NOx is a criteria pollutant, an indirect greenhouse gas and a key cause of acid rain. The burning of fossil fuels is a major source of NOx. Not only will this new class A office building and its neighboring new Vanderbilt Corridor class A Office buildings be burning more fuels for heating and cooling, the higher rents will bring to the East Midtown area more highly compensated workers and thus a dramatic increase in the use of not only personal vehicles but also so called "black cars." Black cars are known for their frequently idling motors and along with the other factors mentioned, could increase area pollution significantly as new sources of NOx, SOx CO and other emissions flourish. There are also the on-going air quality changes the area may experience after the opening of Madison Yards. Over the past 15 years, this has been found to be true for the East Side Access Project. Once the final phases of the East Side Access project are completed, air quality in this area may be affected and this must also be taken into consideration. (Tri-Board)

Response: As described in the Draft and Final Scopes, the DEIS will include an analysis of mobile and stationary source emissions. The 2014 *CEQR Technical Manual* identifies carbon monoxide (CO) and particulate matter (PM) as the pollutants of concern due to induced traffic associated with proposed actions. Accordingly, the DEIS will include an analysis of these pollutants from vehicular traffic generated by the proposed actions. Oxides of nitrogen (NO_x) are principally a concern since it is a precursor to ozone formation therefore it is considered a regional pollutant. Consequently, emissions of NO_x from mobile sources are typically analyzed for projects that can affect regionwide transportation patterns, rather than individual development sites. As described in the Final Scope, the stationary source analysis will address concentrations of NO_2 and if applicable, sulfur dioxide (i.e., if fuel is used).

Comment 123: The Study of Air Quality Mitigation technologies such as photo-catalytic cements and coatings which help reduce hydrocarbons and other emissions at point of reception after being applied to buildings and hardscapes, must be included. (Tri-Board)

Response: As described in the Draft and Final Scopes, the analyses contained in the DEIS will be developed in conformance with CEQR regulations and the guidance of the *2014 CEQR Technical Manual.* A study of building materials and coatings is not a requirement to evaluate the potential for significant adverse impacts from the proposed actions.

Comment 124: The testing of TVOC (Total Volatile Organic Compounds) is not included in the proposed EIS studies of Air Quality. VOC's according to the EPA have an ability to create photochemical smog and should be studied. (Tri-Board)

Response: VOCs, together with NO_x, are precursors in the formation of ozone. Ozone is formed through a series of reactions that take place in the atmosphere in the presence of sunlight. The effects of NO_x and VOC emissions from all sources are therefore generally examined on a regional basis. The proposed actions' potential to affect air quality on a regional scale will be evaluated in the DEIS as noted in the Final Scope.

Comment 125: Will the EIS Scope of Work address and support NYC's Sustainability Master Plan "PlaNYC 2030" in its missions, initiatives and goals? These initiatives are specifically described in pages 127, 128 and 129 of the Greener, Greater New York PlaNYC, which states, "The following initiatives are designed by PlaNYC to provide everyone in our city with healthier air to breathe. We should expect no less than the cleanest air of any big city in America, given the track record we have set in becoming the country's safest large city." These PlaNYC initiatives include:

- Reducing emissions from construction vehicles and construction related activities;
- Reducing emissions from buildings;
- Reducing energy related emissions by cutting energy consumption and upgrading NYC's energy supply by promoting the cleaner burning heating fuels, reducing heating fuel usage and enforcing strict emission standards in buildings;
- Pursuing natural solutions to improve air quality such as increased tree planning (attaining the goal of 1 million by 2017) on properties like vacant lots, parking garages and public spaces;
- Developing new tools to understand the real nature of air quality degradation so that NYC can identify the exposure New Yorkers will experience in the Vanderbilt Corridor Neighborhood and reduce it;
- Launch collaborative local air quality studies by monitoring and modeling neighborhood level air quality across NYC. (Tri-Board)

Response: As discussed in the Draft and Final Scopes, the DEIS will evaluate emissions from construction vehicles and activities, and estimate energy usage and criteria pollutant and greenhouse gas (GHG) emissions due to the proposed actions. Other initiatives referenced in the comment are citywide actions which would be undertaken by specific agencies and are not applicable to particular developments or projects.

Comment 126: The DCP scope of work does not state the amount of microscale receptors and at what locations the reading would be taken. (Tri-Board)

Response: The mobile source analysis will be performed at locations selected based on *CEQR Technical Manual* criteria and the findings of the Transportation analysis. As described in the Draft and Final Scopes, the stationary source

analysis will be performed at elevated receptors (such as open windows, air intake vents, etc.) that are of an equal or greater height when compared with the height of the proposed building's stack(s).

GREENHOUSE GAS EMISSIONS

Comment 127: While climate change is of global concern, we need to act on a local level so as not to exacerbate a growing problem. Based upon the recent predictions of the effects of climate change, it is necessary that the lead agency discuss whether climate change will exacerbate the environmental impacts of the action (or create additional environmental effects). (MAS, Tri-Board)

The EIS must include an in-depth analysis of the impacts a project may have upon climate change. This is especially true in New York City, where, according to the New York Greenhouse Gas Emissions Inventory, citywide carbon dioxide equivalent emissions were approximately 58 million metric tons in 2005, with an astounding 79 percent coming from or attributable to buildings. Therefore, the EIS must simultaneously assess a project's impact upon climate change and how best to reduce such impact. (Tri-Board)

Response: As described in the Draft and Final Scopes, GHG emissions from the proposed One Vanderbilt development will be quantified and an assessment of consistency with the City's GHG reduction goal will be performed, as required by the *CEQR Technical Manual*, and discussed in the Greenhouse Gas Emissions chapter of the DEIS.

Comment 128: To comply with the mitigation and avoidance requirements of CEQR/SEQRA, and to best prepare for, and adapt to, climate change, the EIS should examine adaptation and mitigation measures which may reduce the impact climate change will have on an action in the future. (MAS, Tri-Board)

Response: As required by the *CEQR Technical Manual* and as described in the Draft and Final Scopes, mitigation (i.e., avoiding and reducing GHG emissions) will be reviewed in detail in the Greenhouse Gas Emissions chapter of the DEIS. The only impact of climate change which is currently relevant for review at the project level is storm flooding resilience, which is not relevant to the proposed actions' location.

Comment 129: Since the proposed actions total over 350,000 square feet, a "Greenhouse Gas Emissions" analysis must be conducted using the assessment approach cited in 2010 *CEQR Technical Manual* Chapter 18. If the result of the analysis is inconsistent with the City's GHG reduction goal (Local Law 22 of 2008 Section 24-803 of the Administrative Code of the City of New York), what mitigation measures will be taken to comply with the City's goal of reducing GHG emissions by 30 percent below 2005 levels by 2030? (Tri-Board)

Response: This is included in the Draft and Final Scopes and will be reviewed in the Greenhouse Gas Emissions and Conceptual Analysis chapters of the DEIS.

Comment 130: Regardless of how the carbon dioxide emissions are measured, by disclosing the greenhouse gas emissions of a project, the lead agency can identify the opportunities to economically and practicably reduce such emissions through simple mitigation measures. Other mitigation measures can include reducing the traffic impacts, working with MTA early in the process to develop a better and more comprehensive transit system to serve this area, and working with Con Edison to provide the cleanest energy possible. (Tri-Board)

Response: As required by the *CEQR Technical Manual* and as described in the Draft and Final Scopes, mitigation (i.e., avoiding and reducing GHG emissions) will be reviewed in detail in the Greenhouse Gas Emissions chapter of the DEIS. While there are various City, state, and regional processes that are aimed at working with Con Edison and other electricity generators serving the City and the region to provide more efficient and cleaner power, the proposed actions and the revised zoning text are not the appropriate venue for that unrelated effort.

NOISE

Comment 131: The DCP scope of work cites only four noise receptor locations to be used in its analysis which are too few to do the study justice. The DEIS should also factor in potential future development of all five blocks along Vanderbilt Corridor. (Tri-Board)

Response: While the Draft Scope indicated that four receptor locations would be assessed in the DEIS, the Final Scope states that existing noise levels will be measured at nine receptor locations throughout the Vanderbilt Corridor for the DEIS.

Comment 132: Noise measurements must coincide with weekday peak traffic hours AM, Midday and PM time periods. All noise measurements must be recorded in conformance with procedures contained in the *CEQR Technical Manual*. (Goshow)

Response: As stated in the Draft and Final Scopes, existing noise levels will be measured during the AM, MD, and PM time periods for the DEIS.

Comment 133: At each noise measurement site, noise levels must be measured in units of "A" weighted decibel scale (dBA) for a duration of 20 minutes per time period, especially at peak traffic hours AM, Midday and PM. (Goshow)

Response: As stated in the Draft and Final Scopes, existing noise level measurements will be measured in dB(A) for 20 minutes during each of the peak periods listed above for the DEIS.

Comment 134: Provide a summary table of existing measured noise levels for all time periods as part of the EIS. (Goshow)

Response: A summary table of existing noise levels for all time periods will be presented in the DEIS.

Comment 135: At each of the noise measurement sites a Passenger Car Equivalent (PCE) noise analysis, in accordance with CEQR requirements, will be completed to determine noise levels under future No-Action and With-Action conditions. All projections will be made with Leq noise descriptors. (Goshow)

Response: As stated in the Draft and Final Scopes, if the results of the Noise screening analysis indicate that a doubling of Noise PCEs would occur, a mobile source noise analysis would be performed using either proportional modeling or the Traffic Noise Model (TNM), where appropriate.

Comment 136: Estimated window-wall attenuation requirements will be based upon the proposed used of each of the potential development sites based upon a CEQR interior noise exposure level limits. (Goshow)

Response: As stated in the Draft and Final Scopes, future predicted noise levels will be used to determine the level of attenuation necessary to satisfy CEQR criteria.

Comment 137: A summary of the noise measurement findings and window wall attenuation requirements must be summarized in a tabular format in the EIS. (Goshow)

Response: This summary table will be provided in the DEIS.

Comment 138: Provide an assessment for reduction of noise levels based upon building heights due to high street noise level values (i.e., noise adjustment due to height). (Goshow)

Response: As stated in the Final Scope, noise level decreases due to height will be predicted, and window-wall attenuation will be calculated for higher elevations in the DEIS.

Comment 139: This chapter must examine potential noise impacts due to stationary sources including short-term construction phase noise and vibration impacts. (Goshow)

Response: As stated in the Draft and Final Scopes, the potential for construction noise impacts will be assessed in the Construction Impacts chapter of the DEIS. Potential vibration impacts will also be assessed in the Construction Impacts chapter, as stated in the Final Scope.

Comment 140: Evaluate the potential for significant adverse impacts associated with stationary source noise standards from the proposed One Vanderbilt and Vanderbilt Corridor mechanical equipment. (Goshow)

Response: As stated in the Draft and Final Scopes, it is assumed that outdoor mechanical equipment in the proposed One Vanderbilt development and in future potential developments within Vanderbilt Corridor would be designed to meet applicable regulations and, therefore, no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed in the DEIS.

Comment 141: The noise analysis must be consistent with the requirements of the *CEQR Technical Manual* and consistent with the NYC Noise Control Code (i.e. Local Law 113) and describe how construction activities will be required to adhere to Local Law 113 during construction including regulations to maximum equipment noise levels and the hours of operation for construction equipment use. (Goshow)

Response: The noise and construction analyses in the DEIS will follow the methodologies in the *CEQR Technical Manual*. The Construction Impacts chapter of the DEIS will discuss all applicable codes governing construction.

PUBLIC HEALTH

Comment 142: It is generally accepted that stress has a major economic as well as public health cost. The DEIS should identify potential health risks from the following: noise from demolition; noise from construction; disruption to pedestrians used to talking on Madison, 42nd and Vanderbilt; access for ambulances; access for Fire Engines; access for police; uncertainty created by changes; and uncertainty caused by traffic rerouting. All of these create stress and must be studied in order to assure adequate mitigations. (Tri-Board)

Response: As noted in the Draft and Final Scopes, the public health analysis that will be included in the DEIS will follow the methodologies in the *CEQR Technical Manual*. If significant adverse noise impacts are identified from construction, they will be evaluated as part of the public health analysis. All of the other items listed in the comment are beyond the scope of a CEQR public health analysis.

NEIGHBORHOOD CHARACTER

Comment 143: One of the most unique and defining characteristics of the rezoning area is that it is located atop one of the nation's most significant transportation hubs. This neighborhood—historically known as Terminal City—is uniquely characterized by the astounding network of underground passageways that have contributed to its functionality and to the neighborhood's status as a world-renown central business district. To insure the continuation of the neighborhood's legacy, these passageways should be acknowledged in the EIS as defining features of the neighborhood, and the rezoning should consider how these passageways can be enhanced by these and future proposed actions. (MAS)

Response: As noted in the Draft and Final Scopes, the neighborhood character analysis that will be included in the DEIS will follow the methodologies in the *CEQR*

Technical Manual. As appropriate, the existing underground passageways will be discussed in the relevant sections of the DEIS, such as in the transportation analysis.

Comment 144: The character of the area near Grand Central is notable for change over time. Grand Central Terminal and the earlier terminal were surrounded by small buildings and even open land; Terminal City filled the neighborhood with larger buildings of relatively uniform height, materials, and design; Lever House and Seagram, models for the '61 zoning resolution, and their progeny changed Park Avenue from masonry streetwall to glass towers and plazas; and more recent buildings have reached for the sky. At each stage some of the earlier built context remained making East Midtown a palimpsest rich in history and meaning – perhaps the unrecognized reason for its popularity. A useful analysis of neighborhood character needs to consider the continuum of Terminal City, not compare two snapshots. (Tri-Board)

Response: Comment noted.

Comment 145: I am concerned about the vast amount of people being introduced to this "Turtle Bay" area. (Curtis)

Response: The DEIS will assess the introduction of workers and visitors generated by the proposed actions in the relevant technical analyses in accordance with the Draft and Final Scopes.

CONSTRUCTION IMPACTS

Comment 146: Construction for the development of One Vanderbilt and the other potential development sites in the Vanderbilt Corridor will overlap with the construction of East Side Access. The EIS should study the compounded impacts of the construction of all these elements on the study area. (MAS)

Construction for the development of new office buildings and pedestrian network improvements facilitated by the proposal will overlap with the construction of East Side Access and the Second Avenue Subway. The EIS should study the compounded impacts of the construction of all these elements on the study area. (Goshow, Levine)

Response: As stated in the Final Scope, the cumulative effects from the construction of East Side Access and the proposed One Vanderbilt project will be discussed in the Construction Impacts chapter of the DEIS. The cumulative effects from the construction of East Side Access and the construction within the Vanderbilt Corridor, including that from the proposed One Vanderbilt project, will be discussed on a conceptual and generic basis in the Conceptual Analysis chapter of the DEIS. The construction activities associated with the Second Avenue Subway are not located in the study area for the proposed actions.

Comment 147: The EIS should explore how air pollution emissions and fuel use from construction equipment can minimized, such as through electrified equipment and fine particulate filters. (MAS, Goshow, Levine)

Response: As described in the Draft and Final Scopes of Work, the construction air quality section of the DEIS will discuss measures to reduce air quality emissions during construction and may include components such as: clean fuel; best available tailpipe reduction technologies; utilization of equipment that meets specified emission standards; and fugitive dust control measures, among others.

Comment 148: The DEIS should discuss the following construction impacts in addition to what were cited in the scope of work:

- How would local businesses be protected from an estimated two years of construction of the proposed actions?
- How will Grand Central be protected during demolition and construction?
- What measures are to be taken to maintain free flow of vehicles during construction?
- What safety measures are to be taken to protect the public during construction?
- What air and noise monitoring receptors are to be used and what location are they going to be placed?
- Where are the staging areas for demolition and constriction going to be? What if there are multiple sites being demolished and built simultaneously?
- What security measures are to be taken during construction?
- What safety measures are to be taken to ensure safety operation of cranes during construction?
- Will there be a Construction Site Task Force for the duration of the build-out of the 5 blocks of Vanderbilt Avenue? (Tri-Board)

Response: The socioeconomic effects of construction activities associated with the proposed actions will be considered in the DEIS as described in the Final Scope. The DEIS will describe the anticipated construction staging, site safety measures, and maintenance and protection of traffic requirements, which are subject to NYCDOT approvals, to protect pedestrian safety and minimize effects on traffic during construction as described in the Final Scope. In addition, as described in the Final Scope, the Construction Impacts chapter of the DEIS will describe any construction monitoring proposed to be undertaken for the construction of the One Vanderbilt development. As described in the Draft and Final Scopes, there are no specific proposals to redevelop the four blocks of the proposed Vanderbilt Corridor north of the development site, and the potential impacts, including construction impacts, resulting from development on two of those blocks pursuant to the proposed actions will be

studied conceptually in the DEIS. Potential mitigation measure will also be considered.

Comment 149: Due to the impact that construction may have on existing privately owned public spaces and transit infrastructure, including the Lexington Avenue 4/5/6 subway line, the EIS should assess the potential impacts that construction will have on both open space and infrastructure, in addition to the other factors identified in the draft scope of work. (Goshow, Levine)

Response: As described in the Final Scope, the potential effects of construction on nearby open spaces and transit services will be discussed in DEIS the Construction Impacts chapter of the DEIS as described in the Final Scope.

Comment 150: We ask that the scope of work for Task 18 - Construction, be expanded to include an analysis of current retail establishments and how they will be affected during and after construction, current pedestrian flow around the proposed site during and after construction and how the large number of tourists will be accommodated during and after construction. (Goshow, Levine)

Response: The potential effects of construction on nearby existing retail establishments and pedestrian circulation will be discussed in the Construction Impacts chapter of the DEIS, as described in the Final Scope. The potential effects of the proposed actions on nearby existing retail establishments after construction will be discussed in the Socioeconomic Conditions chapter of the DEIS, as described in the Draft and Final Scopes. The potential effects of the proposed actions on pedestrian circulation after construction will be discussed the Transportation chapter of the DEIS as described in the Draft and Final Scopes.

Comment 151: We believe community involvement in monitoring construction activates will ensure that the appropriate balance is struck between the progress of construction and the quality of neighborhood life. With a cooperative effort, we believe that construction needs can be met without imposing an undue burden on the neighborhood and the workers in close proximity to the site. To this end, we strongly believe that the creation of a Citizens Advisory Committee to work with the construction team will ensure that these concerns are met. (Goshow, Levine)

Response: Comment noted.

ALTERNATIVES

Comment 152: City Planning should provide an example of the type of building that could be built without the proposed actions, utilizing the current Grand Central Transfer of Development Rights (TDR) requirements, set out in special regulations for the Grand Central Subdistrict, which call for significant improvement to the public circulation system. This will help the public better assess if the public is

fairly compensated when it comes to the public realm deal offered by One Vanderbilt. (MAS)

It's unclear why the No-Action scenario does not include a 1.0 FAR as-of-right TDR bonus and a special permit subway improvement bonus. (Tri-Board)

Response: The No-Action scenario does not include a 1.0 FAR as-of-right TDR bonus to ensure the most conservative estimate of the floor area increase pursuant to the proposed actions. Since the existing subway bonus requires its own discretionary review, it cannot be included in the No-Action scenario. As described in the Draft and Final Scopes, the alternatives analysis in the DEIS will assess a 20.7 FAR Alternative that utilizes the existing subway improvement bonus and development rights from the Bowery Savings Bank. The alternative, including the public improvements required for the bonus, will be described in the DEIS.

Comment 153: It's unclear why the No-Action scenario does not include the Vanderbilt "improvement." This is city-owned property and could be closed as have other streets. (Tri-Board)

Response: The proposed City Map amendment to designate the portion of Vanderbilt Avenue between East 42nd and East 43rd Streets as a "public place" dedicated to pedestrian uses is a discretionary action and cannot be considered as part of the No-Action condition. Closing that section of Vanderbilt Avenue to traffic as was done in Times and Herald Squares would be under the purview of NYCDOT, and any permanent closure would require environmental review.

Comment 154: To compare apples to apples, shouldn't the No-Action scenario assume a 21.6 FAR not 15? (Tri-Board)

Response: An FAR of 21.6 in the Grand Central Subdistrict is only permitted through a discretionary review and, therefore, cannot be assumed in a No-Action scenario. For purposes of CEQR, it is a more conservative analysis to compare the proposed 30 FAR building against a 15 FAR No-Action building, as the incremental difference is greater.

Comment 155: Zoning is intended to treat like properties in a like manner. However, the five blocks that would comprise the Vanderbilt Corridor are not alike in the characteristics that would justify greater density.

All five blocks can connect to the pedestrian circulation system of Grand Central Terminal and provide improved access to the existing system and the future LIRR concourse.

- Only two of the blocks overlook the "airpark" that is preserved above the relatively low Grand Central Terminal building by the removal of its excess development rights.

- Only one of the blocks abuts a subway station.
- Only one of the blocks faces on a 100 foot wide street (42 Street).

These characteristics concern pedestrian circulation, transit access, and open space, which are needed to accommodate the larger number of workers and visitors of the future buildings, and they concern light, air and views, which are jeopardized by the larger bulk of the future buildings. Therefore, the DEIS should study the following two alternatives:

1.) 42nd Street Corridor Alternative

The district could be mapped along 42nd Street, say the north side between Madison and Lexington Avenues, so that all of the properties would have all four of the above characteristics that justify greater density. The development properties would therefore be alike. In addition, a 42nd Street Corridor would, based on previous studies, facilitate a pedestrian realm plan incorporating the pedestrian circulation improvements that are proposed for One Vanderbilt, Grand Central, and the subway complex. It would also encompass the transit improvements anticipated to be provided as part of One Vanderbilt. Conversely, it would avoid having to quickly prepare a plan for how the pedestrian circulation of the four blocks north of One Vanderbilt would connect to each other, to Grand Central, and to East Side Access. Also, a 42nd Street Corridor would more completely encompass the views to the Chrysler Building and Grand Central that need to be studied as part of the area's urban design and to justify changes to the height and setback requirements for One Vanderbilt. And, the historic resources along 42nd Street are perhaps better understood than those along Vanderbilt Avenue. A 42nd Street Corridor would allow the futures of the Yale Club, 52 Vanderbilt, and the Roosevelt Hotel to be examined more deliberately during the study of Greater East Midtown.

2.) Differentiated District Alternative

The special permits for the Vanderbilt Corridor could be written so as to limit the amount of additional FAR depending on the number of density justifying characteristics of the property, say a maximum of 3 or 4 additional FAR per characteristic. This would recognize the differences among the properties and treat them proportionally. It should be clear which density justifying characteristics are acceptable, and to whom, for a future developer to get to 30 FAR. (Tri-Board)

Response: As described in the *CEQR Technical Manual*, the purpose of the alternatives analysis is to consider a range of reasonable alternatives to the project that have the potential to reduce or eliminate a proposed project's impacts, while considering the goals and objectives of the proposed actions. The specific alternatives to be analyzed are typically finalized with the lead agency as project impacts become clarified. As stated in the Draft and Final Scopes, DCP is proposing the Vanderbilt Corridor text amendment in order to address the

number of development sites along Vanderbilt Avenue that offer the opportunity to provide modern commercial space in the immediate vicinity of Grand Central in the near term, to create a mechanism for linking new commercial development to significant infrastructure improvements to the overall Grand Central area, and to create greater options for the transfer of unused landmark development rights. Under the text amendment, sites would be permitted a maximum of 30.0 FAR subject to discretionary review of the specific proposal set forth at that time. As such, the appropriate maximum densities on those sites should be assessed in relation to those specific future proposals.

Comment 156: Most of the additional zoning floor area for One Vanderbilt is proposed to be earned by improvements to the public realm, some on-site and some off-site. Of these, the on-site improvements are: unique to the building; the kinds of amenities traditionally best dealt with through zoning, and – in contrast with improvements by the MTA in Grand Central, or NYC Transit in the subway stations, or NYC DOT on Vanderbilt Avenue; and not easily provided by others. The on-site public circulation improvements proposed for One Vanderbilt include a subway entrance on 42nd Street, a public room at 43rd Street and Vanderbilt Avenue, and connecting vertical and horizontal circulation. Arguably, the spaces as proposed are modest in size and formally obtuse given the special location of the site with respect to Grand Central.

The desire line for pedestrian circulation is a diagonal between the sidewalk at the northeast corner of Madison Avenue and 42nd Street and the Grand Central concourse under the intersection of Vanderbilt Avenue and 43rd Street. This is particularly true for Metro North and for East Side Access but also for tourists moving between Grand Central and Times Square. An alternative design for the on-site additions to the public realm would incorporate the improved subway entrance, the public room, and the connecting circulation space into a single spatial and visual sequence. Examples of diagonal public spaces include 875 Third Avenue, the IBM building at 580 Madison Avenue, and 100 William Street.

Such an alternative would provide a significantly greater public benefit by creating a new southwest entrance to Grand Central, with connections to Metro North, the subway and the LIRR, formally and spatially integral to the terminal. The current design relegates the public entrance to Grand Central to frontage on a secondary street adjacent to the building's loading docks and on an indirect route to the Terminal. (Tri-Board)

Response: As described in the Draft and Final Scopes, the DEIS will include an analysis of pedestrian circulation following the methodology in the *CEQR Technical Manual*. If significant adverse impacts are identified, the lead agency may consider the comment's alternative if found to be a practicable option that avoids or reduces the identified significant adverse impacts.

Comment 157: An alternative design should be studied that explores the best location for the main lobby entrance. Currently it is shown occupying at least half of the frontage on Vanderbilt Avenue. This suggests that a pedestrianized street might serve primarily as access to the building rather than as public space with supporting frontage. Having the lobby face east reflects the direction, but not the level, of much of the pedestrian traffic to and from the building, which might be better served by a connection in the building between its lobby and the concourse of Grand Central. (Tri-Board)

Response: As described in the Draft and Final Scopes, the DEIS will include an analysis of pedestrian circulation following the methodology in the *CEQR Technical Manual*. As noted in the response to Comment 155 above, the purpose of an alternatives analysis is to examine reasonable and practicable options that avoid or reduce project-related significant adverse impacts while achieving the goals and objectives of the proposed actions. The specific alternatives to be analyzed are typically finalized with the lead agency as project impacts become clarified.

