

This memorandum summarizes comments provided by Christine Berthet on May 6, 2021 on the Empire Station Complex Civic and Land Use Development Project DEIS and provides responses to these comments.

Comment 1: We are interested in clarification of the assumptions found in Page 14-57 in the EIS. We'd like to see them documented with numbers for each rail operator's base numbers as well as respective increases and decreases for 2028 and 2038. That will help us understand.

"To avoid double-counting and to ensure a reasonably conservative overlay is developed for the future conditions analyses, the projected ridership increases for NJT, LIRR, and MNR were compared to the cumulative commuter rail growth estimated for the various No Action and as-of-right projects described above. Due to regional rail capacity constraints, this comparison showed the latter estimates, which are already part of the 2028 No Action condition, are substantially greater than those summarized by the Penn Station Master Plan. Hence, the projected NJT, LIRR, and MNR ridership increases were assumed to be "captured" and no additional trips from these commuter rail services were added. The projected Amtrak ridership increases, however, were considered additional trips in the 2028 No Action condition. Based on Penn Station Master Plan travel demand projections, approximately 35 percent of the Amtrak trips would use taxis as a connecting mode to access or depart from Penn Station. For the 2028 No Action traffic analysis, these taxi trips were assigned to the various street frontages and logical routes surrounding Penn Station. Overall, the 2028 No Action traffic volumes in the study area are projected to increase over existing conditions by approximately 16, 18, and 19 percent during the weekday AM, midday, and PM peak hours, respectively."

Response: In the 2028 No Action Condition, the regionally projected commuter rail trips were compared against the rail trips generated from background growth, No Action projects, and the GPP as-of-right development that were already incorporated in the 2028 No Action condition, as summarized in **Table 1**. Since the rail trips by commuter rail modes (NJT, LIRR, MNR) that were already incorporated in the 2028 No Action exceed the regionally projected commuter rail trips, the latter was assumed to have already been captured and would no longer need to be added on as a separate volume layer for the 2028 No Action condition. Since Amtrak trips are largely independent of activities and development growth in the area, they were not correlated with the rail trips generated from background growth, No Action projects, and the GPP as-of-right development that were already incorporated in the 2028 No Action condition. Therefore, for the 2028 No Action condition, the regionally projected Amtrak trips, and its resulting person and vehicle trips related to their connecting modes, were added on as a separate volume layer.

Table 1
2028 No Action Condition Rail Trip Projections Comparison

MODE	AM Peak Hour				PM Peak Hour			
	Alighting		Boarding		Alighting		Boarding	
	2028 No Action - 2019 Existing Increment (MTA projection)	2028 Background Growth and No Build Trips	2028 No Action - 2019 Existing Increment (MTA projection)	2028 Background Growth and No Build Trips	2028 No Action - 2019 Existing Increment (MTA projection)	2028 Background Growth and No Build Trips	2028 No Action - 2019 Existing Increment (MTA projection)	2028 Background Growth and No Build Trips
Amtrak	2,457	-	2,093	-	2,653	-	2,385	-
LIRR/MNR	(2,450)	3,846	580	293	570	384	570	3,513
NJT	2,173	3,846	1,017	293	1,298	384	2,121	3,513

TOTAL	2,180	7,692	3,690	586	4,521	768	5,076	7,026
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Similar to the 2028 No Action condition, the 2038 No Action condition projected trips were developed by comparing the regionally projected commuter rail trips against the rail trips generated from background growth, No Action projects, and the GPP as-of-right development that were already incorporated in the 2038 No Action condition, as summarized in **Table 2**.

