
APPENDIX A

Project Related Correspondence

A.1 Natural Resources Correspondence

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Fish and Wildlife, New York Natural Heritage Program
625 Broadway, Fifth Floor, Albany, NY 12233-4757
P: (518) 402-8935 | F: (518) 402-8925
www.dec.ny.gov

April 29, 2021

John Rollino
AECOM
125 Broad Street, 15th Floor
New York, NY 10004

Re: South Battery Park Resiliency Project
County: New York Town/City: New York City

Dear John Rollino:

In response to your recent request, we have reviewed the New York Natural Heritage Program database with respect to the above project.

Enclosed is a report of rare or state-listed animals and plants, and significant natural communities that our database indicates occur within one mile of the project site.

For most sites, comprehensive field surveys have not been conducted; the enclosed report only includes records from our database. We cannot provide a definitive statement as to the presence or absence of all rare or state-listed species or significant natural communities. Depending on the nature of the project and the conditions at the project site, further information from on-site surveys or other sources may be required to fully assess impacts on biological resources.

The presence of the plants and animals identified in the enclosed report may result in this project requiring additional review or permit conditions. For further guidance, and for information regarding other permits that may be required under state law for regulated areas or activities (e.g., regulated wetlands), please contact the NYS DEC Region 2 Office, Division of Environmental Permits, at dep.r2@dec.ny.gov.

Sincerely,



Heidi Krahling
Environmental Review Specialist
New York Natural Heritage Program



**The following state-listed animals have been documented
in the vicinity of the project site.**

The following list includes animals that are listed by NYS as Endangered, Threatened, or Special Concern; and/or that are federally listed.

For information about any permit considerations for your project, please contact the Permits staff at the NYSDEC Region 2 Office at dep.r2@dec.ny.gov, (718) 482-4997.

<i>COMMON NAME</i>	<i>SCIENTIFIC NAME</i>	<i>NY STATE LISTING</i>	<i>FEDERAL LISTING</i>
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The following species has been documented nesting at two locations within 1/3 mile of the project site. An additional nest has been documented within one mile.

Peregrine Falcon <i>Breeding</i>	Falco peregrinus	Endangered	5292
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The following species have been documented in the Lower Hudson River and so could occur at the project site.

Shortnose Sturgeon	Acipenser brevirostrum	Endangered	1091
Atlantic Sturgeon	Acipenser oxyrinchus	No Open Season	11464

This report only includes records from the NY Natural Heritage database.

If any rare plants or animals are documented during site visits, we request that information on the observations be provided to the New York Natural Heritage Program so that we may update our database.

Information about many of the listed animals in New York, including habitat, biology, identification, conservation, and management, are available online in Natural Heritage's Conservation Guides at www.guides.nynhp.org, and from NYSDEC at www.dec.ny.gov/animals/7494.html.

A.2 TPA Memo and Response

Transportation Planning Assumptions Memorandum

Project: South Battery Park Resiliency Design Services
Client: Battery Park City Authority
Date: October 16, 2020: Revised November 10, 2020
Prepared by: Atma Sookram AICP, CTP, PP, PTP

Introduction

AECOM is currently preparing an Environmental Impact Statement (EIS) for the Battery Park City Authority for the proposed construction of a flood barrier system in the South Battery Park City area of Lower Manhattan. This technical memorandum documents the assumptions regarding the anticipated Traffic, Parking, Pedestrian and Transit assessment that may be required to comply with the New York City *CEQR Technical Manual*. Specifically, the purpose of the memo is to present our proposed methodology for data collection and analysis during its permanent post-construction phase, as well as during construction (if determined to be needed). This memo has been revised to reflect the discussion held with NYCDOT on Thursday, November 5, 2020.

As part of the flood protection measures, two gate houses are proposed to be constructed in the pedestrian promenade of the Henry Hudson Greenway (HHG) in the Battery Park area (see **Figure 1**). There are two possible options under consideration; one is in the actual promenade (the option that would reduce the width of the promenade by approximately 12.5 feet and the other is in the existing green space next to the promenade as shown in **Figure 2**). Accordingly, to assess the potential impacts of the reduced width of the promenade on pedestrian mobility, pedestrian analyses are proposed to be conducted at the two locations.

TRANSPORTATION SCREENING

According to the March 2014 *CEQR Technical Manual*, interrelationships between the key technical areas of the transportation system – Traffic, Parking, Transit, and Pedestrians – should be taken into account in any assessment. Furthermore, the individual technical areas should be separately assessed to determine whether a project has the potential to adversely and significantly affect a specific area of the transportation system. The March 2014 *CEQR Technical Manual* states that a preliminary trip generation assessment should be prepared to determine whether a quantified analysis of any technical areas of the transportation system is necessary. Except in unusual circumstances, a further quantified analysis would typically not be needed for a technical area if the proposed development would result in fewer than the following increments:

- 50 peak hour vehicle trips;
- 200 peak hour subway/rail or bus transit riders; or
- 200 peak hour pedestrian trips.

The March 2014 *CEQR Technical Manual* also states that if the threshold for traffic is not surpassed, it is likely that further parking assessment is also not needed.

The proposed South Battery Park Resiliency project has the potential to affect transportation operations both in its permanent, post-construction state (***During Operations***) and as well as during the construction of the flood resiliency measures (***During Construction***), as described in the following sections.

DURING OPERATIONS

Traffic and Parking

In its permanent, post-construction state the proposed flood resiliency measures will not generate any vehicular traffic trips; therefore, the CEQR threshold of 50 vehicle trips per hour will not be met or exceeded. Further, it is expected that all roadways temporarily affected by construction will be restored to their pre-construction configurations resulting in no permanent loss of capacity or effects on traffic operations or parking. Accordingly, detailed traffic and parking analyses are **NOT** required.

Transit

In its permanent, post-construction state, the proposed flood resiliency measures will not generate any transit (bus or subway) trips; therefore, the CEQR threshold of 200 subway trips per hour and 50 bus trips per route, per direction per hour will not be met or exceeded. Therefore, detailed transit analyses are **NOT** required.

Pedestrians

In its permanent, post-construction state, the proposed flood resiliency measures will not generate any pedestrian traffic trips; therefore, the CEQR threshold of 200 pedestrian trips per hour will not be met or exceeded.

However, the construction of the two proposed gate houses in the pedestrian promenade of the Henry Hudson Greenway may potentially affect pedestrian mobility along the promenade. To assess the potential impacts of the reduced width of the promenade on pedestrian mobility, CEQR level ***pedestrian analyses*** are proposed to be conducted at the two proposed gate house locations.

Specifically, it is proposed to conduct a detailed analysis of the pedestrian “walkway” element during the weekday AM, Midday and PM peak hours. Analyses will be performed for the Existing, Future No-Action and Future With-Action conditions. The analyses will be performed in accordance with the pedestrian impact assessment methodology presented in the 2014 *CEQR Technical Manual*.

Pedestrian Data Collection

Beginning in March 2020 at the onset of the Covid-19 pandemic, NYCDOT suspended all data collection efforts until further notice. The moratorium on data collection was since lifted and data collection was allowed to resume beginning October 5, 2020.

Accordingly, we are proposing that pedestrian counts be taken at the two potentially affected gate house locations on the Henry Hudson Greenway for use in the analyses. The counts are proposed to be taken during the Fall 2020 traffic counting season following NYCDOT's data collection calendar for 2020 (which excludes major holidays, etc.). Counts will be taken on two weekdays during the 3-hour AM (6:30-9:30), Midday (11:30 – 2:30) and PM (4:00 – 7:00) peak periods, and during a 3-hour period (12:00-3:00 PM) on two Saturdays (or Sundays), using Miovision cameras. Approval to install cameras will be needed from NYCDOT.

Comparison Counts at Adjacent Intersections

To compare pre- and post/during Covid pedestrian volumes, NYCDOT requested that pedestrian counts be taken at the crosswalks at two intersections: West Street @ Battery Place and Broadway @ Battery Place. These counts will be taken on one weekday and one Saturday during the time periods specified above. The 2020 counts will be compared to pre-Covid counts at these locations provided by NYCDOT to develop a "factor" to update the 2020 HHG counts. Since there are no Saturday pre-Covid counts at the two intersections, we propose using the weekday midday factor to adjust the 2020 Saturday counts on the HHG. NYCDOT concurred with this approach. The adjusted counts will then be used in the pedestrian analyses.

