

A. INTRODUCTION

This chapter analyzes the new demands on community resources from the introduction of new daytime users and new residents to the project area as a result of the proposed Farley Post Office/Moynihan Station Redevelopment Project (Farley/Moynihan). It examines the proposed project's potential effect on police, fire, and emergency services, as well as the potential for the proposed development to cause overcrowding in public schools (i.e., a deficiency of available seats for a particular age group). It identifies the police precincts and fire companies that serve the project site and study area, and any potential impacts to their provision of services from the proposed project. The chapter also identifies public schools serving the proposed project's study area and summarizes conditions in terms of enrollment and utilization during the current school year, noting specific problems with school capacity. In addition, since the proposed project is considered within the overall development projected as part of the Hudson Yards rezoning, this EIS also incorporates, where applicable, the conclusions of the Hudson Yards FGEIS regarding the impacts on community services from the proposed project.

New York City is well into the process of implementing the Hudson Yards rezoning. In 2005, two local development corporations (the "Hudson Yards Infrastructure Corporation" and the "Hudson Yards Development Corporation") were established with the specific mission of financing and overseeing the development of key elements of the Hudson Yard Program, including the subway extension, parks and street improvements, and the mitigation measures identified in the Hudson Yards FGEIS, several of which are reflected in the assessments presented below.

PRINCIPAL CONCLUSIONS**POLICE**

In the Future With the Proposed Action, it is anticipated that the New York Police Department (NYPD) would continue to evaluate its staffing needs and assign personnel based on population growth, area coverage, crime levels, and other local factors. There would be no significant adverse impacts on its operations.

FIRE

The proposed project is not expected to displace existing fire station houses or related emergency medical service (EMS) facilities and, on its own, would be unlikely to result in impacts to these facilities at current service levels. In the context of the larger Hudson Yards Rezoning and Redevelopment Program, it is also noted that the New York City Fire Department (FDNY) believes it would need additional resources, including a new firehouse, to continue to provide adequate fire protection throughout Hudson Yards (which includes the Farley Complex). Therefore, now and into the future with this mitigation in place by 2010 in response to overall

demand generated by the Hudson Yards project, no additional mitigation measures would be required to address any increased fire service demand resulting directly from the proposed project (see Hudson Yards FGEIS page 6-29).

PUBLIC SCHOOLS

In Scenario 1 of the 2010 Future With the Proposed Action, no new residential population would be introduced to the study area and there would be no new student population or impacts to area schools. In 2010 with Scenario 2, it is estimated that about 102 elementary school students, along with 20 intermediate school students, and 32 high school students would be generated. This new demand of 154 students would be a modest contribution to the more than 3,700 new students anticipated between 2010 and 2025 with the introduction of residential development generated by the Hudson Yards and West Chelsea Rezoning and other known projects in the study area. Overall, in the 2010 Future Without the Proposed Action, as disclosed in the Hudson Yards FGEIS, this new enrollment would create a significant shortage of school seats. Mitigation identified in the Hudson Yards FGEIS includes remedies to increase capacity through administrative actions, expansion, or new construction (see Hudson Yards FGEIS page 6-29). No impacts or additional mitigation measures beyond those resulting from, or provided by, the Hudson Yards rezoning would occur with, or be required by, the proposed project.

B. METHODOLOGY

The *CEQR Technical Manual* recommends a community facilities analysis for any project that adds 100 or more residential units, as this project could by 2010 under Scenario 2. Existing conditions are examined and compared with both the Future Without the Proposed Action and the Future With the Proposed Action. To develop the Future With the Proposed Action analysis, conditions that will exist in the Future Without the Proposed Action are also identified, taking into consideration projected increases in future enrollment and plans to increase school capacity through administrative actions on the part of the Department of Education (DOE), as well as new residential populations in the area resulting from development projects. There are two analysis years for the proposed project—2010, which accounts for development of Phase I and the primarily residential building developed on the Development Transfer Site under Scenario 2, and 2015, which accounts for the commercial overbuild constructed under Scenario 1.

As established in the *CEQR Technical Manual* community facility thresholds (Table 3C-1), the proposed Farley/Moynihan Station project would not generate enough demand to warrant an examination of community service impacts on public health care, public day care services, or library services. Each of these community impact sectors was analyzed in more detail as part of the Hudson Yards project.