Table 2
2038 No Action Condition Rail Trip Projections Comparison

MODE	AM Peak Hour				PM Peak Hour			
	Alighting		Boarding		Alighting		Boarding	
	2038 Baseline - 2019 Existing Increment (MTA projection)	2038 Background Growth and No Build Trips	2038 Baseline - 2019 Existing Increment (MTA projection)	2038 Background Growth and No Build Trips	2038 Baseline - 2019 Existing Increment (MTA projection)	2038 Background Growth and No Build Trips	2038 Baseline - 2019 Existing Increment (MTA projection)	2038 Background Growth and No Build Trips
Amtrak	3,357	-	2,893	-	3,453	-	3,085	-
LIRR/MNR	7,850	4,734	2,780	381	1,870	983	7,870	4,415
NJT	3,873	4,734	2,417	381	2,098	983	2,921	4,415
TOTAL	15,080	9,467	8,090	763	7,421	1,966	13,876	8,830

Since the regionally projected commuter rail trips exceed the commuter rail trips generated from background growth, No Action projects, and the GPP as-of-right development that were already incorporated in the 2028 No Action condition, the difference between them was added on as an incremental layer between the existing conditions and 2038 No Action condition.

Comment 2: What are the Port authority numbers related to travelers as well as real estate development on 8th and 9th avenues (EIS 14-55)?

Response: The reference page or specifically Table 14-29 (and Figure 14-13 on the page prior) in the DEIS presents a summary of the future development projects that are anticipated to materialize independent of the proposed project. The Port Authority Bus Terminal (PABT) Replacement project is one of these projects. As stated in the notes at the bottom of Table 14-29, for the purposes of the DEIS transportation analyses, the PABT Replacement project was assumed to not result in material changes in the overall travel patterns and the trips being generated by the current use of the facility. Hence, trips currently made to/from the PABT are part of the background baseline volumes for existing and future conditions. However, trips generated by other future projects shown, including those near the PABT, were accounted for in the DEIS analyses for the traffic and pedestrian study area locations. The manner by which these trips were considered were described in the chapter, with the 2028 discussion presented on page 14-56.

Comment 3: What are the assumptions of commuter splits between subway and walking when arriving or leaving Penn station?

Response: Commuter rail connecting modal split assumptions were provided by the MTA as part of the Penn Station Master Plan efforts and are summarized in the table below. The connecting

modal split assumptions were separately developed for Amtrak, NJT, and MNR/LIRR riders.

**Table 3
Commuter Rail Connecting Modes**

Modal Split	Penn Station Rail Riders (Amtrak)			Penn Station Rail Riders (NJT)*			Penn Station Rail Riders (MNR/LIRR)		
	(1)			(1)			(1)		
	AM	MD	PM	AM	MD	PM	AM	MD	PM
Auto	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Taxi/For-Hire Vehicle	35.0%	35.0%	35.0%	3.0%	3.0%	3.0%	2.2%	2.2%	2.2%
Subway	25.0%	25.0%	25.0%	54.0%	54.0%	54.0%	45.6%	45.6%	45.6%
Railroad	5.0%	5.0%	5.0%	0.5%	0.5%	0.5%	0.5%	0.5%	0.5%
PATH	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Bus	2.0%	2.0%	2.0%	5.0%	5.0%	5.0%	4.7%	4.7%	4.7%
School Bus	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Walk	33.0%	33.0%	33.0%	37.0%	37.0%	37.0%	47.0%	47.0%	47.0%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%
Vehicle Occupancy	(2)(3) Weekday			(2)(3) Weekday			(2)(3) Weekday		
Auto	1.14			1.14			1.14		
Taxi	1.50			1.50			1.50		
Notes:									
(1) WSP Penn Station Master Plan Ridership Trip Assumptions									
(2) Moynihan Station FEIS (2006)									
(3) U.S. Census American Community Survey (ACS) 2012-2016 Reverse Journey-to-Work Data for New York Census tracts 76, 84, 95, 97, 101, 103, 109, 111, 113, and 115									
*In consultation with NYCT, the NJT subway mode share was adjusted to 54% for the subway station and line haul analyses. The traffic and pedestrian analyses were based on an earlier set of modal split assumptions for NJT rail riders that, if modified, would not yield material differences in analysis conclusions.									

Comment 4: How are pedestrians volume calculated?