Analyses

We propose conducting analyses at the two potentially affected locations during the weekday AM, Midday and PM, and Saturday peak hours.

Analyses will be performed for the Existing (2020), Future No-Action (TBD) and Future With-Action conditions analyses. CEQR growth rates will also be applied to the 2020 Existing (baseline) volumes to yield Future No-Action volumes. The Future With-Action conditions will reflect the reduced width of the promenade at the two locations for the proposed gate houses.

Potential pedestrian impacts will be identified based on measures of effectiveness (MOEs) for the Future No-Action and Future With-Action conditions using CEQR criteria for "sidewalks and walkways".

DURING CONSTRUCTION

Construction Screening Assessment

Potential traffic impacts are also likely to occur **during construction** of the proposed resiliency measures as a result of additional (temporary) truck and construction worker vehicles on the roadway network. Additionally, during construction there may be temporary lane closures, reduction in traffic lanes and other activities that may affect traffic operations. Accordingly, a screening assessment of traffic conditions During Construction will be performed to determine if detailed traffic analyses during construction is required.

Since construction of the proposed resiliency measures could potentially exceed two (2) years, a screening assessment of Construction traffic will be performed to determine if detailed traffic analyses "During Construction" will be required. The assessment would include an estimation of additional construction-related vehicle trips that would be generated on the roadway system as a

result of construction activities during the peak construction phase. Based on estimates of preliminary manpower distribution over the construction duration, the peak month of construction activity will be determined. The “*During Construction*” traffic impact assessment will be performed for a typical weekday during the peak construction month.

Construction activities will be assumed to take place during two major construction shifts. The first shift is assumed to occur from approximately 7:00 AM to approximately 3:00 PM which typically comprises approximately 90 percent of the total construction personnel workforce. The second shift is assumed to occur from approximately 3:00 PM to approximately 11:00 PM and would comprise approximately 10 percent of the total construction personnel workforce. The majority of the travel for construction personnel (approximately 80 percent) in the first shift would be assumed to take place during the hour immediately before the start of the shift and the hour immediately after the end of the shift, with the remaining travel occurring before and after these times due to the slight variations in the particular schedules and work activities of the various construction trades.

Due to the area’s proximity to the water, it is expected that a significant portion of construction materials will be shipped into the study area; however, truck trips into and out of the area would still be expected to occur. It is assumed that construction truck trips to and from the site would generally be made between the hours of 4:00 AM and 10:00 PM. Truck arrivals are expected to be generally uniform throughout this time period with slightly higher numbers of trips during the midday hours (8:00 AM to 1:00 PM) when on-site work activities are expected to peak. Some truck deliveries would also be made during off-peak times to ensure that materials are on-site prior to the start of the first shift. Trucks would typically remain on-site for relatively short durations (typically one hour or less). Trucks would be expected to use local truck routes in the area to arrive and depart the construction site(s).

The result of the screening assessment would indicate whether or not 50 or more vehicular trips are expected to occur at any intersection – the threshold for detailed analyses. If the threshold is not met, no further analysis of traffic during construction will be needed. If the threshold is met or exceeded, detailed traffic analyses during construction will be required and a scope of work for data collection and detailed analysis will be prepared and submitted to NYCDOT for review and approval.

Schedule

As stated above, pedestrian counts on the Henry Hudson Greenway and the intersections of West Street @ Battery Place and Broadway @ Battery Place are proposed to be conducted in November 2020 before the Fall counting season ends in order to meet the overall 14-month EIS schedule. On the call of November 5, 2020, NYCDOT indicated that AECOM may proceed with the counts.

