

Comment 5: The northwest Bronx is in desperate need of a health clinic. A health clinic would address the needs of thousands of people, provide jobs in health care, and draw many people into the area, which would economically benefit everyone. (Rozankowski)

Response: The project's approximately 27,000 square feet of community facility space has not yet been programmed. The project sponsor would work with community stakeholders to determine the appropriate programming of this space.

Comment 6: Install decorative street lighting, particularly along Jerome Avenue, which is heavily shadowed by the elevated train. (Diaz)

Response: The project's design includes decorative street lighting surrounding the Armory building,

Comment 7: [There has been] no identification as to whether internal design components would reflect the Romanesque architectural characteristics and former use of the building. There's no provision of transparency for the archway facing the elevated train along Jerome Avenue, similar to the fenestration along Reservoir Avenue, which would provide visual access from the elevated train. [There has been] no provision of transparency guarantees for all entrances without historically significant elements. [There has been] no transparent landscape plan for Reservoir Avenue and Barnhill Square that the community can comment on, to assure the newly landscaped area is aesthetically pleasing and appropriate. (Diaz)

Response: Since the project is seeking federal historic preservation tax credits, the proposed cleaning, repair, and alterations to the Armory (which is listed on the State and National Registers of Historic Places) would be undertaken in consultation with the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) and in compliance with the Secretary of the Interior's Standards for Rehabilitation. As the project could potentially involve discretionary actions by New York State, OPRHP may also review the project and the proposed alterations to the Armory under Section 14.09 of the New York State Historic Preservation Act of 1980. Because the Kingsbridge Armory is a New York City Landmark, the proposed project requires a Certificate of Appropriateness (CofA) from LPC. LPC's issuance of a CofA would ensure that the proposed alterations to the Kingsbridge Armory would be appropriate to the historic character and context of this historic building.

These measures are largely incorporated into the design of the project and have been vetted with OPRHP and the National Parks Service through the project's application for federal historic preservation tax credits. Specifically, the project will reflect the building's existing architectural characteristics and former use, the archway facing the elevated train along Jerome Avenue would be transparent, decorative street lighting would be provided outside the Armory, and a preliminary landscape plan has been developed. With regard to the transparency of all non-historic entrances, most entrances are historic and not subject to alteration, however, the developer will consider this request for the non-historic entrance from Reservoir Avenue.

Comment 8: [There has been] no identification as to how the City plans to use the \$5 million acquisition price or annual taxes, which I feel should go towards the development and maintenance of the community facility, and not to the General Fund. (Diaz)

Response: Comment noted.

Comment 9: [There has been] no commitment that parking fees for the garage are eliminated or patrons have the option to validate parking. (Diaz)

Response: This is correct. The redevelopment currently envisions that a fee will be charged for parking.

COMMUNITY BENEFITS AGREEMENT

Comment 10: Until the Related Companies negotiates a legally binding CBA this body must reject this proposal. The CBA we have developed with the Bronx Borough President would make sure that when the Armory is developed, not just Related but the people who live and work here in Kingsbridge and throughout the Bronx would benefit. It is a reasonable and responsible plan and would in no way hinder Related's ability to profitably develop the Armory. Under the CBA, the Armory would be developed in a way that creates living wage jobs for local residents. And those workers would be able to exercise their right to organize without threat or intimidation. Local businesses that already provide many good jobs to local residents would be protected. There would be ample recreational and community space created and there would be construction and retail jobs for Bronx residents. And under the CBA there would be opportunities for locally owned businesses and businesses owned by women and minorities to have a real share in the development. This would be a groundbreaking approach in the Bronx and in New York City. (Applebaum)

KARA stands behind the Bronx Borough President's recommendation to deny the project without a legally-binding CBA. (Pilgrim-Hunter)

The project should be rejected until a binding CBA has been signed. (Byron, Cunningham, Eichler)

The developer has not agreed to a socially equitable CBA. I cannot understand why the developer would not act in good faith with the Bronx and the City as a whole, by not considering the needs of the community. The provisions in the proposed CBA are both fair and negotiable. Among the most important disagreements with the developer is their refusal to assure living wage provisions, defined by Local Law 38 adopted in 2002, as \$10 per hour with health benefits. EDC made it clear in the site RFP that it would favorably view development plans that maximize the number of jobs meeting the City's living wage and health benefit standards. All the community wishes to do is to be a participant in what could be its greatest socioeconomic investment for generations to come. (Diaz)

Response: Comment noted. CBA's are outside the scope of a CEQR analysis.