C. POLICE PROTECTION

The service areas for analyzing police coverage include the New York Police Department (NYPD) precincts, transit districts, and special units that currently serve the project site or would be assigned upon completion of the proposed project. Impacts are identified in the event that the proposed project would directly displace or infringe on an existing NYPD facility or if the proposed project would significantly and adversely affect NYPD operations.

EXISTING CONDITIONS

As shown in Figure 5-1 and Table 5-1, the NYPD’s Midtown South Precinct serves the project site. The Midtown North Precinct and Transit District 1 are located to the north, the 10th Precinct is immediately to the west, the 13th Precinct is to the south, and the Manhattan Traffic Task Force is located in the study area.

**Table 5-1
Police Protection**

Map No.	Police Department	Address	Facility Type	Staff
1	10th Precinct	230 West 20th Street	NYPD Station	149
2	Midtown South Precinct	357 West 35th Street	NYPD Station	387
3	Midtown North Precinct	306 West 54th Street	NYPD Station	269
4	Manhattan South Traffic Task Force	138 West 30th Street	Other NYPD Facility	377
5	Manhattan Transit District 1	59th Street/Columbus Circle	Other NYPD Facility	181
Note: See Figure 5-1 for locations.				

The Midtown South Precinct serves the project site. In total, the precinct serves an area of approximately 0.77 square miles bounded by West 45th Street, Lexington Avenue, West 29th Street, and Ninth Avenue. This precinct serves the area largely composed of business and entertainment uses, including some of the most intensively used areas in the Midtown area (e.g., Times Square, the Garment Center, the Empire State Building, Penn Station, and Grand Central Station). Approximately 390 uniformed staff members are assigned to the Midtown South Precinct.

The 10th Precinct serves the area immediately adjacent to the project site (the area west of Ninth Avenue). In total, the precinct serves an area of approximately 0.93 square miles bounded by West 43rd Street, Ninth Avenue, West 14th Street, and the Hudson River. It serves the Chelsea residential neighborhood, Hudson Yards commercial and manufacturing districts, notable large regional attractions, such as Chelsea Piers and the Convention Center, and major transportation routes (e.g., Lincoln Tunnel, West Side Highway). Approximately 150 uniformed staff members are assigned to the 10th Precinct.

The Manhattan Traffic Task Force (MTTF) provides additional traffic-related protection and services in Manhattan. The MTTF generally serves the area from the southern end of Manhattan to 59th Street and is dedicated to assisting local precincts with maintaining traffic flow in Manhattan.

The NYPD’s Transit Bureau provides police service for the stations and lines of the New York City Transit System. Transit Bureau operations are divided into districts, and there are four districts in Manhattan. The existing No. 7 Subway and the western stations of Times Square are within Transit Bureau District 1. In addition, the USPS maintains a police presence at the Farley Complex.

FUTURE WITHOUT THE PROPOSED ACTION: 2010

The NYPD typically adjusts its allocation of personnel as the need arises. Increased allocations are considered when demand becomes apparent. It is NYPD policy not to make adjustments in advance of planned or potential development. Each year, the precinct could be assigned new recruits, but there are also losses due to transfers, promotions, and retirements.

Farley Post Office/Moynihan Station Redevelopment Project

By 2010, the new worker, residential, and visitor population introduced to the area by various development projects, including development resulting from the recently approved Hudson Yards rezoning and from reallocation and redevelopment of space on the project site, could increase the demand for police protection.

In conformance with CEQR methodologies and the NYPD's Office of Management Analysis and Planning, it is assumed that NYPD would continue to evaluate its staffing needs and assign personnel based on a variety of factors, including demographics, calls for service, and crime conditions. The NYPD expects that with the planned extension of the No. 7 Subway service, additional police communication equipment would be required to provide service to the expanded subway system. The NYPD will continue to adjust its deployment of personnel and equipment in response to this development. Further adjustments to the size and deployment of the police force according to demand-based needs or other policy decisions could be made by 2010 in the Future Without the Proposed Action.