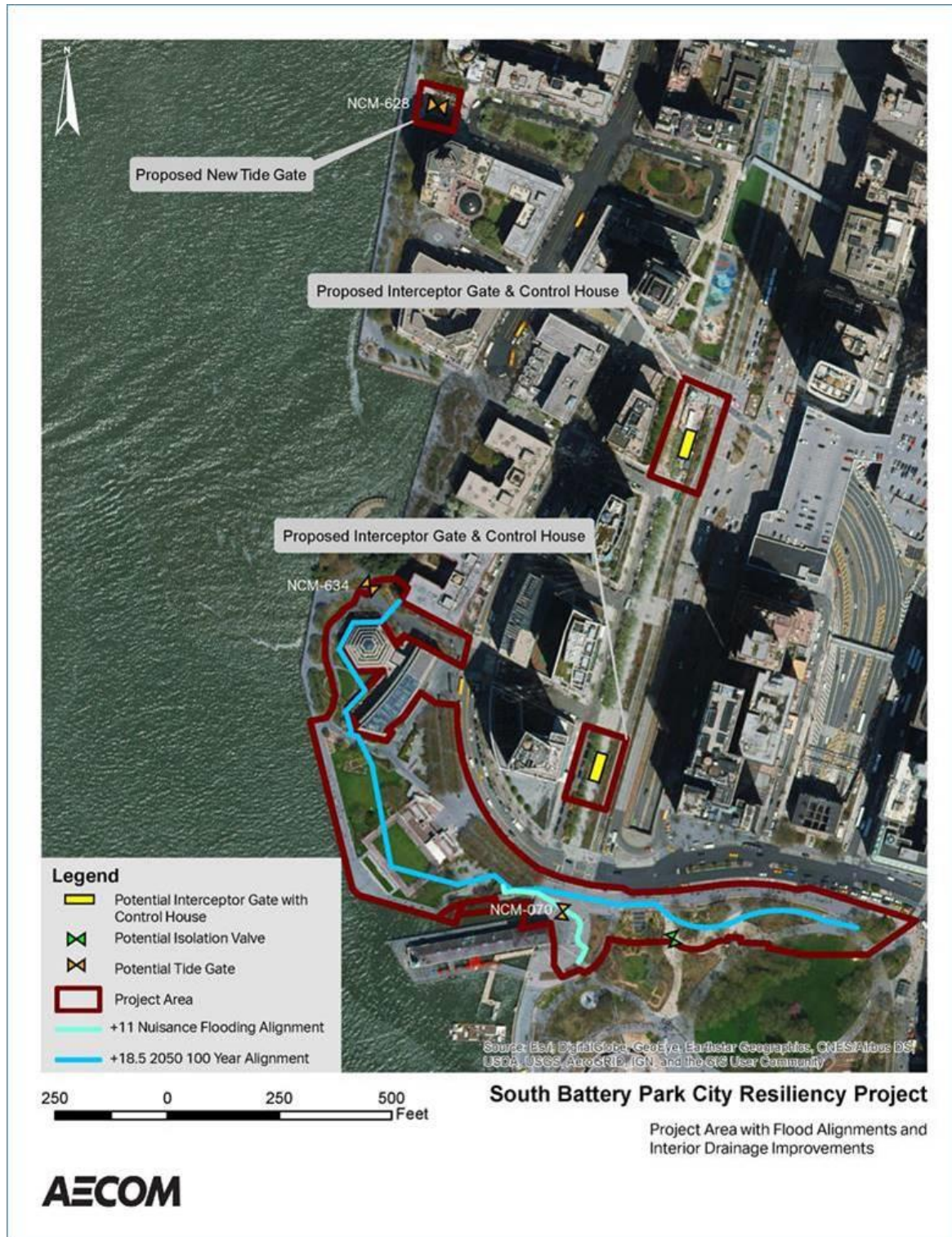


Figure 1

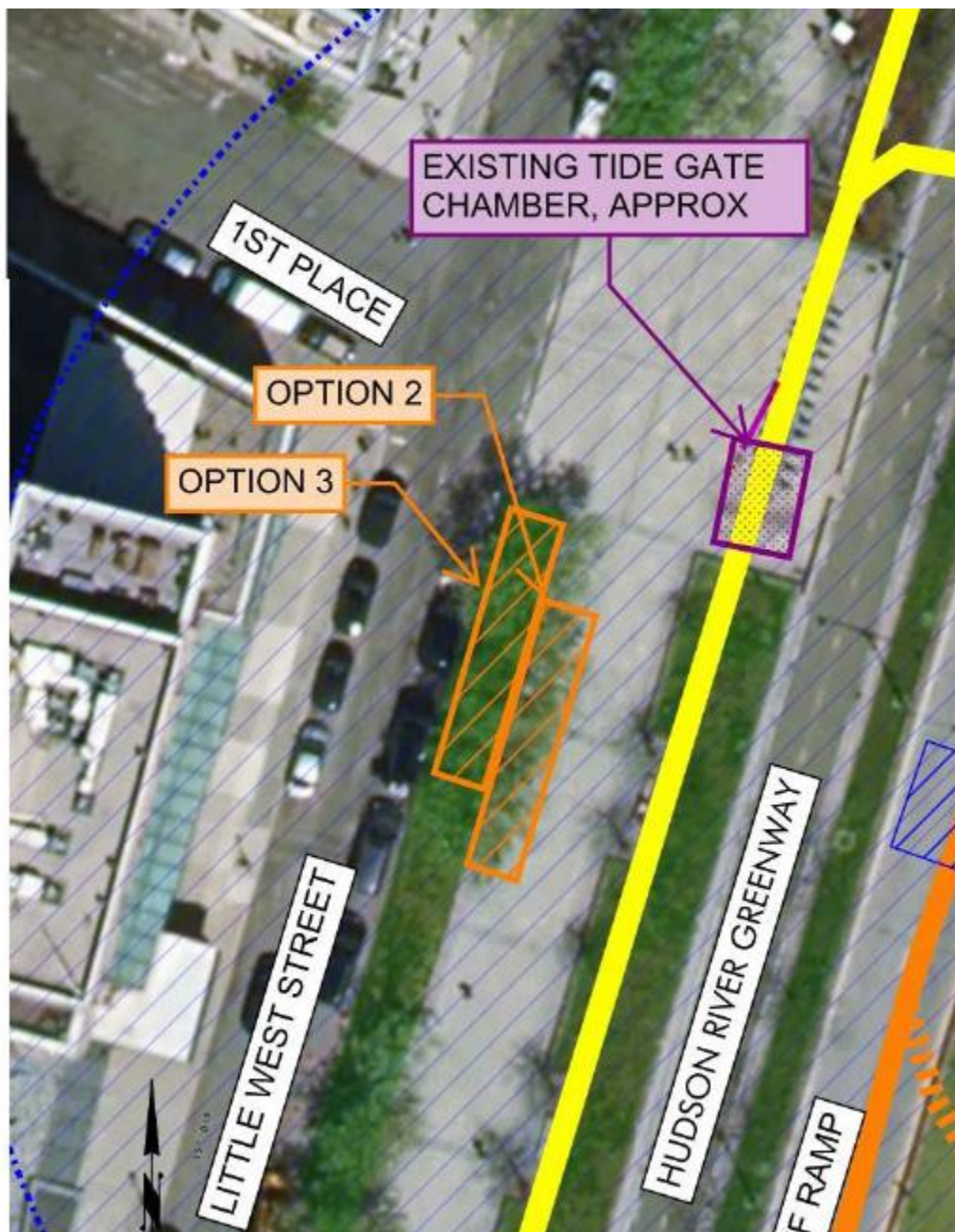


Figure 2

Zhang, Kaiqi

From: Islam, Rubaiet <rislam@dot.nyc.gov>
Sent: Friday, March 19, 2021 10:14 AM
To: Sookram, Atma
Cc: Ahmed, Shakil; Ullom, William; Pincar Jr, Edward; Mattera, John; Samuelsen, Michele; Peter, Tyler
Subject: [EXTERNAL] RE: South Battery Park City EIS

Hi Atma,

We do not have any comments on the Traffic Screening During Construction Memo, and the memo is acceptable to NYC DOT.

Please address our comments on the Comparison Memo, and resubmit along with the back-up materials.

Thanks,
Rubaiet

Rubaiet Islam, EIT (She/her)
Office of Project Analysis/CEQR
NYC DOT- Traffic Engineering & Planning
55 Water Street, 6th Floor, 21-C
212-839-7749 (Office)
rislam@dot.nyc.gov

From: Sookram, Atma [mailto:Atma.Sookram@aecom.com]
Sent: Thursday, March 18, 2021 7:45 PM
To: Islam, Rubaiet <rislam@dot.nyc.gov>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>; Pincar Jr, Edward <EPincar@dot.nyc.gov>; Mattera, John <JMattera@dot.nyc.gov>; Samuelsen, Michele <msamuelsen@dot.nyc.gov>; Peter, Tyler <tpeter@dot.nyc.gov>
Subject: RE: South Battery Park City EIS

Rubaiet:

Thanks for your expeditious review. We will address the comments on the Comparison Memo and resubmit along with the back-up materials.

I did not see any comments on the Traffic Screening During Construction Memo- I'm assuming there are none and the memo is acceptable to NYCDOT. Please confirm.

Thanks again.

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From: Islam, Rubaiet <rislam@dot.nyc.gov>
Sent: Thursday, March 18, 2021 4:27 PM
To: Sookram, Atma <Atma.Sookram@aecom.com>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>; Pincar Jr, Edward <EPincar@dot.nyc.gov>; Mattera, John <JMattera@dot.nyc.gov>; Samuelsen, Michele <msamuelsen@dot.nyc.gov>; Peter, Tyler <tpeter@dot.nyc.gov>
Subject: [EXTERNAL] RE: South Battery Park City EIS

Good Afternoon Atma,

We have reviewed the Response to Comments Memo, backup materials requested for the Comparison Memo and the Traffic Screening During Construction Memo, and the updated Traffic Screening During Construction Memo for the referenced project. Please see attached our comments.

Please let us know if you have any questions.

Thanks
Rubaiet

Rubalet Islam, EIT (She/her)
Office of Project Analysis/CEQR
NYC DOT- Traffic Engineering & Planning
55 Water Street, 6th Floor, 21-C
212-839-7749 (Office)
rislam@dot.nyc.gov

From: Sookram, Atma [<mailto:Atma.Sookram@aecom.com>]
Sent: Tuesday, March 09, 2021 2:37 PM
To: Islam, Rubaiet <rislam@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Zhou, Jiaxu <Jiaxu.Zhou@aecom.com>; Dencker, Rachel <rachel.dencker@aecom.com>; Ducker, Renee <renee.ducker@aecom.com>; Tiernan, Christine <Christine.Tiernan@aecom.com>; Lackovic, Terry <terry.lackovic@aecom.com>; AbiDargham, Antoine <Antoine.AbiDargham@aecom.com>; Lackovic, Terry <terry.lackovic@aecom.com>
Subject: RE: South Battery Park City EIS

Rubalet/William:

Attached is a Response to Comments Memo addressing NYCDOT's comments of March 2, 2021. Also attached are the backup materials requested for the Comparison Memo and the Traffic Screening During Construction Memo, and the updated Traffic Screening During Construction Memo.

We hope these responses adequately address NYCDOT's comments and we look forward to DOT's approval of both documents at your earliest convenience so we can proceed with the time-sensitive EIS analyses.

Thank you!

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From: Ullom, William <wullom@dot.nyc.gov>
Sent: Wednesday, March 03, 2021 10:16 AM
To: Sookram, Atma <Atma.Sookram@aecom.com>; Islam, Rubaiet <rislam@dot.nyc.gov>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Zhou, Jiaxu <Jiaxu.Zhou@aecom.com>
Subject: [EXTERNAL] RE: South Battery Park City EIS

Yes, that would be acceptable. Rubaiet and I had discussed the pros and cons of using 317.01 in our list of suggestions and figured that a reasonable case using engineering judgement could be applied to including 317.01 as well.

From: Sookram, Atma [<mailto:Atma.Sookram@aecom.com>]
Sent: Wednesday, March 03, 2021 10:14 AM
To: Ullom, William <wullom@dot.nyc.gov>; Islam, Rubaiet <rislam@dot.nyc.gov>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Zhou, Jiaxu <Jiaxu.Zhou@aecom.com>
Subject: RE: South Battery Park City EIS

William/Rubaiet:

I reviewed the Census tract map you sent yesterday and recommend that we use three (3) tracts (317.01, 13 and 9) for the revised estimation of mode splits and occupancy using the 2000 CTPP tables for construction workers. Please let me know if you agree with this.

Thanks for your help with this.

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From: Ullom, William <wullom@dot.nyc.gov>
Sent: Wednesday, March 03, 2021 9:09 AM
To: Sookram, Atma <Atma.Sookram@aecom.com>; Islam, Rubaiet <rislam@dot.nyc.gov>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>
Subject: [EXTERNAL] Re: South Battery Park City EIS

Atma, just in case it was not clear in the comments, you should use the table data for construction workers only (i.e. TAB9X221 through TAB9X231.