13 markets within $\frac{3}{4}$ of a mile from the site, and at least 16 that serve the residents within $\frac{3}{4}$ of a mile from the Kingsbridge Armory. In all there are 14 supermarkets and 135 bodegas, fruit stands, etc. within the $\frac{3}{4}$ -mile trade area. In addition, the DEIS identifies 605 convenience goods stores in the $1\frac{1}{2}$ mile radius but does not distinguish the amount of grocery stores. (Pauls)

Response: The DEIS surveyed and analyzed existing food stores within the 1.5-Mile Trade Area. Based on the retail surveys conducted, the DEIS identified 605 convenience goods stores within the 1.5-Mile Trade Area, of which 141 were supermarkets or grocery stores (see page 3-30 of the DEIS or Appendix A, "Socioeconomic Conditions").

The 13 supermarkets discussed in detail in the DEIS do not represent a comprehensive inventory of every supermarket or grocery store within the 1.5-Mile Trade Area. Rather, these 13 supermarkets represent the type of store that would experience the strongest competitive pressure from a potential large chain supermarket, were one to be located within the proposed project. As discussed in the DEIS, these stores are large chain supermarkets with more than 10,000 square feet. As noted above, the analysis focuses on grocery stores in particular, because grocery stores often serve as anchors for retail concentrations.

Comment 17: By utilizing the *Dollars and Cents of Shopping Centers* as a guide they have taken national averages and applied them to the extraordinary circumstances of New York City. Sales volumes in New York City are considerably higher than any national or regional averages. This is due to the extremely high operating costs such as rent, utilities, taxes and wages.

In fact, while the DEIS estimates food store sales at the Kingsbridge Armory at \$41.3 million from the 60,000 square feet of space, the Pathmark supermarket in Co-Op City produces over \$50 million in less space. A typical New York area Costco will produce as much as \$200 million in total volume with over 33 percent derived from food store type merchandise. This is in excess of \$66 million in food sales annually. A typical 60,000 square foot market in New York City will do between \$55 and \$65 million in sales. (Pauls)

Response: The EIS analysis does not apply the national average sales volume; according to the *Dollars and Cents of Shopping Centers: 2008*, the national average for supermarket sales is \$479 per square foot. To estimate potential sales from a 60,000-square-foot supermarket at the project site, the EIS analysis used \$688 per square foot, which is the median sales per square foot amount from the top 10 percent of stores nationally (in terms of sales per square foot) and is a reasonable assumption for analysis. The EIS analysis uses the *Urban Land Institute's Dollars and Cents of Shopping Centers: 2008* as a guide because it is the suggested source for sales volume data cited in the *CEQR Technical Manual*. It should also be noted that the Pathmark supermarket in Co-Op City referenced by the commenter is approximately 62,000 square feet, which is larger than the 60,000-square-foot supermarket analyzed in the EIS.

Comment 18: There is no mention of a viable market study. The DEIS actually states “it is not possible to know exactly who is spending money in the area.” This is especially disturbing to me, as companies around the country spend thousands of dollars to accurately determine their customer base and proper uses, yet it is suggested infeasible in the Bronx. This is critical in terms of determining the best uses for the community and the impact on the surrounding area. This includes the impact of a proposed 60,000 square-foot supermarket will have on the surrounding communities, which have a number of viable supermarkets and grocery stores. (Diaz)

Response: The DEIS includes a detailed analysis of the potential for indirect business displacement due to competition, including a description of retail employment and sales trends, specific types of stores, and an analysis of retail expenditures in the area (see analysis beginning on page 3-12). The quote from the DEIS is incomplete (i.e., words were omitted) and is taken out of context. The statement reads as follows (bold and italics added):

“Capture rates are also affected by an inflow of money from people who do not live in the area. Some of the sales in the Primary Trade Area, for example, may be from people living in other areas of the Bronx, other New York City boroughs, and elsewhere, shopping at stores in the Primary Trade Area. **It is not possible to know exactly who (*residents or non-residents*) is spending money in the area.** This is particularly true for employment-intensive areas such as Fordham Road, where a large portion of shoppers do not live, but rather work in the area.”

