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TECHNICAL MEMORANDUM

Proposed Modifications to the 2006 GPP Approved Jacob K. Javits Convention Center Expansion and Renovation

May 3, 2016

A. INTRODUCTION AND OVERVIEW

The renovation and expansion of the Jacob K. Javits Convention Center (Convention Center) was included as a component of the Proposed Action in the 2004 Final Generic Environmental Impact Statement ("FGEIS") for the No. 7 Subway Extension-Hudson Yards Rezoning and Development Program. A 2006 Technical Memorandum analyzed changes to the FGEIS-Convention Center expansion, which included a new truck marshalling facility, development of a Convention Center hotel on the east side of Eleventh Avenue between West 35th and West 36th Street (35/36 Street Site), a residential and commercial development west of Eleventh Avenue between 33rd and 34th Streets (33/34 Development Site), and certain transportation improvements. The project was approved as part of a General Project Plan (GPP) on July, 18 2006 (2006 GPP Approved Project). The purpose of this Technical Memorandum is to examine proposed modifications to the 2006 GPP Approved Project (Proposed Modifications) and determine whether such modifications would result in any potential significant adverse environmental impacts not previously identified for that project.

Following the approval of the 2006 GPP, the Convention Center Development Corporation (CCDC) initially proceeded with reinvestment in its existing facility including substantial renovations and the provision of an approximately 80,000 square foot (sf) temporary exhibition space (which included the closing of West 39th Street consistent with the 2006 Technical Memorandum). No other expansion has occurred at the Convention Center, the proposed truck marshalling facility has not yet been developed, and no development has occurred on either the 33/34 Development Site or on the 35/36th Street Site. The Proposed Modifications are the result of reevaluation of the design proposed and analyzed in 2006 and would implement a more limited and more efficient expansion of the Convention Center than was previously proposed and analyzed in 2006. No development or action is being proposed on either the 33/34 Development Site or on the 35/36 Street Site.

The New York State Urban Development Corporation (UDC), doing business as Empire State Development (ESD), on behalf of its subsidiary, the CCDC, is the lead agency for environmental review determinations associated with the Proposed Modifications.

PRINCIPAL CONCLUSION

As set forth in greater detail below, this Technical Memorandum concludes that the Proposed Modifications would not result in any significant adverse environmental impacts not previously identified for the 2006 GPP Approved Project. Therefore, no Supplemental Environmental Impact Statement is required in connection with ESD's review and consideration of the Proposed Modifications.

B. BACKGROUND

2004 FGEIS

The 2004 FGEIS analyzed four large-scale planning initiatives for the far West Side of Manhattan, including an expansion of the Jacob K. Javits Convention Center. The Convention Center expansion was to expand north to the southerly side of West 42nd Street where a new hotel was to be built on the west side of Eleventh Avenue between West 41st and West 42nd Streets. The existing block west of Eleventh Avenue between West 33rd and West 34th Streets, currently used by the Convention Center for truck and automobile parking and storage of empty return trailers, was to be the site of a multi-level, partially below-grade truck marshalling facility. New, passive, publicly accessible open space was to be developed on the roof of the expanded Convention Center and above the partially below-grade marshalling facility located between West 33rd and West 34th Streets.

2006 TECHNICAL MEMORANDUM

A Technical Memorandum dated July 11, 2006 analyzed proposed changes to the expansion and renovation of the Convention Center, and a GPP was approved on July, 18 2006. The 2006 GPP Approved Project included a Convention Center expansion only as far north as West 40th Street. Within this expansion, a truck marshalling facility with security screening, unloading, loading, queuing, parking and storage was to be provided above grade along Twelfth Avenue south of West 40th Street, rather than partially below grade west of Eleventh Avenue between West 33rd and West 34th Streets. Approximately 3.2 acres of passive open space was to be provided along the Eleventh Avenue and West 34th and West 40th Street frontages of the Convention Center.

Development on the 33/34 block was proposed for residential and commercial use at a density and configuration consistent with that of the adjacent Special Hudson Yards District. Provision of 1.25 acres of publicly accessible open space was proposed on the site, including 0.5 acres of active open space. Parking for 500 vehicles was also proposed.

The 2006 GPP Approved Project also included the development of a Convention Center hotel on the east side of Eleventh Avenue between West 35th and West 36th Street, rather than on the west side of Eleventh Avenue between West 41st and West 42nd Streets. It was anticipated that the maximum number of rooms would be 1,500.

C. PROPOSED MODIFICATIONS

PURPOSE AND NEED FOR THE PROPOSED MODIFICATIONS

The Convention Center, as it exists today, contains approximately 859,000 gross square feet (gsf) of exhibition space (80,000 gsf of which is Javits North, a temporary structure erected on the north side of West 39th Street), 30,000 gsf of meeting room space, and approximately 959,000 gsf of pre-function, support, and staging areas.

The purpose and need for the expansion of the Convention Center remains unchanged since 2006. The Convention Center lacks a sufficient amount of contiguous prime exhibition space, has no ballroom space, and is deficient in meeting room space, placing it at a serious competitive disadvantage. The Convention Center also lacks an efficient truck marshalling facility, which is problematic in the context of its dense urban setting. Although the block between Eleventh and Twelfth Avenues and West 33rd and West 34th Streets is used for some truck marshalling and storage, on significant show dates throughout the year the larger tractor trailer trucks queue on the streets surrounding the Convention Center and Hudson Yards district, adding to traffic congestion. The proposed truck marshalling facility is a unique opportunity to remove all tractor-trailers from parking on local streets, allow all trailers to be kept on site, greatly increasing the efficiency of loading/unloading operations.

Since the approval of the 2006 GPP project, further efficiencies have been identified that would allow for the CCDC to provide a more competitive and functional Convention Center. The Proposed Modifications would include a more compact expansion layout, and a smaller but more efficient truck marshalling facility that would accommodate even more trucks than the 2006 expansion plan. The Proposed Modifications would thus better serve the surrounding community while enhancing the use and efficiency of the Center.

During this time of design reevaluation, the CCDC has worked to address the upgrades and renovations necessary to bring the original facility into a state of good repair. In addition, the temporary pavilion between 39th and 40th Streets, called Javits North, has supplemented and enhanced the existing exhibit space. The closure of West 39th Street between Eleventh and Twelfth Avenues has improved internal circulation and facilitated on-site operations. The utility relocation associated with the closure of West 39th Street has yet to be completed but would be implemented with or without the Proposed Modifications.

Table 1 provides a comparison of project elements associated with the 2006 GPP Approved Project and the Proposed Modifications.

Table 1
Comparison of 2006 and 2016 Program Elements (square feet)

Project Element	2006 GPP Approved Project	2016 Proposed Modifications	Changes In Development Program from 2006 to 2016
Javits Convention Center Expansion			
Exhibition Space (sf)	275,000	92,819	-182,181
Meeting Rooms (sf)	180,000	49,776 ¹	-130,224
Ballroom (sf)	65,000 ²	58,087 ³	-6,913
Prefunction/Back of House (sf)	990,000	370,000	-620,000
Truck Marshalling (sf)	580,000	480,311 ⁴	-99,689
Open Space (acres)	3.2 (at grade)	0.6	-2.6
33/34 Street Development Site			
Residential (sf)	1,000,000	0	-1,000,000
Office (sf)	1,450,000 ⁵	0	-1,450,000 ⁵
Retail (sf)	18,240	0	-18,240
Open Space (acres)	1.25	0	-1.25
35/36 Street Site			
Hotel (rooms)	1,500	0	-1,500
Notes:	¹ The new meeting room level would include approximately 58,386 sf of outdoor space dedicated to Convention Center users. ² Ballroom/swing exhibition space ³ Ballroom/swing meeting room space ⁴ Includes approximately 20,000 sf dedicated to NYS police parking and associated use. ⁵ The 2006 Technical Memorandum conservatively assumed 1,660,000 sf of office space on the 33/34 Development Site.		
Sources:	2006 GPP, CCDC		

As shown in the table, the Proposed Modifications would result in a considerable reduction of space with respect to all project elements when compared to the 2006 GPP Approved Project. This includes an approximately 940,000 sf reduction in proposed additional convention center space, an approximately 100,000 sf reduction in proposed truck marshalling facility space, an approximately 2,600,000 sf reduction in proposed residential and commercial development, and the elimination of 1,500 proposed hotel rooms.