From: Sookram, Atma <Atma.Sookram@aecom.com>
Sent: Wednesday, March 3, 2021 7:26:58 AM
To: Islam, Rubaiet
Cc: Ahmed, Shakil; Ullom, William
Subject: RE: South Battery Park City EIS

Rubaiet:

We will review the census tract map and get back to you which ones we will be including in the revises estimation of mode splits and occupancy.

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-----Original Message-----

From: Islam, Rubaiet <rislam@dot.nyc.gov>
Sent: Tuesday, March 02, 2021 6:51 PM
To: Sookram, Atma <Atma.Sookram@aecom.com>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>
Subject: [EXTERNAL] Re: South Battery Park City EIS

Hi Atma,

You don't have to include ALL tracts shown on the figure for the calculation of modal splits and vehicle occupancy. Only use the tracts that fall under the project location (possibly tract 13 and 9). Please note that the 2000 CTPP Census data will denote them as 1300 and 900.

Please let me know if you have any questions.

Thanks
Rubaiet

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Traffic Engineering & Planning
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rislam@dot.nyc.gov

From: Sookram, Atma <Atma.Sookram@aecom.com>
Sent: Tuesday, March 2, 2021 6:23:36 PM
To: Islam, Rubaiet
Cc: Ahmed, Shakil
Subject: RE: South Battery Park City EIS

Islam:

Thanks for the comments. I just want to verify that DOT is requesting that ALL tracts shown on the figure that was attached should be included in the calculation of mode splits and vehicle occupancy? Also, we included tracts 317.03 and 317.04 which are not shown on your map. Do we really need tract 5? Please verify.

Thanks.

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[z6eAKGsl&s=iJRtW_YuiJbp_1nHNOUBP2-3_YkGTg9t0scwHmK1nmY&e=](https://www.facebook.com/AecomTechnologyCorporation/?d=DwIF-g&c=TQzoP61-bYDBLzNd0XmHrw&r=va4OCmXk8prz97YgHjXF0YmINymF9YN2OKFH5BtDF3U&m=JXFAAskSqlbo8sWkDjBEdlcxxGAlgQXflgE-z6eAKGsl&s=tNQtoa2pSvQ_Xw9SCUwKdDi5NZg63FU85jVfXyKCKKY&e=) > Facebook<https://urldefense.proofpoint.com/v2/url?u=http-3A_www.facebook.com_AecomTechnologyCorporation&d=DwIF-g&c=TQzoP61-bYDBLzNd0XmHrw&r=va4OCmXk8prz97YgHjXF0YmINymF9YN2OKFH5BtDF3U&m=JXFAAskSqlbo8sWkDjBEdlcxxGAlgQXflgE-z6eAKGsl&s=tNQtoa2pSvQ_Xw9SCUwKdDi5NZg63FU85jVfXyKCKKY&e=> Instagram<https://urldefense.proofpoint.com/v2/url?u=http-3A_instagram.com_aecom&d=DwIF-g&c=TQzoP61-bYDBLzNd0XmHrw&r=va4OCmXk8prz97YgHjXF0YmINymF9YN2OKFH5BtDF3U&m=JXFAAskSqlbo8sWkDjBEdlcxxGAlgQXflgE-z6eAKGsl&s=u8hrQmgT8KKR_3ZnBW1q9UPWh5ioUqhjPYUnRuEqUte&e=>

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From: Islam, Rubaiet <rislam@dot.nyc.gov>
Sent: Tuesday, March 02, 2021 4:46 PM
To: Sookram, Atma <Atma.Sookram@aecom.com>
Cc: Pincar Jr, Edward <EPincar@dot.nyc.gov>; Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>; Samuelson, Michele <msamuelson@dot.nyc.gov>; Peter, Tyler <tpeter@dot.nyc.gov>; Mattera, John <JMattera@dot.nyc.gov>; Li, Shuzuan <slj@dot.nyc.gov>
Subject: [EXTERNAL] RE: South Battery Park City EIS

Hi Atma,

We have reviewed the Construction Screening Memo, Transportation Planning Assumption Memo, and Pre-vs. During-Covid Comparison Memo for the South Battery Park Resiliency project. Please find attached our comments.

Please let us know if you have any questions.

Thanks
Rubaiet

Rubaiet Islam, EIT (She/her)
Office of Project Analysis/CEQR
NYC DOT- Traffic Engineering & Planning
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Thank you.

NYC - Department of Transportation

Transportation Screening Assessment “During Construction”

Project: South Battery Park City Resiliency Project EIS
Client: Battery Park City Authority
Date: December 16, 2020: Revised March 4, 2021
Prepared by: Atma Sookram AICP, CTP, PP, PTP

Introduction

AECOM is currently preparing an Environmental Impact Statement (EIS) for the Battery Park City Authority for the proposed construction of a flood barrier system in the South Battery Park City area of Lower Manhattan. The Lead Agency for the EIS is Battery Park City Authority.

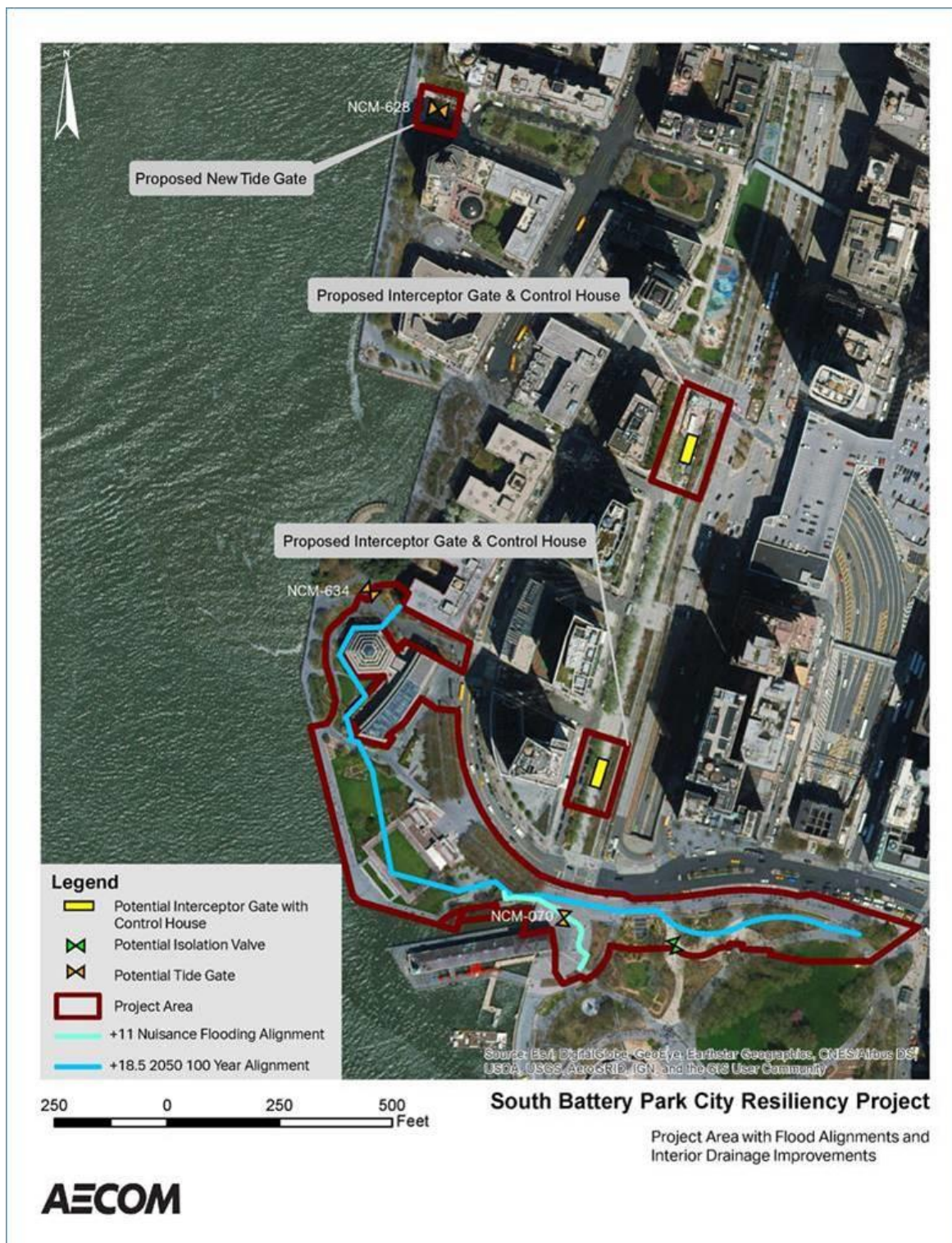
The Project Area and other key project components including two gate houses that are being proposed to be constructed in the pedestrian promenade of the Henry Hudson Greenway (HHG) is shown in **Figure 1**.