The statement was used to explain how capture rate analyses cannot predict with a high level of precision whether sales are coming from residents or workers. It was never meant to indicate that the analysis could not tell where the customer base is located.

Comment 19: [An analysis of the project’s] impact on River Plaza is missing entirely. This key shopping destination includes Target, Marshall’s and Applebees, and is located ¼-mile from the Armory, almost where West Kingsbridge Road becomes West 225th Street. It is crucial to know if this major investment will be affected by the proposed uses at the Armory. (Diaz)

Response: The comment is incorrect. The DEIS contains a detailed analysis of every substantial retail concentration within a 1.5-Mile Trade Area of the project site, including the Broadway/Marble Hill concentration which includes River Plaza (identified as “Area 4” on page 3-19 and in Figure 3-3 of DEIS). In fact, “River Plaza” is explicitly identified on page 3-19. Page 3-32 of the DEIS explicitly states that “Many of the retail concentrations in the 1.5-Mile Trade Area, such as...Broadway/Marble Hill...would continue to draw significant numbers of customers from the local population...Thus, it is unlikely that they would be significantly affected by the proposed project.”

Comment 20: [The project’s potential] impact on Fordham Road and its major chain stores is not clear. (Diaz)

Response: The DEIS contains a detailed analysis for “Area 8: Fordham Road” on Figure 3-3, on page 3-20, and on page 3-34. For reasons cited in these sections and in the competition

analysis more generally, the conclusion is that there is not likely to be significant impacts from displacement of Fordham Road chain stores.

Comment 21: The community does not need a 60,000 square-foot supermarket, when there are a number of viable, successful, union supermarkets within ½ mile of the Armory. (Diaz)

Response: The “need for” a supermarket is outside the scope of CEQR analysis; the analysis in Chapter 3, “Socioeconomic Conditions,” follows *CEQR Technical Manual* guidelines in assessing the potential competitive effects of the proposed project, and conservatively assumes the project would include a 60,000-square-foot supermarket for purposes of analysis. See also the response to Comment 13.

COMMUNITY FACILITIES

Comment 22: [There has been a] lack of assurance from the Department of Education (DOE) that siting of at least two schools occurs. (Diaz)

Response: The only action that relates to the property along West 195th Street is EDC’s demapping application, which will result in an additional 20 feet of land along the south side of West 195th Street currently used as a street. This property is not being disposed to the developed and the developer has no control of its future use or development. Neither the mapping action nor any of the other actions are projected to preclude any future use or development of this property (see DEIS page 2-8).

Comment 23: [There has been] no commitment to develop a community facility adjacent to a school along West 195th Street to assure street life after school hours. [There has been] no identification for non-DOE educational facilities within the Armory, such as space for Lehman College, or practice, rehearsal and performance space for performing arts, as desired by the community. (Diaz)

Response: As described in the DEIS, the project will include approximately 27,000 square feet of community facility space within the Armory, some or all of which can be used by educational facilities. The developer has committed to working with stakeholders to pursue the creation of a viable youth recreation facility inside the Armory. Development adjacent to a school along West 195th Street is outside the scope of the project.