At the Farley Complex, in particular, it is anticipated that in 2010, without the proposed project, the United States Postal Service (USPS) would seek redevelopment opportunities in lieu of the new transportation center. USPS anticipates that up to 650,000 square feet of space in the complex would be used for postal administrative, retail, and sorting functions and that approximately 500 employees (including 367 new employees) would work at the site. In addition, it is assumed that about 436,000 square feet of commercial office space and 248,000 square feet of destination retail would be developed. In total, it is estimated that up to 2,731 employees might be located at the Farley Complex by 2010 in the Future Without the Proposed Action conditions. This would not impact the provision of police services, as the NYPD would incorporate the projected development into overall adjustments to deployment, as described above.

FUTURE WITH THE PROPOSED ACTION: 2010

SCENARIO 1

In 2010 with Scenario 1, the proposed Phase I development would result in a net decrease of 940 workers from the Future Without the Proposed Action. (The additional 367 postal workers, 620 retail workers, and 1,744 office workers associated with the No Build development would not be introduced to the project site, while 1,791 new workers would be introduced). This development would thus not increase the demand for NYPD protection services, and would not be appreciably different from, or would be lower than, a condition in which the complex were redeveloped by USPS, as set forth above. In the Future With the Proposed Action the NJT, Amtrak, Port Authority, and MTA police forces currently at Penn Station would join the USPS police at the Farley Complex.

SCENARIO 2

Under Scenario 2, Phase I of the proposed project would introduce the same 1,791 workers to the project site (a net decrease of 940 from the Future Without the Proposed Action) as part of the commercial and Moynihan station development. In addition, as set forth in Chapter 1, "Project Description," Scenario 2 includes development on the Development Transfer Site of a 940 residential unit building with 120,000 square feet in base level retail. This building would introduce 1,617 residents and 342 workers associated with the residential and retail components. If the Development Transfer Site building were to instead include a mix of 630 residences,

120,000 square feet of retail, and 310,000 square feet of hotel space, the project would add 1,804 residents and 560 employees. With the Phase I development, employment would be between 2,133 and 2,357 workers. As described above, adjustments to the size and deployment of the police force based on need could be made by 2010 in the Future With the Proposed Action. Any adjusted service would be part of the NYPD's routine assessment and redeployment of services and would not constitute a significant adverse impact on police services. In the Future With the Proposed Action the NJT, Amtrak, Port Authority, and MTA police forces currently at Penn Station would join the USPS police at the Farley Complex.

FUTURE WITHOUT THE PROPOSED ACTION: 2015

The potential redevelopment of the site by USPS in the Future Without the Proposed Action would remain the same as with the 2010 analysis year described above. Overall, throughout the study area, new worker, residential, and visitor populations resulting from development occurring in the area (including as a result of the Hudson Yards rezoning) could increase the demand for police coverage by 2015. As with the 2010 analysis, it is expected that further adjustments to the size and deployment of the police force could be made in the Future Without the Proposed Action in 2015.

FUTURE WITH THE PROPOSED ACTION: 2015

Under Scenario 1 with the completion of Phase II of the proposed project (the commercial overbuild), approximately 4,000 workers would be introduced to the study area in addition to the Phase I workforce of approximately 1,791 new workers (in this Scenario, the new residential population described above for Scenario 2 would not occur). While no changes in police staffing by 2015 are anticipated as a result of this increased population, further adjustments to the size and deployment of the police force based on need could be made by 2015 in the Future With the Proposed Action. Any adjusted service would be part of routine assessment and redeployment of services and would not constitute a significant adverse impact on police services.

D. FIRE PROTECTION AND EMERGENCY SERVICES

The service areas for analyzing FDNY coverage include both fire and emergency resources that currently serve the project site or would be assigned upon completion of the proposed project. Emergency Medical Services are included in the Fire Department analysis. This analysis does not include private emergency medical response units that could provide services in the study area. Impacts are identified if the proposed project would result in the direct displacement of an existing FDNY facility or if it would significantly and adversely affect FDNY operations.

EXISTING CONDITIONS

In New York City, engine companies carry hoses, ladder companies provide search, rescue, and building ventilation functions, and rescue companies specifically respond to fires or emergencies in high-rise buildings. In addition, the FDNY operates the City's Emergency Medical Services (EMS) system.