A Transportation Planning Assumptions (TPA) Memorandum documenting the assumptions regarding the proposed Traffic, Parking, Pedestrian and Transit assessment during the permanent, post-construction state the proposed flood resiliency measures (i.e., **During Operations**) was prepared and submitted to Battery Park City Authority and NYCDOT on October 16, 2020. It was prepared in accordance with the transportation screening methodologies and criteria in the 2014 *CEQR Technical Manual*. The memo was revised on November 10, 2020 to reflect comments received from NYCDOT and agreements reached during a conference call with NYCDOT and AECOM on November 5, 2020.

It was concluded in the TPA memo that no detailed Traffic, Parking or Transit analyses would be required during operations. However, the construction of the two proposed gate houses in the pedestrian promenade of the Henry Hudson Greenway may potentially affect pedestrian mobility along the promenade. Accordingly, to assess the potential impacts of the reduced width of the promenade on pedestrian mobility, CEQR level pedestrian analyses were proposed to be conducted at the two proposed gate house locations.

This memo supplements the TPA memo and presents the results of a screening assessment that was performed to determine if detailed transportation analyses may be required **During Construction**. It has been updated to reflect comments received from NYCDOT on March 2, 2021.

Figure 1: Project Area



TRANSPORTATION SCREENING

According to the March 2014 *CEQR Technical Manual*, interrelationships between the key technical areas of the transportation system – Traffic, Parking, Transit, and Pedestrians – should be taken into account in any assessment. Furthermore, the individual technical areas should be separately assessed to determine whether a project has the potential to adversely and significantly affect a specific area of the transportation system. The March 2014 *CEQR Technical Manual* states that a preliminary trip generation assessment should be prepared to determine whether a quantified analysis of any technical areas of the transportation system is necessary. Except in unusual circumstances, a further quantified analysis would typically not be needed for a technical area if the proposed development would result in fewer than the following increments:

- 50 peak hour vehicle trips;
- 200 peak hour subway/rail or bus transit riders; or
- 200 peak hour pedestrian trips.

The March 2014 *CEQR Technical Manual* also states that if the threshold for traffic is not surpassed, it is likely that further parking assessment is also not needed.

DURING CONSTRUCTION

Construction Screening Assessment

Since construction of the proposed resiliency measures is expected to exceed two (2) years, a screening assessment of Construction traffic was performed to determine if detailed traffic analyses “*During Construction*” will be required. The assessment includes an estimation of additional construction-related vehicle trips that would be generated on the roadway system as a result of construction activities during the peak construction phase. Based on estimates of preliminary manpower distribution over the construction duration, the peak month of construction activity was determined. The “*During Construction*” traffic screening assessment was performed for a typical weekday during the peak construction month.

Level 1 Screening

Traffic

The preliminary screening thresholds in the March 2014 *CEQR Technical Manual* suggests that any project which generates 50 or more peak hour incremental vehicle trips through a single intersection in any given peak hour is likely to warrant a detailed traffic operations analysis. Conversely, projects that are anticipated to generate fewer than 50 peak hour incremental vehicle trips through a single intersection generally do not warrant detailed traffic assessments, and potential traffic impacts are not expected.

Construction Trip Generation

The number of vehicle trips that can be expected during construction was estimated based on review and consideration of the following components:

- The proposed construction schedule (and the peak construction phase)
- Expected number of construction workers per weekday during the peak construction phase
- Expected number of trucks per weekday during the peak construction phase

The number of construction workers and trucks were estimated during the peak hours on a typical weekday for the peak phase of construction.

Construction Schedule

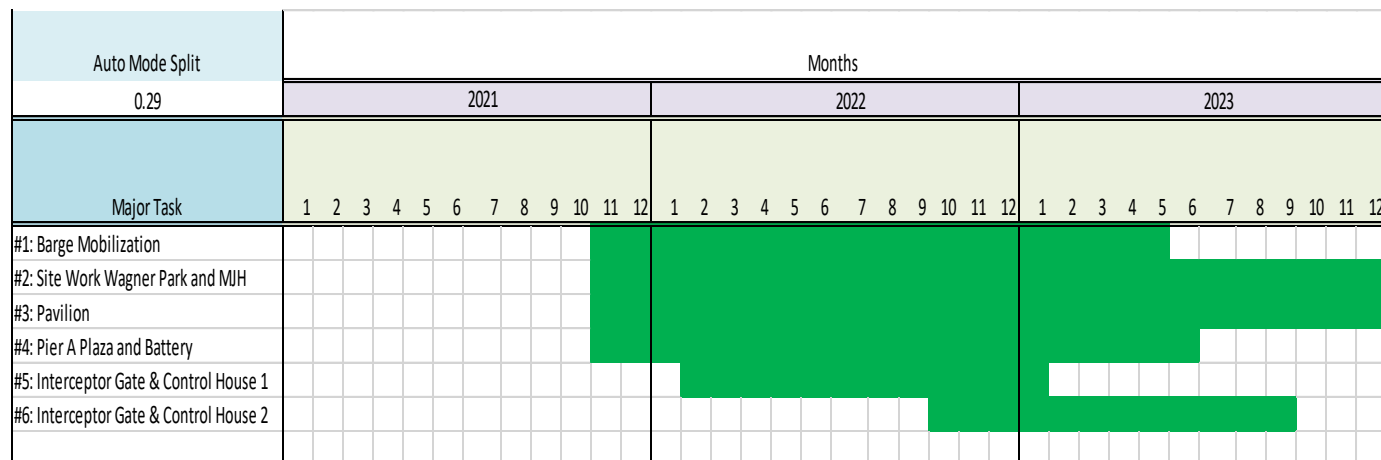
The project is proposed to be constructed in 26 months, involving six (6) major construction tasks, as follows:

- #1: Barge Mobilization
- #2: Site Work at Wagner Park and Museum of Jewish History (MJH)
- #3: Pavilion
- #4: Pier A Plaza and Battery
- #5: Interceptor Gate and Control House 1
- #6: Interceptor Gate and Control House 2

The estimated starting date for construction is expected to be November 2021. All construction is scheduled to be completed by the end of December 2023. The construction schedule is shown in **Table 1**. **Figure 2** presents a graphical illustration of the construction schedule, showing the duration of each major task as well as overlapping tasks.

Table 1: Construction Schedule			
Major Task	Duration (Months)	Start	Finish
#1: Barge Mobilization	19	11/21	05/23
#2: Site Work Wagner Park and MJH	26	11/21	12/23
#3: Pavilion	26	11/21	12/23
#4: Pier A Plaza and Battery	20	11/21	06/23
#5: Interceptor Gate & Control House 1	12	02/22	01/23
#6: Interceptor Gate & Control House 2	12	10/22	09/23

Figure 2: Construction Schedule



As shown in **Figure 2**, all six major work tasks will overlap for a 4-month period: three months in 2022 and one month in 2023; and at least five major tasks will overlap for several months in 2022 and 2023.

The number of vehicle trips to be generated during the peak construction phase was then estimated based on the combined number of construction workers and trucks expected during the peak months of construction.

Construction Workers

The number of daily construction workers is expected to vary depending on the specific work task. The *task* with the highest number of daily construction workers is associated with the site work at Wagner Park and the Museum of Jewish Heritage with 43 workers per day (see **Table 2**). However, due to multiple overlapping work tasks, the highest number of daily construction workers (130) is generally expected to occur during the peak 4-month period: the last three months in 2022 and the first month in 2023 (see **Figure 2**).