TRAFFIC AND PARKING

Comment 24: There are three unmitigated intersections during peak hours: West Fordham Road-Major Deegan Expressway Northbound Ramp; West Fordham Road-Major Deegan Expressway Southbound Ramp; and West Kingsbridge Road-University Avenue. The first two intersections are already immitigable. The Northbound Ramp also connects at Cedar Avenue and Landing Road, which provide additional northbound and southbound traffic. The Southbound Ramp intersects with the University Heights Bridge to Manhattan. There is also additional development anticipated along Landing Road, which will increase traffic. The DEIS predicts that the southbound and westbound lanes of the intersection of West Kingsbridge Road and University Avenue will triple in terms of traffic delays. This

is a wide intersection with a steady traffic flow. I find it troubling that this will not only become a problem intersection, but it is anticipated there is nothing DOT can do about it. (Diaz)

Response: As the commenter notes, the intersections of the Major Deegan Expressway ramps with Fordham Road are already unmitigatable; given prevailing conditions, any substantial project in the vicinity of this intersection would aggravate the existing traffic congestion and result in impacts. With regard to the intersection of West Kingsbridge Road and University Avenue, the DEIS identifies all practicable mitigation measures to reduce traffic impacts projected for this intersection. One further action not suggested in the DEIS, but available in the future if needed, would be to prohibit left turns from key approaches to the intersection. It was thought that this might be more disruptive to overall neighborhood residents' traffic patterns than the benefits potentially available at this one intersection, so it was not introduced at this time.

Comment 25: There are no traffic studies done for Van Cortlandt Park South at the intersections of the Major Deegan Expressway (Deegan), Bailey and Sedgwick Avenues. The Van Cortlandt Park South exit off the Deegan provides a viable travel alternative given the connection to Goulden Avenue, which is an extremely long stretch of street with only two traffic lights that feeds into the Armory garage. (Diaz)

Response: The scope studied in the DEIS, including the traffic study area, was the subject of a scoping meeting held on October 2, 2008. During that hearing, the Borough President's office requested that the scope of study be enlarged from a ¼-mile radius to a ½-mile radius from the project site, stating that "a ½ mile [study area] will also capture key street intersections for evaluation of vehicular and pedestrian traffic impacts." The intersections now raised as concerns to the Borough President are more than one mile from the site, well beyond the ½-mile radius that the Borough President had stated would be sufficient to evaluate traffic impacts. Most importantly, the analyses conducted for the DEIS do not envision a significant volume of traffic passing through these intersections en route to and from the proposed project, so detailed analyses were not warranted. Finally, these locations were also not requested by the New York City Department of Transportation (NYCDOT) in their review of the scope of work for the DEIS.

Comment 26: The proposal for spillover parking to be mitigated by on-street parking in the community is unacceptable. The anticipated worst-case scenario is that 330 vehicles will need to find on-street parking spaces within the community on Saturday afternoons. One recommendation includes parking on Bedford Park Boulevard, which would cause people to walk 2/3-mile to one mile along train yards to the Armory. (Diaz)

Response: The DEIS uses conservative trip generation factors to estimate the number of vehicles generated by the proposed project. While on-street parking space is available to accommodate projected peak traffic demand within ½ mile from the project site, in reality, the limited number of parking spaces within the project is likely to result in substantially fewer drivers to the site and less parking demand, and substantially more patrons taking public transportation since the site is well served by subway and bus. For

the River Plaza shopping development on 225th Street and Broadway, private automobile trips are much lower than what was anticipated before the project was built, resulting in a highly underutilized parking lot. The DEIS does not include any recommendation that people park along Bedford Park Boulevard; it merely points to the availability of parking there should people need to park there if they cannot find spaces closer to the site. Shoppers who do park there could walk along Goulden Avenue and Reservoir Avenue to get to the Shops at the Armory and would not need to walk along train yards.

Comment 27: Although on-street parking is suggested as a mitigable option for the Saturday parking overflow, “No Standing” is proposed at the same time from 11AM-2PM for West Kingsbridge Road and Jerome Avenue, thus cancelling some proposed on-street parking options, as well as directly impacting community parking. (Diaz)

Response: This mitigation measure results in the loss of approximately three parking spaces, an insignificant number of spaces as compared to the total number of on-street spaces in the area, and only during the Saturday midday peak period. If it is determined that on-street parking should be retained at this location then this intersection would not be mitigated during this period.