MITIGATION

Comment 158: It would be instructive to include an accounting of measures of mitigation for previous projects in the area stating whether they have been implemented and whether they have been successful. (Tri-Board)

Response: This is outside the scope of CEQR. However, where transportation mitigation measures have been implemented by past projects, the DEIS will account for them in existing conditions as appropriate. ✷

APPENDIX B

Travel Demand Factors Memorandum

AKRF

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Travel Demand Factors Memorandum

To: Project File

From: AKRF, Inc.

Date: October 3, 2014

Re: One Vanderbilt – Travel Demand Analysis

cc: NYCDCP EARD

A. INTRODUCTION

This memorandum details the trip generation assumptions and travel demand estimates for the One Vanderbilt development—owned by the applicant, Green 317 Madison LLC (317 Madison)—on the block in Midtown, Manhattan bounded by East 42nd and East 43rd Streets, Madison Avenue and Vanderbilt Avenue. The One Vanderbilt site is currently occupied by four low- to mid-rise buildings that are each over eighty years old and the portion of Vanderbilt Avenue between East 42nd and East 43rd Streets. It is located within the Grand Central Subdistrict of the Special Midtown District. With its south edge on East 42nd Street and its east side including Vanderbilt Avenue facing Grand Central Terminal, the One Vanderbilt site occupies a prominent location in Midtown Manhattan.

In the future without the proposed actions, the No-Action building to which the proposed building will be compared would be approximately 811,100 gross square feet (gsf). The No-Action building would include approximately 84,000 gsf of retail use and 636,300 gsf of office use as well as approximately 91,000 gsf of mechanical space. With the proposed actions (With-Action), the One Vanderbilt site would be redeveloped with an approximately 1.8 M gsf building. The proposed building would contain approximately 1,325,000 gsf of office space (including 246,000 gsf to be used as trading floors), 53,000 gsf of retail, 27,000 gsf of restaurant and a 55,000 gsf roof top amenity space that can also be used as event space. In addition, approximately 343,500 gsf would be allocated to circulation, mechanical space, mechanical, core, back-of-house, and loading uses. In addition, the building would have a 4,500-square-foot enclosed public space fronting on East 43rd Street and Vanderbilt Avenue, with access via East 43rd Street. This planned public space is not expected to generate new trips to the One Vanderbilt site. The proposed actions would also include an amendment of the City Map designating the portion of Vanderbilt Avenue between East 42nd and East 43rd Streets as a public place. No accessory or public parking would be developed for either the No-Action or the proposed buildings. The proposed One Vanderbilt development is expected to be completed by 2021, which will be the analysis year for the transportation assessment purposes. **Table 1** provides a comparison of the future without and with the proposed One Vanderbilt development. In addition, a discussion of the relevant analyses to be undertaken for the potential build-out of the entire "Vanderbilt Corridor" is provided at the end of this memorandum.

Table 1
Comparison of the Future Without and With the Proposed One Vanderbilt Development

Components	Future Without the Proposed Actions (No-Action)	Future With the Proposed Actions (With-Action)	Increment
Office (gsf)	636,312	1,079,000	442,688
Event Space (guests/event) (1)	N/A	1,225	1,225
Observation Deck (trips/hour) (2)	N/A	1,400	1,400
Restaurant (gsf)	N/A	27,000	27,000
Destination Retail (gsf)	62,736	40,000	-22,736
Local Retail (gsf)	20,912	13,000	-7,912
Trading Floor (gsf)	N/A	246,000	246,000

Notes:
N/A = Not Applicable
(1) Based on average occupancy of approximately 45 gsf per guest (see Domino Sugar Rezoning FEIS).
(2) Based on estimates provided by the applicant (5,355 visitors/day; 10 hours/day), adjusted per NYCDOT.
Source: Green 317 Madison LLC, 2013

B. TRANSPORTATION PLANNING ASSUMPTIONS

Trip generation factors for the proposed One Vanderbilt development were developed based on information from the 2014 *City Environmental Quality Review (CEQR) Technical Manual*, 2013 *East Midtown Rezoning and Related Actions FEIS*, U.S. Census Data, and other approved EASs and EISs—as summarized in **Table 2**.

OFFICE

The daily person trip rate and temporal distribution are from the 2014 *CEQR Technical Manual*. Peak period (7:30 AM to 10:00 AM) Reverse-Journey-to-Work (RJTW) data for the 2006-2010 U.S. Census Bureau American Community Survey (ACS) for Manhattan census tracts 80, 82, 84, 92, 94, and 96 were used for the weekday AM and PM peak period modal splits. The directional distribution for all peak periods and modal splits for the weekday midday and Saturday peak periods are from the 2013 *East Midtown Rezoning and Related Actions FEIS* and the 2010 *15 Penn Plaza FEIS*. The vehicle occupancies are from the 2006-2010 U.S. Census ACS for Autos and from the 2013 *East Midtown Rezoning and Related Actions FEIS* for Taxis. The daily delivery trip rate and temporal and directional distributions are from the 2014 *CEQR Technical Manual*.

DESTINATION RETAIL

For a reasonable worst case analysis, approximately 75 percent of the total retail space in both the No-Action and the proposed buildings was assumed to be destination retail which generates a higher auto/taxi share compared to local retail. It should be noted that in all likelihood, the retail space in both buildings would contain either a mix of destination and local retail uses or all local retail. The daily person trip rate and temporal distribution for destination retail are from the 2014 *CEQR Technical Manual*. The directional distribution and modal split are from the 2013 *East Midtown Rezoning and Related Actions FEIS* and the 2010 *15 Penn Plaza FEIS*. The vehicle occupancies are from the 2009 *Gateway Estate II FEIS*. The daily delivery trip rate and temporal distribution are from the 2013 *East Midtown Rezoning and Related Actions FEIS* and the *15 Penn Plaza FEIS*. The delivery directional distribution is from the 2014 *CEQR Technical Manual*.

LOCAL RETAIL

The daily trip generation and delivery vehicle trip generation rates for the proposed building's local neighborhood retail component were obtained from the 2014 *CEQR Technical Manual*. In line with accepted City practice, a 25-percent linked trip credit was applied to the local retail trip generation estimates. The modal splits and vehicle occupancies were obtained from the 2013 *East Midtown Rezoning and Related Actions FEIS*. The temporal and directional distributions for all peak periods were obtained from the 2014 *CEQR Technical Manual* and the 2013 *East Midtown Rezoning and Related Actions FEIS*, respectively. The temporal distributions for the delivery trips were obtained from the 2014 *CEQR Technical Manual*.

Table 2
Travel Demand Assumptions

Use	Office				Destination Retail				Observation Deck			
	[442,688 gsf]				[-22,736 gsf]				[5,355 daily visits]			
	Weekday			Saturday	Weekday			Saturday	Weekday			Saturday
Daily	(1)			(1)	(1)			(1)	(4)(13)			(4)
Person Trip	18.0			3.9	78.2			92.5	1,400			0
Generation Rate	Trips/KSF				Trips/KSF				Trips/Hour			
Link Credit	N/A				N/A				N/A			
Final Trip Rate	18.0			3.9	78.2			92.5	1,400			0
Person Trip	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)				
Temporal	AM	MD	PM	Sat	AM	MD	PM	Sat	AM	MD	PM	Sat
Distribution	12%	15%	14%	17%	3%	9%	9%	11%	N/A	N/A	N/A	N/A
Directional Distribution	(2)	(2)	(2)	(3)	(2)	(2)	(2)	(3)	(5)	(5)	(5)	(5)
In	96%	48%	5%	57%	61%	55%	47%	52%	55.0%	50.0%	0.0%	0.0%
Out	4%	52%	95%	43%	39%	45%	53%	48%	45.0%	50.0%	0.0%	0.0%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	0%	0%
Modal Split	(11)	(2)	(11)	(2)(3)	(2)	(2)	(2)	(3)	(12)	(12)	(12)	(12)
Auto	7.2%	2.0%	7.2%	2.0%	9.0%	9.0%	9.0%	9.0%	0.8%	0.8%	0.8%	0.8%
Taxi	2.4%	3.0%	2.0%	3.0%	4.0%	4.0%	4.0%	4.0%	3.3%	3.3%	3.3%	3.3%
Subway	49.3%	6.0%	49.3%	6.0%	26.5%	20.0%	26.5%	20.0%	19.6%	19.6%	19.6%	19.6%
City Bus	15.0%	6.0%	15.0%	6.0%	8.0%	8.0%	8.0%	8.0%	10.8%	10.8%	10.8%	10.8%
Tour Bus	-	-	-	-	-	-	-	-	28.3%	28.3%	28.3%	28.3%
Walk	6.4%	83.0%	6.5%	83.0%	50.5%	59.0%	50.5%	59.0%	33.0%	33.0%	33.0%	33.0%
Railroad	19.7%	0.0%	19.7%	1.5%	2.0%	0.0%	2.0%	0.0%	4.2%	4.2%	4.2%	4.2%
Total	100%	100%	99.7%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Vehicle Occupancy	(2)(3)(11)				(14)				(12)			
Auto	1.15				1.40		1.72		2.00			
Taxi	1.40				1.65		1.75		2.29			
Daily	(1)			(1)	(2)			(3)	(5)			
Delivery Trip	0.32			0.01	0.35			0.02	0.00			
Generation Rate	Delivery Trips / KSF				Delivery Trips / KSF				Delivery Trips			
Delivery Trip	(1)	(1)	(1)	(1)	(2)	(2)	(2)	(3)	(5)	(5)	(5)	(5)
Temporal	AM	MD	PM	Sat	AM	MD	PM	Sat	AM	MD	PM	Sat
Distribution	10%	11%	2%	11%	8.0%	11%	2%	11%	0.0%	0.0%	0.0%	0.0%
Directional Distribution	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(5)	(5)	□5)	(5)
In	50%	50%	50%	50%	50%	50%	50%	50%	0%	0%	0%	0%
Out	50%	50%	50%	50%	50%	50%	50%	50%	0%	0%	0%	0%
Total	100%	100%	100%	100%	100%	100%	100%	100%	0%	0%	0%	0%

Use	Event Space				Trading Floor (Traders)				Trading Floor (Visitors)			
	[1,225 Guests]				[2,734 Traders]				[246,000 gsf]			
	Weekday			Saturday	Weekday			Saturday	Weekday			Saturday
Daily	(6)			(6)	(8)			(8)	(8)			(8)
Person Trip	2.68			2.68	2.0			0.0	3.0			0.0
Generation Rate	Trips/Guest				Trips/Trader				Trips/KSF			
Link Credit	N/A				N/A				N/A			
Final Trip Rate	2.68			2.68	2.0			0.0	3.0			0.0
Person Trip	(6)	(6)	(6)	(6)	(15)	(13)	(15)	(15)	(8)	(8)	(8)	(8)
Temporal	AM	MD	PM	Sat	AM	MD	PM	Sat	AM	MD	PM	Sat
Distribution	0.0%	0.0%	32.0%	32.0%	37.5%	5.0%	37.5%	0.0%	14.7%	20.0%	12.9%	0.0%
Directional Distribution	(6)	(6)	(6)	(6)	(15)	(15)	(15)	(15)	(8)	(8)	(8)	(8)
In	0.0%	50.0%	75.0%	75.0%	100.0%	50.0%	0.0%	50.0%	96.0%	55.0%	5.0%	50.0%
Out	0.0%	50.0%	25.0%	25.0%	0.0%	50.0%	100.0%	50.0%	4.0%	45.0%	95.0%	50.0%
Total	0%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Modal Split	(7)	(7)	(7)	(7)	(3)	(13)	(3)	(3)	(8)	(8)	(8)	(8)
Auto	25.0%	25.0%	25.0%	25.0%	10.2%	0.0%	10.2%	2.0%	3.5%	3.5%	3.5%	3.5%
Taxi	25.0%	25.0%	25.0%	25.0%	1.3%	0.0%	1.3%	3.0%	3.5%	3.5%	3.5%	3.5%
Subway	20.0%	20.0%	20.0%	20.0%	47.3%	0.0%	47.3%	6.0%	17.8%	17.8%	17.8%	17.8%
City Bus	5.0%	5.0%	5.0%	5.0%	12.9%	0.0%	12.9%	6.0%	2.5%	2.5%	2.5%	2.5%
Tour Bus	-	-	-	-	-	-	-	-	-	-	-	-
Walk	15.0%	15.0%	15.0%	15.0%	3.2%	100.0%	3.2%	83.0%	69.9%	69.9%	69.9%	69.9%
Railroad	10.0%	10.0%	10.0%	10.0%	25.1%	0.0%	25.1%	0.0%	2.8%	2.8%	2.8%	2.8%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Vehicle Occupancy	(6)				(2)(3)(11)				(8)			
Auto	2.90				1.15				1.25			
Taxi	2.30				1.40				1.40			
Daily	(6)				(3)			(3)				
Delivery Trip	0.01				0.16			0.01				
Generation Rate	Delivery Trips / Guest				Delivery Trips / KSF							
Delivery Trip	(6)	(6)	(6)	(6)	(3)	(3)	(3)	(3)				
Temporal	AM	MD	PM	Sat	AM	MD	PM	Sat				
Distribution	0.0%	6.0%	1.0%	0.0%	7.0%	7.0%	3.0%	11.0%				
Directional Distribution	(6)	(6)	(6)	(6)	(8)	(8)	(8)	(8)				
In	50%	50%	50%	50%	50%	50%	50%	50%				
Out	50%	50%	50%	50%	50%	50%	50%	50%				
Total	100%	100%	100%	100%	100%	100%	100%	100%				

Table 2, cont'd
Travel Demand Assumptions

Use	Local Retail				Restaurant			
	[-7,912 gsf]				[27,000 gsf]			
	Weekday		Saturday		Weekday		Saturday	
Daily Person Trip Generation Rate	(1) 205.0		(1) 240.0		(9) 173.0		(9) 181.0	
	Trips / KSF				Trips / KSF			
Link Credit	25%				0%(AM)	25% (MD)	(13) 15% (PM)	15%(SAT)
Final Trip Rate	153.8		180.0		173.0	129.8	147.1	153.9
Person Trip	(1)	(1)	(1)	(1)	(9)	(9)	(9)	(9)
Temporal Distribution	AM 3%	MD 19%	PM 10%	Sat 10%	AM 0.0%	MD 6.2%	PM 8.3%	Sat 11.0%
Directional Distribution	(2)	(2)	(2)	(2)	(9)	(9)	(9)	(9)
In	50%	50%	50%	50%	50%	50%	67%	50%
Out	50%	50%	50%	50%	50%	50%	33%	50%
Total	100%	100%	100%	100%	100%	100%	100%	100%
Modal Split	(2)	(2)	(2)	(3)	(10)(13)	(10)(13)	(10)(13)	(10)(13)
Auto	2.0%	2.0%	2.0%	2.0%	10.0%	10.0%	10.0%	10.0%
Taxi	3.0%	3.0%	3.0%	3.0%	15.0%	15.0%	15.0%	15.0%
Subway	6.0%	6.0%	6.0%	6.0%	26.5%	26.5%	26.5%	26.5%
City Bus	6.0%	6.0%	6.0%	6.0%	2.0%	2.0%	2.0%	2.0%
Tour Bus	-	-	-	-	-	-	-	-
Walk	83.0%	83.0%	83.0%	83.0%	44.5%	44.5%	44.5%	44.5%
Railroad	0.0%	0.0%	0.0%	0.0%	2.0%	2.0%	2.0%	2.0%
Total	100%	100%	100%	100%	100%	100%	100%	100%
Vehicle Occupancy	(2)				(9)			
Auto	1.65				2.20			
Taxi	1.40				2.30			
Daily Delivery Trip Generation Rate	(1) 0.35			0.04	(9) 3.60			
	Delivery Trip / KSF				Delivery Trips / KSF			
Delivery Trip	(1)	(1)	(1)	(1)	(9)	(9)	(9)	(9)
Temporal Distribution	AM 8%	MD 11%	PM 2%	Sat 11%	AM 0%	MD 6%	PM 1%	Sat 6%
Directional Distribution	(1)	(1)	(1)	(1)	(9)	(9)	(9)	(9)
In	50%	50%	50%	50%	50%	50%	50%	50%
Out	50%	50%	50%	50%	50%	50%	50%	50%
Total	100%	100%	100%	100%	100%	100%	100%	100%

Sources:
(1) 2014 *CEQR Technical Manual*
(2) *East Midtown Rezoning and Related Actions FEIS* (2013).
(3) *15 Penn Plaza FEIS* (2010). Midday modal split was applied to Saturday for the office component.
(4) Roof top amenity space trip estimates from Hines. Observation Deck and Event Space occupy the same space (the "amenity space"). For analysis purposes, the amenity space is assumed to be used as an observation deck during the AM and midday peaks and as an event space during the PM and Saturday peaks.
(5) *Special West Chelsea District Rezoning and High Line Open Space FEIS* (2005), based on High Line Open Space use.
(6) *Pier 57 Redevelopment FEIS* (2013) - PM and Saturday assumed to be the same as Pier 57 Park Evening and Saturday Evening.
(7) Event Space modal splits developed to account for local travel patterns.
(8) *Sixth Supplemental Battery Park City Site 26 FEIS* (2004). Assumed 1 trader per 90 gsf of trading floor space per Hines. Modal splits adjusted to account for local travel patterns.
(9) *Pier 57 Redevelopment FEIS* (2013)
(10) Restaurant modal splits similar to Destination Retail Use, with adjustments based on local travel patterns.
(11) 2006-10 U.S. Census American Community Survey (ACS) Reverse Journey-to-Work (RJTW) modal splits and auto occupancy for AM peak period (7:30-10:00 AM).
(12) Travel survey of Empire State Building observation deck patrons, conducted on Wednesday, May 7, 2014, by AKRF, Inc.; the City Bus mode includes approximately 8.4 percent of travel by "hop-on, hop-off" City tour buses.
(13) NYCDOT assumption.
(14) *Gateway Estate II FEIS* (2009)
(15) *New York Stock Exchange New Facility FEIS* (1999)

RESTAURANT

The travel demand factors for the proposed restaurant component were obtained from the 2013 *Pier 57 Redevelopment FEIS.* Modal split factors were assumed to be similar to those of destination retail's. Based on discussions with the New York City Department of Transportation (NYCDOT), auto and taxi shares were adjusted to account for local travel characteristics. Also per NYCDOT's recommendation, a 25-percent, 15-percent, and 15-percent linked trip credit was applied to the restaurant trip generation estimates for the weekday midday, weekday PM, and Saturday peak hours, respectively.

ROOFTOP AMENITY SPACE (OBSERVATION DECK/EVENT SPACE)

OBSERVATION DECK

Based on information provided by the applicant, a total of approximately 5,355 patrons are expected to visit the rooftop amenity space on a daily basis. This estimate is based on the 75 percent design capacity of two elevators (design capacity is 357 persons/elevator/hour) for a 10 hour daily operation. This level of daily visitation would amount to nearly 2 million visits annually. In comparison, the Empire State

Building's observation deck has been visited by approximately 4 million people annually. With competition in New York City expected to increase for observation deck attractions (increasing from two currently to five, including One Vanderbilt, in the next few years), achieving approximately half of Empire State Building's visitation levels can be considered reasonably optimistic from a business perspective and conservative from a travel demand projections standpoint. While there could be peaking in visitation arrivals (departures are capped by the cab capacity of 714 people per hour), it would typically be coupled with lower demand during the shoulder hours. Furthermore, peak visitation for a recreational/tourist destination, such as One Vanderbilt's observation deck, would typically occur during off-peak travel hours. If One Vanderbilt's observation deck is opened for more than 10 hours per day (those at the Empire State Building and Top of the Rock are opened 18 and 16 hours per day, respectively), there could be a further distribution of visitor arrival and departure. However, because this space is expected to also accommodate events, operating it on average 10 hours a day as an observation deck has been determined as reasonable. In consultation with NYCDOT, the transportation analysis assumed a conservative travel demand of 1,400 visitation trips (representing approximately 95-percent capacity elevator usage) to and from One Vanderbilt's observation deck during the analysis peak hour. The directional distribution, temporal distribution, and directional distribution for the observation deck patrons were developed based on the guidance from the 2005 *Special West Chelsea District Rezoning and High Line Open Space FEIS*. A survey of visitors to the Empire State Building was conducted on Wednesday, May 7, 2014 to inform on modal splits and vehicle occupancies for future observation deck patrons at the One Vanderbilt site.

EVENT SPACE

During the weekday evening and Saturday hours, the roof top amenity space could be used to host formal events. Travel demand assumptions for various projects with banquet halls or catering halls, as well as the metrics used in developing the trip generation factors for the 2013 *Pier 57 Redevelopment FEIS*, were reviewed. This review concluded that the Pier 57 trip generation factors would be the most appropriate for providing best coverage of event types that may take place at the One Vanderbilt site. It should be noted that given the proximity of the One Vanderbilt site to Grand Central Terminal, the modal splits were refined to account for an increased transit share compared to the information presented in the 2013 *Pier 57 Redevelopment FEIS*.

TRADING FLOOR

Travel demand estimates for the trading floor component were developed separately for the traders and visitors. For the traders, the applicant has indicated a building occupancy of 90 square feet per trader. The travel demand assumptions are taken from the 2010 *15 Penn Plaza FEIS* (modal splits, taxi occupancy, delivery trips) and the 1999 *New York Stock Exchange FEIS* (temporal distribution and in/out distribution), adjusted per NYCDOT guidance (weekday midday trader trips). The auto vehicle occupancy is derived from the 2006-2010 U.S. Census ACS data. For the visitors, the travel demand assumptions are from the *Sixth Supplemental Battery Park City Site 26 FEIS*, prepared as part of the Environmental Assessment for the Goldman Sachs headquarters in Lower Manhattan.

C. CEQR TRANSPORTATION ANALYSIS SCREENING

The 2014 *CEQR Technical Manual* identifies procedures for evaluating a proposed project's potential impacts on traffic, transit, pedestrian, and parking conditions. This methodology begins with the preparation of a trip generation analysis to determine the volume of person and vehicle trips associated with the proposed project. The results are then compared with the *CEQR Technical Manual*-specified thresholds (Level 1 screening analysis) to determine whether additional quantified analyses are warranted. If the proposed project would result in 50 or more peak hour vehicle trips, 200 or more peak hour transit trips (200 or more peak hour transit riders at any given subway station or 50 or more peak hour bus trips on a particularly route in one direction), and/or 200 or more peak hour pedestrian trips, a Level 2 screening analysis is undertaken.

For the Level 2 screening analysis, project-generated trips would be assigned to specific intersections, transit routes, and pedestrian elements. If the results of this analysis show that the proposed project would generate 50 or more peak hour vehicle trips through an intersection, 50 or more peak hour bus riders on a bus route in a single direction, 200 or more peak hour subway passengers at any given station, or 200 or more peak hour pedestrian trips per pedestrian element, further quantified analyses may be warranted to evaluate the potential for significant adverse traffic, transit, pedestrian, and parking impacts.

TRIP GENERATION SUMMARY

As summarized in **Table 3**, in the future without the proposed One Vanderbilt development, with the development of a 15 FAR building, a total of 1,617, 2,770, 2,368, and 1,437 person trips would be generated during the weekday AM, midday, PM, and Saturday peak hours, respectively. Approximately 172, 165, 212, and 82 vehicle trips would be generated during the same respective peak hours.

Table 3

Trip Generation Summary: Future Without the Proposed Actions (No-Action Condition)

Person Trips									Vehicle Trips				
Peak Hour	**In/Out**	**Auto**	**Taxi**	**Subway**	**Bus**	**Walk**	**Railroad**	**Total**	**In/Out**	**Auto**	**Taxi**	**Delivery**	**Total**
AM	In	104	37	677	208	169	262	1,457	In	90	26	11	127
	Out	10	4	45	16	73	12	160	Out	8	26	11	45
	Total	114	41	722	224	242	274	1,617	Total	98	52	22	172
MD	In	44	44	116	86	1,081	0	1,371	In	34	37	12	83
	Out	42	44	112	88	1,113	0	1,399	Out	33	37	12	82
	Total	86	88	228	174	2,194	0	2,770	Total	67	74	24	165
PM	In	28	15	105	39	243	20	450	In	21	37	2	60
	Out	134	51	823	257	348	305	1,918	Out	113	37	2	152
	Total	162	66	928	296	591	325	2,368	Total	134	74	4	212
Saturday	In	39	26	91	52	552	0	760	In	23	19	0	42
	Out	36	23	83	47	488	0	677	Out	21	19	0	40
	Total	75	49	174	99	1,040	0	1,437	Total	44	38	0	82

As summarized in **Table 4,** in the future with the proposed One Vanderbilt development, with the development of a 30 FAR building, a total of 6,046, 5,610, 6,725, and 2,864 person trips would be generated during the weekday AM, midday, PM, and Saturday peak hours, respectively. Approximately 541, 292, 757, and 390 vehicle trips would be generated during the same respective time periods.

Table 4

Trip Generation Summary: Future With the Proposed Actions (With-Action Condition)

Person Trips										Vehicle Trips					
Peak Hour	**In/Out**	**Auto**	**Taxi**	**Subway**	**City Bus**	**Tour Bus**	**Walk**	**Railroad**	**Total**	**In/Out**	**Auto**	**Taxi (Balanced)**	**Tour Bus**	**Delivery**	**Total**
AM	In	386	113	2,260	694	218	590	992	5,253	In	333	74	5	19	431
	Out	16	25	182	87	178	260	45	793	Out	12	74	5	19	110
	Total	402	138	2,442	781	396	850	1,037	6,046	Total	345	148	10	38	541
MD	In	66	96	306	187	198	1,883	33	2,769	In	46	71	5	24	146
	Out	64	97	305	192	198	1,952	33	2,841	Out	46	71	5	24	146
	Total	130	193	611	379	396	3,835	66	5,610	Total	92	142	10	48	292
PM	In	243	241	326	80	0	378	113	1,381	In	97	134	0	4	235
	Out	490	183	2,387	687	0	539	1,058	5,344	Out	384	134	0	4	522
	Total	733	424	2,713	767	0	917	1,171	6,725	Total	481	268	0	8	757
Saturday	In	249	255	292	92	0	780	84	1,752	In	97	118	0	4	219
	Out	115	121	178	59	0	608	31	1,112	Out	49	118	0	4	171
	Total	364	376	470	151	0	1,388	115	2,864	Total	146	236	0	8	390

LEVEL 1 SCREENING

The net incremental trips generated in the future without and with the proposed One Vanderbilt development are shown in **Table 5**.