Response: The DEIS pedestrian volumes were developed by first establishing baseline volumes using existing or historical data, followed by projecting for future conditions absent the proposed project (i.e., No Action condition), and then finally overlaying the proposed project’s incremental pedestrian trips on top of the No Action condition pedestrian volumes to develop the future conditions with the proposed project (i.e., With Action condition). This process, which has been reviewed and approved by the New York City Department of Transportation (DOT), is further described below.

The existing pedestrian volume development is discussed on pages 14-100 to 14-101 of the DEIS. Due to COVID-19, new data would not be representative of typical conditions. Therefore, baseline volumes for the study area pedestrian analysis elements were established by reviewing the most recently available pedestrian data prior to COVID-19 from DOT and other public agencies, as well as reviewing historical data from previously approved projects (i.e., 2010 *15 Penn Plaza FEIS*) in the general study area.

Once the existing pedestrian volumes were established, the next step was to project future pedestrian volumes absent the proposed project. The 2028 and 2038 No Action condition pedestrian volume development are summarized on pages 14-102 and 14-106 of the DEIS, respectively.

- The first step in projecting the future No Action pedestrian volumes is to grow the existing pedestrian volumes by the *CEQR Technical Manual* annual background growth rates.
- This is followed by a review of future development projects (i.e., No Action projects) that would advance absent the proposed project by the future analysis year to determine if trip estimates and trip assignments need to be developed for specific projects and

overlaid on top of the grown volumes discussed in the previous step. For the DEIS, in consultation with DOT, additional No Action project growth factors were developed to account for the anticipated incremental trip contributions from the small- to moderate-sized No Action projects identified within the ¼-mile study area.

- Pedestrian trip layers from other notable No Action projects in the study area, such as the Farley Post Office/Moynihan Station Redevelopment Project and Western Rail Yard, were then developed and overlaid.
- Pedestrian trip layers from the commuter rails discussed in Comment 1 were also developed as appropriate and then overlaid.
- Lastly, incremental pedestrian trip layers from as-of-right developments on the development sites were developed and overlaid.
- Overall, the future total No Action pedestrian volumes include the grown baseline pedestrian volumes based on *CEQR Technical Manual* background growth and No Action project growth factors; pedestrian trip layers from other notable No Action projects; pedestrian trip layers from commuter rail ridership growth; and the incremental pedestrian trip layers from the development sites' as-of-right developments.

The With Action pedestrian volumes build upon the total No Action pedestrian volumes by overlaying the proposed project's incremental pedestrian trip layers. The development process for the proposed project's incremental pedestrian trip layers is detailed in Section B, "Preliminary Analysis Methodology and Screening Assessment" of the DEIS, starting on page 14-9. Peak hour trip estimates were first developed based on trip generation factors and then trip assignments were developed to assign the pedestrian trips to the various study area pedestrian analysis elements. The 2028 and 2038 With Action condition volume development are summarized on pages 14-104 and 14-108 of the DEIS, respectively. Overall, the With Action pedestrian volumes include the total No Action pedestrian volumes; proposed project incremental trip layers; diverted pedestrian trips from the reconstructed Gimbels Passageway; and additional commuter rail pedestrian trip layers that would be enabled by the completion of the Penn Station expansion.

Comment 5: Was the Hudson Yards EIS from 2005 used as a base for calculation of pedestrian volumes?

As noted in the response to Comment 4, the existing baseline pedestrian volumes were developed based on a combination of pedestrian data provided by public agencies and historical data from previously approved projects. Since the data from these sources were more recent than what would be available from the Hudson Yards EIS, the Hudson Yards EIS data were not used in the calculation of pedestrian volumes. However, many of the development projects that have been completed or under construction in the far west side were borne out of the approvals related to the Hudson Yards EIS. The specific build-out of individual sites may have changed over time and those that have been completed are already part of the existing baseline. The future development projects accounted for in this DEIS reflect the latest expectations for the surrounding area and were reviewed and signed off by the New York City Department of City Planning (DCP). The trips estimated for these projects were incorporated into the respective traffic, transit, and pedestrian analyses, in the manner