For estimating purposes, it was assumed that workers will work one main shift between 7 AM and 3 PM, as is typical in New York City. Normally work would end at around 3:00 or 3:30 PM, but it can be expected that, in order to complete certain critical tasks (e.g., finishing a concrete pour), the workday may occasionally be extended beyond normal work hours. Any extended weekday workdays would generally last until approximately 6:00 PM and would not include all construction workers on-site, but only those involved in the specific task requiring additional work time.

Weekend or night work may also be occasionally required for certain construction activities. Appropriate work permits from NYC Department of Buildings (DOB) would be obtained for any necessary work outside of normal construction and no work outside of normal construction hours would be performed until such permits are obtained. The numbers of workers and pieces of equipment in operation for weekend work would typically be limited to those needed to complete

the particular task. Therefore, the level of activity for any weekend or night work would be less than that of a normal workday. The weekend workday, if necessary, would typically occur from 8:00 AM to 4:00 PM.

It was estimated that 29% of workers will arrive and leave in private vehicles; 69% would arrive and leave via transit; and 2% would arrive and leave by the walking/bicycling. These mode splits were based on the 2000 CTPP Reverse Journey to Work (RJTW) Data Tables for census tracts 9, 13, and 317.01 in Lower Manhattan for Construction and Excavation occupations. A vehicle occupancy rate of 1.19 persons per vehicle was estimated from the same data source. The “raw” and “rounded” modal splits are shown in **Table 3**.

Table 2: Daily Estimate of Construction Workers and Trucks

Major Task	Workers Per day	Trucks Per Day
#1: Barge Mobilization	1	0
#2: Site Work Wagner Park and MJH	43	4
#3: Pavilion	23	6
#4: Pier A Plaza and Battery	35	4
#5: Interceptor Gate & Control House 1	14	2
#6: Interceptor Gate & Control House 2	14	2

Table 3: Modal Splits for Census Tracts 9, 13, 317.01

Mode	Raw	Rounded
Drive	28.9%	29%
Subway	42.9%	43%
Bus	11.2%	11%
Ferry or Railroad	14.9%	15%
Bicycle or Walk	1.8%	2%
Taxi or Motorcycle	0.3%	0%
	100.0%	100%

Trucks

Due to the area's proximity to the water, it is expected that a significant portion of construction materials will be shipped into and out of the study area by barges; however, truck trips into and out of the area would still be expected to occur. Trucks would typically remain on-site for relatively short durations (typically one hour or less). Trucks would be expected to use local truck routes in the area to arrive and depart the construction site(s).

The daily volume of trucks making deliveries to the site and hauling away debris and excavated materials from the site would vary according to the specific construction activity being undertaken. As shown in **Table 2**, approximately six (6) trucks, the highest number of daily trucks for any major task, are expected per day during the construction of the Pavilion. Between two and four trucks are expected per day for each of the other tasks, except for the task associated with barge mobilization which is not expected to generate any truck traffic.

Daily Vehicle Estimates

Based on the above assumptions, the number of construction workers and trucks that can be expected during a typical weekday during the peak construction phase was estimated, as shown in **Figure 3**. As shown, the peak construction phase is expected to occur during the 4-month period from October 2022 through January 2023. On a typical weekday during this peak phase of construction, 32 construction worker vehicles *passenger car equivalents* (pces) and 45 trucks (pces) are projected to occur, for a total of 77 vehicles (pces). *Note: for purposes of this analysis, trucks were converted to pces using a conversion factor of 2.5.*

Hourly Vehicle Trip Estimates

The estimated *daily* vehicle volumes were converted to *hourly* vehicle trips by applying appropriate temporal (hourly) and directional (in and out) distributions for construction workers and trucks. All of the workers are expected to arrive by 8 AM and leave by 5 PM, with 80 percent arriving during the 6-7 AM hour, and 80 percent leaving during the 3-4 PM hour. Trucks are expected to arrive at, and leave the Project Area, throughout the day between 6 AM and 5 PM.

Table 4 shows the estimated number of vehicle trips for construction workers and trucks (separately and combined) that are projected to occur during a typical weekday. Specifically, it shows the estimated number of trips during the weekday morning peak arrival hour (6-7 AM) and afternoon peak departure hour (3-4 PM). During both of these hours, 31 vehicle trips are projected to occur: 28 in and 3 out during the AM peak hour; and 3 in and 28 out during the PM peak hour.

Since these Level 1 trip generation estimates do not exceed 50 vehicle trips during any hour, a Level 2 screening assessment (trip distribution and trip assignment) is not required. Accordingly, no intersection is expected to experience an increase of 50 or more vehicular trips during any hour, and therefore, ***no further traffic analysis during construction is needed.***

Transit and Pedestrians

With a transit modal split of 69 percent, approximately 90 construction workers would arrive and leave *daily* by transit modes (bus and subway). During the AM and PM peak hours, approximately 72 workers would arrive and leave by transit modes, respectively. The projected increase in peak hour transit trips (72) does not meet or exceed the *CEQR* thresholds for detailed analyses, and therefore, ***no further transit analysis during construction is required.***

In addition, with 130 construction workers expected on a typical *weekday* during the peak construction period, the CEQR threshold of 200 pedestrian trips *per hour* is not expected to be met or exceeded. Therefore, ***no further pedestrian analysis during construction is required.***

Figure 3: Estimated Daily Vehicles During Construction

[illegible]

Table 4: Estimated Hourly Vehicle Trips

Peak Truck PCEs =	45													
Peak Workers =	130													
Average Auto Occupancy=	1.19	persons/vehicle												
Worker Mode-Split Auto =	29%													
Worker Mode-Split Transit* =	69%													
Hour of Day	Temporal Distributions				Car Trips (Workers)			Truck (PCE) Trips			Total Vehicle Trips (PCEs)			
	Workers IN	Workers Out	Trucks IN	Trucks OUT	In	Out	Total	In	Out	Total	In	Out	Total	
12-1AM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	0
1-2 AM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	0
2-3AM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	0
3-4AM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	0
4-5AM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	0
5-6AM	10%	0%	0%	0%	3	0	3	0	0	0	3	0	3	
6-7AM	80%	0%	6%	6%	25	0	25	3	3	5	28	3	31	
7-8AM	10%	0%	6%	6%	3	0	3	3	3	5	6	3	9	
8-9AM	0%	0%	11%	11%	0	0	0	5	5	10	5	5	10	
9-10AM	0%	0%	11%	11%	0	0	0	5	5	10	5	5	10	
10-11AM	0%	0%	11%	11%	0	0	0	5	5	10	5	5	10	
11AM-12PM	0%	0%	11%	11%	0	0	0	5	5	10	5	5	10	
12-1PM	0%	0%	11%	11%	0	0	0	5	5	10	5	5	10	
1-2PM	0%	0%	11%	11%	0	0	0	5	5	10	5	5	10	
2-3PM	0%	10%	11%	11%	0	3	3	5	5	10	5	8	13	
3-4PM	0%	80%	6%	6%	0	25	25	3	3	5	3	28	31	
4-5PM	0%	10%	5%	5%	0	3	3	2	2	5	2	5	8	
5-6PM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	
6-7PM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	
7-8PM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	
8-9PM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	
9-10PM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	
10-11PM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	
11PM-12AM	0%	0%	0%	0%	0	0	0	0	0	0	0	0	0	
TOTAL =	100%	100%	100%	100%	32	32	63	45	45	90	77	77	153	

Parking

It is expected that all or most of the 32 daily construction worker vehicles during the peak construction period will utilize on-street or public off-street parking facilities within and near the Project Area. Alternatively, motorists could choose alternate modes of transportation. As stated in the *CEQR Technical Manual*, a parking shortfall resulting from a project located in Manhattan does not constitute a significant adverse parking impact, due to the magnitude of available alternative modes of transportation. Accordingly, no detailed parking assessment during construction is required.

Summary and Conclusion

Based on the Level 1 screening assessment described above, it was determined that the traffic volume threshold of 50 vehicles per hour will **not be met or exceeded** at any intersection during the AM peak arrival and PM peak departure hours during construction. As shown in **Table 4**, the highest number of vehicle trips (in pces) would be 31 trips during each of the AM and PM peak hours, below the 50 vph threshold. In addition, it is expected that all or most of the 32 daily construction worker vehicles will utilize public off-street parking facilities within and near the Project Area.