Table 5
Trip Generation Summary: Net Incremental Trips

Person Trips									Vehicle Trips					
Weekday AM Peak Hour														
In/Out	**Auto**	**Taxi**	**Subway**	**City Bus**	**Tour Bus**	**Walk**	**Railroad**	**Total**	**In/Out**	**Auto**	**Taxi**	**Tour Bus**	**Delivery**	**Total**
In	282	76	1,583	486	218	421	730	3,796	In	243	48	5	8	304
Out	6	21	137	71	178	187	33	633	Out	4	48	5	8	65
Total	288	97	1,720	557	396	608	763	4,429	Total	247	96	10	16	369
Weekday Midday Peak Hour														
In/Out	**Auto**	**Taxi**	**Subway**	**Bus**	**Tour Bus**	**Walk**	**Railroad**	**Total**	**In/Out**	**Auto**	**Taxi (Balanced)**	**Tour Bus**	**Delivery**	**Total**
In	22	52	190	101	198	802	33	1,398	In	12	34	5	12	63
Out	22	53	193	104	198	839	33	1,442	Out	13	34	5	12	64
Total	44	105	383	205	396	1,641	66	2,840	Total	25	68	10	24	127
Weekday PM Peak Hour														
In/Out	**Auto**	**Taxi**	**Subway**	**Bus**	**Tour Bus**	**Walk**	**Railroad**	**Total**	**In/Out**	**Auto**	**Taxi (Balanced)**	**Tour Bus**	**Delivery**	**Total**
In	215	226	221	41	0	135	93	931	In	76	97	0	2	175
Out	356	132	1,564	430	0	191	753	3,426	Out	271	97	0	2	370
Total	571	358	1,785	471	0	326	846	4,357	Total	347	194	0	4	545
Saturday Peak Hour														
In/Out	**Auto**	**Taxi**	**Subway**	**Bus**	**Tour Bus**	**Walk**	**Railroad**	**Total**	**In/Out**	**Auto**	**Taxi (Balanced)**	**Tour Bus**	**Delivery**	**Total**
In	210	229	201	40	0	228	84	992	In	74	99	0	4	177
Out	79	98	95	12	0	120	31	435	Out	28	99	0	4	131
Total	289	327	296	52	0	348	115	1,427	Total	102	198	0	8	308

TRAFFIC

As shown in **Table 5**, the net incremental trips generated in the future without and with the proposed One Vanderbilt development would be 369, 127, 545, and 308 vehicle trips during the weekday AM, midday, PM, and Saturday peak hours, respectively. Since the incremental vehicle trips would be greater than 50 vehicles, a Level 2 screening assessment (presented in the section below) was conducted to determine if there is a need for additional quantified traffic analyses.

TRANSIT

Public transit options to and from the study area are shown on **Figure 1**. As detailed in **Table 5**, the net incremental transit trips generated in the future without and with the proposed actions would be 1,720, 383, 1,785, and 296 person trips by subway, 557, 205, 471, and 52 person trips by bus, and 763, 66, 846, and 115 person trips by railroad during the weekday AM, midday, PM, and Saturday peak hours, respectively. Since the incremental subway trips would be greater than 200 during all peak hours, a Level 2 screening assessment (presented in the section below) was conducted to determine if there is a need for additional quantified subway analysis. Since the incremental bus trips would be greater than 50 during all peak hours, a Level 2 screening assessment was conducted to determine if there is a need for additional quantified bus analysis. Furthermore, the incremental railroad trips would be greater than 200 during the weekday AM and PM peak hours. Therefore, a Level 2 screening assessment could be required to determine if there is a need for additional quantified railroad analysis. It should be noted that if warranted, this assessment would be conducted by the Metropolitan Transportation Authority (MTA) New York City Transit (NYCT) and may not necessarily fully conform to the guidelines of the *CEQR Technical Manual*.

PEDESTRIAN

All person trips generated by the proposed One Vanderbilt development would traverse the pedestrian elements surrounding the One Vanderbilt site. As shown in **Table 5**, the net incremental pedestrian trips would be greater than 200 during all peak hours. A Level 2 screening assessment (presented in the section below) was conducted to determine if there is a need for additional quantified pedestrian analyses.

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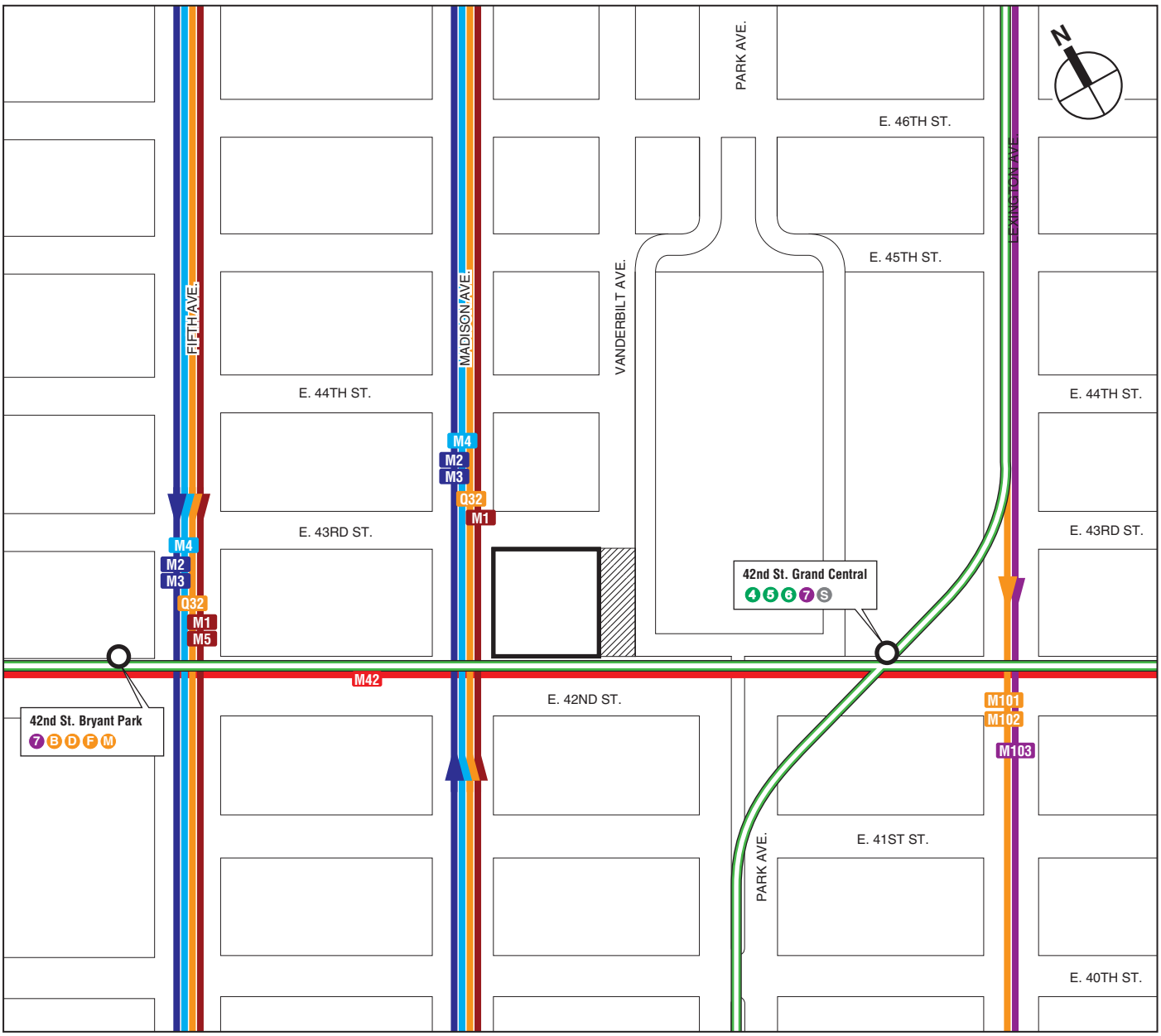


One Vanderbilt Development Site

Proposed Public Place

Subway Line

Subway Stop

Bus Line

Vanderbilt Corridor and One Vanderbilt

Public Transit Options

Figure 1

LEVEL 2 SCREENING

As part of the Level 2 screening assessment, project-generated trips were assigned to specific intersections and pedestrian elements near the One Vanderbilt site. As previously stated, further quantified analyses to assess the potential impacts of the proposed One Vanderbilt development on the transportation system would be warranted if the trip assignments were to identify key intersections incurring 50 or more peak hour vehicle-trips or pedestrian elements incurring 200 or more peak hour pedestrian-trips. Similarly, for transit elements, the projected trips were considered in determining the likely transit facilities requiring a detailed analysis of potential impacts.

SITE ACCESS AND EGRESS

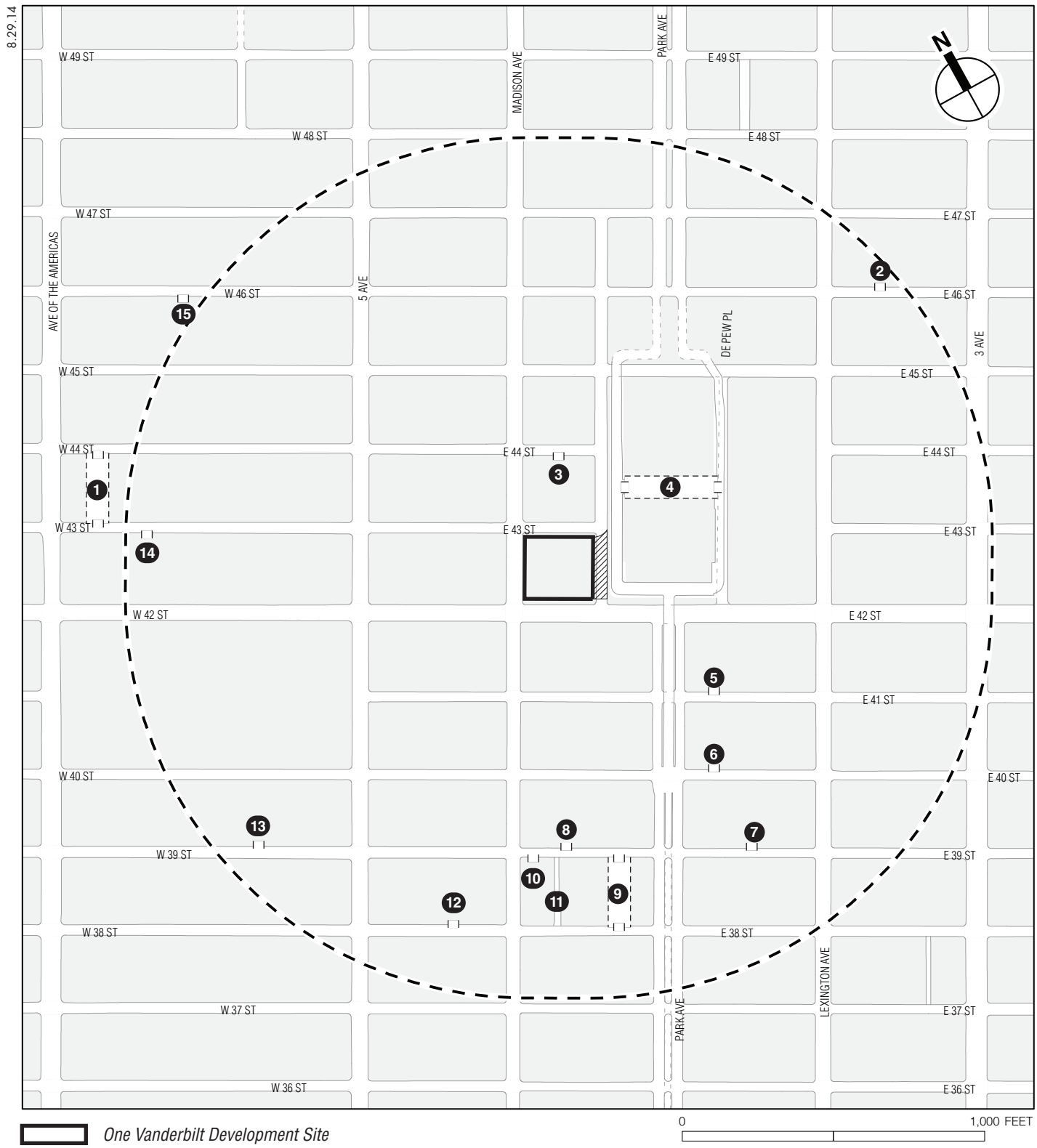
For the proposed One Vanderbilt building, the main entrance to the office component would be on the Vanderbilt Avenue public place, with an additional entrance to the office lobby from Madison Avenue. Most of the new retail space would be located along Madison Avenue at grade, with possible additional retail space on the second floor and on the first below-grade level. The entrance to the restaurant component would be located on East 42nd Street near Vanderbilt Avenue. The building would have two levels below grade. The first level would have connections to the pedestrian circulation network serving Grand Central Terminal (GCT) and the subway, as well as queuing and display space accessory to a proposed rooftop observation deck. In addition, the second level below grade would accommodate a loading dock accessible via two truck elevators that would be accessed from East 43rd Street.

CHANGES TO PEDESTRIAN CIRCULATION AND VANDERBILT AVENUE

The proposed actions would further the Midtown Special District goal of improving pedestrian circulation in the Midtown area, in particular around connections to mass transit. The proposed One Vanderbilt development would include a below-grade level connecting to the pedestrian circulation network serving GCT and the subway; this connection would relieve pedestrian congestion within the GCT hub. In addition, the proposed One Vanderbilt development would create a public place on Vanderbilt Avenue between East 42nd Street and East 43rd Street to provide additional pedestrian circulation space at-grade and furthering the city's goal of creating public open space resources within the right-of-way. Currently, this segment of Vanderbilt Avenue serves limited northbound traffic, which would be diverted to other area roadways. Since East 43rd Street serves westbound traffic and dead-ends at Vanderbilt Avenue, there would also no longer be any northbound traffic on Vanderbilt Avenue between East 43rd and East 44th Streets. It is assumed that this roadway segment would be converted from two-way to one-way southbound operations with the proposed One Vanderbilt development.

TRAFFIC

As shown in **Table 5**, incremental vehicle trips resulting from the proposed One Vanderbilt development would exceed the *CEQR* Level-1 screening threshold during all peak hours. These vehicle trips were assigned to area intersections based on the most likely travel routes to and from the One Vanderbilt site, prevailing travel patterns, commuter origin-destination (O-D) summaries from the census data, the configuration of the roadway network, and the anticipated locations of site access and egress. Auto trips were assigned to public garages in the study area, as shown in **Figure 2** and **Table 6**. Taxi trips were assigned to the block faces along Madison Avenue, East 42nd Street and East 43rd Street. All delivery trips were assigned to the One Vanderbilt site via the New York City Department of Transportation (NYCDOT) designated truck routes. The proposed remapping would close Vanderbilt Avenue between East 42nd and East 43rd Streets to vehicular traffic to create a public place. This segment currently runs one-way northbound, and there are turn restrictions onto Vanderbilt Avenue from both eastbound and westbound East 42nd Street. Therefore, no vehicular trips generated by the proposed One Vanderbilt development were assigned to this roadway segment. Traffic assignments for autos, taxis, and deliveries for individual components are discussed below.



Off-Street Parking Facilities

Vanderbilt Corridor and One Vanderbilt

Figure 2

Table 6
Existing Weekday Off-Street Parking Utilization
¼-mile Study Area

Map #	Name/Operator and Address/Location	License Number	Licensed Capacity	Utilization Rate				Utilized Spaces				Available Spaces			
				AM	MD	PM	ON	AM	MD	PM	ON	AM	MD	PM	ON
1	Fast Park Edison Parking, LLC: 1120 Sixth Avenue	1250358	648	50%	66%	50%	20%	324	428	324	130	324	220	324	518
2	Kinney Parking Systems, Inc: 485 Lexington Avenue	1451289	100	70%	85%	60%	15%	70	85	60	15	30	15	40	85
3	CPS: 335 Madison Avenue	368723	90	80%	90%	80%	20%	72	81	72	18	18	9	18	72
4	One Parking Corp.: 200 Park Avenue	1379494	350	30%	75%	75%	15%	105	263	263	53	245	87	87	297
5	Grand Central Park, LLC: 110 E. 42nd Street	1320538	77	60%	85%	25%	5%	46	65	19	4	31	12	58	73
6	Quick Park, LLC: 101 Park Avenue	1293753	124	10%	90%	85%	5%	12	112	105	6	112	12	19	118
7	Rapid Park 99 Park Avenue Corp: 99 Park Avenue	1181507	75	25%	40%	25%	5%	19	30	19	4	56	45	56	71
8	Park Avenue 39: 90 Park Avenue	1298776	150	70%	90%	30%	15%	105	135	45	23	45	15	105	127
9	Imperial Parking, Inc: 35 E. 38th Street	1387693 /1387690	112	80%	100%	80%	50%	90	112	90	56	22	0	22	56
10	Affiliated Parking, LLC: 247-261 Madison Avenue	429844	80	55%	80%	50%	10%	44	64	40	8	36	16	40	72
11	Affiliated Parking, LLC: 238 E. 39th Street	469319	25	85%	60%	70%	CLD	21	15	18	CLD	4	10	7	CLD
12	Regal Parking, LLC: 250-264 Madison Avenue	429658	155	70%	85%	30%	15%	109	132	47	23	46	23	108	132
13	Bryant Park Car Park, LLC: 13 W. 39th Street	1001165	76	40%	90%	65%	20%	30	68	49	15	46	8	27	61
14	1114 Sixth Parking LLC: 1114 Sixth Avenue	1020999	188	45%	70%	70%	15%	85	132	132	28	103	56	56	160
15	Kinney Parking Systems: 38 W. 46th Street	1463445	225	25%	70%	75%	10%	56	158	169	23	169	67	56	202
			2,475	**48%**	**76%**	**59%**	**17%**	**1,188**	**1,880**	**1,452**	**406**	**1,287**	**595**	**1,023**	**2,044**

Notes: MD = Midday; ON = Overnight; CLD = Closed
Sources: Survey conducted by AKRF Inc. in May 2014.

Office

Auto trips generated by the office use were based on the 2006-2010 U.S. Census American Community Survey (ACS) Reverse Journey-to-Work (RJTW) origin-destination estimates. Many of the office trips would originate from New Jersey (25 percent), from Queens (15 percent), and from Long Island (15 percent). The remaining trips would originate from the Bronx (6 percent), Brooklyn (10 percent), within Manhattan (9 percent), Staten Island (3 percent), and from counties in Upstate New York (12 percent), Connecticut (4 percent), and Pennsylvania (1 percent). The majority of trips from the Bronx were assigned to public garages in the proximity of the One Vanderbilt site via Harlem River crossings, and subsequently along the FDR Drive and Park Avenue. Some Bronx trips were assigned to the West Side Highway to Park Avenue via local streets. Trips from Brooklyn are expected to use East River crossings to enter Manhattan and will then approach the study area garages via the most direct routes available, primarily along the FDR Drive, Third Avenue, and Park Avenue. Of the trips within Manhattan, approximately 70 percent were assigned from points north of the One Vanderbilt site, and the remaining 30 percent were assigned from points south of the site, approaching the study area garages via the most direct routes available. Trips from Queens were assigned to the Queensboro Bridge and the Queens-Midtown Tunnel, and subsequently along Park Avenue via local streets. Trips from Staten Island were assigned through New Jersey to the Lincoln Tunnel and subsequently along local streets to garages near the One Vanderbilt site, or through Brooklyn and subsequently across the Brooklyn Bridge to the FDR Drive and to area garages via local streets. Long Island-based trips would arrive at garages near the One Vanderbilt site via the Queens-Midtown Tunnel and Park Avenue. Trips traveling from Upstate New York and Connecticut were assigned to the garages via local streets connecting to the West Side Highway or the FDR Drive. Trips from New Jersey and Pennsylvania were assigned through New Jersey to the Lincoln Tunnel and subsequently to garages near the One Vanderbilt site via local streets, or over the George Washington Bridge to the West Side Highway and to the garages via local streets.

Destination Retail

The destination retail component is expected to draw customers from within a three-mile radius of the One Vanderbilt site; therefore, a majority of the auto trips are expected to come from within Manhattan (65 percent) with some trips expected to come from Queens (25 percent) and Brooklyn (10 percent).

Overall, the vehicle trips generated by the destination retail component were distributed to the study area streets/roadways in the following manner: approximately 50 percent of project-generated trips were assumed to approach the One Vanderbilt site from the north, northeast, and northwest, and 50 percent from the south, southeast, and southwest. Departing trips were assigned along the same routes as arrivals.

Rooftop Amenity Space

The roof top amenity space component is expected to draw visitors primarily from within Manhattan, from other tourist destinations or from area hotels. Of these trips, approximately 50 percent were assigned from points north of the One Vanderbilt site, and 50 percent were assigned from points south of the site. Trips traveling within Manhattan from north of the One Vanderbilt site were assigned to various major roadways leading to garages near the site, including Fifth Avenue, Park Avenue, Lexington Avenue, and across 42nd, 46th, and 47th Streets. Trips traveling within Manhattan from south of the One Vanderbilt site were also assigned to various major roadways leading to public garages near the site, including Madison Avenue, Park Avenue, Third Avenue, and across 39th, 40th, and 42nd Streets.

Event Space

The event space is expected to have travel patterns similar to the destination retail component, with trips originating mostly from within Manhattan residential areas, and some from neighboring boroughs within New York City.

Trading Floor

Overall, trips to the trading floor are expected to have travel patterns similar to the office component, with the trip origins of traders developed using the 2006-2010 U.S. Census American Community Survey (ACS) Reverse Journey-to-Work (RJTW) origin-destination estimates, and those of visitors assumed to be from areas within New York City and the region with a similar concentration of office and commercial uses as the One Vanderbilt study area.

Local Retail

The local retail uses are expected to serve the immediate surrounding area. Therefore, auto trips were generally assigned from local origins within the neighborhood and adjacent residential areas. Overall, the vehicle trips generated by the local retail component were distributed to the study area streets/roadways in the following manner: approximately 50 percent were assigned from points north of the One Vanderbilt site, and 50 percent were assigned from points south of the site. Trips traveling within Manhattan from north of the One Vanderbilt site were assigned to various major roadways leading to garages near the site, including Fifth Avenue, Park Avenue, Lexington Avenue, and across 42nd, 46th, and 47th Streets. Trips traveling within Manhattan from south of the One Vanderbilt site were also assigned to various major roadways leading to public garages near the site, including Madison Avenue, Park Avenue, Third Avenue, and across 39th, 40th, and 42nd Streets.

Restaurant

The restaurant component is expected to draw customers from within a three-mile radius of the One Vanderbilt site; therefore, a majority of the auto trips are expected to come from within Manhattan (65 percent) with some trips expected to come from Queens (25 percent) and Brooklyn (10 percent). Overall, the vehicle trips generated by the restaurant component were distributed to the study area streets/roadways in the following manner: approximately 50 percent of project-generated trips were assumed to approach the One Vanderbilt site from the north, northeast, and northwest, and 50 percent from the south, southeast, and southwest. Departing trips were assigned along the same routes as arrivals.

Taxis

Taxi pick-ups and drop-offs for all project components were assigned to pick up and drop off along the One Vanderbilt site frontages on East 42nd Street, East 43rd Street, and Madison Avenue.

Tour Buses

Tour buses to the One Vanderbilt site, some of which may already be circulating in the study area, were conservatively assumed to be new trips routed to potential drop-off locations along the south side of East 43rd Street between Vanderbilt Avenue and Madison Avenue, the south side of East 41st Street between Madison Avenue and Park Avenue, and the south side of East 41st Street between Park Avenue and Lexington Avenue. The tour buses were assigned to study area streets/roadways in the following manner: approximately 34 percent assumed to approach the One Vanderbilt site from the north, northeast, and northwest, and 66 percent from the south, southeast, and southwest. Departing trips were assigned along the same routes as arrivals.

Deliveries

Truck delivery trips for all land uses were assigned to NYCDOT-designated truck routes. Trucks were assigned to the study area from regional origins via Eighth Avenue, 42nd Street, 57th Street, Lexington Avenue, Third Avenue, and Second Avenue. Trucks were assigned along regional and local truck routes as long as possible until reaching the One Vanderbilt site's loading area along East 43rd Street between Vanderbilt and Madison Avenues.

Summary

According to the 2014 *CEQR Technical Manual*, intersections expected to incur 50 or more incremental peak hour vehicle trips as a result of a proposed action would have the potential for significant adverse traffic impacts and should be assessed in a quantified traffic impact analysis. As shown in **Figures 3 through 6** and presented in **Table 7**, 31 intersections, comprising the traffic study area, have been selected for analysis.[1] These intersections include those expected to incur 50 or more project generated vehicle trips during the weekday AM, weekday midday, weekday PM, and/or Saturday peak hours, as well as several other intersections determined for analysis per consultation with NYCDOT. Among these, all 31 intersections will be analyzed for the weekday peak hours while 10 intersections will be analyzed for the Saturday peak hour, as shown in **Figure 7**. Baseline traffic data for these analysis locations will be collected anew (some already collected in 2013) to establish peak hour traffic volumes under 2014 existing conditions. Traffic volumes and analyses developed as part of the 2013 *East Midtown Rezoning and Related Actions FEIS* will also be reviewed as reference, and where necessary to supplement the more recently collected data.

TRANSIT

The One Vanderbilt site is located near two New York City Transit (NYCT) subway stations: (1) GCT (Nos. 4, 5, 6, 7 lines and Shuttle service); and (2) 42nd Street and Bryant Park Station (B, D, F, and M lines). Subway services at these stations provide convenient connections to other subway lines. As summarized in **Table 5**, the proposed One Vanderbilt development is expected to generate 1,720, 383, 1,785, and 296 peak-hour net incremental subway trips during the weekday AM, midday, and PM, and the Saturday peak hours, respectively. Based on the trip distribution results, it is expected that quantified analyses of affected subway elements at the GCT and 42nd Street and Bryant Park subway stations for the weekday AM and PM peak hours would be necessary. For the 42nd Street and Bryant Park Station, baseline pedestrian data and analyses will be developed in consultation with MTA NYCT. Similarly, MTA NYCT will be consulted to assess subway and/or railroad line-haul conditions.

[1] As detailed analysis is conducted, a need for additional analysis locations may be identified; the DEIS will include any such additional analysis and provide an explanation for the additional analysis locations.