As shown in Figure 5-1 and Table 5-2, the study area for fire protection services, the area within approximately 1 mile of the study area includes a total of eight firehouses and two emergency response units, although units responding to a fire are not limited to those closest to it. Normally, a total of three engine companies and two ladder companies respond to each call, although initial

**Table 5-2
Fire Protection Services**

Map No.	Fire Department	Address	Type
6	Engine 3 Ladder 12 Battalion 7	146 West 19th Street	NYC Firehouse
7	Engine 14	14 East 18th Street	NYC Firehouse
8	Engine 65	33 West 43rd Street	NYC Firehouse
9	EMS Battalion No. 9—Port Authority Outpost	641 Eighth Avenue	NYC EMS
10	Engine 34 Ladder 21	440 West 38th Street	NYC Firehouse
11	Rescue Co 1	530 West 43rd Street	NYC Firehouse
12	EMS Battalion No. 9—Clinton Station	522 West 45th Street	NYC EMS
13	Engine 54 Ladder 4	782 Eighth Avenue	NYC Firehouse
14	Engine 1 Ladder 24	142 West 31st Street	NYC Firehouse
15	Engine 26	220 West 37th Street	NYC Firehouse

Note: See Figure 5-1 for locations.

responses to alarms from any given call box location are sometimes determined by the specific needs of the geographic location or use at that location. The FDNY can also call on units in other parts of the City, as needed.

Approximately 25 personnel are staffed in each engine company and each ladder company. Therefore, if a firehouse contains one engine and one ladder company, a total of approximately 50 personnel are assigned to that facility. Typically, during one shift, each engine and ladder company is manned by five and six firefighters, respectively.

FUTURE WITHOUT THE PROPOSED ACTION: 2010

The new worker, residential, and visitor populations introduced by the development resulting from the Hudson Yards rezoning will increase the demand for fire department services by 2010. In addition, the development related to the Jacob Javits Convention Center expansion would require West 33rd, West 39th, West 40th, and a portion of West 41st Streets between Eleventh and Twelfth Avenues to be closed. The FDNY has determined that it would need additional resources to continue to provide adequate fire protection service in the vicinity of the Hudson Yards project, which encompasses the project site.

As noted above, the USPS would pursue redevelopment of the Farley Complex if the proposed project did not occur. For the Future Without the Proposed Action it is assumed that this would include up to 650,000 square feet of space for the USPS and about 436,000 square feet of commercial office space and 248,000 square feet of destination retail. This would not impact the provision of fire and emergency services on its own, but would be considered as part of the overall need for additional resources as determined in the Hudson Yards FGEIS.

FUTURE WITH THE PROPOSED ACTION: 2010

SCENARIO 1

As there would be a net decrease of 940 workers in the area from the Future Without the Proposed Action during Phase I of the proposed project, the demand for fire protection services would either remain the same or decrease from the new demand created in the Future Without the Proposed Action and no adverse impacts would be anticipated.

SCENARIO 2

Under Scenario 2, the proposed project would introduce 2,133 to 2,351 workers to the project site (net decrease of 598 from the Future Without the Proposed Action) as part of the commercial, railway, and residential developments and an additional 1,617 residents to the Development Transfer Site. This overall increase in population from the Future Without the Proposed Action could potentially create new demands on the fire fighting and emergency resources of the study area. However, the incremental demand created by the project is within the total projected demand as analyzed for the comprehensive Hudson Yards FGEIS, in which the FDNY determined that additional resources would be necessary to provide adequate protection in the area. Therefore, the resources to provide adequate protection for the larger Hudson Yards area (administrative actions, and if necessary a new firehouse) would be determined and implemented in the future with or without the proposed project and there would be no additional significant adverse impacts to fire protection services and no additional mitigation measures needed.

FUTURE WITHOUT THE PROPOSED ACTION: 2015

The potential redevelopment of the site by USPS in the Future Without the Proposed Action would remain the same as with the 2010 analysis year described above. Overall throughout the study area, the new worker, residential, and visitor populations resulting from the Hudson Yards and other development could increase the demand for fire department services by 2015. The new development could result in significant impacts to fire fighting services in the area. FDNY would monitor growth and development in the Hudson Yards area and would respond, first with administrative actions, and finally, if necessary, with a new firehouse to meet demand.

