

New York University

February 7, 2012

Responses to CB2 Letter dated 1/31/12

Traffic and Transportation Questions

Analysis Times

1. Community input, based on long-time familiarity with day-to-day traffic patterns and conditions, indicates that there is currently considerable vehicular activity in the study area during night-time/late night hours Thursday through Sunday and hours all through the weekend, which would be expected to increase with increased student, faculty, resident and visiting populations. Yet the only late-day analysis done was on weekdays at what is called the PM Peak Hours, from 5:00 p.m. – 6:00 p.m., and the only weekend analysis was on a Saturday afternoon at midday.
 - a. In view of the frequency of current activities making use of motor vehicles on these days and times that are beyond the habitually assigned peak times, and the prospect that this vehicular activity at these other times will increase, why weren't these extended days and times of day studied?
 - b. Can analysis of these vehicular activities during night-time/late night hours Thursday through Sunday and all through the weekend be added for study in the Final EIS?

The determination of appropriate peak hours for the transportation study conducted for the DEIS considered time periods during which the proposed project would be expected to have the highest travel by its users and background conditions are also most active. The selection of the weekday AM, midday, and PM peak hours as analyzed in DEIS was determined by the Department of City Planning (“DCP”) acting on behalf of the City Planning Commission as lead agency. In addition, as specified in the Final Scope, an assessment of the Saturday afternoon conditions was included in the DEIS, principally because of the proposed project’s retail and hotel uses. While the Greenwich Village area is a popular evening and weekend destination, its attraction is attributable to many other factors beyond the presence of NYU and its student and staff populations. A substantial portion of the development included in the proposed project is academic space, which is expected to result in a much greater number of trips during the weekday peak hours studied in the DEIS than during night-time/late night hours. Although the proposed project also includes other uses (such as dormitories, faculty housing and potentially a hotel) that would result in some night-time/late night hour trips, many of these trips within the study area would be local in nature and by foot rather than automobile, particularly because the proposed project will not result in an increase of available parking spaces. For these reasons, the peak hours analyzed in the DEIS were deemed adequate to disclose and provide for appropriate mitigation for the traffic and transportation impacts of the proposed project. Based on public comments received by DCP on the DEIS, including any that may be submitted by the Community Board, DCP as lead agency would determine whether any additional traffic or transportation analysis should be included in the FEIS. DCP may consult with DOT on this determination.

2. Concerning transit and pedestrians, similarly, study of subway station elements and pedestrian activities was limited to only the weekday AM, midday and PM peak hours, although current night-time/late night hours Thursday through Sunday and hours all through the weekend were identified by the community as times of heavy use.

- a. Given the nature of increased student, residential and visiting populations expected to be active at these night-time/late night and weekend hours, both on transit and in pedestrian activities, can consideration be given to including these additional days and times for study in the Final EIS?
3. There are certain “peak” usage moments that the study needs to take into account, e.g., the volume and effects of foot traffic during class change or the exacerbation of vehicular and foot traffic at specific times of year, such as at the beginning and end of the school year, when significant numbers of students move in and out. Has any of this been looked at, and if not, can it be studied in the Final EIS?

The DEIS analyzed representative peak background and project-generation conditions. Hence, peak student activities, during class change for example, are reflected in the analyses. However, the move-in and move-out conditions, which occur typically four times a year, were not analyzed. These conditions, as well as those associated with graduation, are managed by NYU and take place infrequently. As such, they are not representative of project impacts and were determined not to require a quantitative analysis in the DEIS. Acting on behalf of the City Planning Commission as lead agency, DCP may determine if these other conditions warrant further analyses in the FEIS. DCP may consult with DOT on this determination.

Parking

4. The current 670-space below-grade parking garage (that includes public parking) is proposed to be replaced by a 389-space below-grade accessory parking facility, resulting in a loss of roughly 110 to 135 parking spaces to accommodate the public. NYU indicates there are 21 public parking facilities in the area with nearly 3,000 parking spaces. However, some of these facilities will be gone by 2031 (146-150 Wooster and NW corner of Lafayette & Bond are two sites planned for new buildings), while others will no doubt join them along the way. Can NYU study this situation in more depth and give a more detailed and realistic assessment of what (and how many) parking facilities are expected to be available with how many spaces?