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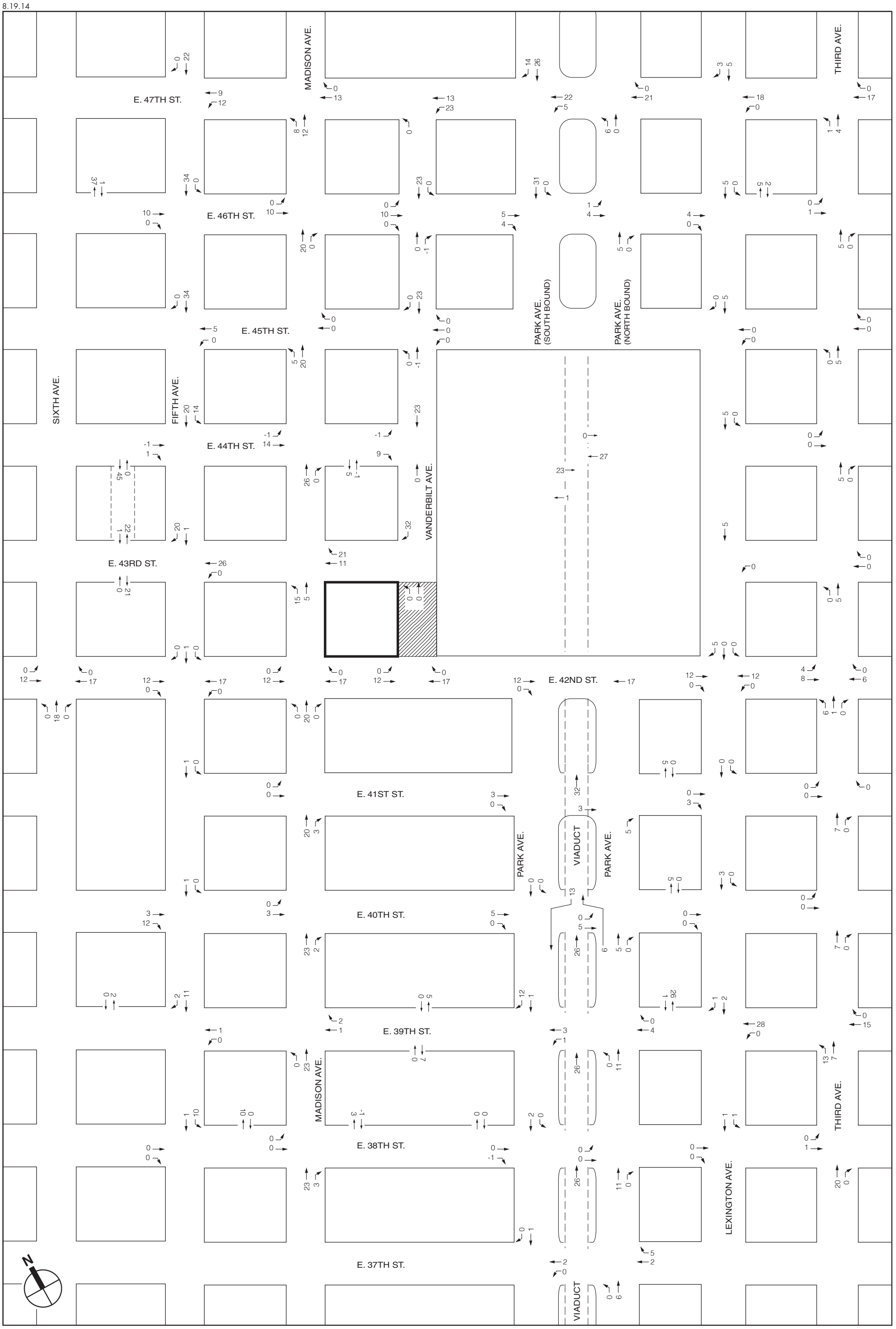

One Vanderbilt Development Site

Proposed Public Place

NOT TO SCALE

2021 Proposed Project Incremental Vehicle Trips
Weekday AM Peak Hour

Figure 3

Vanderbilt Corridor and One Vanderbilt

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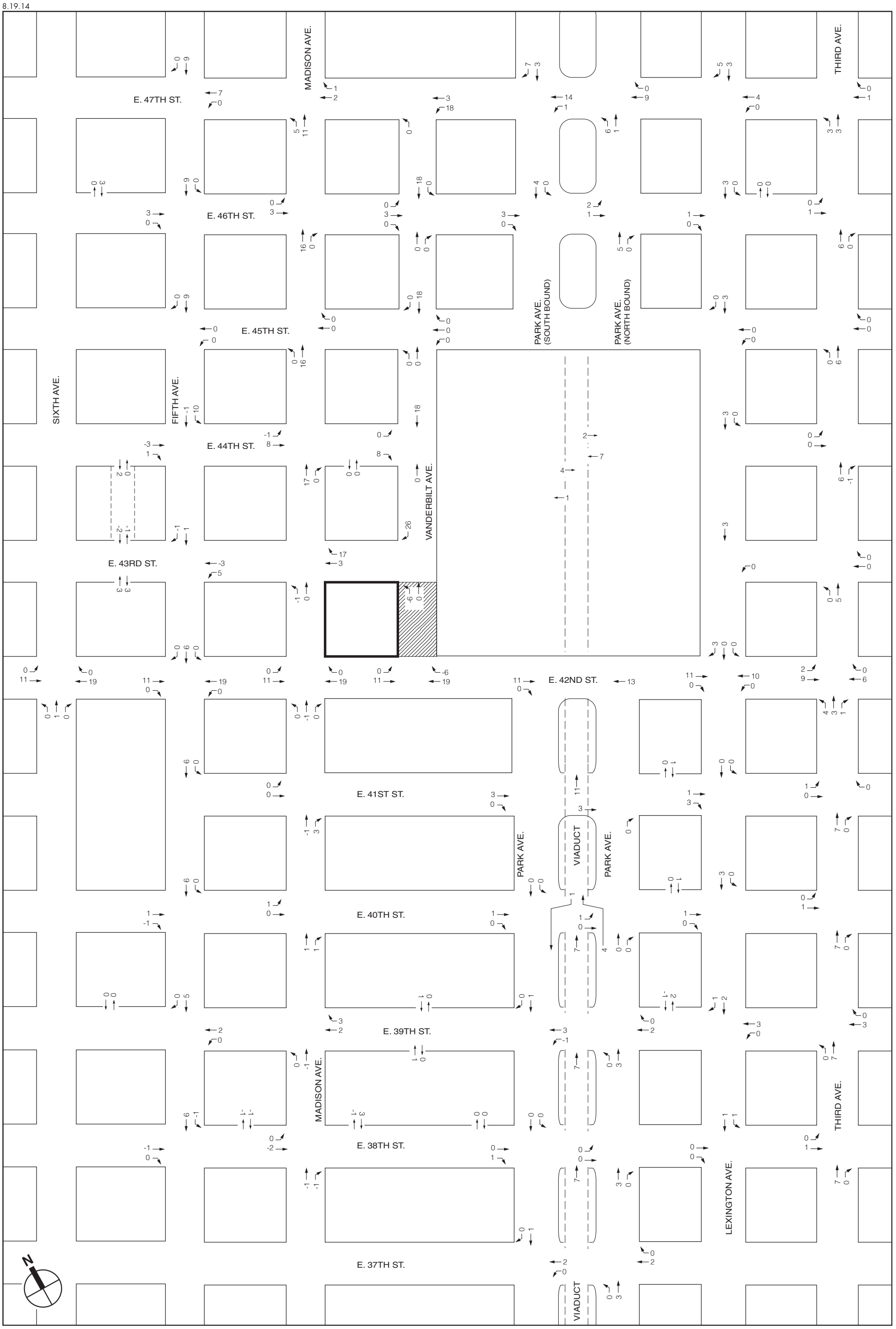

One Vanderbilt Development Site

Proposed Public Place

NOT TO SCALE

2021 Proposed Project Incremental Vehicle Trips
Weekday Midday Peak Hour

Figure 4

Vanderbilt Corridor and One Vanderbilt

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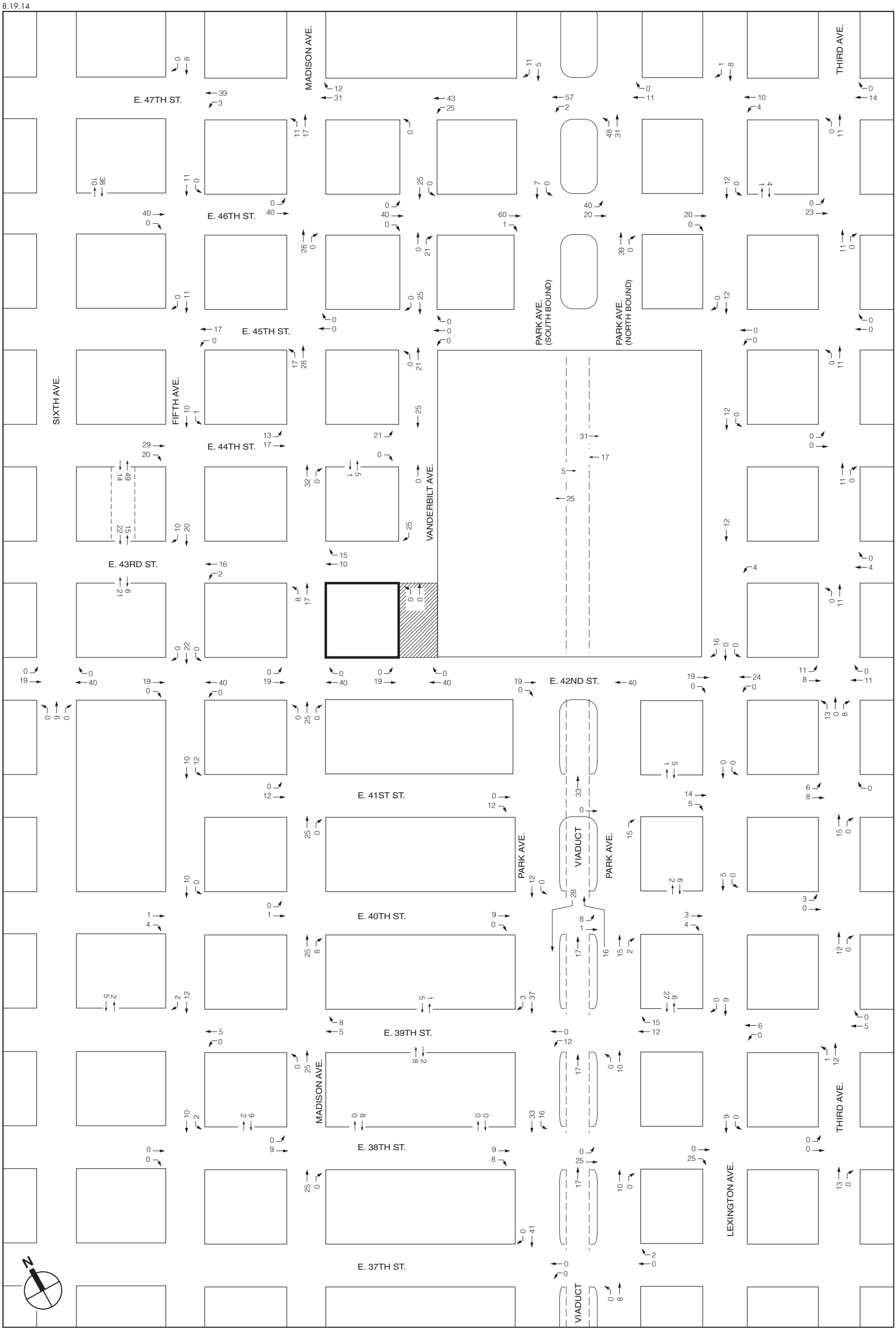

One Vanderbilt Development Site

Proposed Public Place

NOT TO SCALE

2021 Proposed Project Incremental Vehicle Trips
Weekday PM Peak Hour
Figure 5

Vanderbilt Corridor and One Vanderbilt

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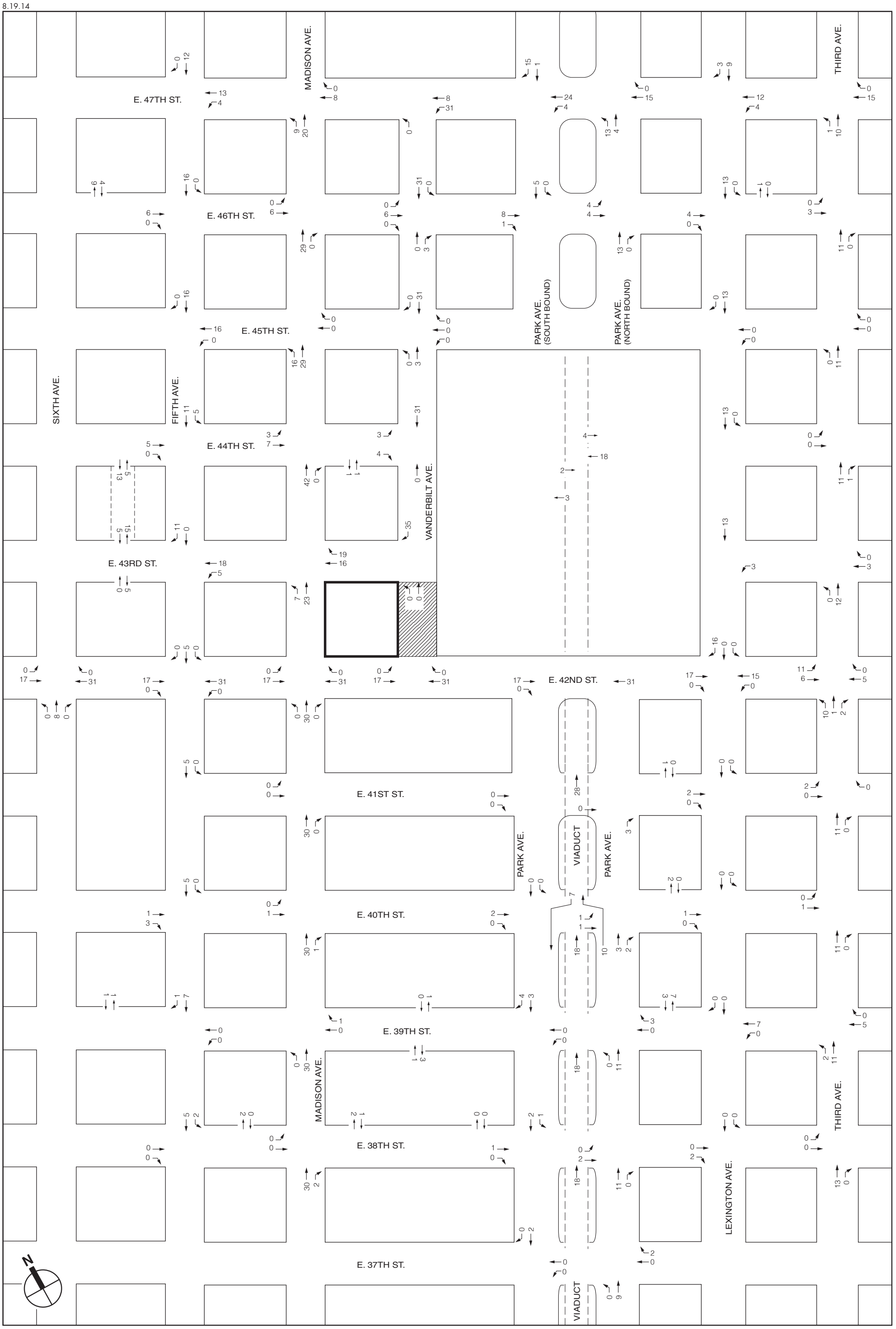

One Vanderbilt Development Site

Proposed Public Place

NOT TO SCALE

2021 Proposed Project Incremental Vehicle Trips
Saturday Peak Hour
Figure 6

Vanderbilt Corridor and One Vanderbilt

Traffic Analysis Locations

Vanderbilt Corridor and One Vanderbilt

Figure 7

Table 7
Traffic Level 2 Screening Analysis Results—Selected Analysis Locations

Intersection	Incremental Vehicle Trips (Weekday)			Selected Analysis Locations	Incremental Vehicle Trips (Saturday)	Selected Analysis Locations
	AM	Midday	PM	Weekday		Saturday
Third Avenue and East 47th Street	22	7	25		26	
Third Avenue and East 46th Street	6	7	34		14	
Third Avenue and East 45th Street	5	6	11		11	
Third Avenue and East 44th Street	5	5	11		12	
Third Avenue and East 43rd Street	5	5	15		15	
Third Avenue and East 42nd Street	25	26	**51**	✓	35	
Third Avenue and East 41st Street	7	8	29	✓	13	
Third Avenue and East 40th Street	7	8	15		12	
Third Avenue and East 39th Street	35	10	18		18	
Third Avenue and East 38th Street	21	8	13		13	
Lexington Avenue and East 47th Street	26	12	23		28	
Lexington Avenue and East 46th Street	9	4	32		17	
Lexington Avenue and East 45th Street	5	3	12		13	
Lexington Avenue and East 44th Street	5	3	12		13	
Lexington Avenue and East 43rd Street	5	3	16		16	
Lexington Avenue and East 42nd Street	29	25	**59**	✓	48	
Lexington Avenue and East 41st Street	3	5	19		2	
Lexington Avenue and East 40th Street	3	5	12		1	
Lexington Avenue and East 39th Street	31	7	15		7	
Lexington Avenue and East 38th Street	2	2	34		2	
Park Avenue (NB) and East 47th Street	27	16	**90**	✓	32	✓
Park Avenue (SB) and East 47th Street	**67**	25	**75**	✓	44	✓
Park Avenue (NB) and East 46th Street	10	8	**99**	✓	21	✓
Park Avenue (SB) and East 46th Street	40	7	**68**	✓	14	✓
Park Avenue and East 42nd Street	29	24	**59**	✓	48	
Park Avenue (NB) and East 41st Street	8	3	15		3	
Park Avenue (SB) and East 41st Street	3	3	12		0	
Park Avenue (NB) and East 40th Street	16	5	42	✓	17	
Park Avenue (SB) and East 40th Street	18	2	49	✓	9	
Park Avenue (NB) and East 39th Street	15	5	37	✓	14	
Park Avenue (SB) and East 39th Street	17	3	**52**	✓	7	
Park Avenue (NB) and East 38th Street	11	3	35	✓	13	
Park Avenue (SB) and East 38th Street	1	1	**66**	✓	4	
Park Avenue (NB) and East 37th Street	13	5	10	✓	11	
Park Avenue (SB) and East 37th Street	3	3	41	✓	2	
Vanderbilt Avenue and East 47th Street	36	21	**68**	✓	39	
Vanderbilt Avenue and East 46th Street	32	21	**86**	✓	40	✓
Vanderbilt Avenue and East 45th Street	22	18	46		34	
Vanderbilt Avenue and East 44th Street	31	26	46	✓	38	
Vanderbilt Avenue and East 43rd Street	32	20	25	✓	35	
Vanderbilt Avenue and East 42nd Street	29	30	**59**	✓	48	
Madison Avenue and East 47th Street	33	19	**71**	✓	37	
Madison Avenue and East 46th Street	30	19	**68**	✓	35	
Madison Avenue and East 45th Street	25	16	45		45	
Madison Avenue and East 44th Street	39	24	**62**	✓	**52**	✓
Madison Avenue and East 43rd Street	**52**	19	**50**	✓	**65**	✓
Madison Avenue and East 42nd Street	49	29	**84**	✓	**78**	✓
Madison Avenue and East 41st Street	23	2	37		30	
Madison Avenue and East 40th Street	28	3	34		32	
Madison Avenue and East 39th Street	26	4	38		31	
Madison Avenue and East 38th Street	26	-4	34		32	
Fifth Avenue and 47th Street	43	16	**50**	✓	29	
Fifth Avenue and 46th Street	44	12	**51**	✓	22	
Fifth Avenue and 45th Street	39	9	28		32	
Fifth Avenue and 44th Street	34	7	**60**	✓	21	
Fifth Avenue and 43rd Street	47	2	48		34	
Fifth Avenue and 42nd Street	30	36	**81**	✓	**53**	✓
Fifth Avenue and 41st Street	1	6	22		5	
Fifth Avenue and 40th Street	16	6	15		9	
Fifth Avenue and 39th Street	14	7	19		8	
Fifth Avenue and 38th Street	11	4	12		7	
Sixth Avenue and West 42nd Street	47	31	**68**	✓	**56**	✓

Notes:
✓ denotes intersection selected for the detailed traffic analysis.

There are numerous bus routes with stops adjacent to or near the One Vanderbilt site, including the M1, M2, M3, M4, M5, M15, M15 SBS, M42, M101, M102, 103, and Q32 local bus routes, express bus routes from the Bronx, Brooklyn, Queens, and Staten Island, and Port Authority Bus Terminal buses. As summarized in **Table 5**, the proposed One Vanderbilt development is expected to generate 557, 205, 471, and 52 net-incremental bus trips during the weekday AM, midday, and PM, and Saturday peak hours, respectively. Based on detailed distribution of the projected bus trips, including transfers, it was determined that none of the bus routes serving the study area would incur 50 or more peak hour riders in a single direction. Therefore, a quantified bus line-haul analysis is not warranted and the proposed One Vanderbilt development is not expected to result in any significant adverse bus line-haul impacts in the study area.

Off-Site Transit Improvements

The applicant is also undertaking ongoing consultation with MTA NYCT regarding the potential provision of off-site pedestrian circulation improvements to the Grand Central subway station. The potential off-site improvements under consideration include:

1. A new stair in the basement of the Pershing Building (located at the southeast corner of East 42nd Street and Park Avenue) that would connect the IRT Lexington Avenue subway mezzanine to the platform;
2. Two new street-level subway stairs in the sidewalk at the southeast corner of East 42nd Street and Lexington Avenue that would connect to an existing below-grade passageway;
3. Narrowing of stairs and columns in the IRT Lexington Avenue subway mezzanine paid area to provide more platform area and improved pedestrian flow;
4. Replacement of an existing street-level subway entrance at the northwest corner of East 42nd Street and Lexington Avenue with new stairs and an elevator;
5. Creation of a new IRT Lexington Avenue subway mezzanine paid area in the basement of the Grand Hyatt Hotel with two new stairs to the subway platform; and
6. Conversion of basement area of the Grand Hyatt Hotel to IRT Lexington Avenue subway mezzanine paid area.

These improvements would improve overall access and circulation to and within the station but are not expected to affect travel patterns of future users to the proposed One Vanderbilt building. All of these improvements, with the exception of #2 above, would also not be expected to affect how transit riders would access the station from street level. For potential improvement #2, the new street-level subway stairs' potential effects on pedestrian flow have been studied by MTA NYCT and reviewed by NYCDOT. The details of this study and its findings will be described in this EIS. Since these potential improvements would not require new analyses of pedestrian conditions, the pedestrian study area described below considers only the incremental trips associated with components of the proposed One Vanderbilt building.

PEDESTRIANS

As shown in **Table 5**, the projected peak hour pedestrian trips would exceed the CEQR analysis threshold of 200 pedestrians during all peak hours. Level 2 pedestrian trip assignments were individually developed for all the proposed development components and are shown in **Figures 8** through **11** and discussed below. Based on the detailed assignment of pedestrian trips, 10 sidewalks, 9 crosswalks, and 15 corners were selected for detailed analysis for the weekday peak hours and 4 sidewalks, 4 crosswalks, and 5 corners were selected for detailed analysis for the Saturday peak hour[2], as shown in **Table 8** and **Figure 12**.

[2] As detailed analysis is conducted, a need for additional analysis locations may be identified; the DEIS will include any such additional analysis and provide an explanation for the additional analysis locations.