FUTURE WITH THE PROPOSED ACTION: 2015

Under Scenario 1, the addition of a new commercial overbuild on the Farley Complex as the Phase II development would add additional workers to the study area and create a new building that could potentially create new demands on the fire fighting and emergency resources of the study area. However, as described above, the incremental demand created by the project is within the total projected demand as analyzed for the comprehensive Hudson Yards FGEIS. Mitigation measures planned for the Hudson Yards rezoning, which are described above, would provide for adequate fire protection levels for the proposed project. No additional mitigation measures beyond those provided by the Hudson Yards rezoning would be required and no additional significant adverse impacts would result.

E. PUBLIC SCHOOLS

EXISTING CONDITIONS

As per Table 3C-1 of the *CEQR Technical Manual*, detailed analyses are required if the proposed project would generate more than 50 elementary/intermediate school and/or more than 150 high school students. Under Scenario 1, no housing units would be introduced by the proposed project. Under Scenario 2, the residential development that could occur by 2010 would exceed the threshold for requiring an elementary/intermediate school analysis but would not exceed the threshold for requiring a high school analysis. Because the proposed project development would fall within the total development projected in the Hudson Yards area, the impacts of the proposed project would be a part of the larger impacts associated with the

Farley Post Office/Moynihan Station Redevelopment Project

development completed under that rezoning and analyzed in the Hudson Yards FGEIS community facilities analysis. Nevertheless, an analysis of potential impacts on elementary/intermediate schools from the proposed project's Phase II residential development is included in this chapter, as the proposed residential component (940 units in the primarily residential building) would generate enough primary/intermediate school students to exceed the CEQR threshold on its own. Therefore, this section analyzes the potential impact of the proposed project on local public elementary/intermediate school conditions for the 2010 analysis year only.

The service area analyzed in this EIS includes the elementary and intermediate schools located in that portion of the Community School District (CSD) serving the project site. The primary study area for educational facilities falls within the boundaries of Community School District 2 (CSD 2), which extends from 59th Street to the southern tip of Manhattan on the West Side and from 96th Street to the southern tip of Manhattan on the East Side, except for a section of the Lower East Side between 14th Street and Delancey Street and east of the Bowery. Under the DOE's 2003 reorganization, New York City's 32 Community School Districts have been grouped into 10 instructional divisions. CSD 2 has been placed into Instructional Division 9 (along with CSDs 1, 4, and 7).

According to the *CEQR Technical Manual*, the study area for an analysis of educational facilities generally coincides with the region within the CSD serving the proposed project. Therefore, this analysis assesses the potential effects of the proposed project on schools located in Region 3 of CSD 2 (see Figure 5-2). The analysis also examines effects on schools within the entire CSD 2, since students can also attend schools within their district but outside their immediate neighborhood. As population shifts within a school district over time, the DOE can adjust attendance zones within the district to improve the affected school's or schools' composition and utilization.

Impacts can occur if the proposed project would result in a 5 percent or more increase in a deficiency of available seats in the affected schools over the Future Without the Proposed Action.

ELEMENTARY SCHOOLS

Five elementary schools are located in Region 3 of CSD 2 (see Figure 5-2). According to the most recent enrollment and capacity figures available from DOE, which are for the 2003-2004 school year, P.S. 51, Elias Howe School, is operating at 119 percent capacity, and has a deficit of 50 seats (see Table 5-3). P.S. 33, Chelsea School, is operating at 60 percent capacity, with 247 available seats; P.S. 212, Midtown West School, is operating at 91 percent capacity, with a surplus of 33 seats; P.S. 11, William J. Harris School, is operating at 86 percent capacity, with 83 available seats; and P.S. 111, Adolph S. Ochs School, which has 174 available seats, is operating at 78 percent capacity. Cumulatively, these five elementary schools are operating below capacity (82 percent) with 487 available seats. Total enrollment at elementary schools in all of CSD 2 is 14,760 students, or 90 percent of capacity (16,382 students), with 1,622 available seats.