Therefore, in accordance with the 2014 *CEQR Technical Manual*, this screening assessment concludes that **during construction** of the proposed South Battery Park City flood protection measures:

- No further analysis of **Traffic** is required.
- The thresholds for Transit analyses (200 trips per hour) and Pedestrian analyses (200 trips per hour) are not expected to be met; therefore, no **Transit** and **Pedestrian** analysis are required.
- Since a parking shortfall resulting from a project located in Manhattan does not constitute a significant adverse parking impact, due to the magnitude of available alternative modes of transportation, a detailed **Parking** assessment is **not** required.

Based on the above assessment, **no further transportation analyses During Construction are required** for the South Battery Park City Resilience project.

Zhang, Kaiqi

From: Islam, Rubaiet <rislam@dot.nyc.gov>
Sent: Thursday, March 25, 2021 4:01 PM
To: Sookram, Atma
Cc: Ahmed, Shakil; Ullom, William; Pincar Jr, Edward; Mattera, John; Samuelsen, Michele; Peter, Tyler; Dencker, Rachel; Tiernan, Christine; Ducker, Renee; Lackovic, Terry; Taylor, Jessica
Subject: [EXTERNAL] RE: South Battery Park City EIS

Hi Atma,

We approve the findings of the Pre- and During-Covid Pedestrian Count Comparison Memo and do not have any further comment.

To assess the potential impacts of the reduced width of the promenade on pedestrian mobility, Please provide us the CEQR level *pedestrian analyses* at the two proposed gate house locations when completed.

Thank you,
Rubaiet

Rubalet Islam, EIT (She/her)
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55 Water Street, 6th Floor, 21-C
212-839-7749 (Office)
rislam@dot.nyc.gov

From: Sookram, Atma [mailto:Atma.Sookram@aecom.com]
Sent: Monday, March 22, 2021 9:51 AM
To: Islam, Rubaiet <rislam@dot.nyc.gov>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>; Pincar Jr, Edward <EPincar@dot.nyc.gov>; Mattera, John <JMattera@dot.nyc.gov>; Samuelsen, Michele <msamuelsen@dot.nyc.gov>; Peter, Tyler <tpeter@dot.nyc.gov>; Dencker, Rachel <rachel.dencker@aecom.com>; Tiernan, Christine <Christine.Tiernan@aecom.com>; Ducker, Renee <renee.ducker@aecom.com>; Lackovic, Terry <terry.lackovic@aecom.com>
Subject: RE: South Battery Park City EIS

Rubalet:

Attached for your final review is a Response to Comments Memo with our responses to NYCDOT's comments of March 18, 2021. Also attached is the revised Comparison Memo with the updated Table 1, and the back-up materials (Excel files). The overall factors for the intersection of Broadway/Battery Place did not change.

As always, we appreciate your expeditious review.

Thanks.

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Sent: Friday, March 19, 2021 10:14 AM
To: Sookram, Atma <Atma.Sookram@aecom.com>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>; Pincar Jr, Edward <EPincar@dot.nyc.gov>; Mattera, John <JMattera@dot.nyc.gov>; Samuelson, Michele <msamuelsen@dot.nyc.gov>; Peter, Tyler <tpeter@dot.nyc.gov>
Subject: [EXTERNAL] RE: South Battery Park City EIS

Hi Atma,

We do not have any comments on the Traffic Screening During Construction Memo, and the memo is acceptable to NYC DOT.

Please address our comments on the Comparison Memo, and resubmit along with the back-up materials.

Thanks,
Rubaiet

Rubaiet Islam, EIT (She/her)
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212-839-7749 (Office)
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Sent: Thursday, March 18, 2021 7:45 PM
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Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>; Pincar Jr, Edward <EPincar@dot.nyc.gov>; Mattera, John <JMattera@dot.nyc.gov>; Samuelson, Michele <msamuelsen@dot.nyc.gov>; Peter, Tyler <tpeter@dot.nyc.gov>
Subject: RE: South Battery Park City EIS

Rubaiet:

Thanks for your expeditious review. We will address the comments on the Comparison Memo and resubmit along with the back-up materials.

I did not see any comments on the Traffic Screening During Construction Memo- I'm assuming there are none and the memo is acceptable to NYCDOT. Please confirm.

Thanks again.

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To: Sookram, Atma <Atma.Sookram@aecom.com>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>; Pincar Jr, Edward <EPincar@dot.nyc.gov>; Mattera, John <JMattera@dot.nyc.gov>; Samuelson, Michele <msamuelsen@dot.nyc.gov>; Peter, Tyler <tpeter@dot.nyc.gov>
Subject: [EXTERNAL] RE: South Battery Park City EIS

Good Afternoon Atma,

We have reviewed the Response to Comments Memo, backup materials requested for the Comparison Memo and the Traffic Screening During Construction Memo, and the updated Traffic Screening During Construction Memo for the referenced project. Please see attached our comments.

Please let us know if you have any questions.

Thanks
Rubaiet

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From: Sookram, Atma [<mailto:Atma.Sookram@aecom.com>]
Sent: Tuesday, March 09, 2021 2:37 PM
To: Islam, Rubaiet <rislam@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Zhou, Jiaxu <Jiaxu.Zhou@aecom.com>; Dencker, Rachel <rachel.dencker@aecom.com>; Ducker, Renee <renee.ducker@aecom.com>; Tiernan, Christine <Christine.Tiernan@aecom.com>; Lackovic, Terry <terry.lackovic@aecom.com>; AbiDargham, Antoine <Antoine.AbiDargham@aecom.com>; Lackovic, Terry <terry.lackovic@aecom.com>
Subject: RE: South Battery Park City EIS

Rubaiet/William:

Attached is a Response to Comments Memo addressing NYCDOT's comments of March 2, 2021. Also attached are the backup materials requested for the Comparison Memo and the Traffic Screening During Construction Memo, and the updated Traffic Screening During Construction Memo.

We hope these responses adequately address NYCDOT's comments and we look forward to DOT's approval of both documents at your earliest convenience so we can proceed with the time-sensitive EIS analyses.

Thank you!

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From: Ullom, William <wullom@dot.nyc.gov>
Sent: Wednesday, March 03, 2021 10:16 AM
To: Sookram, Atma <Atma.Sookram@aecom.com>; Islam, Rubaiet <rislam@dot.nyc.gov>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Zhou, Jiaxu <Jiaxu.Zhou@aecom.com>
Subject: [EXTERNAL] RE: South Battery Park City EIS

Yes, that would be acceptable. Rubaiet and I had discussed the pros and cons of using 317.01 in our list of suggestions and figured that a reasonable case using engineering judgement could be applied to including 317.01 as well.

From: Sookram, Atma [<mailto:Atma.Sookram@aecom.com>]
Sent: Wednesday, March 03, 2021 10:14 AM
To: Ullom, William <wullom@dot.nyc.gov>; Islam, Rubaiet <rislam@dot.nyc.gov>

Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Zhou, Jiaxu <Jiaxu.Zhou@aecom.com>

Subject: RE: South Battery Park City EIS

William/Rubalet:

I reviewed the Census tract map you sent yesterday and recommend that we use three (3) tracts (317.01, 13 and 9) for the revised estimation of mode splits and occupancy using the 2000 CTPP tables for construction workers. Please let me know if you agree with this.

Thanks for your help with this.

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From: Ullom, William <wullom@dot.nyc.gov>
Sent: Wednesday, March 03, 2021 9:09 AM
To: Sookram, Atma <Atma.Sookram@aecom.com>; Islam, Rubalet <rislam@dot.nyc.gov>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>
Subject: [EXTERNAL] Re: South Battery Park City EIS

Atma, just in case it was not clear in the comments, you should use the table data for construction workers only (i.e. TAB9X221 through TAB9X231).

From: Sookram, Atma <Atma.Sookram@aecom.com>
Sent: Wednesday, March 3, 2021 7:26:58 AM
To: Islam, Rubalet
Cc: Ahmed, Shakil; Ullom, William
Subject: RE: South Battery Park City EIS

Rubalet:

We will review the census tract map and get back to you which ones we will be including in the revised estimation of mode splits and occupancy.

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-----Original Message-----

From: Islam, Rubaiet <rislam@dot.nyc.gov>
Sent: Tuesday, March 02, 2021 6:51 PM
To: Sookram, Atma <Atma.Sookram@aecom.com>
Cc: Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>
Subject: [EXTERNAL] Re: South Battery Park City EIS

Hi Atma,

You don't have to include ALL tracts shown on the figure for the calculation of modal splits and vehicle occupancy. Only use the tracts that fall under the project location (possibly tract 13 and 9). Please note that the 2000 CTPP Census data will denote them as 1300 and 900.