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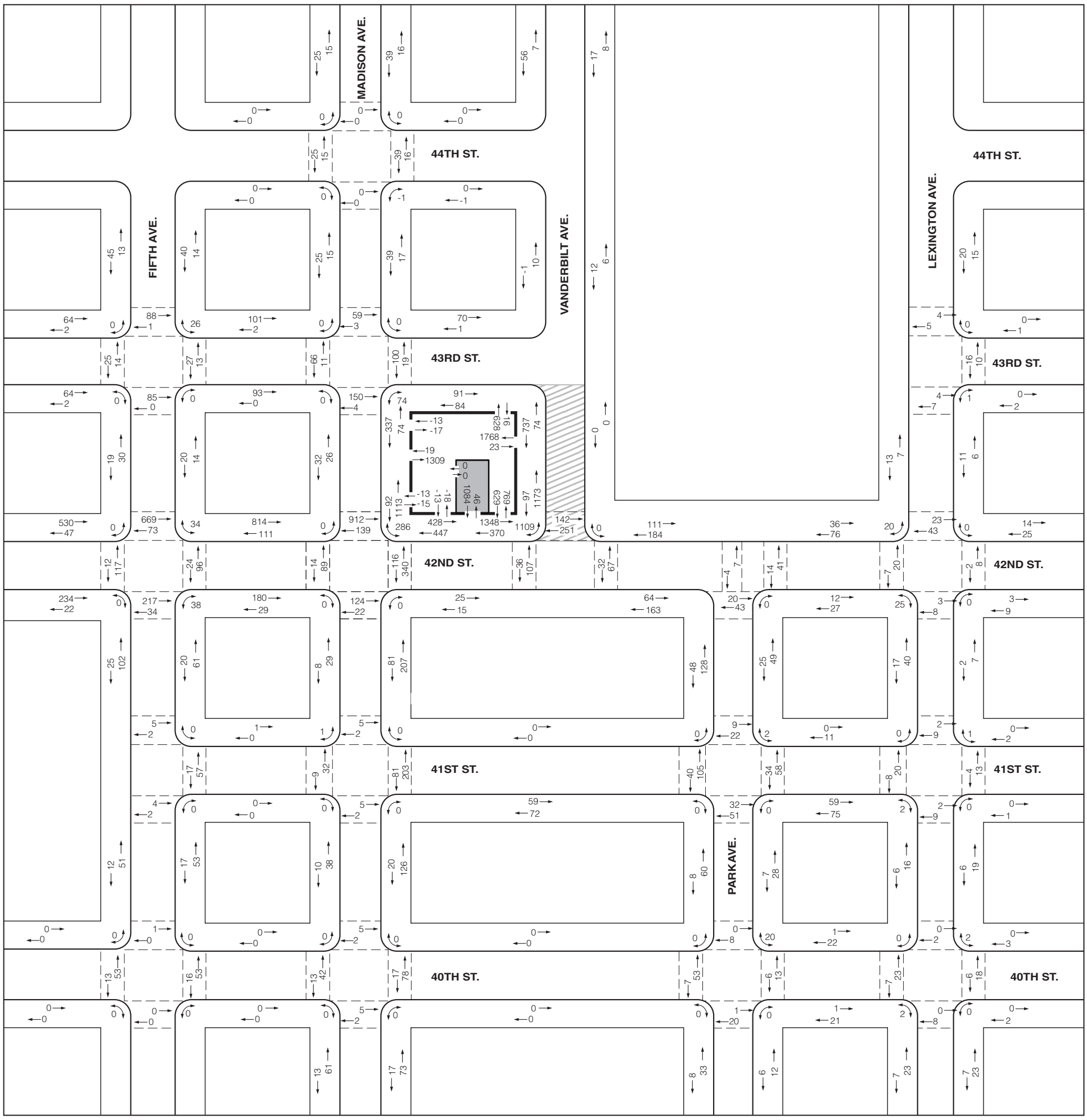

One Vanderbilt Development Site

MTA Access Area

Proposed Public Place

NOT TO SCALE

2021 Proposed Project Incremental Pedestrian Trips
Weekday AM Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure 8

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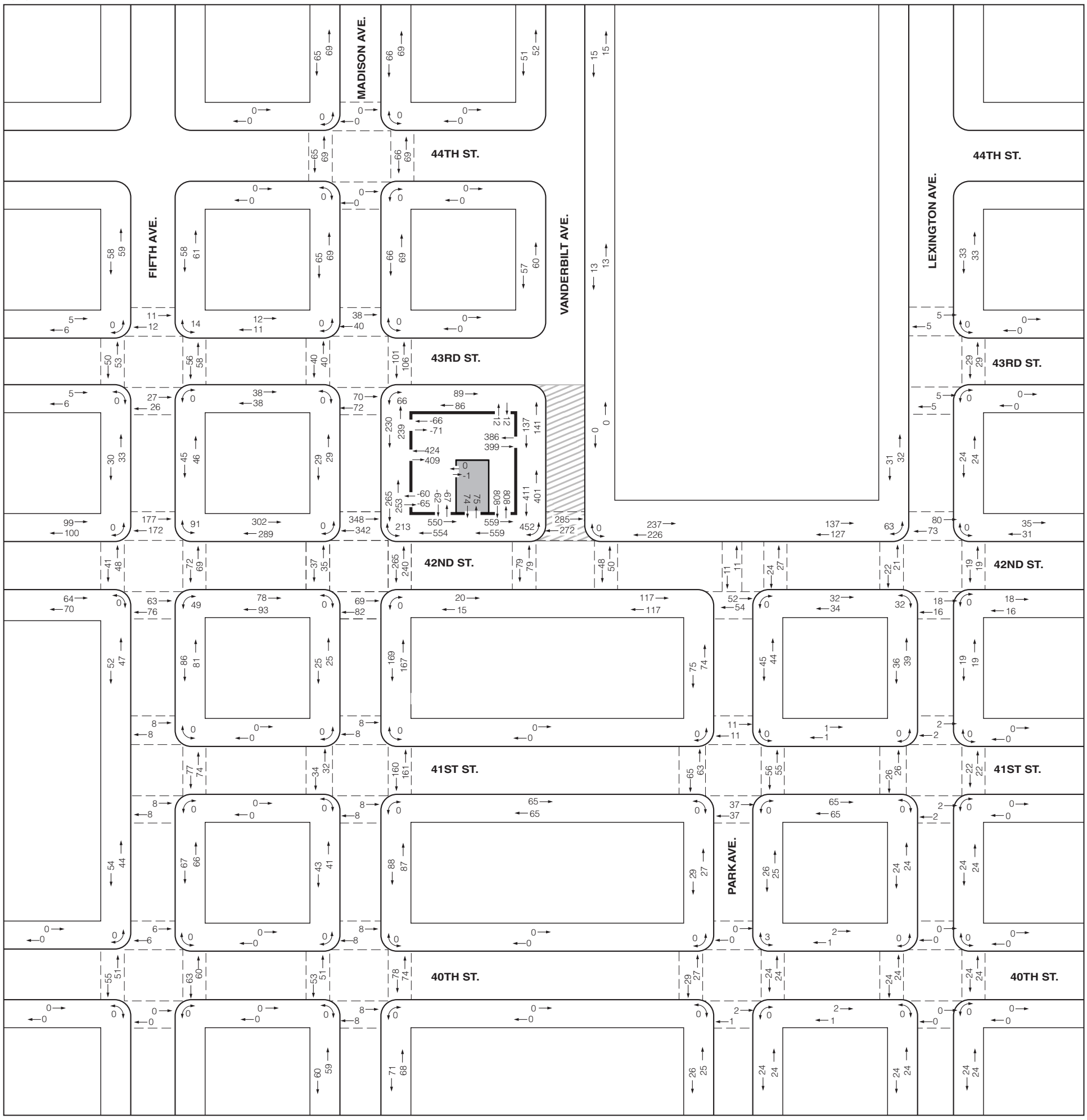


One Vanderbilt Development Site

MTA Access Area

Proposed Public Place

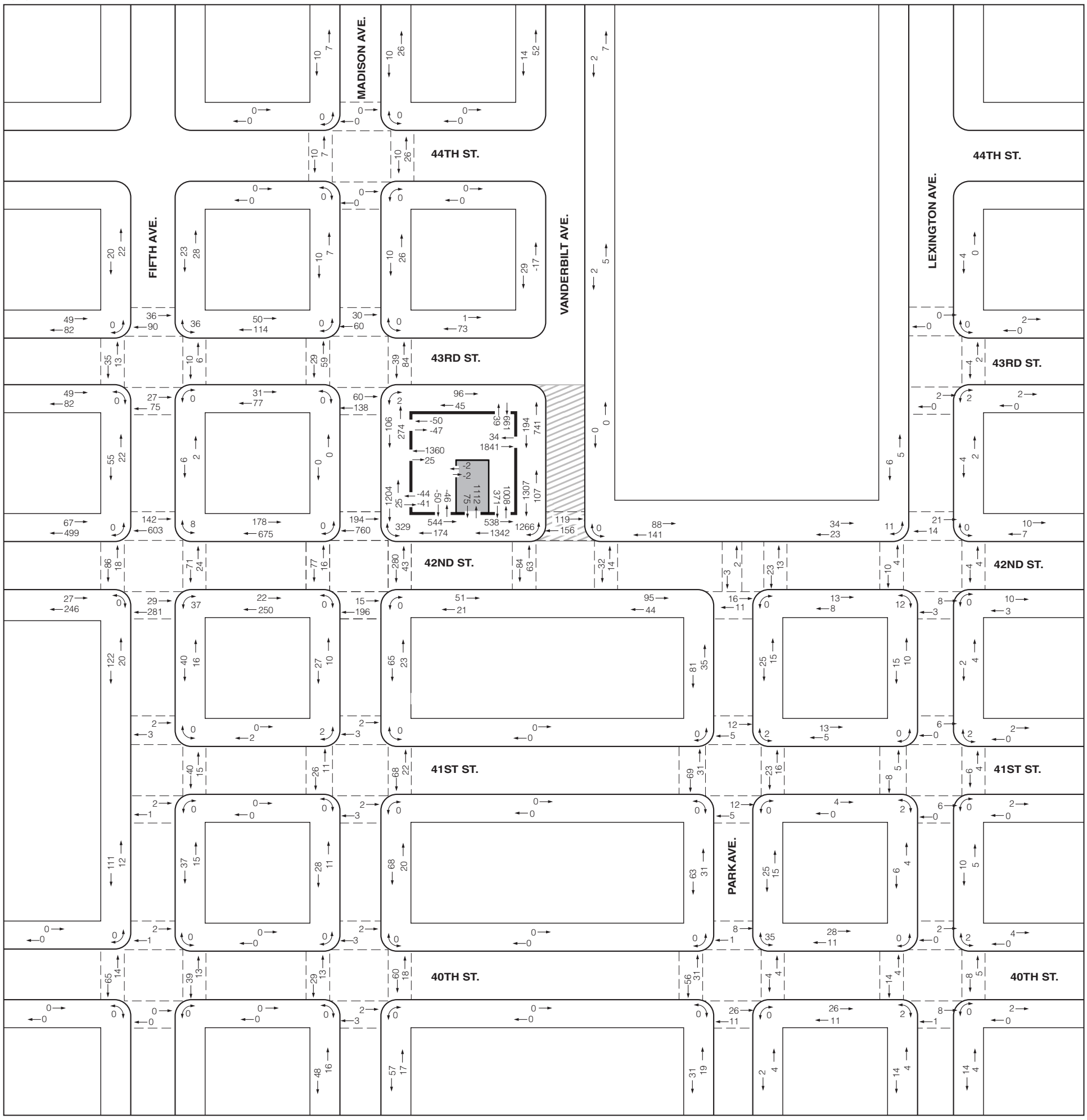
NOT TO SCALE

2021 Proposed Project Incremental Pedestrian Trips
Weekday Midday Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure 9

9.12.14



One Vanderbilt Development Site

MTA Access Area

Proposed Public Place

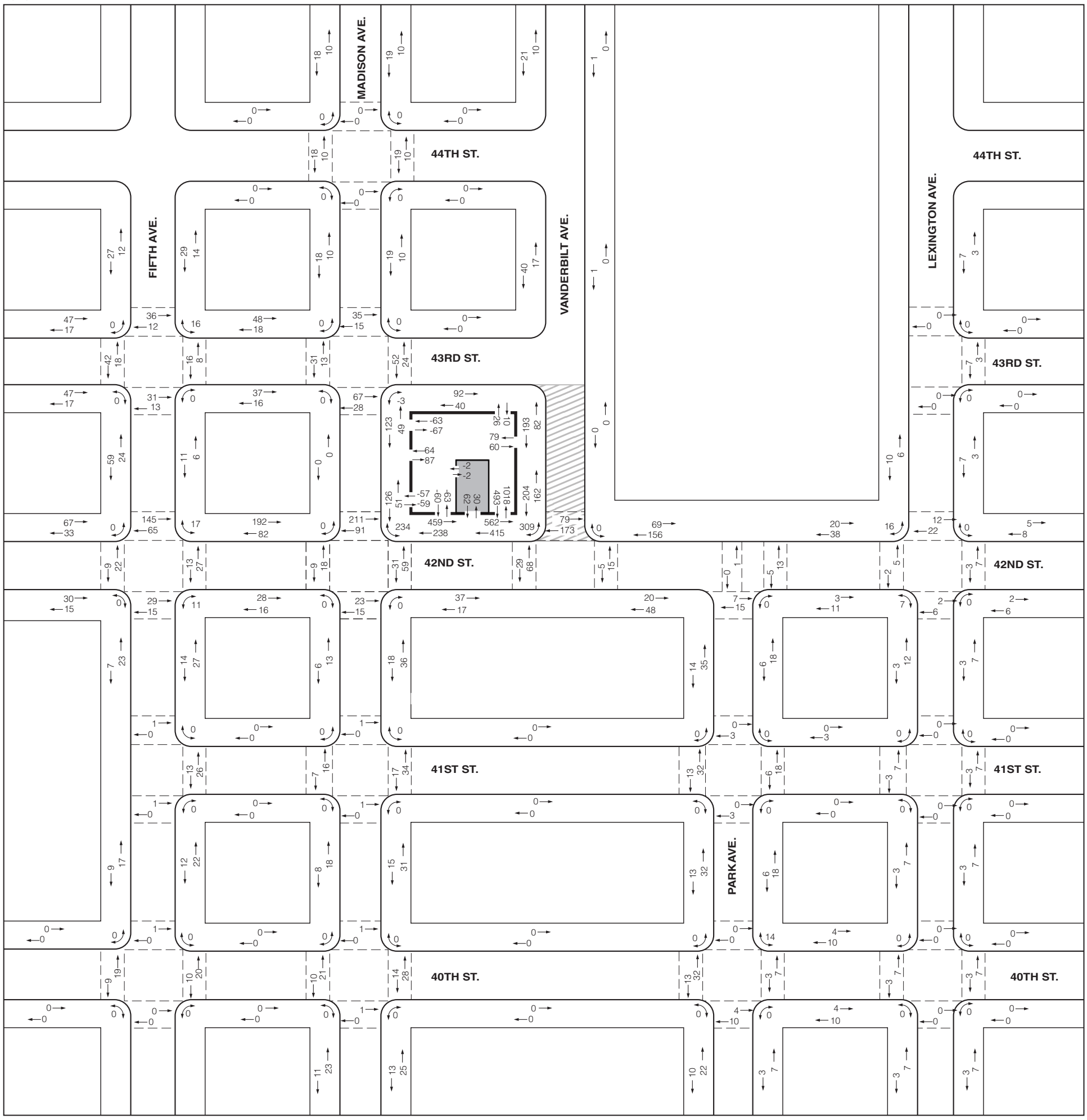
NOT TO SCALE

2021 Proposed Project Incremental Pedestrian Trips
Weekday PM Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure 10

9.12.14



One Vanderbilt Development Site

MTA Access Area

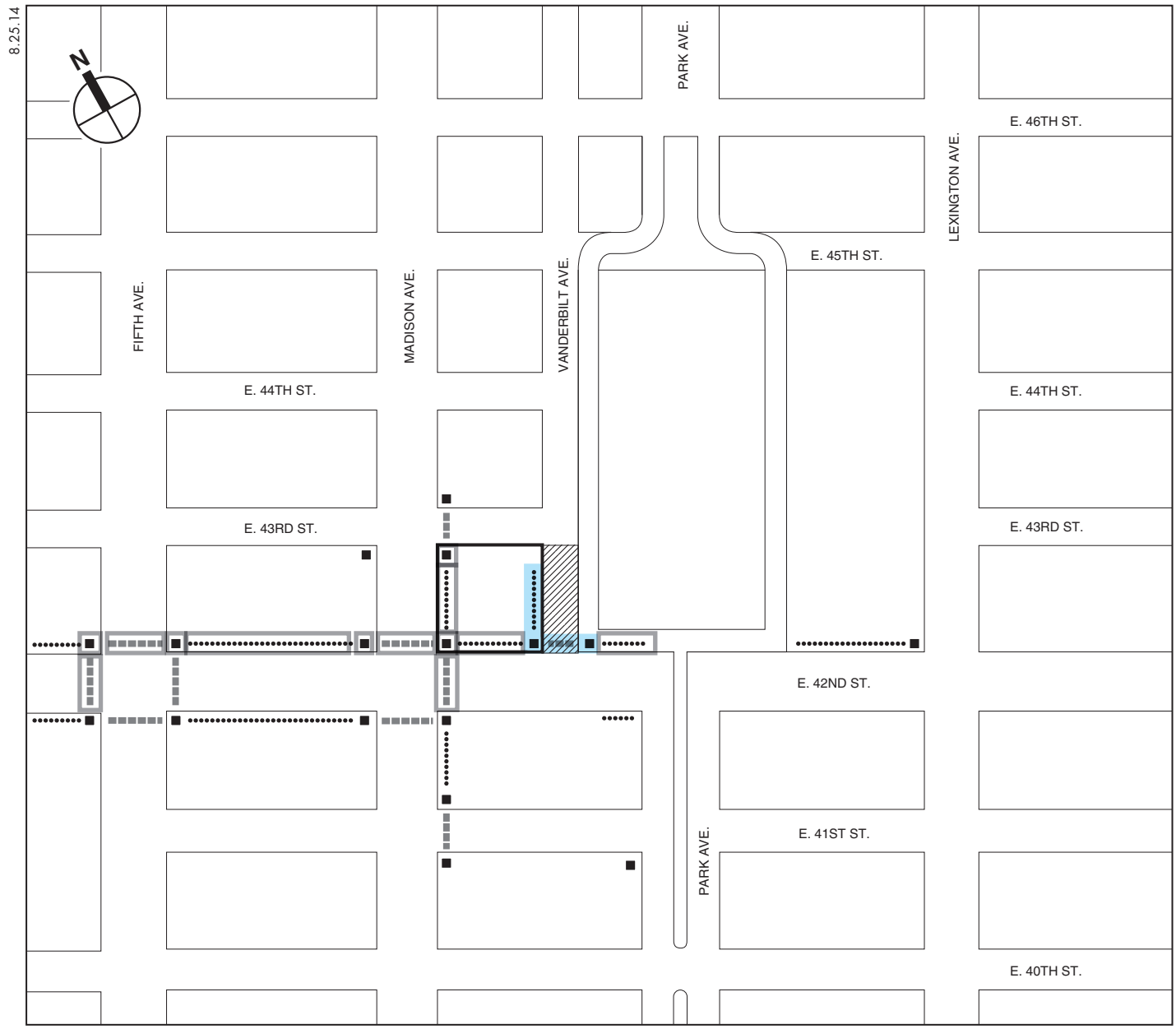
Proposed Public Place

NOT TO SCALE

2021 Proposed Project Incremental Pedestrian Trips
Saturday Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure 11



Vanderbilt Corridor and One Vanderbilt

Pedestrian Analysis Locations

Figure 12

- Auto Trips – Motorists would park at off-street parking facilities within ¼ mile of the One Vanderbilt site and walk to/from the One Vanderbilt site.

Table 8

Pedestrian Level 2 Screening Analysis Results—Selected Analysis Locations

Pedestrian Elements	Weekday AM	Weekday Midday	Weekday PM	Selected Analysis Location Weekday	Saturday	Selected Analysis Location Saturday
Fifth Avenue and 42nd Street						
South Sidewalk between Sixth and Fifth Avenues (on 42nd Street)	**256**	134	**273**	✓	45	
North Sidewalk between Sixth and Fifth Avenues (on 42nd Street)	**577**	199	**566**	✓	110	
Northeast Corner	**896**	**581**	**848**	✓	**267**	✓
Southeast Corner	**409**	**329**	**442**	✓	95	
Southwest Corner	**380**	**228**	**414**	✓	75	
Northwest Corner	**871**	**438**	**849**	✓	**241**	✓
East Crosswalk	120	141	95	✓	40	
West Crosswalk	129	89	104	✓	31	✓
South Crosswalk	**251**	139	**310**	✓	44	
North Crosswalk	**742**	**349**	**745**	✓	**210**	✓
Madison Avenue and East 43rd Street						
Northeast Corner	181	**285**	**213**	✓	126	
Southeast Corner	**347**	**427**	**447**	✓	**301**	✓
Southwest Corner	**231**	**222**	**286**	✓	139	
East Crosswalk	119	**207**	123	✓	76	
East Sidewalk between East 43rd and East 42nd Streets (on Madison Avenue)	**411**	**487**	**551**	✓	**353**	✓
Madison Avenue and East 42nd Street						
North Crosswalk	**1,051**	**690**	**954**	✓	**302**	✓
East Crosswalk	**456**	**510**	**368**	✓	138	✓
South Crosswalk	146	151	**211**	✓	38	
Northeast Corner	**2,128**	**1,430**	**1,955**	✓	**628**	✓
Southeast Corner	**602**	**661**	**579**	✓	176	
Northwest Corner	**1,154**	**762**	**1,047**	✓	**329**	✓
Southwest Corner	**249**	**223**	**304**	✓	65	
East Sidewalk between East 43rd and East 42nd Streets (on Madison Avenue)	**1,542**	**554**	**1,706**	✓	**311**	✓
North Sidewalk between Madison and Vanderbilt Avenues (on East 42nd Street)	**1,210**	**1,144**	**1,242**	✓	**884**	✓
South Sidewalk between Fifth and Madison Avenues (on East 42nd Street)	**209**	171	**272**	✓	44	
North Sidewalk between Fifth and Madison Avenues (on East 42nd Street)	**925**	**591**	**853**	✓	**274**	✓
East Sidewalk between East 42nd and East 41st Streets (on Madison Avenue)	**288**	**336**	88	✓	54	
Madison Avenue and East 41st Street						
East Crosswalk	**284**	**321**	90	✓	51	
Northeast Corner	**291**	**337**	95	✓	52	
Southeast Corner	**291**	**337**	95	✓	52	
Vanderbilt Avenue and East 42nd Street						
North Crosswalk*	**393**	**557**	**275**		**252**	
Northeast Corner*	**492**	**655**	**321**		**272**	
Northwest Corner*	**1,311**	**1,126**	**1,161**		**468**	
West Sidewalk between East 42nd and East 43rd Streets (on Vanderbilt Avenue)*	**935**	**777**	**936**		**231**	
South Sidewalk between Vanderbilt and Park Avenues (on East 42nd Street)	**227**	**234**	139	✓	68	
North Sidewalk between Vanderbilt and Park Avenues (on East 42nd Street)	**295**	**463**	**229**	✓	**225**	✓
North Sidewalk between Madison and Vanderbilt Avenues (on East 42nd Street)	**1,384**	**1,092**	**1,527**	✓	**973**	✓
Park Avenue and East 41st Street						
Southwest Corner	**228**	**202**	117	✓	48	
Lexington Avenue and East 42nd Street						
Northwest Corner	113	**259**	60	✓	57	
North Sidewalk between Park and Lexington Avenues (on East 42nd Street)	112	**264**	57	✓	58	

Notes: ✓ denotes pedestrian elements selected for the detailed analysis.
* Future Vanderbilt Public Place

- Taxi Trips – Taxi patrons would get dropped off and picked up along East 42nd Street, East 43rd Street, and Madison Avenue.
- City Bus Trips – City bus riders would use buses stopping on 42nd Street, Madison Avenue, Fifth Avenue, Lexington Avenue, Third Avenue, Second Avenue, and First Avenue, and would get off at bus stops nearest to the One Vanderbilt site. Bus riders traveling from outside New York City would get on/off at the Port Authority Bus Terminal (PABT) and would either walk to the One Vanderbilt site from the station or transfer to the subway to GCT. "Hop-on, hop-off" City tour bus riders traveling to the observation deck would walk from stops on or near 42nd Street to the One Vanderbilt site.
- Tour Bus Trips – Tour bus passengers have been assumed to board/alight at the south side of East 43rd Street between Madison Avenue and Park Avenue, the south side of East 41st Street between Madison Avenue and Park Avenue, and the south side of East 41st Street between Lexington Avenue and Park Avenue.
- Subway Trips – Subway riders were assigned to the 42nd Street-GCT (Nos. 4, 5, 6, 7, and Shuttle trains), the 42nd Street-Bryant Park Station (7, B, D, F, and M trains), and the 33rd Street PATH station. Based on NYCT's modeling results, approximately 64 percent of the riders were assigned to GCT, 34 percent were assigned to the 42nd Street-Bryant Park Station, and the remaining 2 percent were assigned to the 33rd Street PATH Station.
- Rail Trips – Rail riders would travel to GCT and Penn Station. All rail riders to/from GCT would walk to/from the One Vanderbilt site. Based on NYCT's modeling results, it was determined that 65 percent of the rail riders to/from Penn Station would transfer to subway lines and the remaining riders would walk to/from the One Vanderbilt site. PATH Trips – PATH riders would travel to/from the 33rd Street PATH station. Based on NYCT's modeling results, 85 percent of PATH riders were assumed to walk to/from the One Vanderbilt site and the remaining 15 percent were assigned to the 34th Street subway station for subway transfer trips. These PATH riders were accounted for in the subway assignments.
- Walk-Only Trips – Pedestrian walk-only trips were developed by distributing project-generated person trips to surrounding pedestrian facilities (i.e., sidewalks, corner reservoirs, and crosswalks) based on population data as well as the land use characteristics of the surrounding neighborhood.

D. CONCEPTUAL ANALYSIS

The proposed actions' zoning text amendment would create the Vanderbilt Corridor (consisting of the five blocks along the west side of Vanderbilt Avenue between East 42nd and East 47th Streets) and a new special permit under which the City Planning Commission (CPC) may approve bonus floor area up to a maximum floor area ratio (FAR) of 30.0 (the "Grand Central Public Realm Improvement Bonus") in connection with public space and transit improvements related to development within the Vanderbilt Corridor. Potential impacts of any redevelopment that could reasonably be expected to occur within the proposed Vanderbilt Corridor on the four blocks north of the One Vanderbilt site (Block 1277) in the foreseeable future (defined as 2033) will be addressed in the EIS's Conceptual Analysis chapter.

In addition to the One Vanderbilt site, three parcels on two other blocks within the Vanderbilt Corridor have been identified as sites that could potentially be redeveloped in the foreseeable future using the new Grand Central Public Realm Improvement Bonus and related waivers, the modified Landmark Transfer specific permit, the special permit to allow hotel uses, or a combination of those special permits. These sites are: Block 1279/Lots 23-25 and 48, encompassing the MTA Building at 347 Madison Avenue and other MTA-owned parcels, between East 44th and East 45th Streets; Block 1279/Lot 45, encompassing the predominantly office building at 52 Vanderbilt Avenue; and Block 1281/Lot 21, encompassing the Roosevelt Hotel between East 45th and East 46th Streets.

Table 9 provides a summary of the development program assumptions for the three blocks under the future No Action and With Action conditions, as well as the development increments that would be subject to the impact analyses. Among the uses anticipated for the Vanderbilt Corridor, only the hotel would not be a component of the One Vanderbilt development. Hence, in addition to the trip generation factors described above for estimating trips for the One Vanderbilt development, hotel trip rates and factors, as summarized in **Table 10**, were also used to estimate the trip-making associated with the Vanderbilt Corridor development program. The resulting trip estimates are presented in **Tables 11** to **13**.