The 146-150 Wooster lot currently accommodates a small 34-space parking lot, but as pointed out by the Community Board in its comment, is expected to be developed in the future No Build (with an estimated 2014 completion). NYU will request that DCP consider a revision to the parking analysis for the FEIS to account for this change. However, the northwest corner of Lafayette and Bond Streets (currently a small 30-space parking lot) has not been identified by DCP as a development site. If it is confirmed otherwise through on-going efforts to revisit plans for area No Build projects, the parking analysis will be revised accordingly for the FEIS under the direction of DCP. Further, in response to concerns raised at the Community Board hearings, NYU will request that DCP consider that the FEIS include an expanded parking study area of ½ mile from the Proposed Development Area to determine if the parking shortfall identified in the DEIS could be accommodated within a ½ mile study area.

5. Please describe the new access and egress patterns for the proposed new underground accessory parking garage. With proposed access only from W. 3rd Street (whereas currently it is from both W. 3rd and Bleecker Streets), wouldn't this add more traffic and congestion to W. 3rd Street?

The DEIS transportation analysis considered the potential traffic impacts of the proposal to replace the existing 670-space public parking garage with a 389-space accessory parking garage, including the change in access/egress, which was accounted for in the analysis. Where significant adverse impacts were identified, measures were recommended to mitigate those impacts to the extent practicable.

6. A resident conducted an informal survey in the area of the Super Blocks of the number of free day on-street parking spaces on Mercer, West 3rd and Bleecker Streets and the number of metered day parking spaces on LaGuardia Place and found there are close to 200 of these spaces at present. The survey didn't include overnight spaces (which include additional spots). This day parking for community residents, NYU faculty, staff, and students, and visitors or those who have business in the area will be adversely affected by closing of traffic lanes, establishment of construction staging areas, sidewalk sheds, delivery of construction equipment and materials, and construction dumpsters.
 - a. Can NYU assess how much of this on-street parking would be lost during construction and then, permanently and identify where this would happen?

In response to concerns raised at the Community Board hearings, NYU will request that DCP consider including in the FEIS the locations and number of on-street parking spaces that will be eliminated during construction and when the project is complete. DCP, acting on behalf of the City Planning Commission as lead agency, will determine whether the FEIS should include this information.

- b. What impact would the loss of on-street parking and resulting cruising and circling for spaces have on pedestrian safety and access, traffic congestion and emissions?

As stated in a number of prior EIS documents for other projects in Manhattan, the City has determined that the loss of on-street parking in Manhattan is not considered a significant adverse environmental impact under CEQR and does not require the type of analysis requested by the Community Board. In general, the loss of parking spaces discourages the use of automobiles by those traveling to the area.

- c. What does the University plan to do to mitigate the effects of this loss to the community?

As stated above, the City has determined that the loss of on-street parking in Manhattan is not considered a significant adverse environmental impact under CEQR; hence, no mitigation is required.

Motor Vehicle and Pedestrian Traffic

7. Why is Bleecker Street considered adequate to handle project-generated traffic when it is narrow (only one traffic lane) and overwhelmed now? The suggested mitigations at Bleecker & Mercer ("eliminate 4-5 alternate side parking spaces on the south side of Bleecker St. on the EB approach, install No Standing Anytime sign approx. 100 ft. from the intersection, paint transitional striping on the pavement") (thereby widening the moving lane in this area from 11 ft. to effectively 16 ft.) will only invite more traffic on an

already overburdened corridor, facilitate speeding (and further reduce safety) on a vulnerable residential block, and take away from the character of this residential environment. Where would the removed parking be alternatively provided?