INTERMEDIATE/JUNIOR HIGH SCHOOLS

I.S./J.H.S. 260, Clinton School, is the only intermediate school within Region 3 of CSD 2. It is located in the same building as P.S. 11 (see Figure 5-2). According to DOE enrollment statistics

Table 5-3
2003–2004 School Year:
Public Elementary/Intermediate School Enrollment, Capacity, and Utilization

Map No.	School Name	Address	Enrollment in Program	Capacity	Available Seats in Program	Program Utilization (Percent)
Elementary Schools						
1	P.S. 51 Elias Howe School	520 W. 45th Street	314	264	-50	119
2	P.S. 33 Chelsea School	281 Ninth Avenue	376	623	247	60
3	P.S. 212 Midtown West School	328 W. 48th Street	352	385	33	91
4	P.S. 11 William J. Harris School	320 W. 21st Street	509	592	83	86
5	P.S. 111 Adolph S. Ochs School	Tenth Avenue, between W. 53rd and 54th Streets	632	806	174	78
Total, Region 3			2,183	2,670	487	82
Total, CSD 2			14,760	16,382	1,622	90
Junior High/Intermediate Schools						
6	I.S./J.H.S. 260 Clinton School	320 W. 21st Street	245	273	28	90
Totals, CSD 2			7,201	7,225	24	99
Note: See Figure 5-2.						
Sources: Enrollment and capacity for individual schools: DOE, Utilization Profiles: Enrollment/Capacity/Utilization, 2003-2004 (Target Capacity). The figures include Pre-K enrollment in these buildings. Totals for CSD 2 enrollment: DCP, Enrollment Projections for CSD 2 (actual 2003, projected 2004-2013). DCP's actual enrollment does not include Pre-K enrollment. Capacity numbers for CSD 2: DOE, Utilization Profiles: Enrollment/ Capacity/Utilization, 2003-2004.						

for the 2003-2004 school year, this school has a utilization rate of 90 percent, with 28 available seats (see Table 5-3). Overall, the intermediate schools in CSD 2 are operating at over 99 percent of capacity, with a surplus of 24 seats.

FUTURE WITHOUT THE PROPOSED ACTION: 2010

The Future Without the Proposed Action utilization rate for school facilities is calculated by adding the estimated enrollment from known future proposed residential developments to the projected enrollment from the DCP or DOE and then comparing that number to projected capacity.

In the 2010 Future Without the Proposed Action, new residential development is anticipated within the study area (see Table 5-4). This includes individual development projects affecting single sites, as well as residential units that could be generated by the proposed Special West Chelsea Rezoning, the adopted Ladies Mile Rezoning, and the adopted Hudson Yards Rezoning, which are located within Region 3 of District 2. The schools most likely to be affected by the rezoning actions include P.S. 11, I.S./J.H.S. 260, and P.S. 33. Up to approximately 2,908 market rate units and 460 low-to-moderate income units are expected to be generated by 2010 as a result of the Special West Chelsea District Rezoning. The Ladies Mile Rezoning is expected to generate approximately 869 market-rate units and 62 low-to-moderate income units by 2010.

Table 5-4

**Future Without the Proposed Action:
Proposed Development Expected to be Completed in the Study Area**

Development Name/Address	Build Year	Total Units	Market Rate Units	Low-Moderate Units
Expected To Be Completed by 2010				
Hudson Yards Project Area Development	2010	5,994*	4,158	836
306 West 44th Street, West 44th Street and Eighth Avenue	2005	564	564	0
Friars Tower, West 31st Street between Seventh Avenue and Broadway	2005	534	534	0
Eighth Avenue and West 20th Street	2004	37	37	0
Special W. Chelsea District Rezoning (south of West 27th Street)	2010	3,368	2,908	460
Biltmore Theater Project 770-780 Eighth Avenue	2004	460	460	0
812/815 Sixth Ave.	2004	269	269	0
35 West 33rd Street between Fifth and Sixth Avenues	2004	168	168	0
Clinton Mews—511 West 46th and 516 West 47th Streets	2006	151	151	0
Pitcairn— 505-513 West 47th Street	2006	95	95	0
Ladies Mile Rezoning	2010	931	869	62
2010 Total		11,571	10,213	1,358
Expected To Be Completed by 2015				
Special West Chelsea District Rezoning (north of West 27th Street)	2015	1,340	1,143	197
Hudson Yards Project Area Development	2015	2,568**	2,157	411
Subtotal		3,908	3,300	608
Total		15,479	13,513	1,966
Notes:				
* Utilizes development projections from Hudson Yards FGEIS Alternative S, excludes existing housing units on the sites, includes recently completed development at Ivy Towers and 360 West 43rd Street.				
** Includes 1/3 of Alternative S development projected from 2010 to 2025, excludes 1,000 housing units, which could be development within the Hudson Yards rezoning area on the Farley/Moynihan project site that would be considered in the Build Condition.				