PROPOSED MODIFICATIONS TO THE CONVENTION CENTER EXPANSION

PROJECT COMPONENTS

The Proposed Modifications would permanently extend the Convention Center facility north to West 40th Street (see **Figure 1**). The connecting portion of the existing temporary facility between West 38th and West 39th Streets and the main Javits North structure would be demolished to accommodate the new construction.

Convention Space

The 2006 GPP Approved Project included a Convention Center expansion up to seven levels with a maximum height of approximately 210 feet. The smaller, more efficient design under the Proposed Modifications would expand the Convention Center to 5 levels with a maximum height of approximately 179 feet (see **Figures 2, 3 and 4**). The Proposed Modifications would add approximately 92,819 square feet of exhibition space, 49,776 square feet of meeting room space, 58,087 square feet of ballroom space, 370,000 square feet of pre-function, back of house and core space, a 480,311 square foot truck marshalling facility, and 58,386 square feet of private outdoor space for Convention Center users, plus 64,489 square feet of green roof. As shown earlier in Table 1, the Proposed Modifications would result in a considerable reduction of space and building height with respect to all project elements when compared to the 2006 GPP Approved Project. In addition, approximately 0.6 acres of passive open space would be included along Eleventh Avenue.

Truck Marshalling

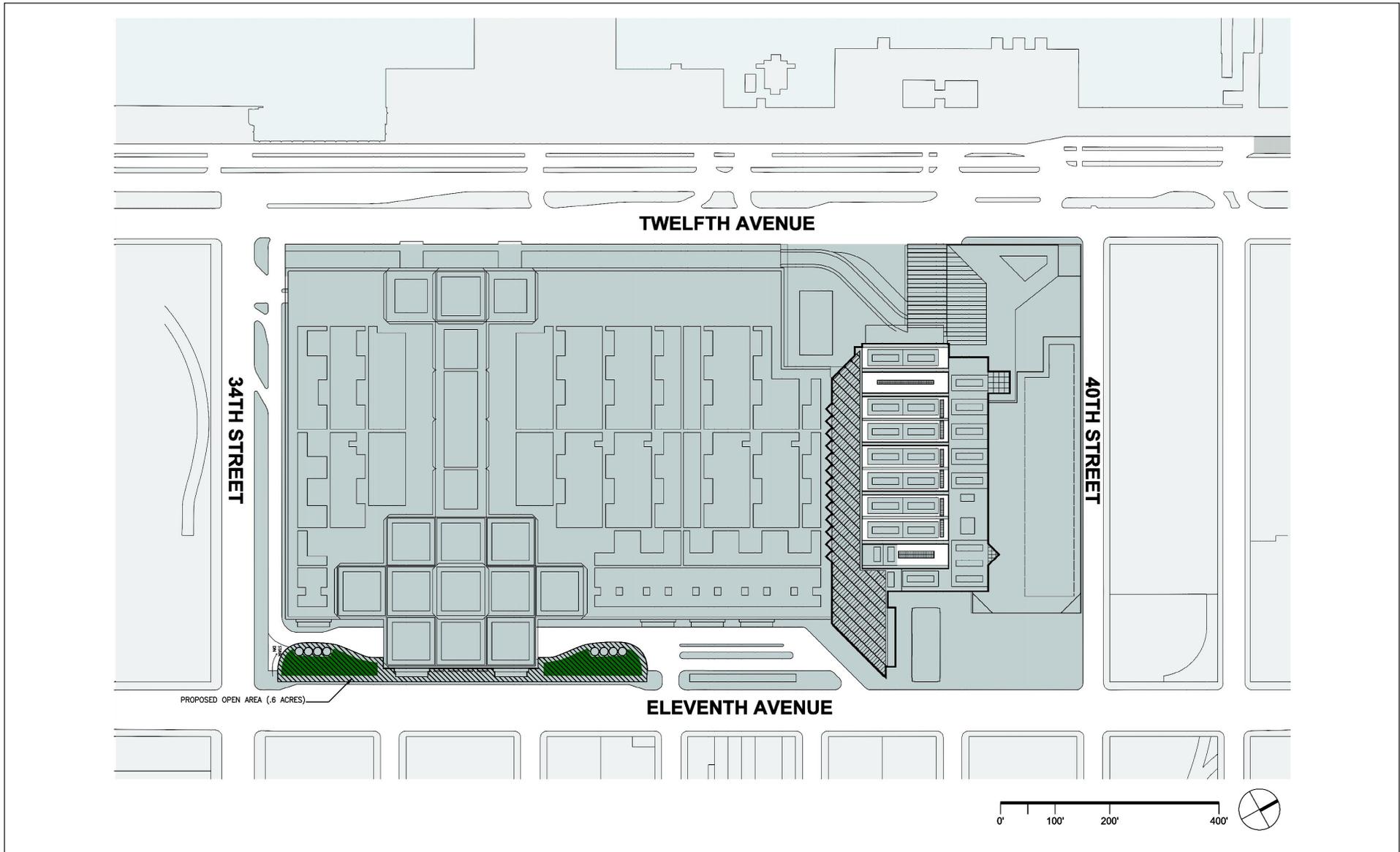
The Convention Center currently uses the block between West 33rd and West 34th Streets and Eleventh and Twelfth Avenues for some over-the-road truck parking and the storage of trailers that require as many as six trips back and forth over the local streets to the loading docks during a show. Truck marshalling currently takes place along Eleventh and Twelfth Avenues, West 34th Street, and nearby City streets. The trucks pull out when they are called, line up on Twelfth Avenue in a standing lane provided for that purpose, and enter the building from its northern end to reach the loading docks. This condition is exacerbated by the lack of loading dock capacity. The Proposed Modifications would eliminate this condition.

As with the 2006 GPP Approved Project, the Proposed Modifications include the construction of a new above-grade multi-level truck marshalling facility located along Twelfth Avenue south of West 40th Street. The 2006 GPP Approved Project proposed a 580,000 gsf marshalling facility containing seven levels. The Proposed Modifications include a 4-level, approximately 480,311 gsf marshalling facility (approximately 100,000 sf smaller than proposed in 2006). However, with a more efficient design, the Proposed Modifications can actually accommodate more trucks in less time compared with the 2006 plan, while eliminating the need for curbside holding lanes.