Please let me know if you have any questions.

Thanks
Rubaiet

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From: Sookram, Atma <Atma.Sookram@aecom.com>
Sent: Tuesday, March 2, 2021 6:23:36 PM
To: Islam, Rubaiet
Cc: Ahmed, Shakil
Subject: RE: South Battery Park City EIS

Islam:

Thanks for the comments. I just want to verify that DOT is requesting that ALL tracts shown on the figure that was attached should be included in the calculation of mode splits and vehicle occupancy? Also, we included tracts 317.03 and 317.04 which are not shown on your map. Do we really need tract 5? Please verify.

Thanks.

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From: Islam, Rubaiet <rislam@dot.nyc.gov>
Sent: Tuesday, March 02, 2021 4:46 PM
To: Sookram, Atma <Atma.Sookram@aecom.com>
Cc: Pincar Jr, Edward <EPincar@dot.nyc.gov>; Ahmed, Shakil <SAhmed2@dot.nyc.gov>; Ullom, William <wullom@dot.nyc.gov>; Samuelson, Michele <msamuelson@dot.nyc.gov>; Peter, Tyler <tpeter@dot.nyc.gov>; Mattera, John <JMattera@dot.nyc.gov>; Li, Shuzuan <sli@dot.nyc.gov>
Subject: [EXTERNAL] RE: South Battery Park City EIS

Hi Atma,

We have reviewed the Construction Screening Memo, Transportation Planning Assumption Memo, and Pre-vs. During-Covid Comparison Memo for the South Battery Park Resiliency project. Please find attached our comments.

Please let us know if you have any questions.

Thanks
Rubaiet

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NYC - Department of Transportation

Pre- and During-Covid Pedestrian Count Comparison

Project: South Battery Park City Resiliency Project EIS
Client: Battery Park City Authority
Date: February 1, 2021: Revised March 22, 2021
Prepared by: Atma Sookram AICP, CTP, PP, PTP

Introduction

AECOM, through a sub-contractor, recently performed pedestrian counts in November 2020 at two locations on the Henry Hudson Greenway (HHG) on West Street (Route 9A) in the Battery Park City area of Lower Manhattan for use in pedestrian analyses for the South Battery Park City EIS. The counts were performed before Thanksgiving when NYC schools were open and after NYCDOT lifted the moratorium on data collection that went into effect in March 2020; however, data collection still occurred during the Covid pandemic.

As was requested by NYCDOT, AECOM concurrently collected pedestrian counts at crosswalks at two adjacent intersections (West Street @ Battery Place and Broadway @ Battery Place). The purpose of these crosswalk pedestrian counts was to conduct a comparison between pre-Covid conditions and during-Covid conditions, and to develop an adjustment factor(s) that could be applied to the 2020 “during Covid” counts on the HHG, based on NYCDOT’s guidance.

Specifically, NYCDOT provided “pre-Covid” pedestrian counts at the following four crosswalks during the specified time periods for use in the comparison with November 2020 “during Covid” counts:

1. West Street @ Battery Place West Crosswalk (Weekday Midday and PM)
2. Broadway @ Battery Place North Crosswalk (Weekday AM, Midday, PM and Sat.)
3. Broadway @ Battery Place East Crosswalk (Weekday AM, Midday, PM and Sat.)
4. Broadway @ Battery Place West Crosswalk (Weekday AM, Midday, PM and Sat.)

The purpose of this memo is to present the results of the comparison between the pre Covid and during Covid pedestrian counts at the above four locations, and the adjustment factors developed based on that comparison. AECOM will consult with NYCDOT to determine if and how these adjustment factors should be applied to the 2020 counts taken on the pedestrian promenade of West Street (Route 9A) for purposes of the EIS. This memo was revised to reflect comments received from NYCDOT on March 18, 2021.

Comparison of Pre-Covid and During Covid Pedestrian Volumes

Table 1 shows the comparison of the pre-Covid and 2020 during-Covid pedestrian volumes at the four crosswalks. Based on the availability of “pre-Covid” pedestrian count data, comparisons were performed for the following weekday time periods; pre-Covid Saturday counts are only available for the crosswalks at Broadway/Battery Place.

1. West Street @ Battery Place: West Crosswalk
Weekday Midday (11:30 AM to 2 PM)
Weekday PM (4-7 PM)
2. Broadway @ Battery Place: North, West and East Crosswalks
Weekday AM (7:-9:30 AM)
Weekday Midday (11:30 AM to 2:30 PM)
Weekday PM (4-7 PM)
Saturday Midday (12 Noon to 3 PM)

Table 1: Pre- and During Covid Pedestrian Count Comparison

Location	AM				MD				PM				SAT			
	Pre-Covid Raw	Pre Covid Grown to 2020	2020 Field Counts	Adj. Factor	Pre-Covid Raw	Pre Covid Grown to 2020	2020 Field Counts	Adj. Factor	Pre-Covid Raw	Pre Covid Grown to 2020	2020 Field Counts	Adj. Factor	Pre-Covid Raw	Pre Covid Grown to 2020	2020 Field Counts	Adj. Factor
West Street @ Battery: West X-Walk	-	-	-	-	953	960	43	22.3	1106	1114	61	18.3	-	-	-	-
Broadway/Battery: North X-Walk	1048	1050	370	2.8	1724	1728	545	3.2	1652	1656	389	4.3	1029	1032	432	2.4
Broadway/Battery: East X-Walk	1186	1188	344	3.5	1931	1936	445	4.4	982	984	288	3.4	2352	2358	880	2.7
Broadway/Battery: West X-Walk	587	588	176	3.3	1018	1020	251	4.1	721	722	181	4.0	1640	1644	631	2.6
Overall	2820	2827	890	3.2	4673	4684	1241	3.8	3354	3362	858	3.9	5021	5034	1943	2.6

Since the pre-Covid “raw” counts provided by NYCDOT were from years prior to 2020, to enable a fair comparison, they were “grown” to 2020 by applying a growth factor of 0.25 percent per year in accordance with the 2020 *CEQR Technical Manual*. These “grown” volumes were then compared to the 2020 field counts and a factor developed for each location, for each time period, and for all locations combined. The 2020 field counts represent the average of two weekdays for each time period.

The factor was calculated as the pre-Covid pedestrian volumes divided by the 2020 field (during Covid) volumes. In addition to calculating a “factor” for each location and time period, an *overall factor* for the three crosswalks combined at the intersection of Broadway and Battery Place was computed for each time period.

As shown, the pre-Covid counts at each of the four crosswalks are significantly higher than the counts taken in November 2020 during the Covid pandemic. The difference between the pre-Covid and during-Covid counts are greatest at the westerly crosswalk at West Street & Battery Place where the comparison was performed for the weekday Midday and PM peak periods.

At the Broadway/Battery Place intersection, the pre-Covid counts were also higher than the November 2020 field counts. The overall factors for the three crosswalks combined at this intersection range from 3.2 during the AM peak period; 3.8 during the Midday peak period; 3.9 during the PM peak period; and 2.6 during the Saturday Midday peak period.

Adjustment to West Street Promenade Pedestrian Counts for Use in EIS

Prior to the analysis of pedestrian conditions on the West Street pedestrian promenade for the EIS, AECOM and NYCDOT should discuss if and how to adjust the during-Covid pedestrian counts collected in November 2020 to reflect pre-Covid conditions. Based on the foregoing discussion, the *overall* adjustment factors computed for the three crosswalks combined at the Broadway/Battery Place intersection during the weekday AM, Midday, PM and Saturday peak periods may be most appropriate to adjust the November 2020 pedestrian counts, since the West Street/Battery Place intersection only includes one crosswalk and the comparison is only done for two time periods.

In addition, since the comparison between pre-Covid and during-Covid conditions only included crosswalk *pedestrian* counts, it is also recommended that the factors developed from the pedestrian counts be used to adjust the November 2020 *bicycle* counts on the promenade.

We seek NYCDOT's approval of these proposed adjustments to the 2020 pedestrian and bicycle counts on the promenade before proceeding with the EIS pedestrian analyses.