The Hudson Yards rezoning is expected to generate 2,623 market rate and 522 low- to moderate-income units by 2010. To serve this increased student population, four school classrooms would be added at P.S. 51.¹ In total, 8,678 market rate and 1,044 low-to-moderate income units are expected to be developed in the study area by 2010. In addition, the revised expansion program for the Jacob Javits Convention Center is expected to add another 1,849 housing units (1,535 market rate and 314 low-income units).

The *CEQR Technical Manual's* Table 3C-2, "Projected Public School Pupil Ratios in New Housing Units of All Sizes," summarizes pupil generation rates based on DOE's analysis of income mix and location (borough) for new residential units. Table 5-5 shows the number of new public school students expected to be generated by the new residential development.

¹ It is assumed that each classroom would have 25 seats.

Table 5-5

Future Without The Proposed Action: 2010—Projected New Housing Units and Estimated Number of Students Generated by the New Housing Units

	Housing Units	Elementary School	Intermediate School	High School	Total
Market Rate	10,213	1,022	205	306	1,533
Low to Moderate Income	1,358	169	40	68	267
Total	11,571	1,191	245	374	1,810
Sources: Student generation rates are based on the <i>CEQR Technical Manual's</i> Table 3C-2: "Projected Public School Pupil Ratios in New Housing Units of All Sizes."					

In addition to growth attributable to new development, DCP and DOE's Division of School Facilities predict changes in enrollment by school district up to 10 years into the future using cohort survival methodology based on number of births, actual enrollment, and grade-retention ratios. Some differences in methodology account for variations between the DOE and DCP enrollment projections.¹ The *CEQR Technical Manual* suggests that both the DCP's and DOE's enrollment projections be considered in evaluating potential impacts, although the more conservative (higher) projections should be used for calculating numerical impacts. Enrollment projections were obtained from the DCP and DOE, and the data were compared to determine which figures were more conservative in projecting future enrollment for Community School District 2. The DCP's enrollment projections (actual 2003, projected 2004-2013), which were higher than the DOE's, were used for this analysis.

ELEMENTARY SCHOOLS

By 2010, the DCP's Community School District 2 projections indicate that elementary school enrollments are expected to increase, primarily because of the increase in the number of births in CSD 2 during the latter 1990s. The DCP's projections show 3,052 additional public elementary school students for CSD 2 in 2010, or an approximate 21 percent net increase (for a total enrollment in CSD 2 of 17,812). DOE also projects increased elementary school enrollment by 2010, with an overall increase of approximately 14 percent, or 2,049 students in CSD 2.

Applying the more conservative DCP rates (approximately 21 percent) to the schools nearest the project site (CSD 2, Region 3) results in a projection of 458 additional public elementary school students at local schools by 2010. In addition, as shown in Table 5-5, several residential projects are expected to be completed within the study area that would add 1,191 students to the elementary schools in the area. With a total of 1,451 additional elementary school students expected by 2010 (including DCP projections and students generated by new residential development), the total enrollment in the five elementary schools near the project site would be 3,832 (see Table 5-6). This is expected to result in a deficit of 1.062 seats in the elementary schools nearest the project site (138 percent utilization). Districtwide there is expected to be a total of 4,045 additional elementary school students above the 2003-2004 enrollments, and schools would operate at 115 percent of capacity with a deficit of 2,521 seats.

¹ The DOE includes Long-Term Absentees (LTAs) in its enrollment projections; the DCP does not include them. The term "long-term absentee" refers to those students who are registered but not in attendance at a New York City public school.