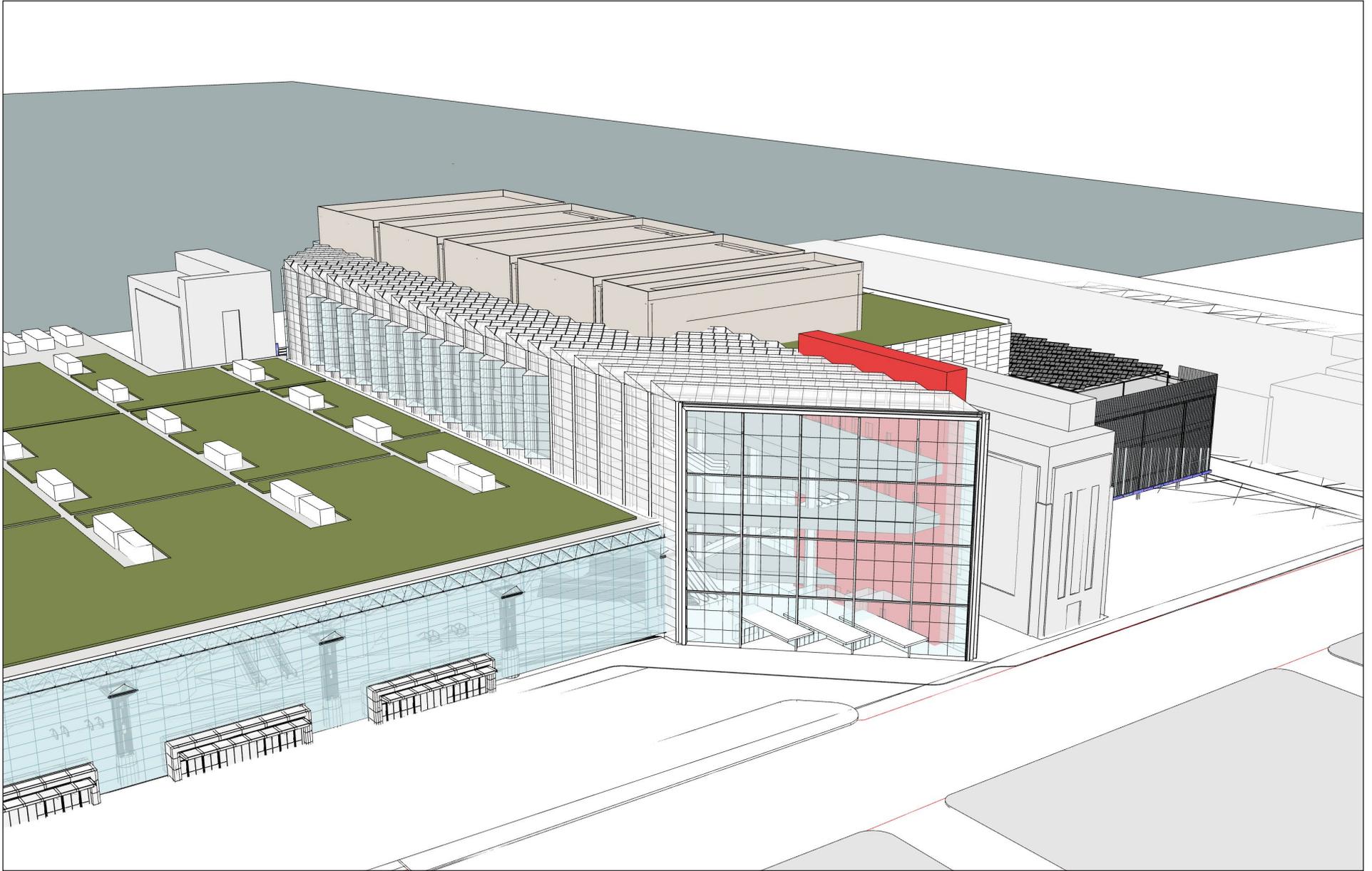
All trucks would enter the marshalling facility just south of 40th Street—slightly north of the existing Convention Center truck entrance at West 39th Street (see **Figure 5**). Compared to existing operations as well as with the 2006 GPP Approved Project, the Proposed Modifications provide the added efficiency of an additional exit point toward the north opposite the Quill Bus Depot on West 40th Street. By bringing the trucks closer to the Lincoln Tunnel entrance, this is expected to further reduce traffic on local streets, reduce traffic in the loading dock areas, and minimize congestion at the 34th Street truck exit.

FACILITY PLANNING AND DESIGN

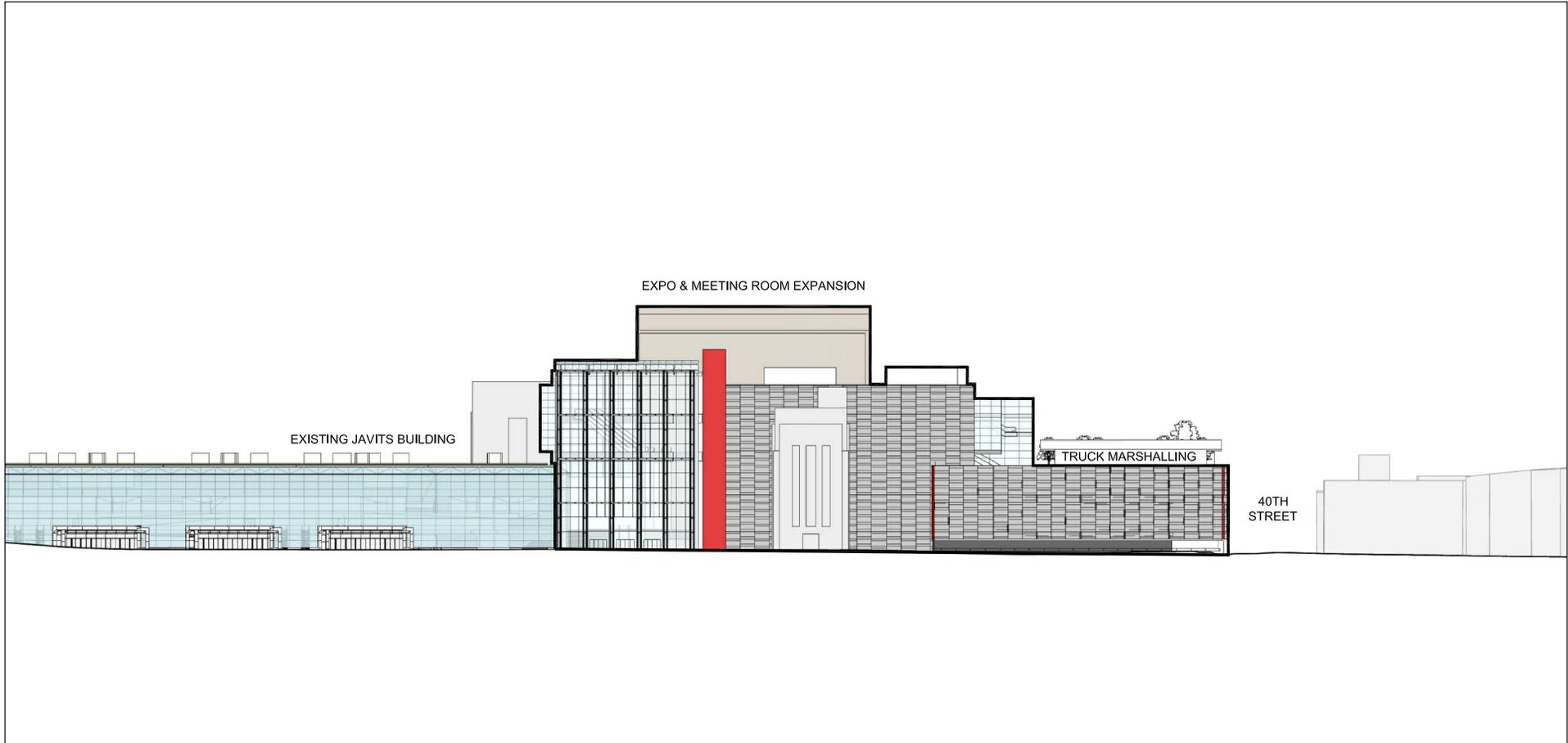
The Proposed Modifications would create a new entry pavilion to provide access and entry off of the Level 2 inner roadway/plaza. This area, an extension of the existing Level 2 Concourse, would house or connect to all of the pre-function and registration space required by the new exhibition, meeting room, and ballroom functions. The entry pavilion would be accessed through a new vestibule as well as existing vestibules that were created as part of the main building's renovation, thereby dispersing pedestrian traffic.