Comment 28: Traffic comparisons to Willets Point and Plaza at the HUB are inappropriate. Willets Point is an entirely different community that is isolated by highways, parks and the East River, while Plaza at the HUB has no anticipated start date and was developed in a different economic environment. (Diaz)

Response: Willets Point and Plaza at the HUB data were used only for the purposes of estimating mode split and average vehicle occupancies since the Willets Point and Bronx Hub areas have similar public transportation and roadway network features as the vicinity of the proposed project. The two projects were not used to evaluate traffic conditions at all in the vicinity of the Kingsbridge Armory development. Use of the mode split and average vehicle occupancy data were reviewed with and approved by NYCDOT as being appropriate for the project site.

Comment 29: [There has been] no promise to allow only school-related vehicles, including teacher and school administrative vehicles, along West 195th Street between 2-4 PM on weekdays. [There has been] no commitment to restrict truck access to the ramp leading from West 195th Street to the Armory, particularly during school hours. (Diaz)

Response: This request is not supported by any traffic conclusions of the DEIS. The number of vehicles projected to be generated by the Armory project along West 195th Street during this time is less than three per minute and no significant traffic or pedestrian impacts or safety concerns are projected in this area.

Upon completion of the project, the ramp leading from West 195th Street to the Armory will be used for emergency pedestrian egress only and will not typically be used for truck access.

Comment 30: The Related Companies knows the increase in congestion is going to be significantly worse and admits there's nothing they are willing to do about it—so the traffic congestion that was rated from letter A through F will become an F, the worst possible rating, due to this current plan. (Pilgrim-Hunter)

Response: The detailed traffic analysis included in the DEIS followed the *CEQR Technical Manual* procedures. The DEIS presents a reasonable worst-case description of projected future conditions, consistent with CEQR guidelines; all procedures and analyses were reviewed and approved by NYCDOT and includes a wide array of traffic improvements intended to mitigate significant impacts to the maximum extent possible.

Comment 31: Any large retail use in the area would have a terrible effect on traffic in the area. There's already tremendous traffic on Jerome Avenue. (Sloane)

Response: The DEIS included a detailed traffic analysis at key locations along Jerome Avenue following *CEQR Technical Manual* procedures and was reviewed and approved by NYCDOT. It identified locations that would be significantly impacted and traffic capacity improvements needed to mitigate those impacts to the extent possible.

Comment 32: Adding a warehouse-style, big-box supermarket will significantly increase the impact of this project, significantly increase traffic volumes, and produce even more locations where project impacts cannot be mitigated. The full impact of the proposed 60,000 square foot, big-box supermarket has not been accounted for in the DEIS. The trip generation characteristics assumed in the DEIS are relevant to a shopping center (the DEIS refers to destination retail as inclusive of warehouse supermarket club land use), not a supermarket land use that generates 2 to 4 times the number of trips per square foot of retail space as does an equivalent designation space for the Armory. The Institute of Transportation Engineers *Trip Generation Manual* reports the trip generation rate for a warehouse supermarket [is] about three times that for the destination retail rates used in the DEIS. As a result, the DEIS is fatally flawed and must be fully revised before any action is taken on this project. Correcting for the flawed analysis results in a severe under count of project impacts. This report shows that the project will produce at 16 to 24 percent increase in overall vehicular travel, resulting in 137 more trips in the PM peak hour and 319 more trips midday on Saturdays. (Ketcham)

Response: At this time, the proposed project has unprogrammed retail space; that is, specific tenants have not been identified for any of the space. While, as reflected in Chapter 1, "Project Description," it is possible the program may provide a supermarket use, it is not anticipated to include a warehouse-style big box supermarket. Consequently, the application of a warehouse supermarket use for trip generation purposes is not appropriate. Specifically, a warehouse type supermarket, which is typically larger than 100,000 square feet, would not be feasible within the up to 60,000 square foot space assumed in the EIS. Moreover, based on the information presented in the *Institute of Transportation Engineers (ITE) Trip Generation Manual, 8th Edition*, warehouse or discount supermarkets are free-standing retail stores, and therefore do not reflect the character of the retail space at the project site. Rather, the proposed project would not

procedures and guidelines, identifies significant impacts, and identifies measures needed to mitigate such impacts. Its analyses and findings were fully reviewed and approved by NYCDOT. Comment noted.