Table 9
2033 Vanderbilt Corridor Development Program Comparison

	Future No-Action As-of-Right Development			Future With-Action under Special Permit			Development Increments Subject to Impact Analysis		
Use	**Block 1277**	**Block 1279**	**Block 1281**	**Block 1277**	**Block 1279**	**Block 1281**	**Block 1277**	**Block 1279**	**Block 1281**
Office (gsf)	636,312	597,485	768,806	1,079,000	914,361	1,580,924	442,688	316,876	812,118
Trading Floor (gsf)	0	0	0	246,000	0	0	246,000	0	0
Hotel (rooms)	0	0	0	0	250	0	0	250	0
Local Retail (gsf)	20,912	34,551	43,313	13,000	25,051	43,313	-7,910	-9,500	0
Destination Retail (gsf)	62,736	0	0	40,000	0	0	-22,740	0	0
Restaurant (gsf)	0	0	0	27,000	0	0	27,000	0	0
Roof-top Amenity (gsf)	0	0	0	55,000	0	0	55,000	0	0

Table 10
Hotel Travel Demand Assumptions

Use	**Hotel**			
Daily		Weekday		Saturday
Person Trip		(1)		(1)
Generation Rate		9.4		9.4
		Trips / Room		
Person Trip	(1)	(1)	(1)	(1)
Temporal	AM	MD	PM	Sat
Distribution	8%	14%	13%	9%
Directional Distribution	(2)	(2)	(2)	(3)
In	39%	54%	65%	56%
Out	61%	46%	35%	44%
Total	100%	100%	100%	100%
Modal Split	(2)	(2)	(2)	(3)
Auto	9.0%	8.0%	9.0%	9.0%
Taxi	18.0%	15.0%	18.0%	18.0%
Subway	24.0%	13.0%	24.0%	24.0%
City Bus	3.0%	3.0%	3.0%	3.0%
Tour Bus	-	-	-	-
Walk	46.0%	61.0%	46.0%	46.0%
Railroad	0.0%	0.0%	0.0%	0.0%
Total	100%	100%	100%	100%
Vehicle Occupancy			(2)	
Auto			1.40	
Taxi			1.80	
Daily			(2,3)	
Delivery Trip		0.06		0.01
Generation Rate			Delivery Trip / Room	
Delivery Trip	(2)	(2)	(2)	(3)
Temporal	AM	MD	PM	Sat
Distribution	12%	9%	1%	9%
Directional Distribution	(2)	(2)	(2)	(3)
In	50%	50%	50%	50%
Out	50%	50%	50%	50%
Total	100%	100%	100%	100%

Sources:
(1) 2014 *CEQR Technical Manual*
(2) *East Midtown Rezoning and Related Actions FEIS* (2013).
(3) *606 West 57th Street FEIS* (2014).

Table 11
No-Action Vanderbilt Corridor Trip Generation Summary

		Person Trips								Vehicle Trips					
Peak Hour	In/Out	Auto	Taxi	Subway	City Bus	Tour Bus	Walk	Railroad	Total	In/Out	Auto	Taxi	Tour Bus	Delivery	Total
AM	In	312	110	2,085	644	0	499	820	4,470	In	269	77	0	34	380
	Out	23	12	114	45	0	229	35	458	Out	17	77	0	34	128
	Total	335	122	2,199	689	0	728	855	4,928	Total	286	154	0	68	508
MD	In	102	131	290	260	0	3,495	0	4,278	In	78	119	0	39	236
	Out	104	135	295	271	0	3,649	0	4,454	Out	81	119	0	39	239
	Total	206	266	585	531	0	7,144	0	8,732	Total	159	238	0	78	475
PM	In	52	37	226	101	0	751	54	1,221	In	38	109	0	6	153
	Out	382	147	2,471	784	0	1,055	950	5,789	Out	326	109	0	6	441
	Total	434	184	2,697	885	0	1,806	1,004	7,010	Total	364	218	0	12	594
Saturday	In	64	63	164	125	0	1,562	0	1,978	In	41	50	0	0	91
	Out	57	56	148	112	0	1,393	0	1,766	Out	36	50	0	0	86
	Total	121	119	312	237	0	2,955	0	3,744	Total	77	100	0	0	177

Table 12
With-Action Vanderbilt Corridor Trip Generation Summary

		Person Trips								Vehicle Trips					
Peak Hour	In/Out	Auto	Taxi	Subway	City Bus	Tour Bus	Walk	Railroad	Total	In/Out	Auto	Taxi	Tour Bus	Delivery	Total
AM	In	769	256	4,838	1,481	218	1,086	2,012	10,660	In	664	173	5	61	903
	Out	45	56	325	131	178	458	88	1,281	Out	35	173	5	61	274
	Total	814	312	5,163	1,612	396	1,544	2,100	11,941	Total	699	346	10	122	1,177
MD	In	165	250	583	446	198	5,505	33	7,180	In	125	208	5	70	408
	Out	166	256	595	467	198	5,781	33	7,496	Out	128	208	5	70	411
	Total	331	506	1,178	913	396	11,286	66	14,676	Total	253	416	10	140	819
PM	In	294	301	561	165	0	925	175	2,421	In	135	268	0	12	415
	Out	942	362	5,390	1,618	0	1,406	2,235	11,953	Out	771	268	0	12	1,051
	Total	1,236	663	5,951	1,783	0	2,331	2,410	14,374	Total	906	536	0	24	1,466
Saturday	In	292	323	414	190	0	2,128	84	3,431	In	129	168	0	6	303
	Out	150	179	280	142	0	1,752	31	2,534	Out	75	168	0	6	249
	Total	442	502	694	332	0	3,880	115	5,965	Total	204	336	0	12	552

Table 13
Vanderbilt Corridor Trip Increments

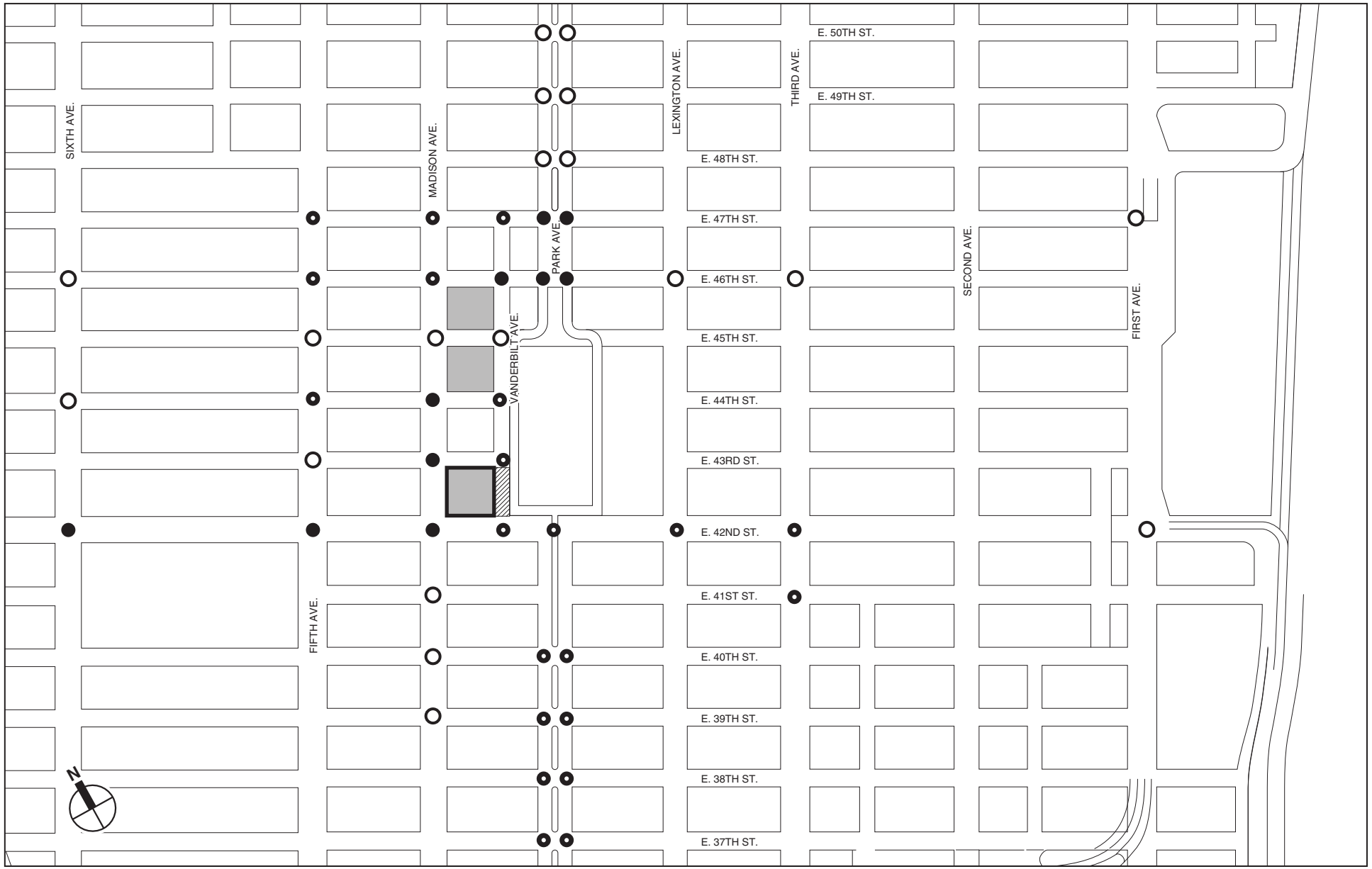
		Person Trips								Vehicle Trips					
Peak Hour	In/Out	Auto	Taxi	Subway	City Bus	Tour Bus	Walk	Railroad	Total	In/Out	Auto	Taxi	Tour Bus	Delivery	Total
AM	In	457	146	2,753	837	218	587	1,192	6,190	In	395	96	5	27	523
	Out	22	44	211	86	178	229	53	823	Out	18	96	5	27	146
	Total	479	190	2,964	923	396	816	1,245	7,013	Total	413	192	10	54	669
MD	In	63	119	293	186	198	2,010	33	2,902	In	47	89	5	31	172
	Out	62	121	300	196	198	2,132	33	3,042	Out	47	89	5	31	172
	Total	125	240	593	382	396	4,142	66	5,944	Total	94	178	10	62	344
PM	In	242	264	335	64	0	174	121	1,200	In	97	159	0	6	262
	Out	560	215	2,919	834	0	351	1,285	6,164	Out	445	159	0	6	610
	Total	802	479	3,254	898	0	525	1,406	7,364	Total	542	318	0	12	872
Saturday	In	228	260	250	65	0	566	84	1,453	In	88	118	0	6	212
	Out	93	123	132	30	0	359	31	768	Out	39	118	0	6	163
	Total	321	383	382	95	0	925	115	2,221	Total	127	236	0	12	375

Compared to the trip increments described above for only the One Vanderbilt site, the cumulative development of the Vanderbilt Corridor sites would result in 67 to 327 more incremental vehicle trips and 794 to 3,104 more incremental person trips during the analysis peak hours. Correspondingly, there would be up to 1,469 more incremental subway trips and 427 more incremental bus trips during peak hours. As a result, the transportation study areas needed to address potential impacts from these projected trip increments (in 2033) would be larger than those described above for assessing potential impacts from the One Vanderbilt trip increments (in 2021).

As shown in **Figure 13**, the traffic study area considered for this conceptual analysis would include 50 intersections (as compared to the 31 intersections analyzed for the One Vanderbilt development). For transit, station elements at the same two subway stations, GCT and the 42nd Street and Bryant Park Station, plus the 47th-50th Street Rockefeller Center Station, will be included for analysis; subway line-haul analyses will be prepared for the same lines assessed for the One Vanderbilt development; and incremental bus trips would still be sufficiently distributed to not warrant a detailed bus line-haul analysis. With regard to pedestrians, as shown in **Figure 14**, 17 sidewalks, 42 corners, and 28 crosswalks were selected for analysis (as compared to 10 sidewalks, 15 corners, and 9 crosswalks to be analyzed for the One Vanderbilt development).

✶

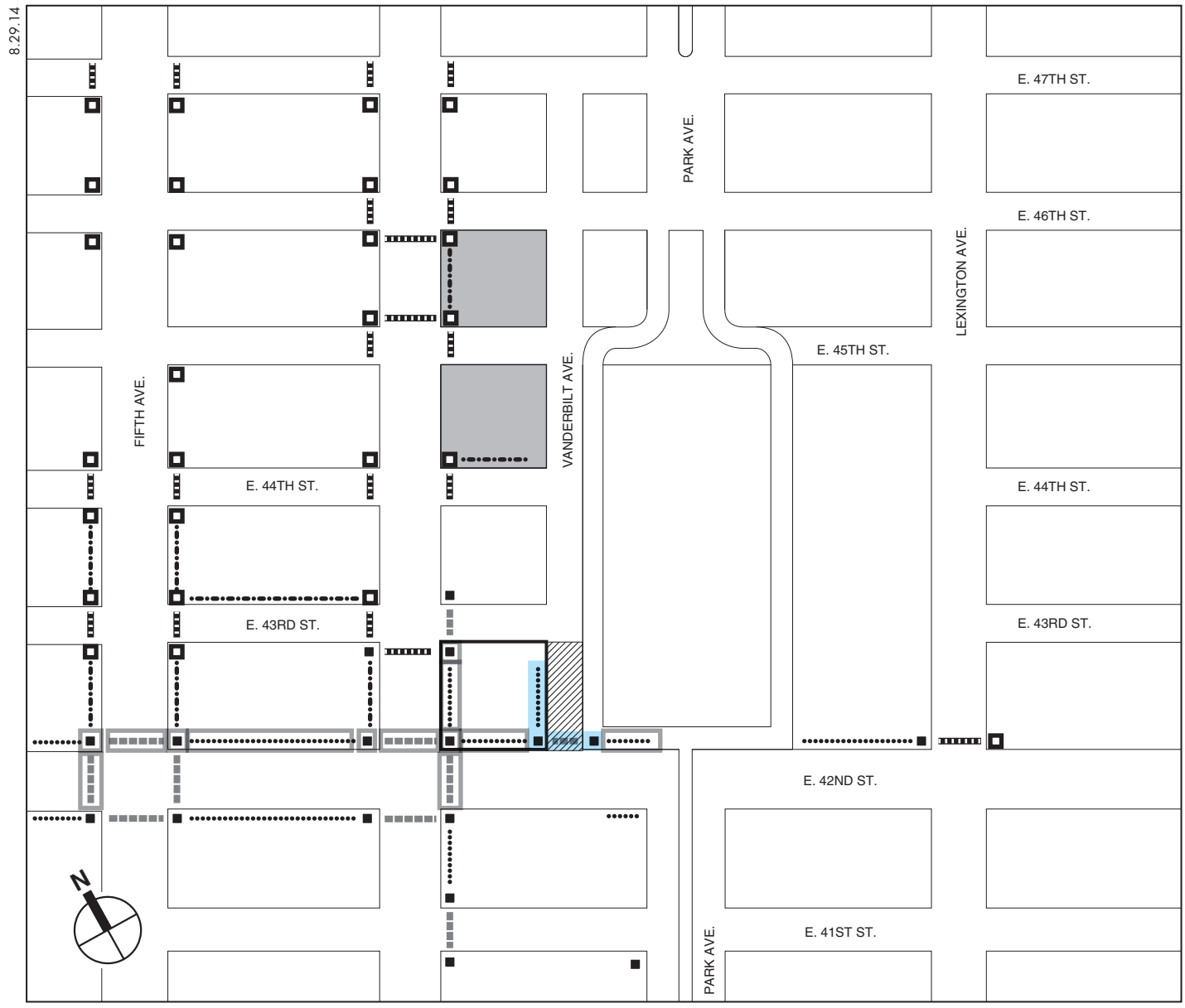
8.29.14



2033 Vanderbilt Corridor Traffic Analysis Locations

Vanderbilt Corridor and One Vanderbilt

Figure 13



2033 Vanderbilt Corridor Development Sites

One Vanderbilt Development Site

Proposed Public Place

2021 and 2033 Analysis Location

Crosswalk (weekday)

Corner (weekday)

Sidewalk (weekday)

Crosswalk (weekday/Saturday)

Corner (weekday/Saturday)

Sidewalk (weekday/Saturday)

>200 Net-Incremental Pedestrian Trips in at Least One Peak Hour. Not Included in Analysis Locations Due to Proposed Public Place