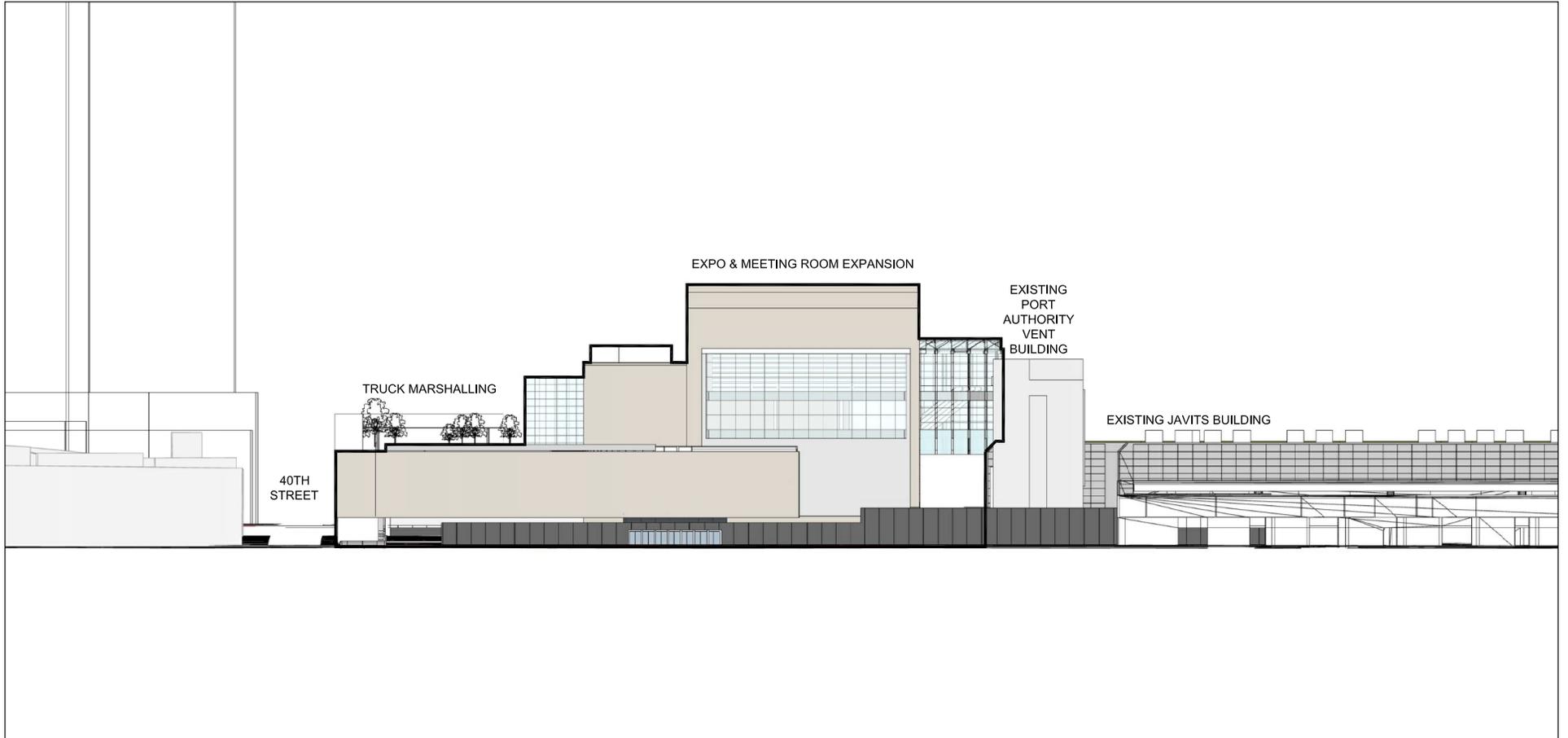
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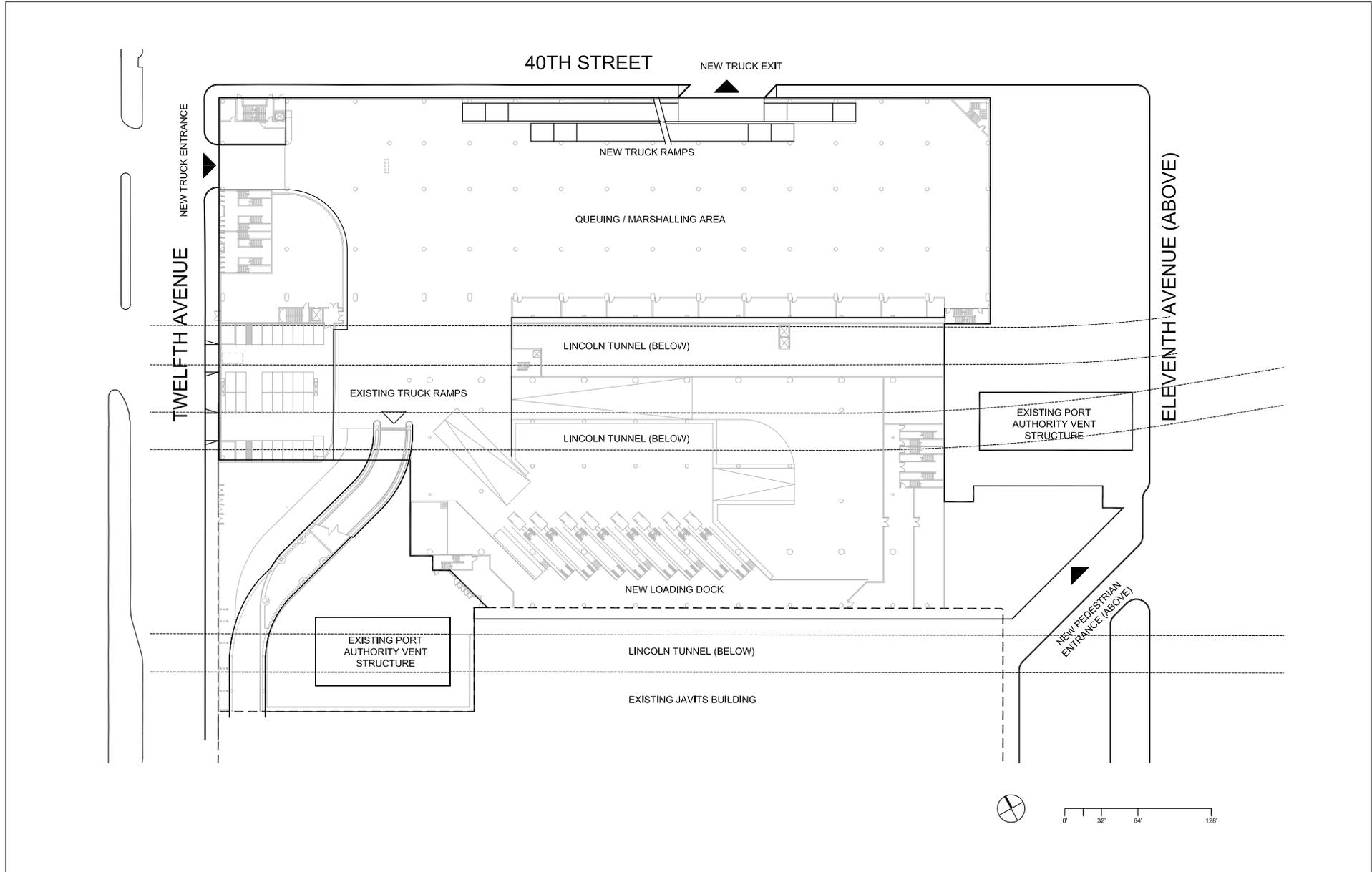
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The Proposed Modifications would incorporate some of the design elements used in the renovations of the existing facility, such as stainless steel/metal panels and a glass curtain wall system. The northern façade would be more opaque and translucent than the other facades. The western façade would feature large windows overlooking the Hudson River from the new ballroom, meeting rooms and pre-function corridors. The southern façade would bring in natural light through a series of saw toothed roof clearstories. The pre-function and entry pavilion on Eleventh Avenue would feature large southeast facing windows with views towards the City and inner roadway/plaza. All floors and internal circulation would be visible from the street so as to animate the building as well as the public realm.

Landscaped open space elements would include trees, benches, and stairs connecting the drop-off area to the West 34th Street/Eleventh Avenue corner bringing pedestrians travelling to/from the No. 7 Subway directly into the entry area. This area would provide front-of-house reception and registration along with catering and convention support. It is intended that this area be furnished with public amenities including seating areas.

As with the 2006 GPP Approved Project, the Proposed Modifications would construct the new levels around the existing Lincoln Tunnel ventilation structures near Twelfth Avenue and West 38th Street and Eleventh Avenue and West 39th Street. The Proposed Modifications would include a 30-foot setback around the ventilation structures.

SUSTAINABLE DESIGN

As with the 2006 GPP Approved Project, the current Proposed Modifications would incorporate sustainable design features and Leadership in Energy and Environmental Design (LEED). The goal is to obtain, at a minimum, a LEED Silver rating with specific requirements to comply with Optimize Energy Performance credits.