The DEIS analyses were prepared in accordance with CEQR guidelines and vetted by DCP in coordination with DOT. The purpose of the mitigation measure referenced in the comment is not to increase capacity but to address impacts from additional pedestrians projected to cross the south crosswalk at the Mercer Street and Bleecker Street intersection that are expected to cause additional delays to right-turning traffic from Bleecker Street. As shown in the DEIS analysis results, the expected effect of the proposed mitigation is to revert service levels comparable to those experienced under the No Build condition, rather than to increase throughput capacity for Bleecker Street. It should also be noted that upon the project's completion in 2031, there will be a new signalized mid-block crosswalk on Bleecker Street. The crosswalk will facilitate a shorter crossing distance for pedestrians, meter the traffic that arrives upstream, and have neck-downs that provide traffic calming effects. As noted in response to question 6(c), there are no plans to create additional on-street parking spaces to offset the elimination of the 4 to 5 on-street parking spaces at this location.

a. Shouldn't, instead, efforts be made to alleviate current conditions that would further be exacerbated by the proposed actions, and approaches be explored (e.g., re-routing the many oversize tour buses currently using this street) as a way to mitigate those proposed actions by establishing a foundation that lessens already-intense traffic impacts?

The re-routing of tour buses is not within NYU's control.

8. Similarly, how can Mercer Street, an even more narrow one-lane corridor, accommodate additional vehicular traffic, especially with anticipated Zipper Building loading docks, a hotel entrance, a mega-grocery and a student dorm, all also adding substantial new vehicular, bicycle and foot traffic?

As stated above, the DEIS analyses were prepared in accordance with CEQR guidelines and vetted by DCP in coordination with DOT. Where significant adverse impacts were identified (e.g., southbound Mercer Street at West Houston Street), measures were identified to mitigate these impacts to the extent practicable.

9. Where would loading and unloading zones (and for what?) and garbage pickup facilities be located? How would they be accessed, e.g. how would 40-ft. trailers and delivery trucks move in and out of the area? What would be their route(s)? How would their activities be managed?

The development plan includes one off-street loading dock on West 3rd Street, which will serve the proposed LaGuardia and Mercer Buildings on the North Block through below-grade interconnections. The plan also includes two loading docks on Mercer Street to serve the proposed Zipper Building. Truck trips associated with the proposed development, including trips to and from these loading docks, were estimated and incorporated into the DEIS impact analyses, in accordance with CEQR guidelines and have been vetted by DCP in coordination with DOT.

10. What arrangements have been made with the FDNY, NYPD and other emergency service entities to provide emergency vehicle access and ensure adequate emergency response time?

The wide open spaces separating the proposed buildings from the existing buildings on the South and North Blocks are sufficient to permit emergency access to both the existing buildings and the proposed new buildings. FDNY has reviewed the proposed plans and will review future construction and implementation plans to ensure that they are designed and constructed to allow for adequate emergency access. Further, emergency vehicles can maneuver around and through congested areas because they are not bound by standard traffic controls. Incremental traffic volumes projected to occur with the proposed project are not expected to significantly affect emergency response times.

11. What access and accommodation would be provided for visiting sports team buses and what measures would be taken to minimize their impact on congestion, cruising, street safety and air quality? Where would buses for the proposed public school go and how would they impact traffic?

The new athletics facility planned for the Zipper building will be essentially a replacement of the existing Coles Gym. The construction of this facility is not expected to affect NYU's planning of its sporting activities or the routing and staging of visiting sports team buses. Hence, there are no anticipated changes from NYU's current operations with regard to accommodating sporting events that warrant further analyses. If a public school is to be incorporated into the Bleecker Building, as proposed by NYU, the Department of Education is expected to coordinate with DOT to manage school bus pick-ups and drop-offs along the curb lane in front of the school along Bleecker Street.

12. The DEIS claims that current traffic conditions at the analyzed intersections are Level Of Service D for the most part, which it describes as "acceptable" and "satisfactory." Since LOS D is usually considered much less than desirable, how was the conclusion reached that LOS D is "satisfactory?" If conditions for the most part are LOS D at present, what hope is there for future traffic conditions with the proposed project?