2033 Analysis Location – Weekday Only

Crosswalk

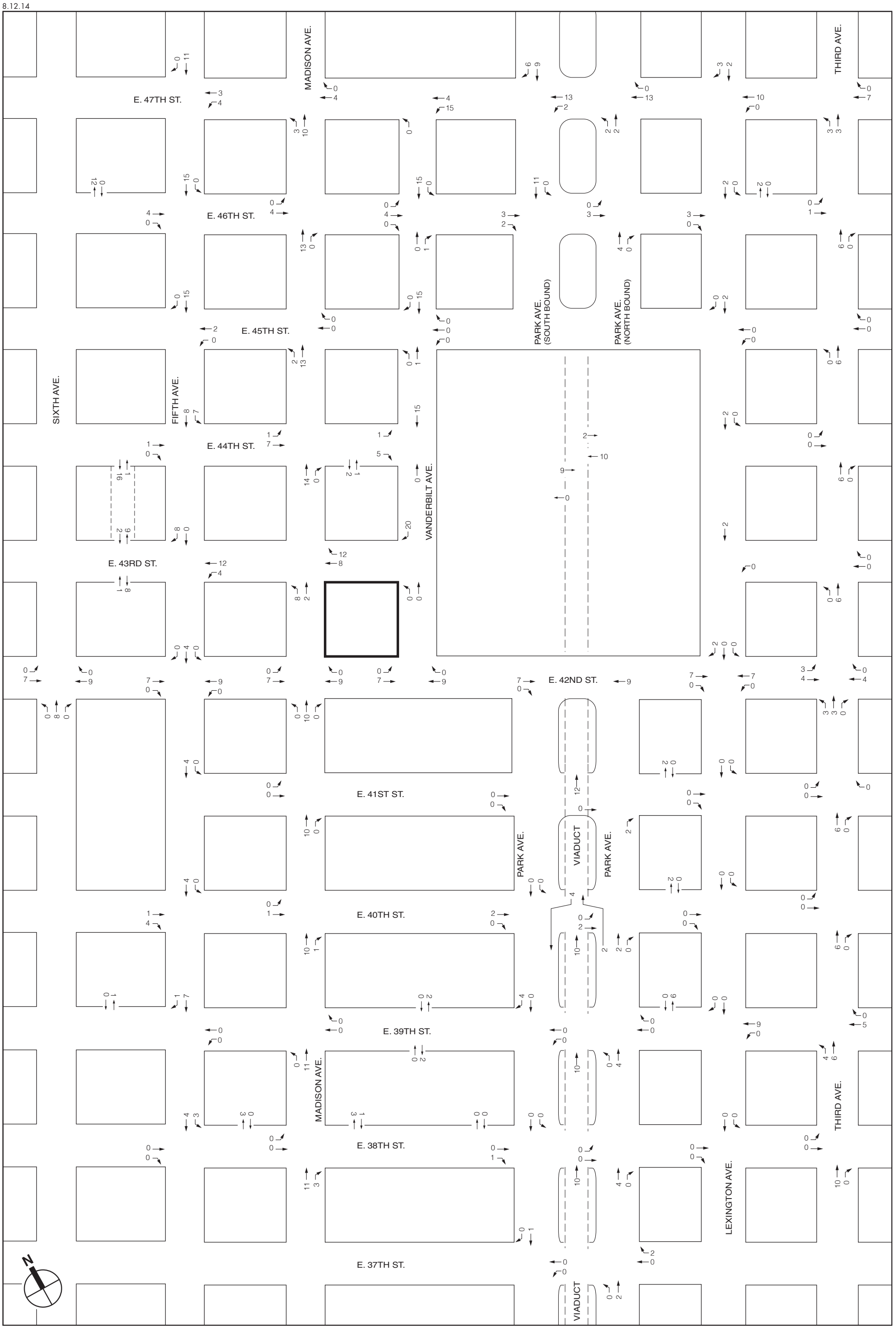
Corner

Sidewalk

2033 Vanderbilt Corridor Pedestrian Analysis Locations

Attachments

8.12.14



One Vanderbilt Development Site

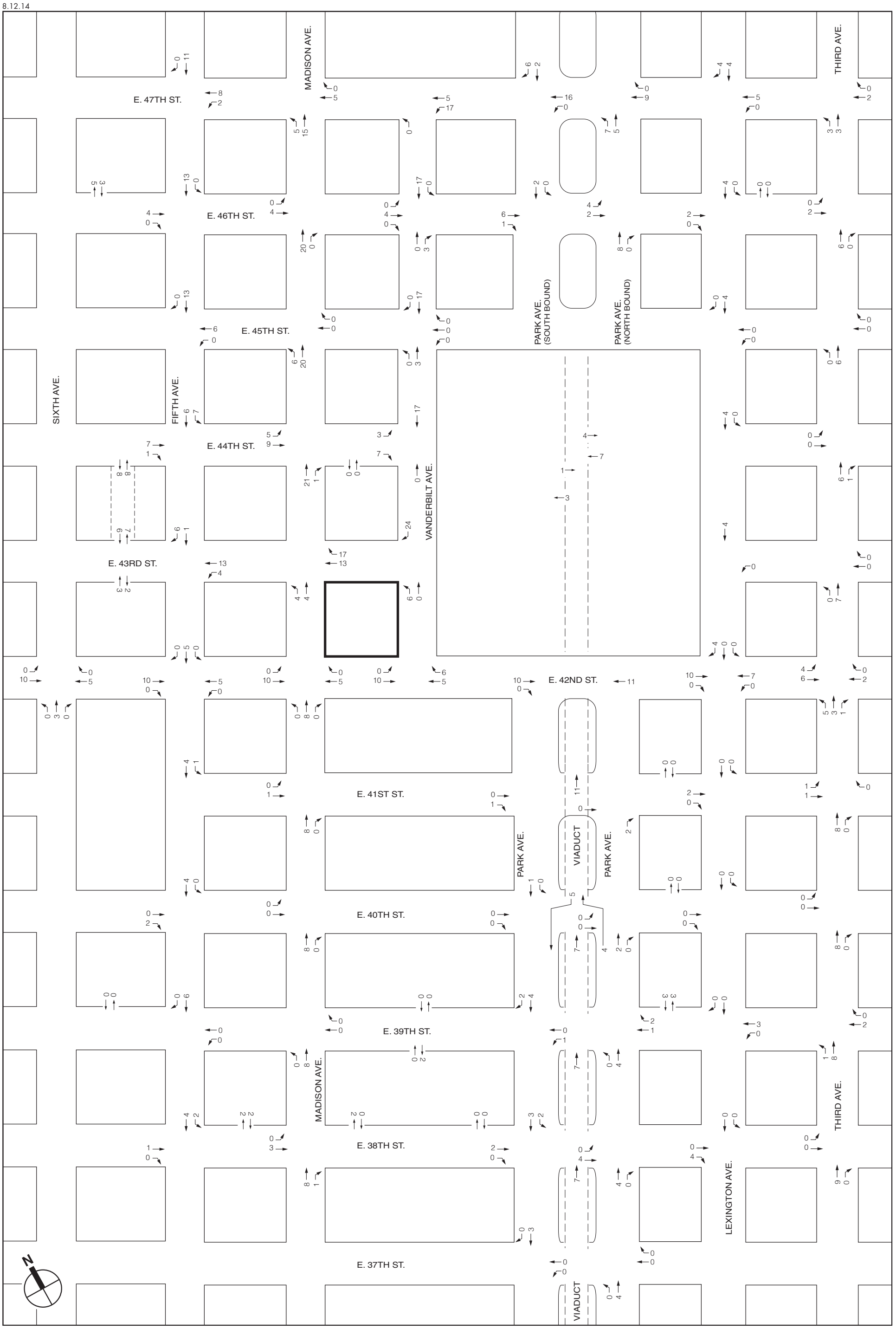
NOT TO SCALE

2021 No-Action Project Generated Vehicle Trips
Weekday AM Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-1

8.12.14



One Vanderbilt Development Site

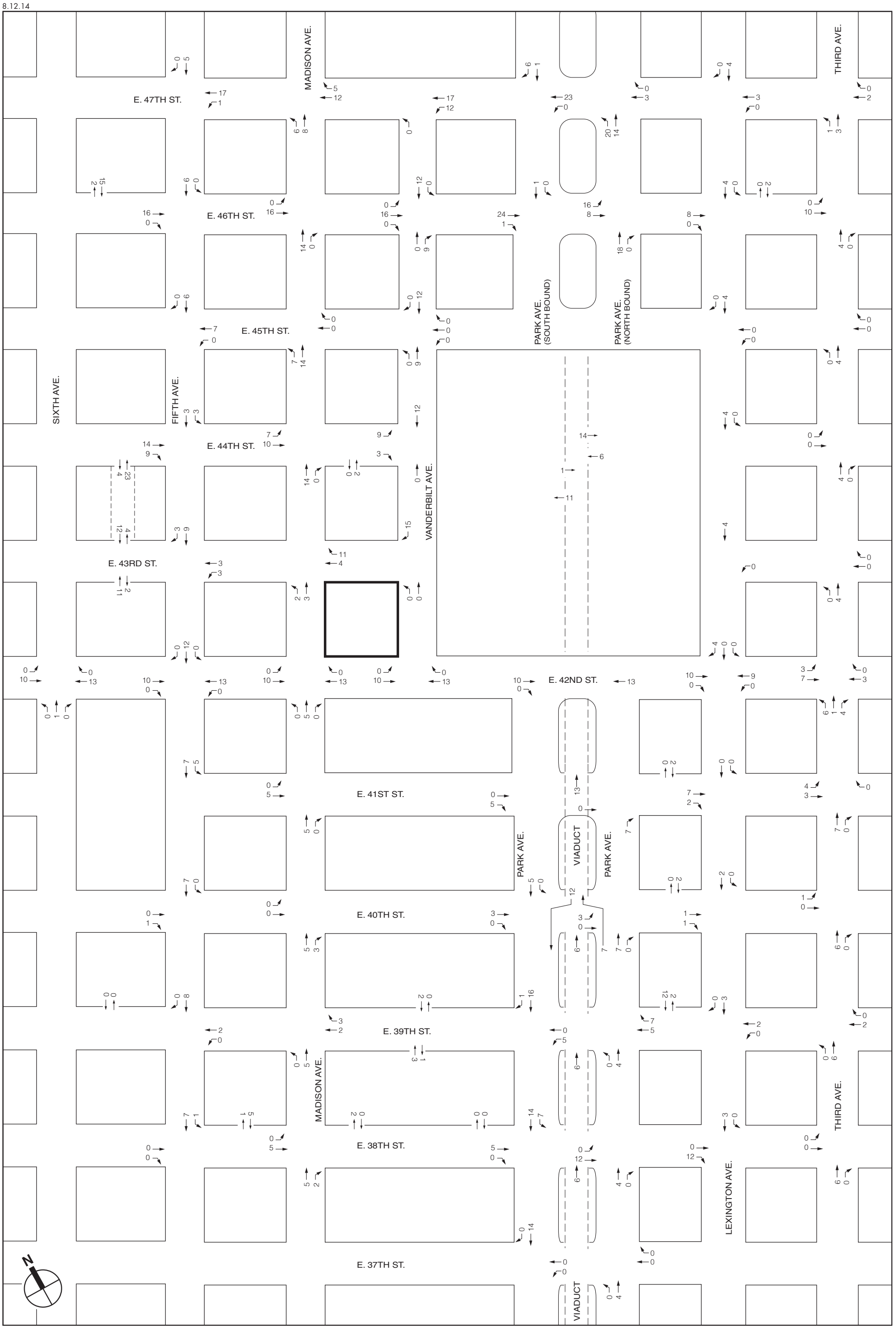
NOT TO SCALE

2021 No-Action Project Generated Vehicle Trips
Weekday Midday Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-2

8.12.14



One Vanderbilt Development Site

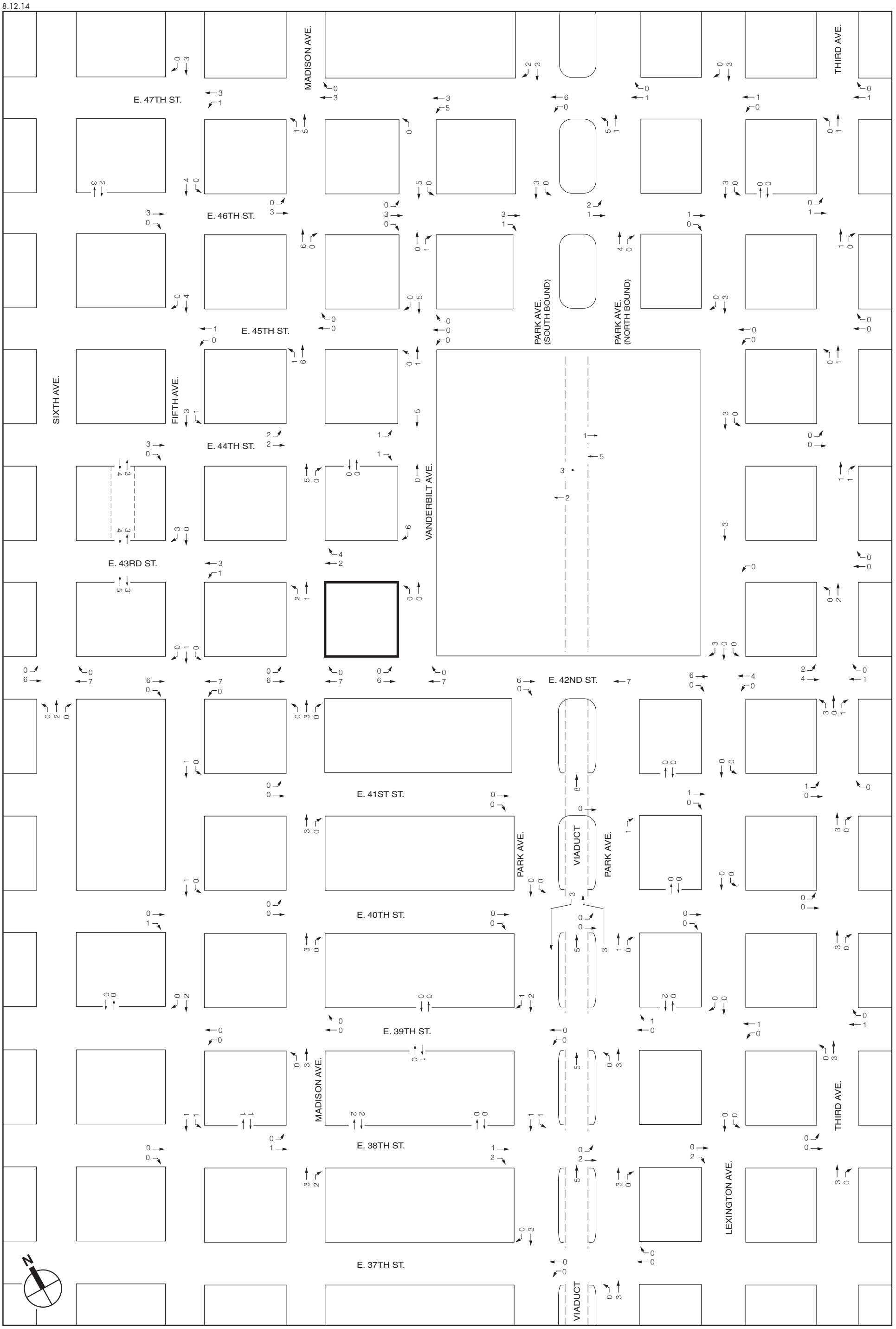
NOT TO SCALE

2021 No-Action Project Generated Vehicle Trips
Weekday PM Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-3

8.12.14



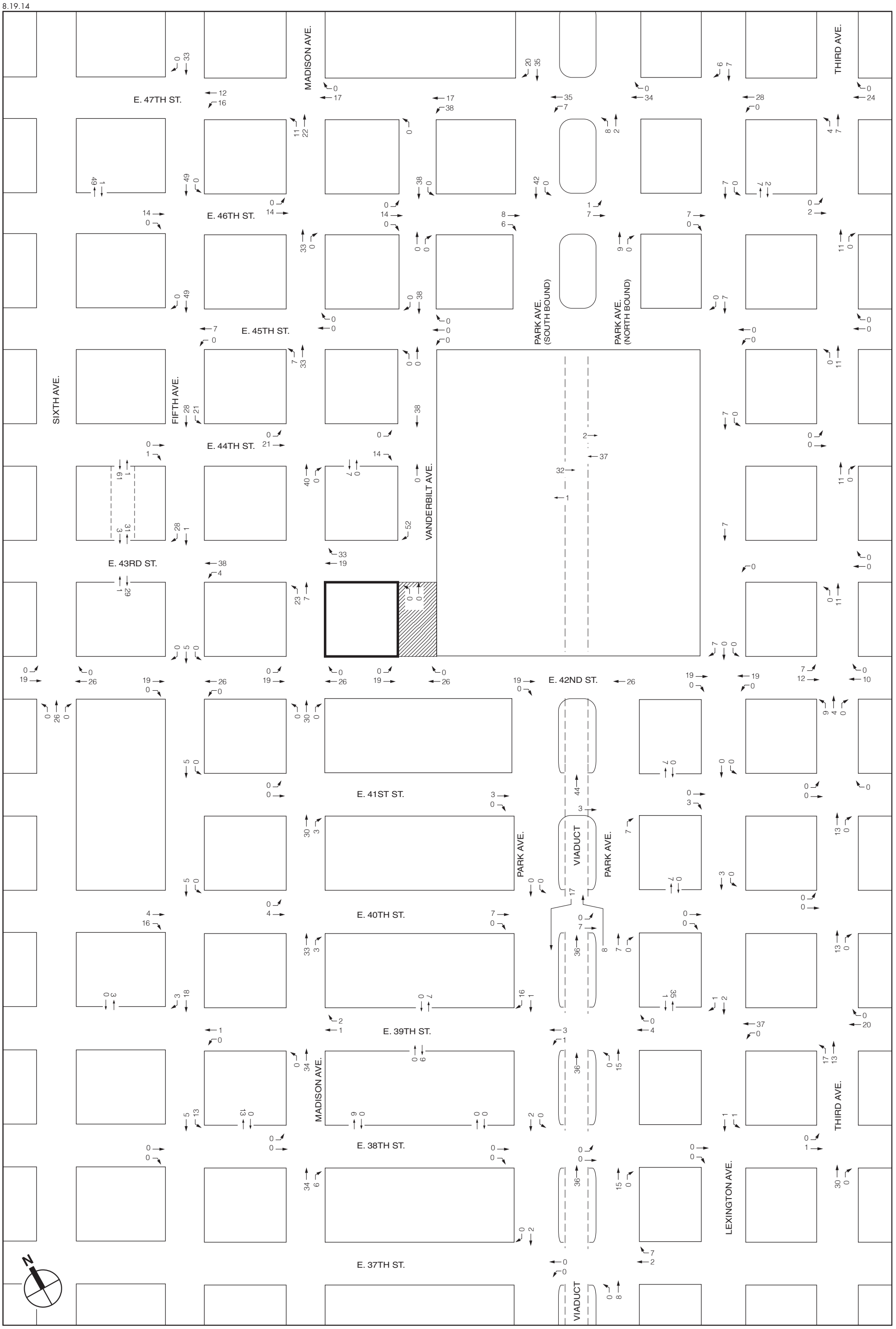
One Vanderbilt Development Site

NOT TO SCALE

2021 No-Action Project Generated Vehicle Trips
Saturday Peak Hour
Figure A-4

Vanderbilt Corridor and One Vanderbilt

8.19.14



One Vanderbilt Development Site

Proposed Public Place

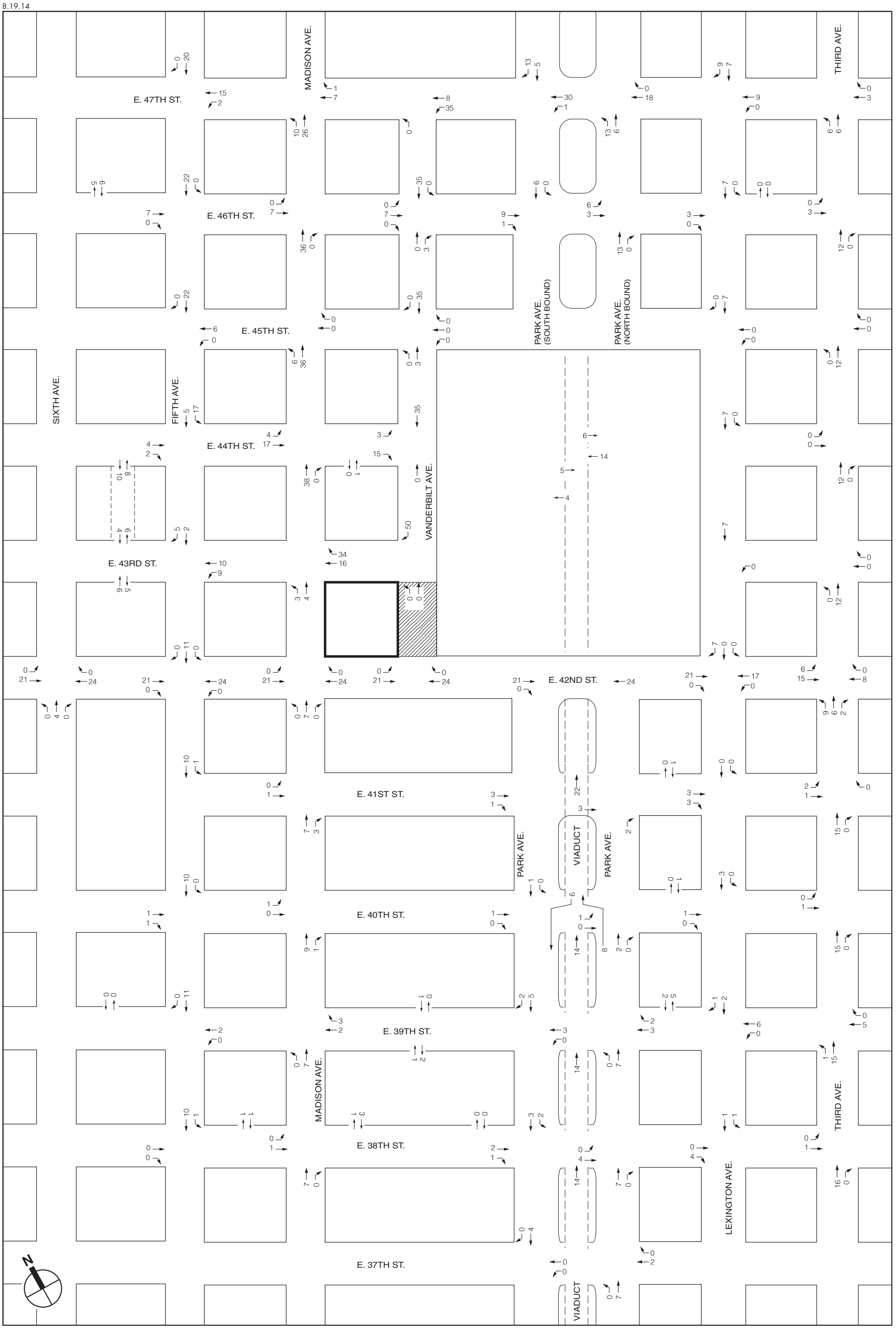
NOT TO SCALE

2021 With-Action Project Generated Vehicle Trips
Weekday AM Peak Hour

Figure A-5

Vanderbilt Corridor and One Vanderbilt

8.19.14



One Vanderbilt Development Site

Proposed Public Place

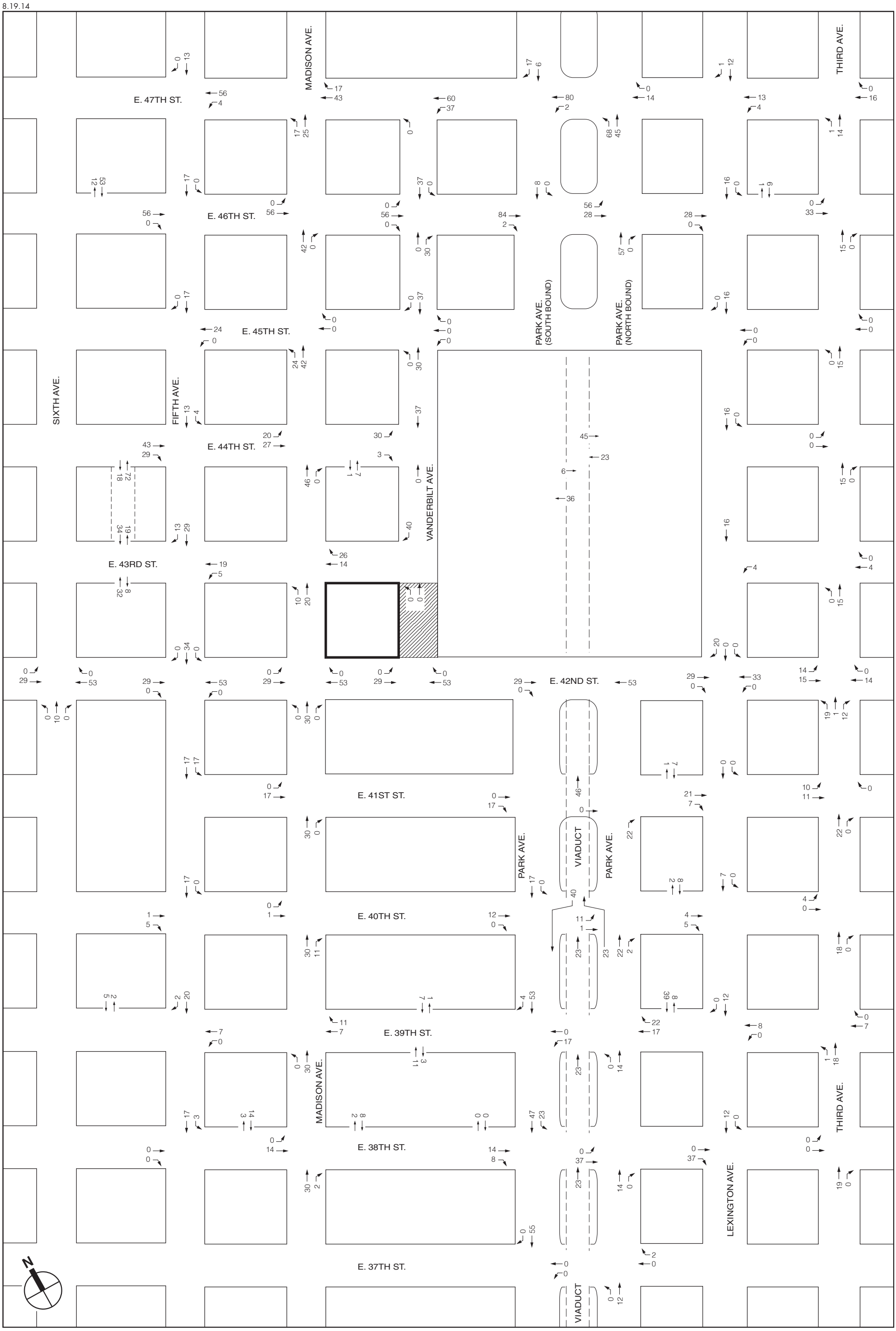
NOT TO SCALE

2021 With-Action Project Generated Vehicle Trips
Weekday Midday Peak Hour

Figure A-6

Vanderbilt Corridor and One Vanderbilt

8.19.14



One Vanderbilt Development Site

Proposed Public Place

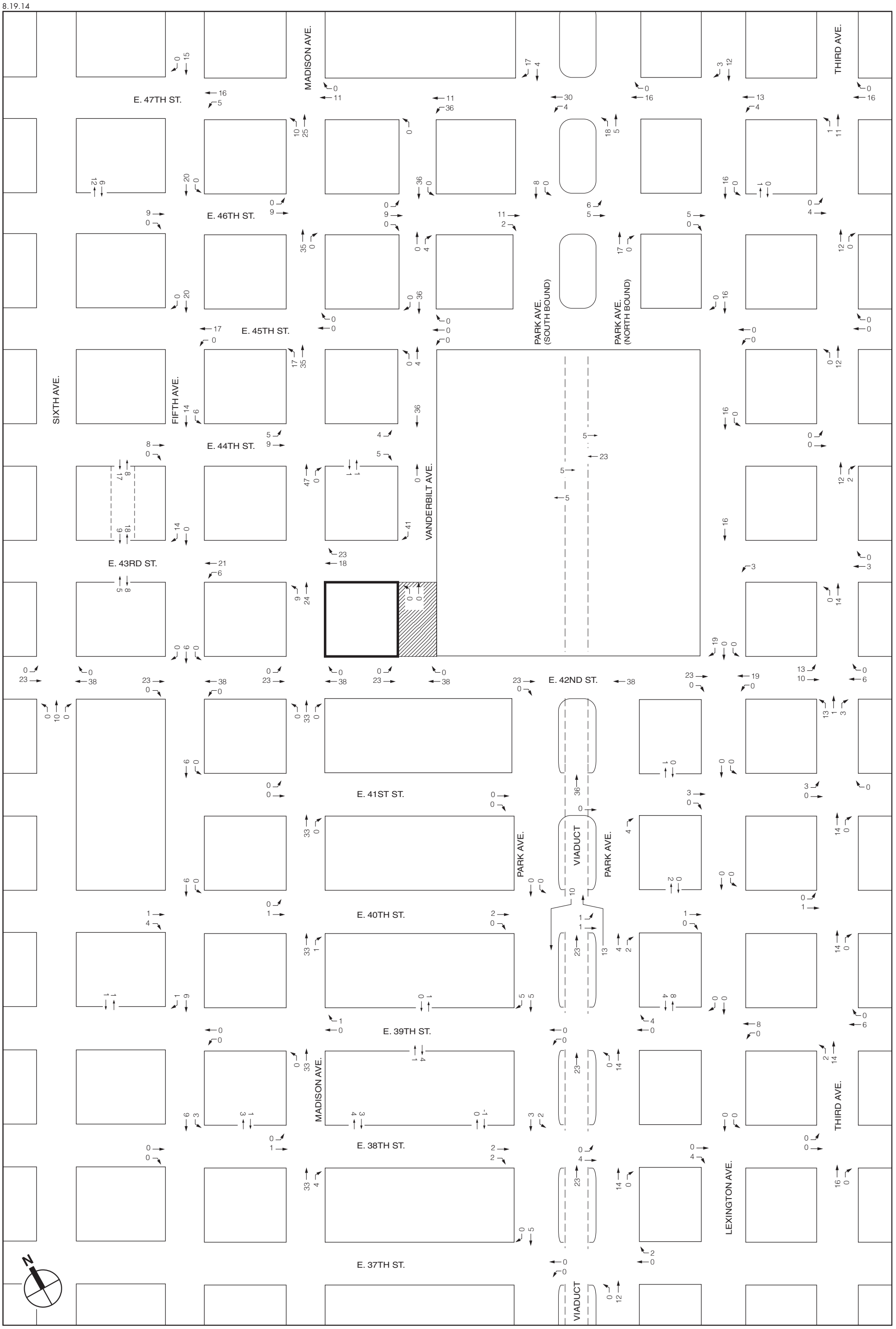
NOT TO SCALE

2021 With-Action Project Generated Vehicle Trips
Weekday PM Peak Hour

Figure A-7

Vanderbilt Corridor and One Vanderbilt

8.19.14



One Vanderbilt Development Site

Proposed Public Place

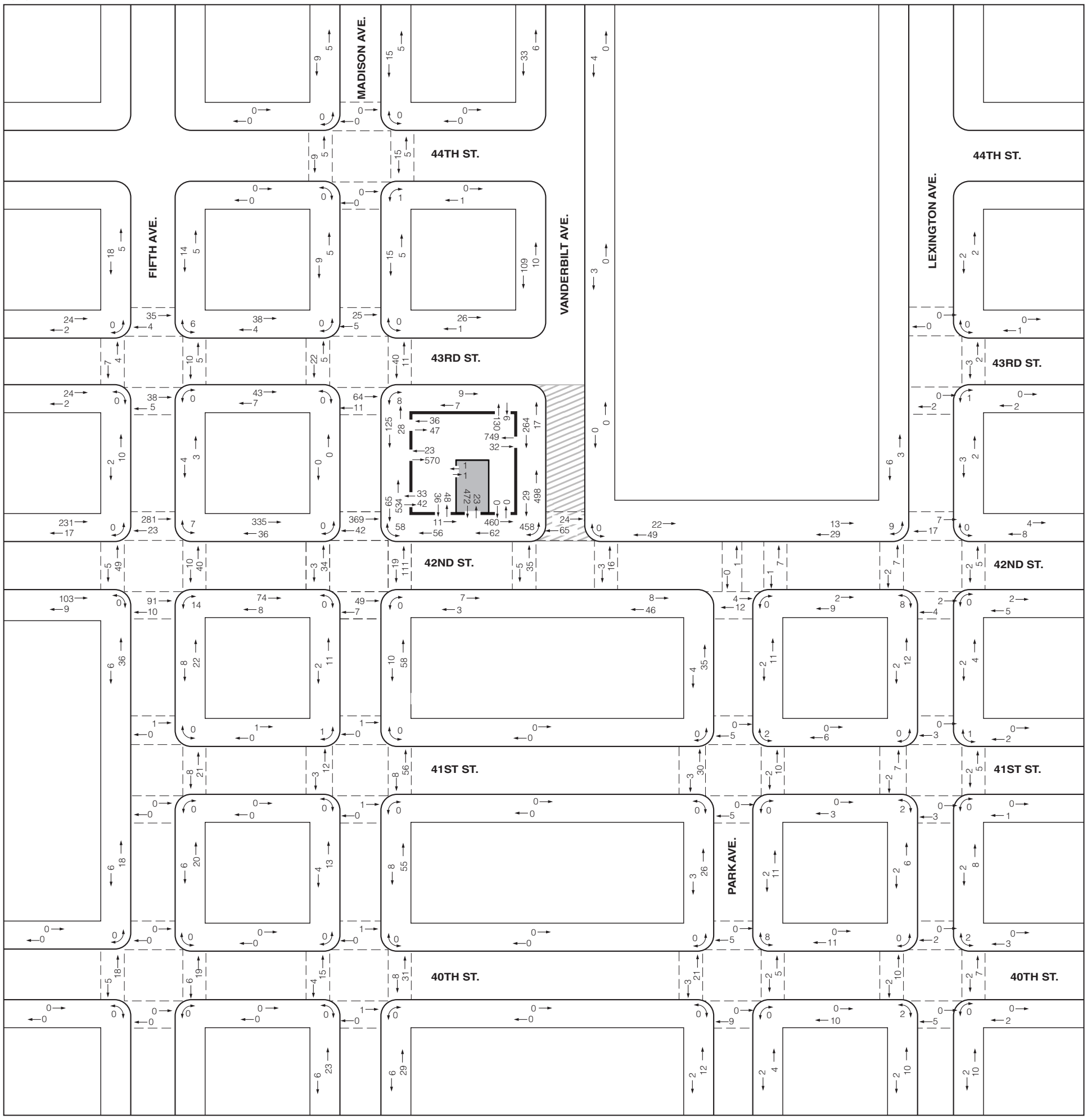
NOT TO SCALE

2021 With-Action Project Generated Vehicle Trips
Saturday Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-8

9.12.14