TRANSPORTATION IMPROVEMENTS

The Proposed Modifications would include the same minor transportation improvements that were included in the 2006 GPP Approved Project. Specifically, these improvements include:

- Twelfth Avenue and West 33rd Street: Install a new signal to control northbound and westbound traffic. This signal would facilitate westbound turns from West 33rd Street onto Twelfth Avenue. Southbound Twelfth Avenue would not be controlled by this signal.
- Twelfth Avenue and West 34th Street: Minor signal timing changes would be made at this intersection.
- Twelfth Avenue and West 39th Street: The existing median would be modified to construct a second northbound left turn only lane. In addition, minor signal timing modifications would be made at this intersection. Pedestrians would be prohibited from crossing at this intersection and would cross one block north at West 40th Street.
- Eleventh Avenue at West 33rd Street: Daylighting (removal of parking) would be provided on westbound West 33rd Street during the PM peak hour.
- Eleventh Avenue and West 42nd Street: Minor signal timing changes would be made at this intersection.

D. POTENTIAL FOR SIGNIFICANT ADVERSE ENVIRONMENTAL IMPACTS FROM PROPOSED MODIFICATIONS

The purpose of this Technical Memorandum is to examine the Proposed Modifications and determine whether the changes would result in any significant adverse environmental impacts not previously identified for the 2006 GPP Approved Project. The following analyses compare the potential for impacts as a result of the Proposed Modifications with the assessment of potential impacts for the 2006 GPP Approved Project.

LAND USE, ZONING AND PUBLIC POLICY

The Proposed Modifications include a more limited expansion of the Convention Center than the 2006 GPP Approved Project. Development on the 33/34 Development Site and 35/36 Street Site is not a part of Proposed Modifications and these parcels are assumed to remain in their current condition until future opportunities for these parcels are identified and assessed.

Land use patterns facilitated by the Special Hudson Yards District have been firmly established, and the completion of Convention Center expansion as set forth in the Proposed Modifications would not alter the well-established land use pattern or affect zoning and public policy. Therefore, the Proposed Modifications would not result in any significant adverse impacts on land use, zoning and public policy not previously identified for the 2006 GPP Approved Project.

SOCIOECONOMIC CONDITIONS

The Proposed Modifications would not cause the direct displacement of any existing businesses. The Proposed Modifications would not introduce a new residential or commercial population to the study area and therefore does not have the potential to result in significant adverse impacts to socioeconomic conditions not previously identified for the 2006 GPP Approved Project.

COMMUNITY FACILITIES AND SERVICES

The Proposed Modifications would not create in any increase in residential units resulting in additional demand, and, therefore, would not have the potential to result in any significant adverse impacts to Community Facilities not previously identified for the 2006 GPP Approved Project.

OPEN SPACE AND RECREATION

The 2006 GPP Approved Project would have provided approximately 3.2 acres of passive open space along the Eleventh Avenue and West 34th and West 40th Street frontages of the expanded Convention Center and 1.25 acres of public open space (including 0.5 acres of active open space) at the 33/34 Development site. Since the Proposed Modifications do not include development on 33/34 Development Site, the associated 1.25 acres of public open space on that site would not be built.

The Proposed Modifications would not result in any increase in residential units or additional workers resulting in additional demand. Nonetheless, the Proposed Modifications would include approximately 0.6 acres of publicly accessible passive open space along Eleventh Avenue, as well as approximately 58,386 square feet of private open space within the Convention Center for visitors to the facility.

In summary, no new demand on publicly accessible open spaces would be created by the Proposed Modifications and there would be no significant adverse impacts with respect to open spaces not previously identified for the 2006 GPP Approved Project.

SHADOWS

The Proposed Modifications do not include any development on the 33/34 Development Site or the 35/36 Site and the proposed Convention Center expansion would be smaller than that analyzed in the 2006 Technical Memorandum. Therefore, the Proposed Modifications would not have the potential to result in any significant shadow impacts not previously identified for the 2006 GPP Approved Project.

HISTORIC RESOURCES

As with the 2006 GPP Approved Project, the Proposed Modifications do not have the potential to result in significant adverse impacts to historic resources.

URBAN DESIGN AND VISUAL RESOURCES

As with the 2006 GPP Approved Project, the Convention Center under the Proposed Modifications would include an all clear glass street wall, covered arcade and enhanced pedestrian and open space features which would emphasize the structure's connection with Eleventh Avenue and the adjacent areas of Hudson Yards to the east of Eleventh Avenue (see **Figure 2**). The transparent glass façade would tie the Convention Center to street activities, and create a new visual environment along the west side of Eleventh Avenue.

The Proposed Modifications would not result in any significant adverse impacts to urban design or visual resources not previously identified for the 2006 GPP Approved Project.

NEIGHBORHOOD CHARACTER

The Proposed Modifications represent a more compact expansion of the Convention Center and a smaller, but more efficient truck marshalling facility than the 2006 GPP Approved Project. As a result, the Proposed Modifications would be more compatible with the surrounding community and would not result in any significant adverse impacts to neighborhood character not previously identified for the 2006 GPP Approved Project.

NATURAL RESOURCES

Since the current Proposed Modifications would result in an even smaller incremental increase in Convention Center facilities than the 2006 GPP Approved Project, there would be no potential for adverse impact on natural resources not previously identified for the 2006 GPP Approved Project.

HAZARDOUS MATERIALS

The lands underlying the Convention Center have an urban, manufacturing, and rail yard history. Prior Phase II testing indicates soil and groundwater conditions typical of urban fill with Semi-Volatile Organic Compounds (SVOCs) and metals. The 2006 GPP Approved Project established that proper management and the creation and implementation of a Construction Environmental Protection Programs (CEPP) would eliminate the potential for any significant adverse hazardous materials impacts during the operational phases of the Convention Center. The CEPP would also be implemented for the Proposed Modifications and, as a result, there would be no significant adverse impacts from hazardous materials not previously identified for the 2006 GPP Approved Project.

WATERFRONT REVITALIZATION PROGRAM

The 2006 Technical Memorandum concluded that the 2006 GPP Approved Project was consistent with the policies of waterfront revitalization. Since the Proposed Modifications include an expansion that is more limited compared to the 2006 GPP Approved Project, the Proposed Modifications would not result in any significant adverse impacts to the waterfront revitalization program not previously identified for the 2006 GPP Approved Project.

INFRASTRUCTURE

With a more limited Convention Center expansion than the 2006 GPP Approved Project and no new development on the 33/34 Development Site or 35/36 Street Site, the Proposed Modifications would not result in any significant adverse impact on infrastructure not previously identified for the 2006 GPP Approved Project.

SOLID WASTE AND SANITATION SERVICES

The Convention Center would continue to privately handle its solid waste and there is no change in the estimate of solid waste generation as compared with the 2006 GPP Approved Project. In addition, since no new development on the 33/34 Development Site or 35/36 Street Site is currently proposed, the Proposed Modifications would not create any additional demand on municipal sanitation services. Thus, the Proposed Modifications would not result in any

significant adverse impacts on solid waste and sanitation services not previously identified for the 2006 GPP Approved Project.

ENERGY

The Proposed Modifications involve a more limited expansion of the Convention Center than the 2006 GPP Approved Project, and do not include new development on the 33/34 Development Site or 35/36 Street Site. Therefore, the Proposed Modifications would result in less demand for energy than the 2006 GPP Approved Project and would not result in any significant adverse impacts on energy not previously identified for the 2006 GPP Approved Project.

TRANSPORTATION

An analysis was conducted to determine whether the Proposed Modifications would have the potential to result in any new significant adverse transportation impacts not previously identified for the 2006 GPP Approved Project.

DEVELOPMENT PROGRAM TRIP INCREMENT COMPARISON

As shown in **Table 1** above, the Proposed Modifications would be developed at a smaller scale than the 2006 GPP Approved Project. Therefore, the changes to the development program for the Proposed Modifications would result in a smaller trip increment when compared to the 2006 GPP Approved Project. In addition, because the Proposed Modifications would not include the development of the 33/34 Development Site or the 35/36 Street Site, the trip increments for those components of the 2006 GPP Approved Project were removed as project-generated increments when evaluating the potential impacts of the Proposed Modifications.