Comment 53: There are only 400 spaces for over 500,000 square feet of commercial uses, and that is less than 1 per 1,000 square feet of space. That is far less than the typical standard of 5 spaces per 1,000 square feet recommended by the ICSC and also far less than most of the provisions of the New York City Zoning Code, which typically mandate 3-4 spaces per 1,000 square feet. We suspect that the artificially low availability of parking was guided by the severe traffic impacts of the proposed garage and the impossibility to mitigate impacts of a larger, more appropriate parking garage. (Pauls)

Response: The amount of on-site parking provided is in compliance with the provisions of the New York City Zoning Resolution for the proposed zoning district and appropriate given the project's close proximity to multiple mass transit options.

TRANSIT AND PEDESTRIANS

Comment 54: There is no analysis of the Bx1 and Bx2 bus lines. These are heavily-used buses located three blocks from the site. (Diaz)

Response: Detailed analyses of the five most relevant bus routes in the vicinity of the project site were conducted including the Bx3, Bx9, Bx22, Bx28 and Bx32 routes. Significant impacts were not identified to any of these routes. The Bx28 and Bx32 routes (operating on Jerome Avenue) provide similar north/south connections as the Bx1 and Bx2 routes (operating on Grand Concourse), and have bus-stops located in the immediate vicinity of the project site as compared to the Bx1 and Bx2 stops which are located approximately 3-blocks away. Therefore, it is anticipated that few, if any, of the patrons would use the Bx1 and Bx2 lines and no quantified analysis is warranted.

Comment 55: The DEIS analyzes weekend service to the Armory for the Bx22. The Bx22 does not serve the Armory on the weekends, terminating at either East Fordham Road-Valentine Avenue or Boston Road-Pelham Parkway. (Diaz)

Response: The comment is correct that the Bx22 does not service the project site during weekends. Accounting for this service condition does not alter the DEIS conclusion that the project would not result in significant impacts on bus loadings in the project area. The bus analyses presented in Chapter 14, "Transit and Pedestrians" in the FEIS have been modified to reflect the fact that the Bx22 does not provide Saturday service to the site.

Comment 56: There is no suggested service increase on the BX9, which connects Fordham Road, Riverdale, Kingsbridge and West Farms. Ridership will undoubtedly increase with the advent of the Armory. Also, location of the current BX9 stop on the eastern side of Jerome Avenue will cause traffic delays due to bunching and increased ridership. This should have been considered in the DEIS. (Diaz)

Response: The analysis for Bx9 route identified no impacts on the service conditions based on the CEQR methodology. Therefore, no service increase is warranted on this route as per the CEQR standards. In the event there is a need for service changes in the interim, it would be addressed by NYCT as part of their regular service evaluation.

Comment 57: Install bump outs or neck outs at the northwest corner of Jerome Avenue and West Kingsbridge Road to provide more space for people waiting for area buses, and assure proper traffic flow. (Diaz)

Response: The project sponsor has been discussing this aspect with NYCDOT, and the FEIS analysis includes a bump out/neck down at the northwest corner of West Kingsbridge and Jerome Avenue.

Comment 58: The Kingsbridge Armory project will attract as many as 4,800 pedestrians an hour to the site (Saturday peak hour), ultimately concentrating most of them along Kingsbridge Road, the main entrance to the site. Combined with upwards of 900 more cars and trucks each hour weekdays and 1,300 on Saturdays (and far more when adjusting for a supermarket), the Kingsbridge community will clearly face increased hazards as more conflicts occur between pedestrians and vehicles. The result can only be a significant increase in pedestrian injuries and fatalities. These consequences are ignored in the DEIS. (Note that pedestrian-vehicle accidents will increase in direct proportion to any increase in traffic from the proposed project. This assumption is standard engineering practice for NYSDOT.) Traffic simulation, which includes pedestrian movements, would help to answer this question ignored in the DEIS. (Ketcham)