NOT TO SCALE

One Vanderbilt Development Site

MTA Access Area

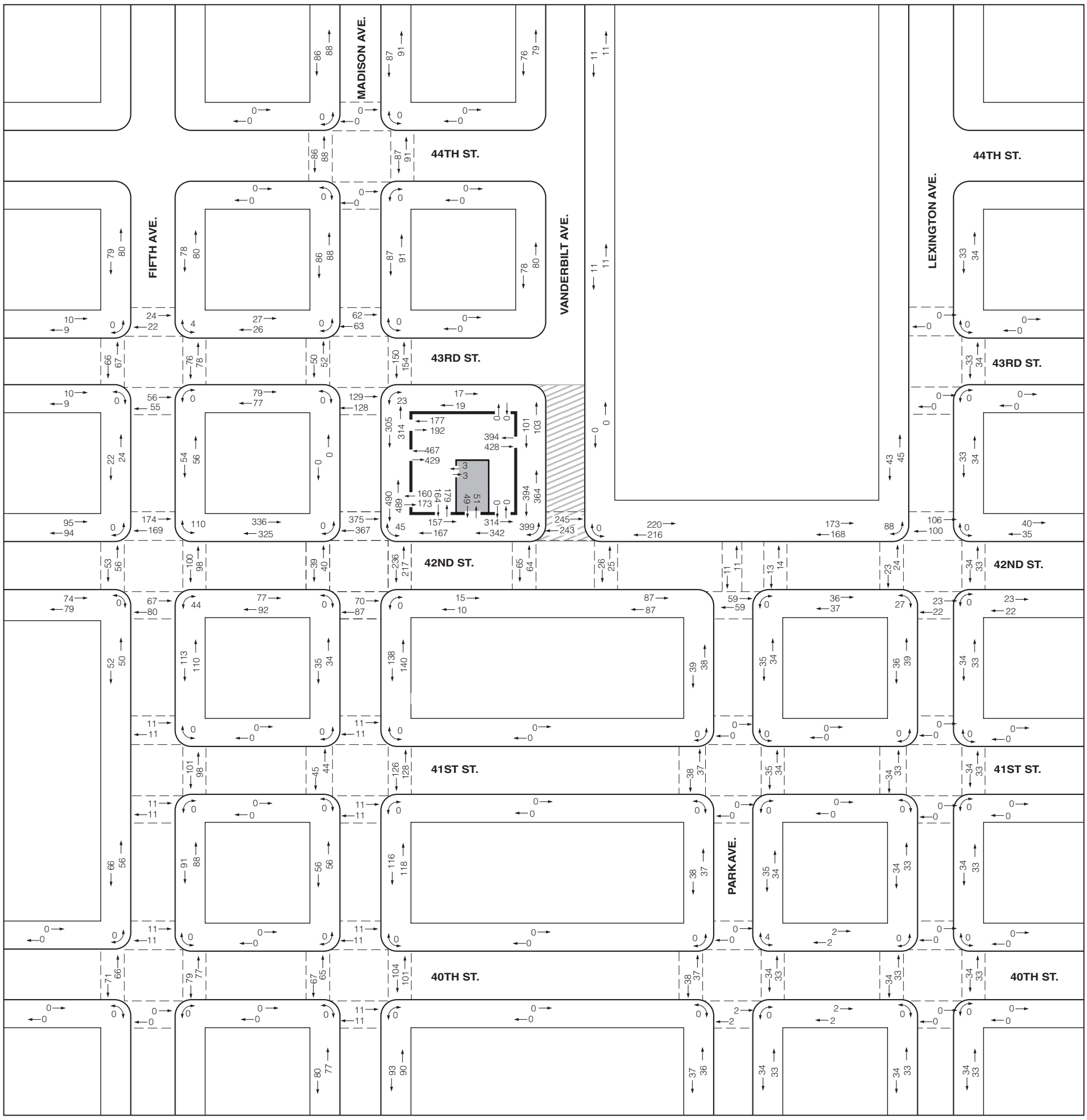
Proposed Public Place

2021 No-Action Project Generated Pedestrian Trips
Weekday AM Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-9

9.12.14



One Vanderbilt Development Site

MTA Access Area

Proposed Public Place

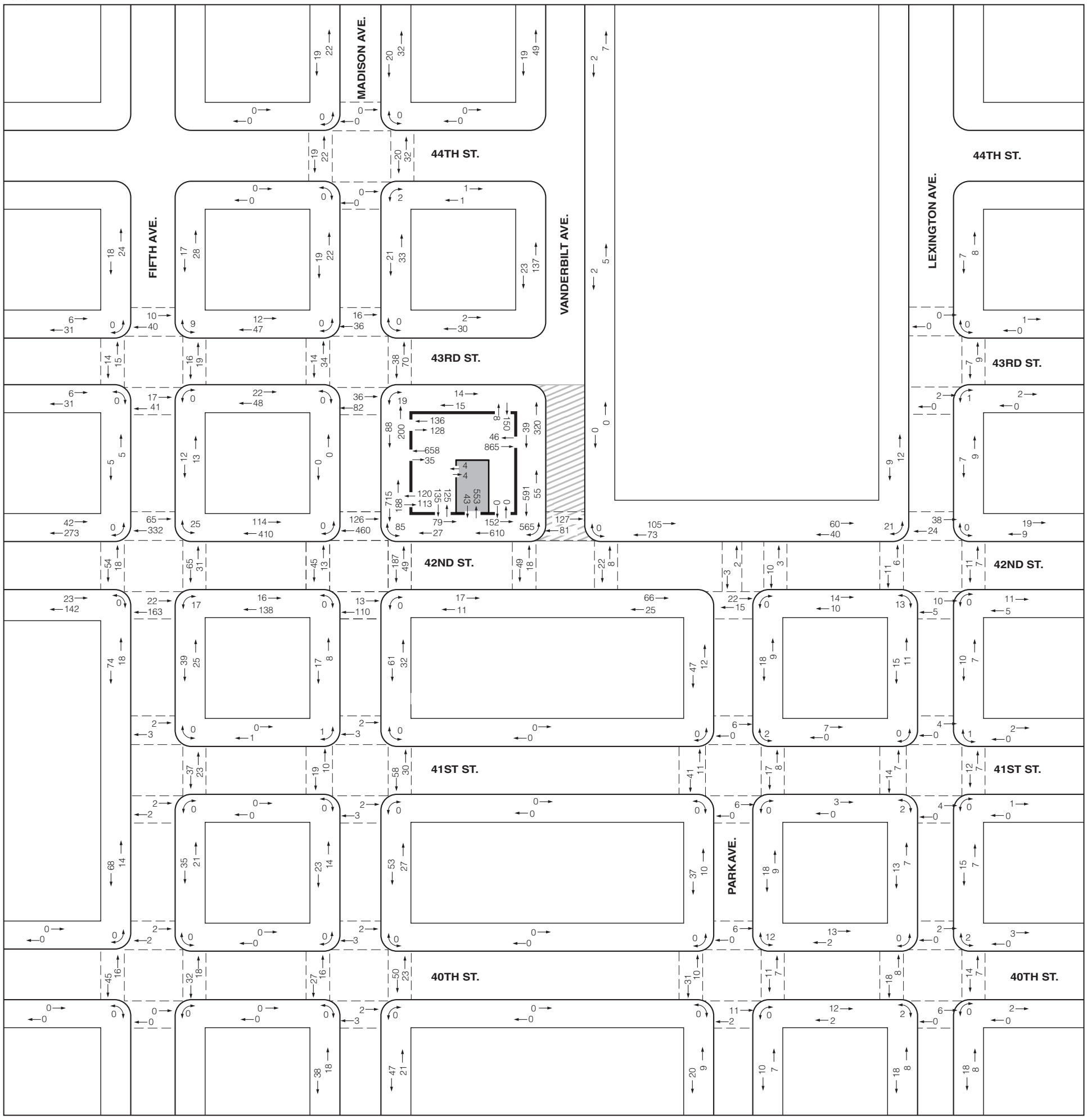
NOT TO SCALE

2021 No-Action Project Generated Pedestrian Trips
Weekday Midday Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-10

9.12.14



One Vanderbilt Development Site

MTA Access Area

Proposed Public Place

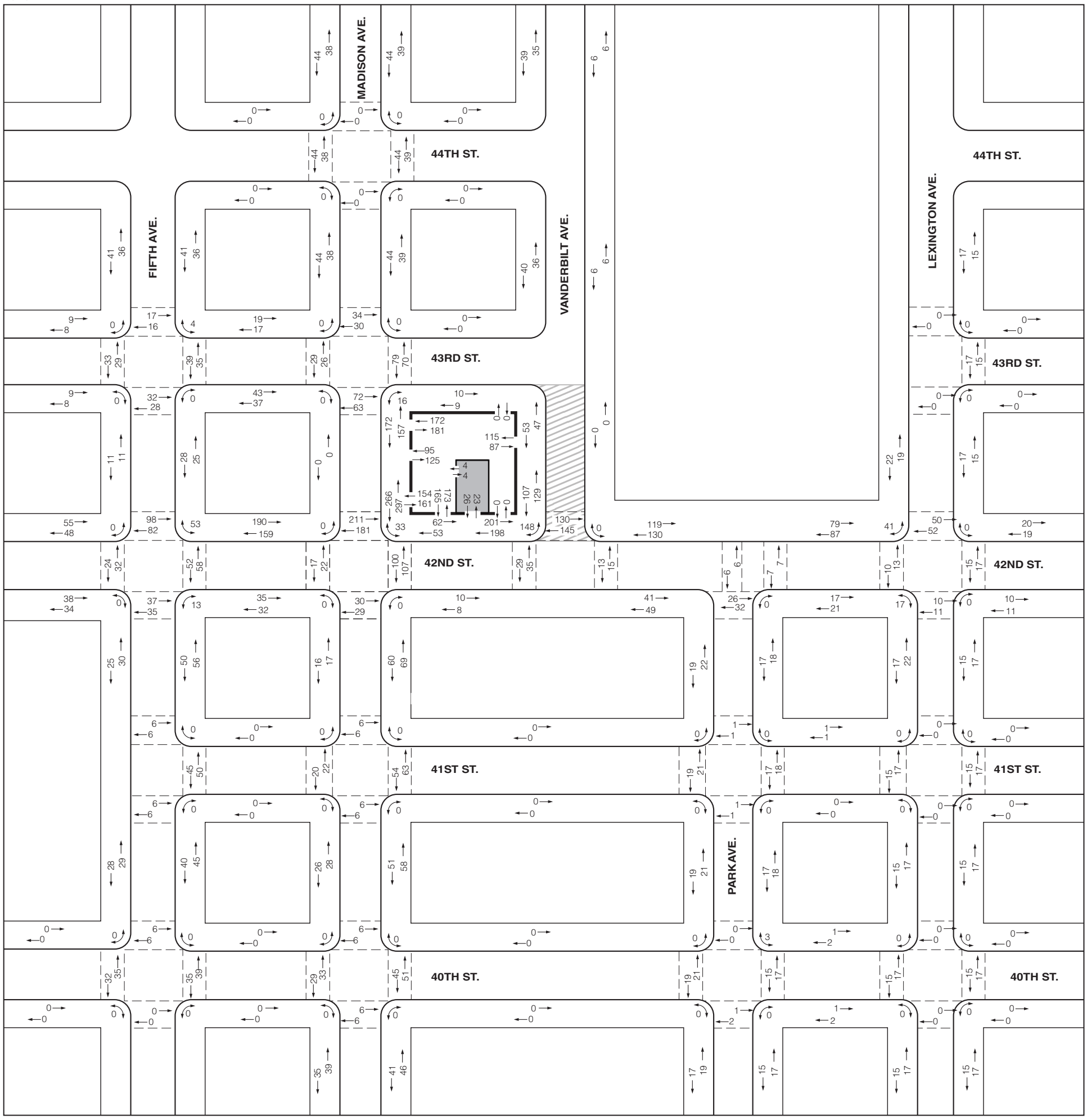
NOT TO SCALE

Vanderbilt Corridor and One Vanderbilt

2021 No-Action Project Generated Pedestrian Trips
Weekday PM Peak Hour

Figure A-11

9.12.14



One Vanderbilt Development Site

MTA Access Area

Proposed Public Place

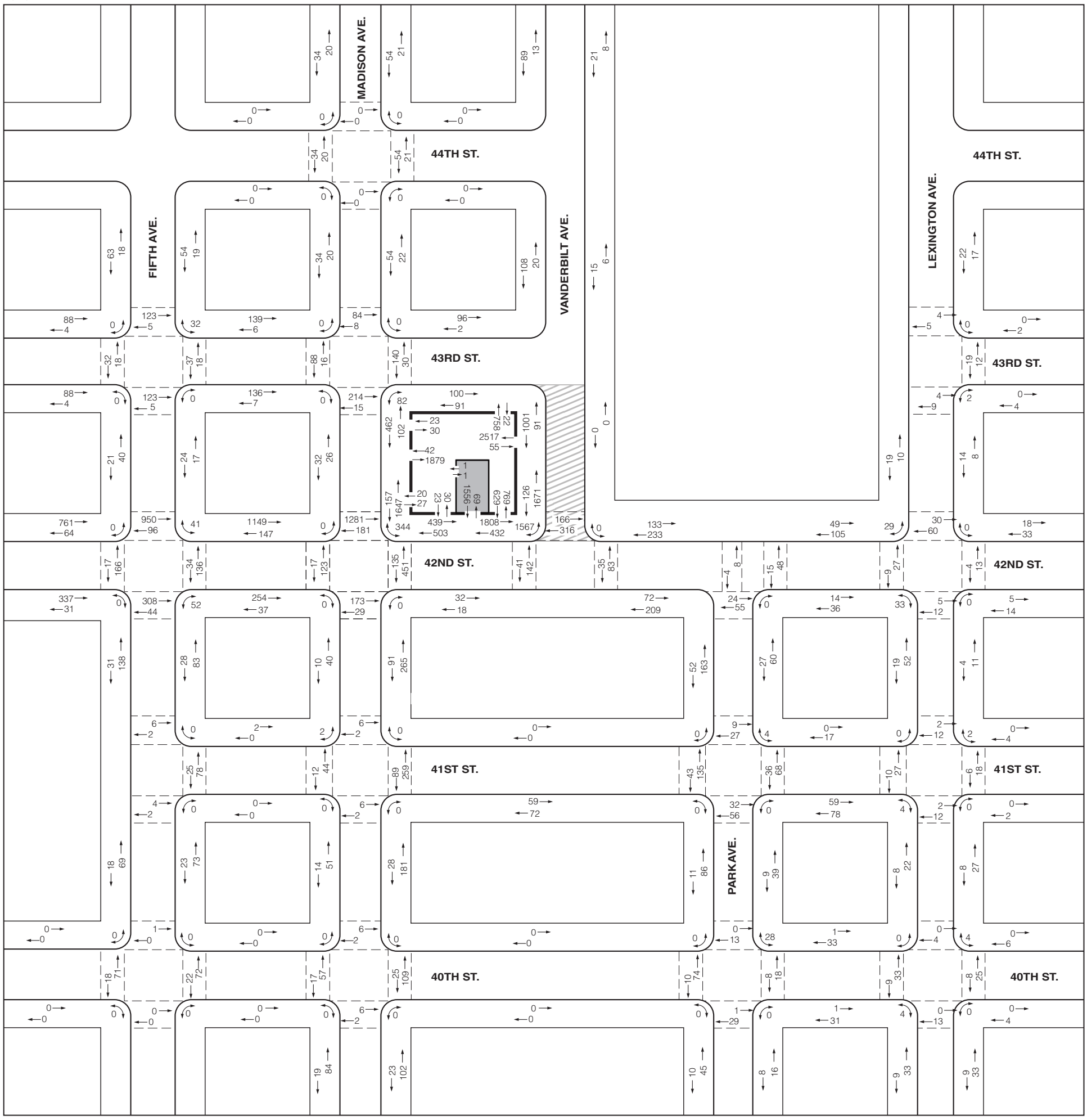
NOT TO SCALE

2021 No-Action Project Generated Pedestrian Trips
Saturday Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-12

9.12.14



One Vanderbilt Development Site

MTA Access Area

Proposed Public Place

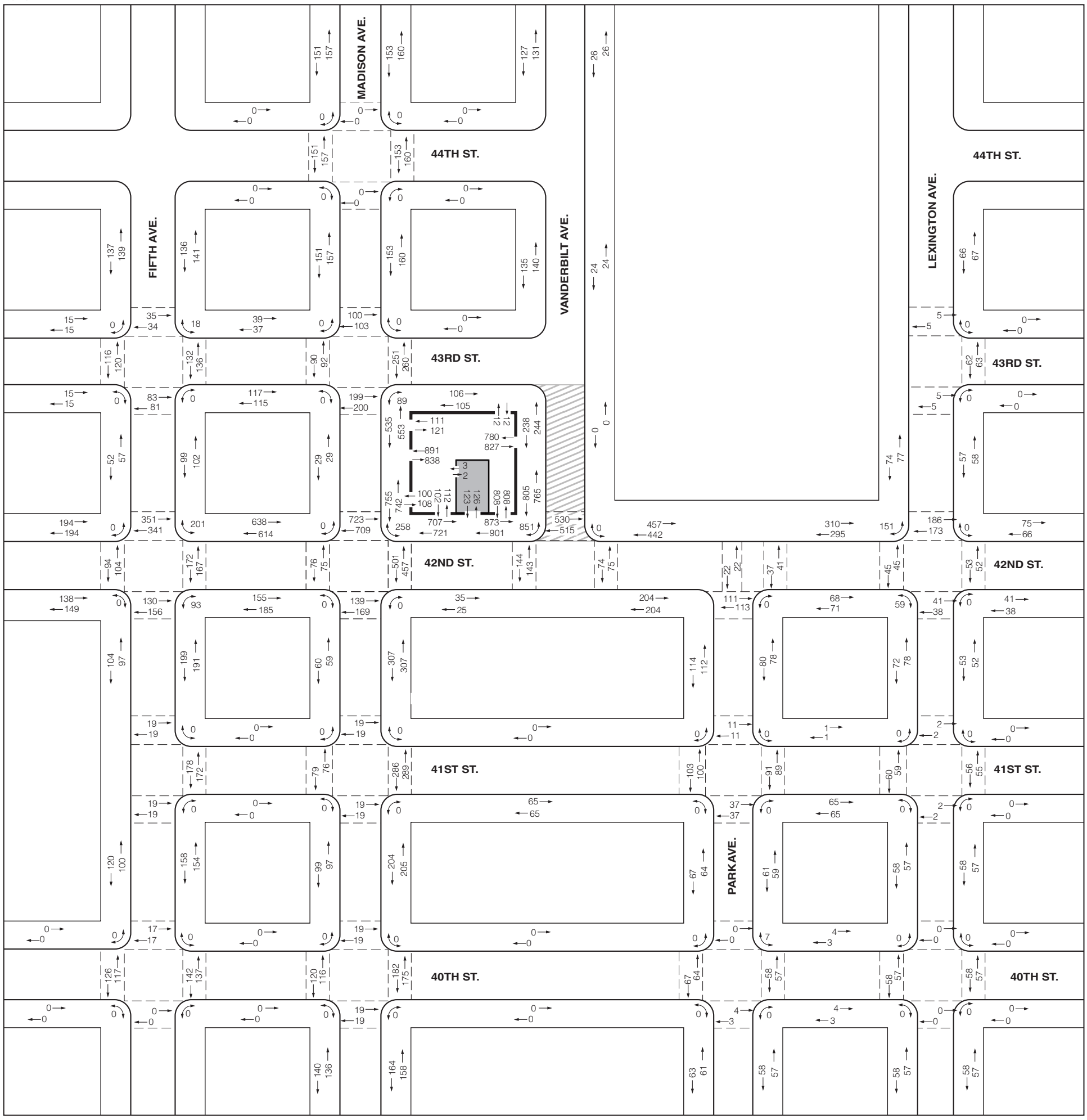
NOT TO SCALE

2021 With-Action Project Generated Pedestrian Trips
Weekday AM Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-13

9.12.14



NOT TO SCALE

One Vanderbilt Development Site

MTA Access Area

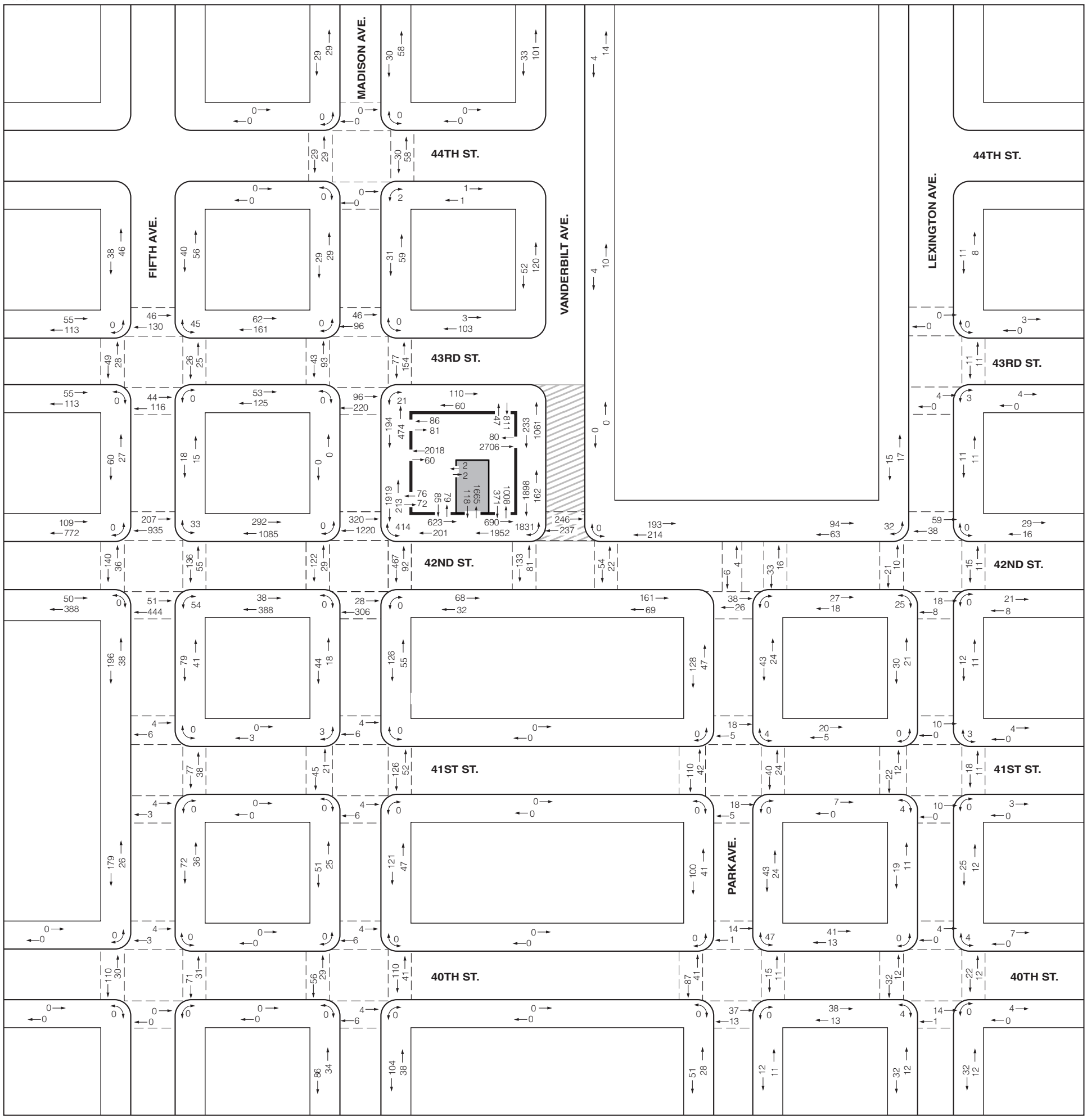
Proposed Public Place

2021 With-Action Project Generated Pedestrian Trips
Weekday Midday Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-14

9.12.14



NOT TO SCALE

One Vanderbilt Development Site

MTA Access Area

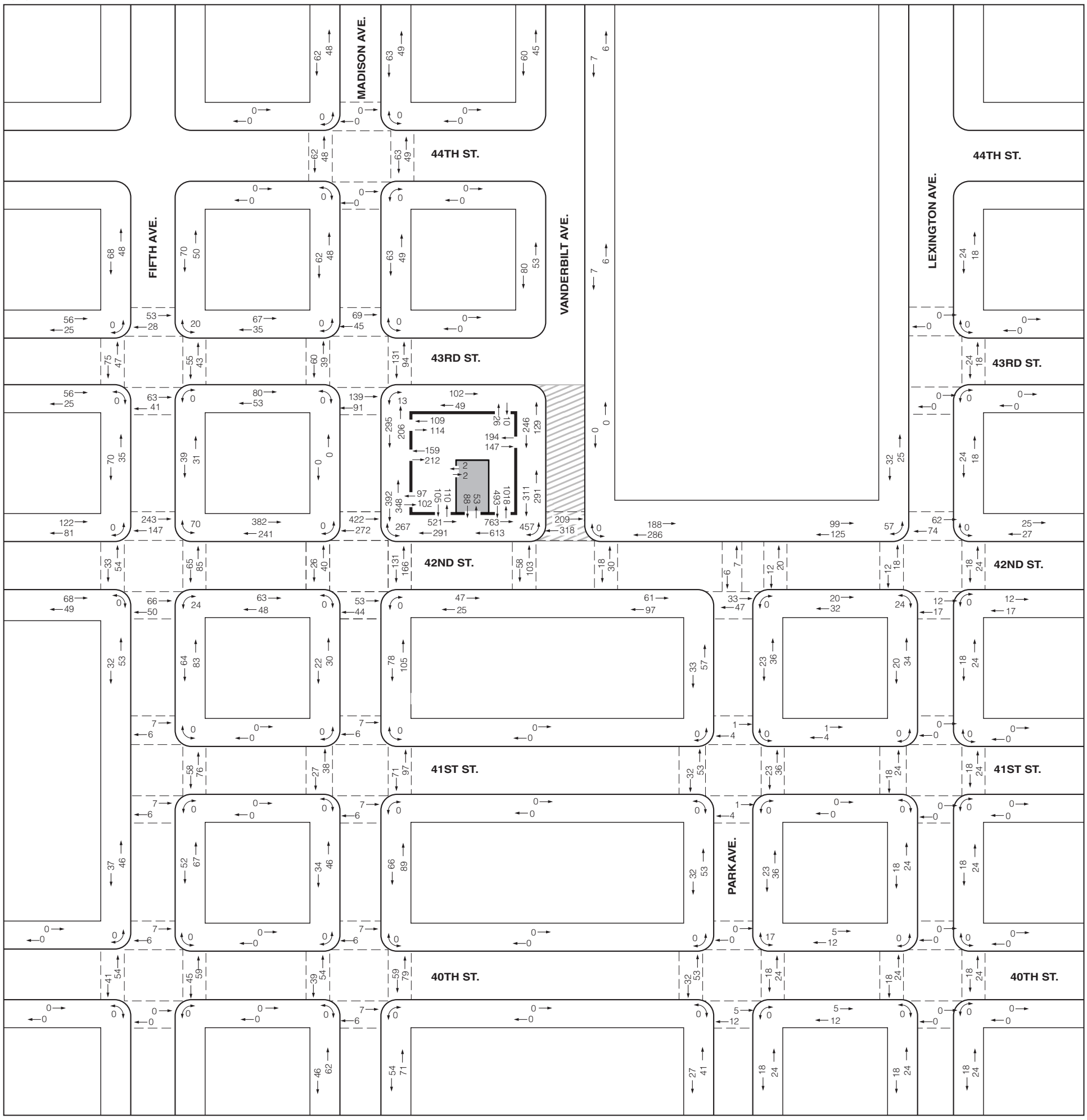
Proposed Public Place

2021 With-Action Project Generated Pedestrian Trips
Weekday PM Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-15

9.12.14



One Vanderbilt Development Site

MTA Access Area

Proposed Public Place

NOT TO SCALE

2021 With-Action Project Generated Pedestrian Trips
Saturday Peak Hour

Vanderbilt Corridor and One Vanderbilt

Figure A-16