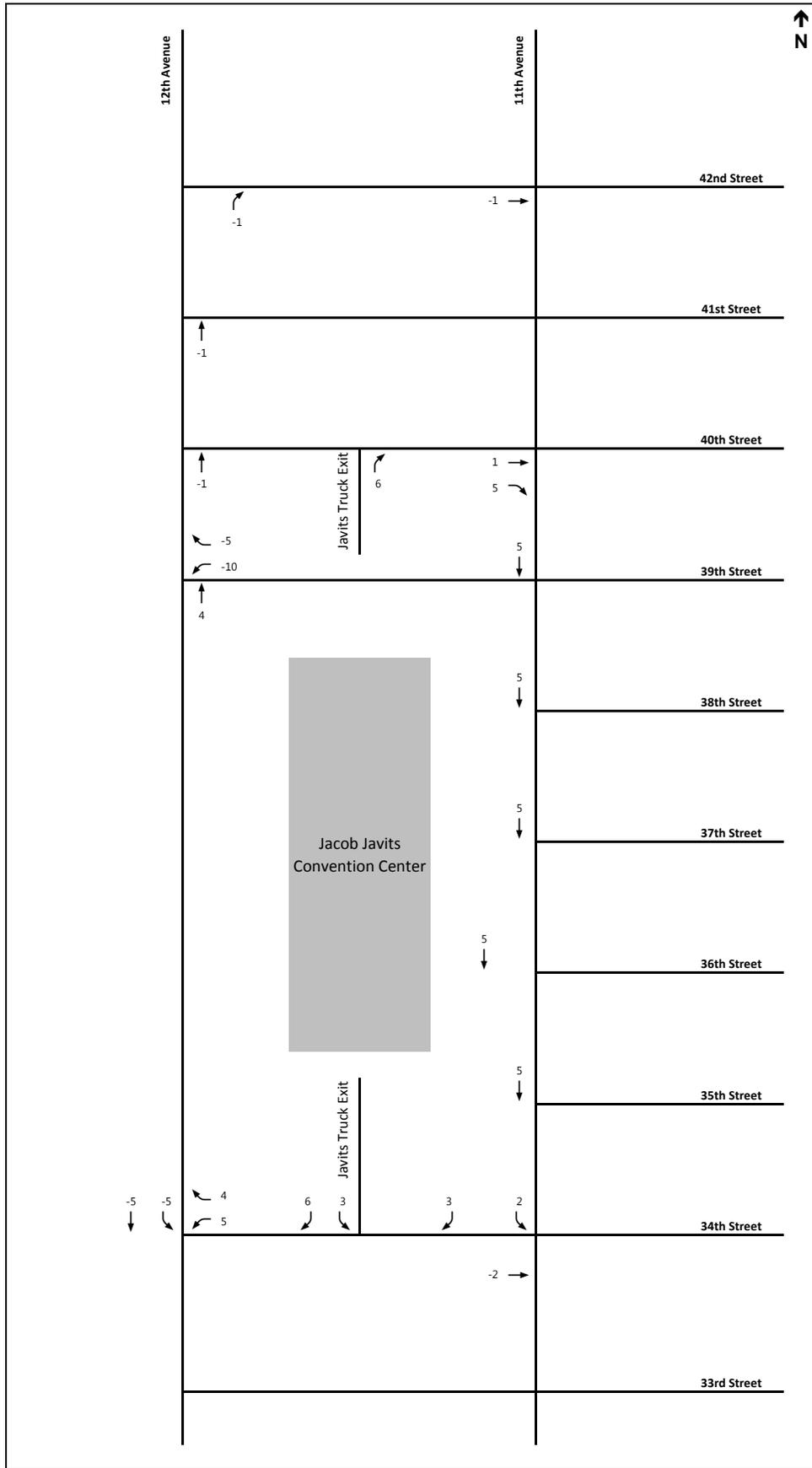
MODIFIED OPERATION OF TRUCK MARSHALLING FACILITY TRIP INCREMENT COMPARISON

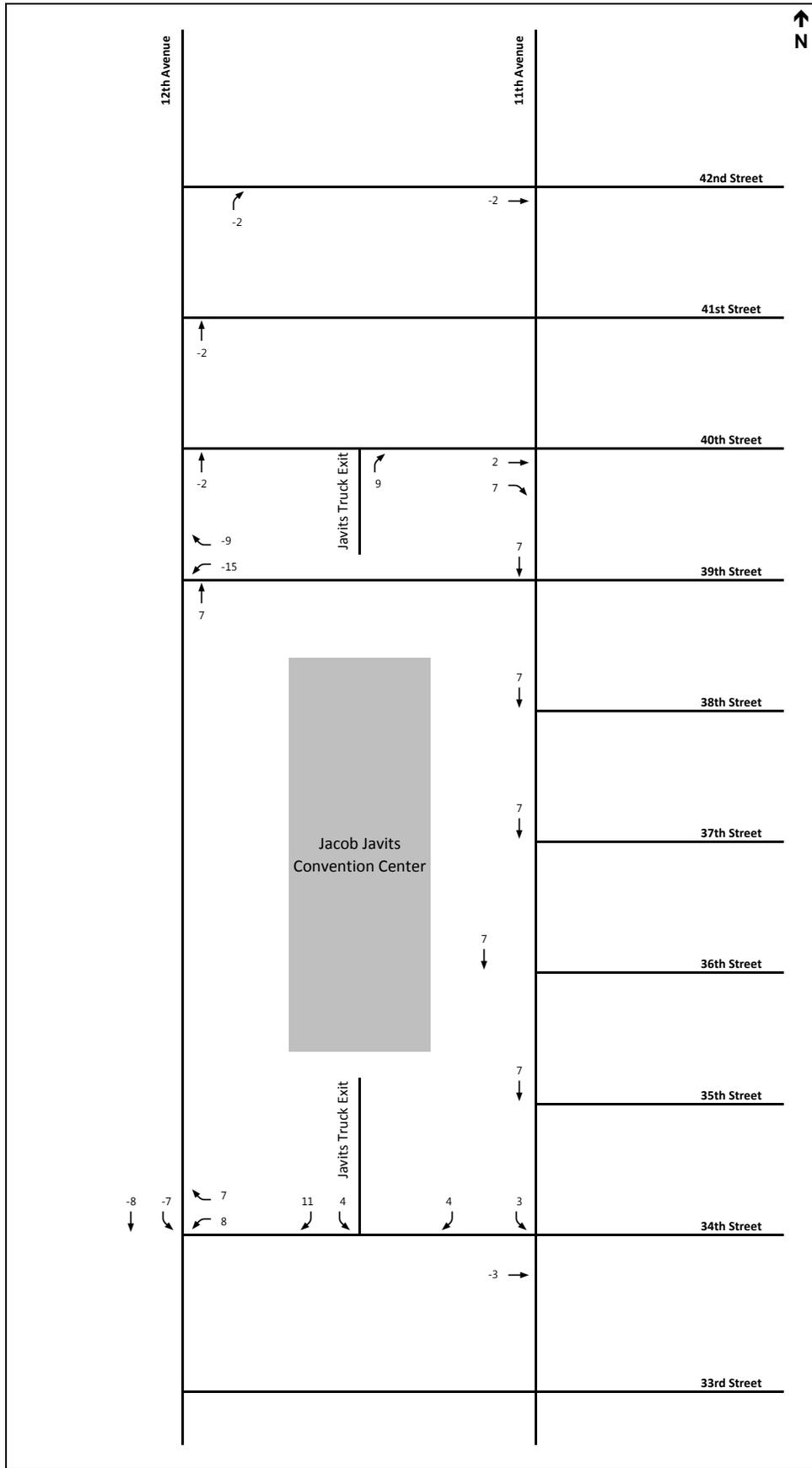
The Proposed Modifications, as with the 2006 GPP Approved Project, include an above-ground, multi-story truck marshalling facility along the western side of the existing Convention Center. The Proposed Modifications reflect a truck marshalling facility that would be more efficient, smaller, and allow for greater flexibility in providing for two egress points rather than only one location as with existing conditions and in the 2006 GPP Approved Project. Fewer trucks would exit onto West 34th Street just east of Twelfth Avenue at the existing exit driveway with a new exit onto West 40th Street between Eleventh and Twelfth Avenues opposite the Quill Bus Depot allowing them to go directly to the Lincoln tunnel entrance or down Eleventh Avenue. **Figures 6, 7, and 8** illustrate the reassignment of trucks due to these changes.