Response: Consistent with the requirements of the *CEQR Technical Manual*, the DEIS includes a detailed assessment of pedestrian conditions in the study area with increased pedestrian and vehicle levels due to the proposed project (please refer to Chapter 14, “Transit and Pedestrians”). In addition, the DEIS includes an assessment of pedestrian safety conditions as well as the impact of the proposed project on school safety in Chapter 14, “Transit and Pedestrians.” It should be noted that the assessment of potential environmental impacts (including the impacts on traffic and pedestrian conditions) for the proposed project were based on CEQR procedures; these procedures do not assume an increase in pedestrian-vehicle accidents in direct proportion to any increase in traffic.

Comment 59: Pedestrian impacts appear to have been under-reported by at least 20 percent and perhaps much more. The assignment of pedestrians entering and leaving the site in this figure, while understated, actually disappears near the site; for example, at the northwest corner of Jerome and Kingsbridge where 97 trips vanish. Also, the assignment of pedestrian trips do not reflect the large number of shoppers who will be forced to park on-street, some at great distances from the Armory; they are simply not represented in the DEIS or in Appendix C. (Ketcham)

Pedestrian impacts are 20 percent or more under reported in the DEIS. (Pilgrim-Hunter)

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Pedestrian impacts are 20 percent or more under reported in the DEIS. (Pilgrim-Hunter)

Response: All of the pedestrian trips—including the large number of shoppers who will park on-street— have been accounted for in the analysis (see the figures contained in Appendix C). As identified in Chapter 14, “Transit and Pedestrians,” based on the results of the pedestrian analysis, the proposed project would not result in any significant adverse pedestrian impacts.

Comment 60: The DEIS must provide diagrams showing pedestrians entering and leaving the site at all proposed entrances. (Ketcham)

Response: Comment noted. The potential impacts due to the project generated pedestrian trips are assessed for sidewalks, crosswalks, and corners. The peak hour pedestrian volumes at these elements are presented in the figures contained in Appendix C.

Comment 61: It is estimated that 135 vehicles will be traveling to and from the Armory weekdays between 3-4 PM. Students will still be exiting school at this time. How will this impact student pedestrian flow? (Diaz)

Related is ignoring the impacts of traffic on nearby schools, playgrounds, churches, public libraries, and in particular traffic congestion/pedestrian safety. (Pilgrim Hunter)

Also largely ignored are the impacts of traffic on nearby sensitive sites like schools, playgrounds, churches, public libraries, etc. For example, P.S. 86 is directly across West 195th Street from the northeast corner of the Armory. The DEIS reports approximately the same number of auto trips during the 3 to 4 pm hour as during the evening peak traffic hour when students leave P.S. 86, thereby increasing the hazards borne by residents of the Kingsbridge community, yet the DEIS reports no impact. Similarly, the heavily used St. James Park, just a block south of the site down Jerome Avenue, where families take their young children every day is likewise jeopardized by any increase in traffic volumes. And these effects are true all over this heavily populated area. The EIS must account for these impacts on a site by site basis, not just assert that P.S. 86 is safe. (Ketcham)

Response: The commenter’s assertion that the impacts of traffic on nearby sensitive sites like schools were largely ignored is not correct. The DEIS included a detailed assessment of pedestrian safety conditions as well as the impact of the proposed project on school safety (please refer to Section F, “Pedestrian Safety” in Chapter 14, “Transit and Pedestrians”). An assessment of pedestrian safety conditions was performed for 18 intersections in the study area based on the most recent 3-year accident data obtained from the New York State Department of Transportation (NYSDOT). Based on this assessment, two of the study area intersections (including the intersection of Jerome Avenue at West Kingsbridge Road) were identified as high-accident locations based on the CEQR criteria. The DEIS identified additional safety measures for the intersection of Jerome Avenue at West Kingsbridge Road to enhance pedestrian safety.