The DEIS traffic analyses found that only three of the seventeen intersections analyzed currently operate at LOS D or worse during one or more peak periods, although certain movements within intersections that operate at overall LOS C or better were found to operate at LOS D or worse. As explained in the DEIS, the City's *CEQR Technical Manual* identifies the midpoint of LOS D as the threshold of "acceptable" operations and where significant adverse impacts were identified, measures were proposed to mitigate those impacts to the extent practicable.

13. What exactly would restriping the second moving lane from the median on the westbound approach from 14 ft. to 13 ft. and restriping the third moving lane from the median on the westbound approach from 11 ft. to 12 ft. on W. Houston St. & 6th Ave. do to improve vehicular conditions there?

The capacity of a roadway is affected by geometric and operational parameters, including the number of lanes, the width of these lanes, presence of parking or bus stops, vehicle mix in the traffic stream, and intersection signal timing. The adjustment of one, some, or all of these parameters would result in changes in roadway capacity, thereby affecting the flow rate of vehicles and resulting delays at the intersection. In this example, the restriping of the westbound approach of West Houston Street to Sixth Avenue is expected to

create a more balanced flow on this approach and allow for the shift of green time from West Houston Street to Sixth Avenue to mitigate the significant adverse impact identified for northbound Sixth Avenue.

14. What mechanisms would be put in place to accurately and continuously monitor changes to foot traffic and road traffic now, and through 2031?

DCP in coordination with DOT will determine the need for and parameters of any required post-approval monitoring.

15. Since there is no guarantee offered that foot and road traffic would not worsen and no absolute commitment to remediate “worst case” expectations should known mitigation approaches be infeasible, could there be a continuous mode of surveillance that allows for quick mitigational responses to changing situations at different times, especially during construction?

Please see response to question 14.

Transit

16. Has consideration been given to reopening any entrances have been closed previously at all the subway stations in the study area (as is being considered at the Cable Building location) as well as to restoring token booths and on-site service personnel to help mitigate the adverse impacts that are anticipated?

In coordination with MTA NYCT, the previously closed Cable Building entrance is the only such entrance that has been identified for further analysis to determine the feasibility of its reinstatement. Restoring token booths and on-site service personnel would not help mitigate the adverse transit impacts of the project identified in the DEIS.

17. The DEIS states that potential mitigation measures for transit impacts will be explored between the DEIS and FEIS. Please describe these potential measures and explain what they would do.

As stated in the DEIS, engineering studies will be undertaken to determine the feasibility of the potential mitigation measures identified, including stairway widening and reopening the Cable Building entrance. If determined to be feasible, these measures would provide additional access and egress capacities at the affected stations.

a. The DEIS also states that other subway system elements will be explored in the FEIS.

In coordination with MTA NYCT, several other station elements, including additional elements within the Broadway-Lafayette and West 4th Street Stations and those at the Prince Street station will be assessed for potential impacts.

18. It is also stated that proposed mitigation measures will be explored and implementation coordinated with MTA/NYCT. Since these have yet to be looked at, when would the results of these explorations and discussions be available to present to the community? Can the community/CB2 be apprised of such decisions on an ongoing basis?

The related studies are currently being undertaken and will be reviewed with DCP and MTA NYCT. DCP, acting on behalf of the City Planning Commission as lead agency, will determine how the study would be incorporated into the FEIS.

19. Has consideration been given to the new MTA interconnected “super-station” at Broadway/Houston/Lafayette/Bleecker and what its potential for both positive and negative impacts might be? If not, please do so.

The “interconnection” of the two stations will take place in the future without the proposed project (No Build condition) and its effects on future access/egress and circulation have been incorporated into the DEIS analyses.

20. The DEIS states that there is a possibility that subway station mitigation measures may be infeasible. If so, the impacts would be unmitigated. Could mechanisms be put in place for observing conditions as the project progresses and to address them immediately with incremental adjustments before these transit impacts (e.g. during construction) get out of hand?

If the referenced condition is determined, it will be disclosed in the FEIS per DCP direction. MTA NYCT regularly monitors transit ridership and operations and has made improvements throughout the City independent of specific projects where operationally and fiscally feasible. Because these capital improvements are expensive, they are typically designed and constructed with consideration of future growth and are generally not implemented incrementally.