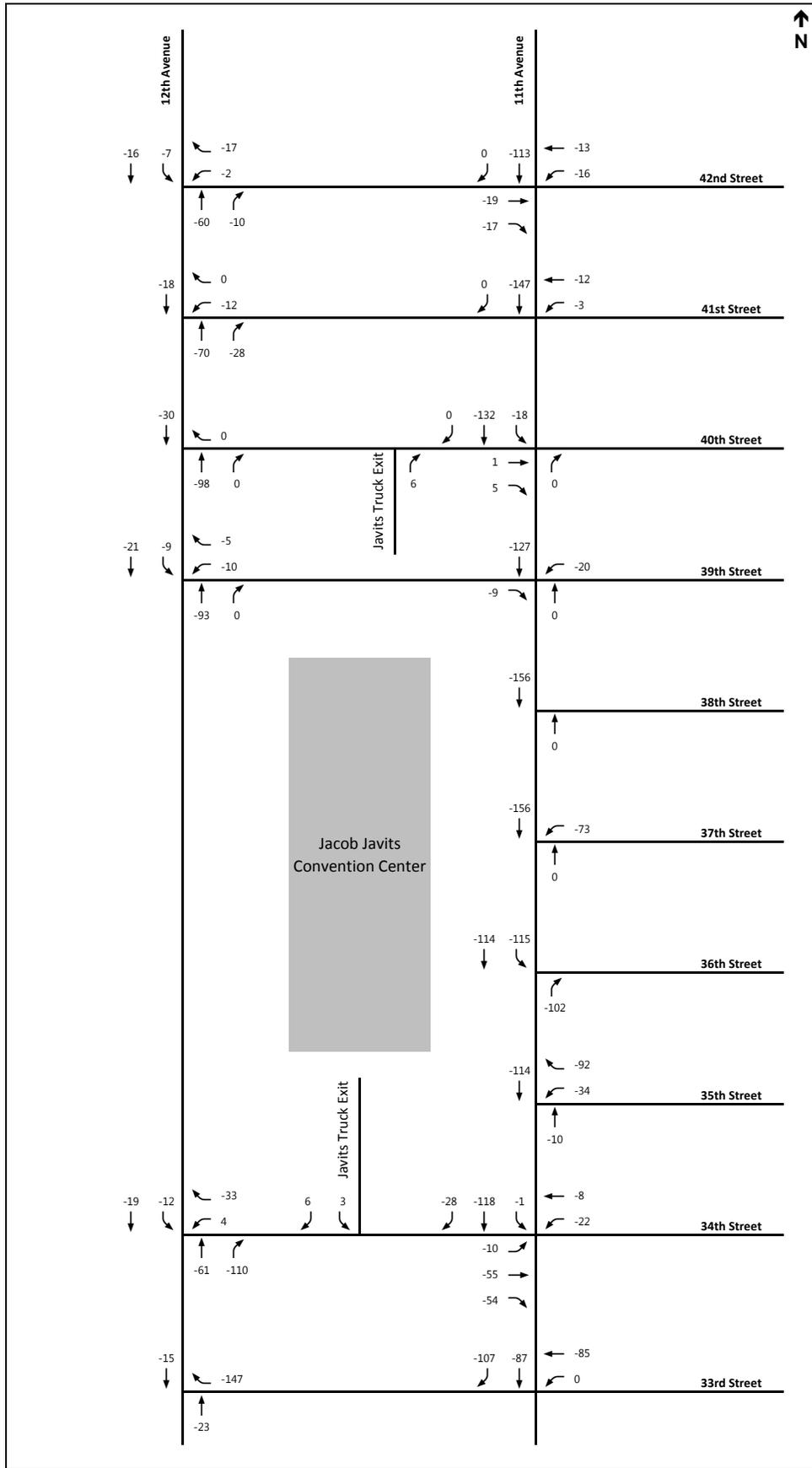
TOTAL INCREMENTAL VOLUMES WITH PROPOSED MODIFICATIONS

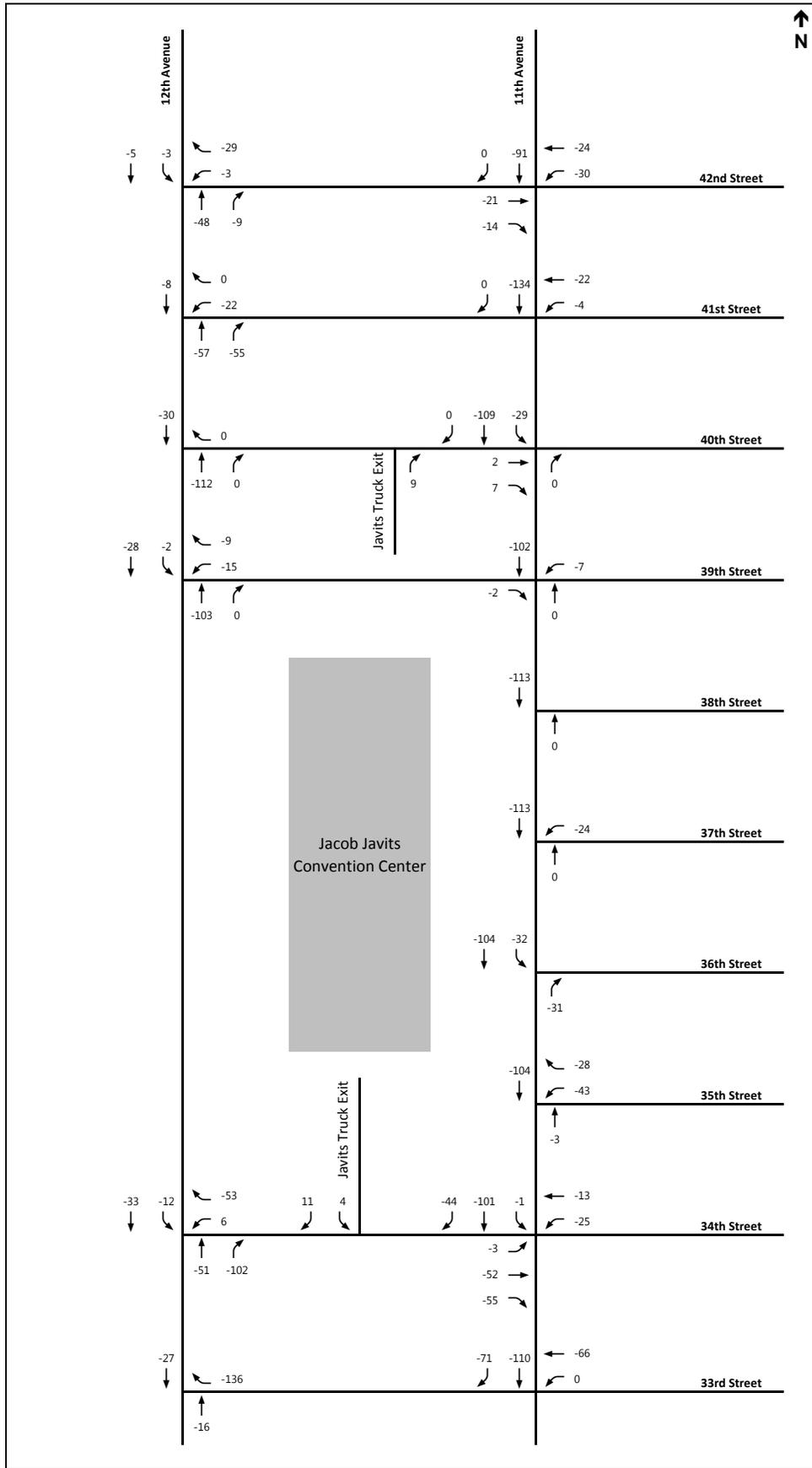
As shown on **Figures 9, 10, and 11**, the total increment for the Proposed Modifications would result in a reduction of vehicular traffic at all intersections and individual turning movements except for very small increases for turning movements at two intersections, which are caused by the rerouting of trucks associated with the Truck Marshalling Facility when compared to the 2006 GPP Approved Project:

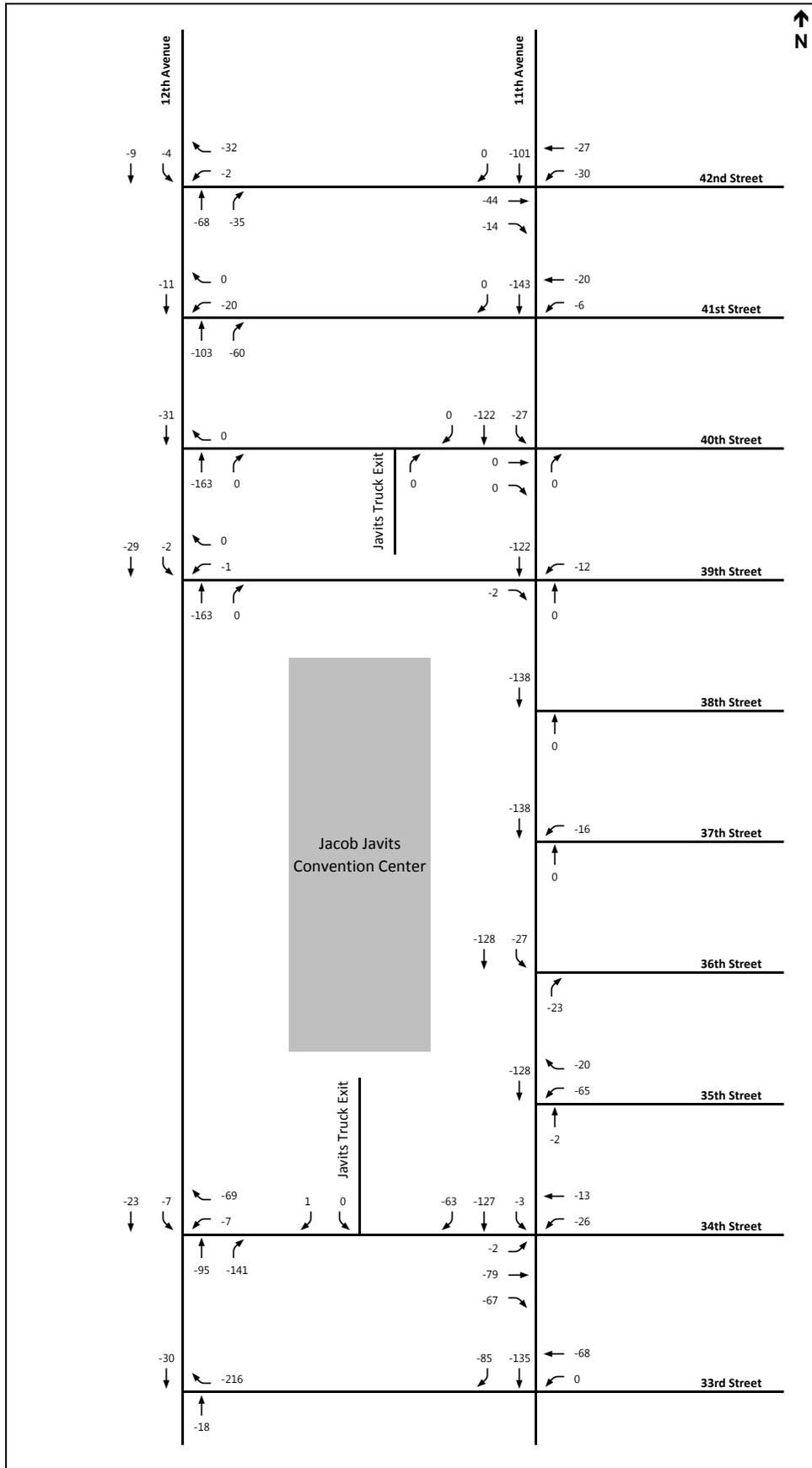
- Twelfth Avenue and West 34th Street
 - During the AM peak hour, the westbound left-turn movement would increase by 4 vehicles; however, the total intersection volume would decrease by 231 vehicles.
 - During the MD peak hour, the westbound left-turn movement would increase by 6 vehicles; however, the total intersection volume would decrease by 245 vehicles.
- Eleventh Avenue and West 40th Street
 - During the AM peak hour, the eastbound through movement would increase by 1 vehicle and the eastbound right-turn movement would increase by 5 vehicles; however, the total intersection volume would decrease by 144 vehicles.











- During the MD peak hour, the eastbound through movement would increase by 2 vehicles and the eastbound right-turn movement would increase by 7 vehicles; however, the total intersection volume would decrease by 129 vehicles.

ANALYSIS SUMMARY

Based on a review of the comparative trip increment and site operations, it was determined that the Proposed Modifications would not result in any new significant impacts not previously identified for the 2006 GPP Approved Project.

Traffic

With a more limited expansion and no development on the 33/34 Development Site and 35/36 Street Site, the Proposed Modifications would result in an overall reduction of incremental traffic at all analyzed intersections compared to the 2006 GPP Approved Project. Minor positive increments at two individual intersection approaches (the westbound left-turn on West 34th Street at Twelfth Avenue and the eastbound approach on West 40th Street at Eleventh Avenue as noted above) are associated with the truck marshalling facility and would be negligible, particularly when compared to overall reduction of incremental volume at these intersections. Furthermore, all the project improvements proposed in the 2006 GPP Approved Project would remain as part of the Proposed Modifications. Therefore, the Proposed Modifications would not result in any significant adverse traffic impacts not previously identified for the 2006 GPP Approved Project.

Parking

The Proposed Modifications would result in a smaller increment compared to the 2006 GPP Approved Project. Therefore, the Proposed Modifications would not result in any new adverse significant parking impacts not previously identified for the 2006 GPP Approved Project.

Pedestrian

The Proposed Modifications would result in a smaller increment compared to the 2006 GPP Approved Project. Therefore, the Proposed Modifications would not result in any new adverse significant pedestrian impacts not previously identified for the 2006 GPP Approved Project.

Transit

The Proposed Modifications would result in a smaller increment compared to the 2006 GPP Approved Project. Therefore, the Proposed Modifications would not result in any new adverse significant transit impacts not previously identified for the 2006 GPP Approved Project.

AIR QUALITY

As described above under "Transportation," the Proposed Modifications would result in lower traffic volumes and consequently improve conditions in the surrounding area compared to the 2006 GPP Approved Project. In addition, the Proposed Modifications would not introduce any new sensitive uses, as no new development is proposed on the 33/34 Development Site or 35/36 Street Site. Therefore the Proposed Modifications are not anticipated to result in any significant adverse air quality impacts due to vehicular mobile sources or industrial sources not previously identified for the 2006 GPP Approved Project.

As with the 2006 Proposed Modifications, the truck marshalling facility would be an above-ground multi-tiered facility with a mechanically ventilated design. The proposed truck marshalling facility would accommodate more trucks than the 2006 GPP Approved Project, and would therefore result in improved truck circulation, staging, and street-side queuing of idling trucks. Therefore, as with the 2006 GPP Approved Project, the truck marshalling facility under the Proposed Modifications would not result in any significant adverse air quality impacts not previously identified for the 2006 GPP Approved Project.

Although the HVAC design for the Proposed Modifications is not yet developed, it is anticipated that as with the 2006 GPP Approved Project, no significant adverse air quality impacts would occur on existing and proposed developments since the proposed heating plant would be similar or smaller in size.

NOISE

As presented above, the net change in vehicular trips at any given intersection would be smaller under the Proposed Modifications as compared with the 2006 GPP Approved Project. Accordingly, there would be no significant adverse impacts due to noise from mobile sources not previously identified for the 2006 GPP Approved Project.

CONSTRUCTION

With a more compact Convention Center expansion and no new development on the 33/34 Development Site and 35/36 Street Site, construction activities associated with the Proposed Modifications would be less intensive and shorter in duration. Therefore, there would be no significant adverse impacts generated by construction activities not previously identified for the 2006 GPP Approved Project.

As specified in the GPP, all construction activities would adhere to the mitigation measures, most notably the use of Ultra-Low Sulfur Diesel (ULSD) and adherence to the applicable provisions of the New York City Noise Control Code and good engineering practices.

E. CONCLUSIONS

As a result of the analyses detailed above, this memorandum concludes that the Proposed Modifications would not result in any significant adverse environmental impacts not previously identified for the 2006 GPP Approved Project. Therefore, no Supplemental Environmental Impact Statement is required in connection with ESD's review and consideration of the Proposed Modifications. *