Table 5-6

Future Without the Proposed Action: 2010—Estimated Public Elementary/Intermediate School Enrollment Capacity and Utilization

Region/District	Projected Enrollment in 2010	Students Generated from New Residential Development	Total Projected Enrollment	Program Capacity	Available Seats in Program	Program Utilization (Percent)
Elementary Schools						
Totals, Region 3	2,641	1,191	3,832	2,770**	(1,062)	138
Totals, CSD 2	17,812	1,191*	19,003	16,482**	(2,521)	115
Junior High/Intermediate Schools						
I.S./J.H.S. 260 Clinton School	294	245	539	273	(266)	197
Totals, CSD 2	8,667	245	8,912	7,225	(1,687)	123
Notes:	2010 estimates for enrollment in schools Region 3 of CSD 2 were derived proportionally from total enrollment for CSD 2.					
	* Residential development for CSD 2 considers only the development that would occur within the study area.					
	** Includes 110 additional seats as mitigation for the Hudson Yards rezoning.					
Sources:	Totals for CSD 2 projected enrollment: DCP, Enrollment Projections (actual 2003, projected 2004-2013) for CSD 2. DCP enrollment projections do not include Pre-K enrollment. Capacity numbers for CSD 2: DOE, Utilization Profiles: Enrollment/Capacity/Utilization, 2003-2004.					

INTERMEDIATE/JUNIOR HIGH SCHOOLS

In 2010, DCP projections indicate that the intermediate schools in CSD 2 would have a total enrollment of 8,667, an increase of 1,466 students (approximately 20 percent) from 2003-2004 enrollments. DOE projections also indicate a net increase in students in CSD 2 of approximately 9 percent that would result in 657 additional students. In addition, residential projects expected to be completed in the area by 2010 would add approximately 245 intermediate school students to the study area. Based on the DCP's more conservative projections and the additional students generated by residential projects in the Future Without the Proposed Action, I.S./J.H.S. 260 would be operating at 197 percent of capacity with a shortfall of 266 seats (see Table 5-6). Both this school and the district as a whole would be operating with a deficit of available seats.

FUTURE WITH THE PROPOSED ACTION: 2010

SCENARIO 1

Under Scenario 1 in the Future With the Proposed Action, it is expected that no housing units would be introduced to the project site by 2010. Therefore there would be no increase in the residential population or school aged students. Enrollment would be expected to remain the same as under the Future Without the Proposed Action, with a deficiency in both primary and intermediate school seats. There would be no significant adverse school impact related to the proposed project.

SCENARIO 2

With the Phase II construction of the primarily residential building on the Development Transfer Site, the proposed project would add a total of 940 additional new housing units to the study area by 2010. Twenty percent of the proposed rental units (potentially up to 188 units, conservatively assuming all units to be rental units) would be affordable housing units developed under the 80-20 affordable housing program. Based on those unit counts and student generation rates set forth in Table 3C-2 in the *CEQR Technical Manual*, the proposed project would generate approximately 154 public school students (see Table 5-7).

Table 5-7

Future With the Proposed Action, Scenario 2: 2010—Projected New Housing Units and Estimated Number of Students Generated by the New Housing Units

	Housing Units	Elementary School	Intermediate School	High School	Total
Market Rate	752	75	15	22	112
Affordable	188	27	5	10	42
Total	940	102	20	32	154

Sources: Student generation rates are based on the *CEQR Technical Manual's* Table 3C-2: "Projected Public School Pupil Ratios in New Housing Units of All Sizes."

ELEMENTARY SCHOOLS

Based on the formula provided in the *CEQR Technical Manual*, up to 102 additional elementary school students would be introduced into the study area as a result of Scenario 2 of the proposed project (see Table 5-7) representing about a 2.7 percent increase. As shown in Table 5-8, the elementary schools districtwide are expected to be operating over capacity. This additional population would produce a shortfall of 1,164 seats within Region 3 of CSD 2 and 2,623 seats within CSD 2 as a whole.

Table 5-8

Future With the Proposed Action Scenario 2: 2010—Estimated Public Elementary/Intermediate School Enrollment, capacity, and Utilization

Region/District	Projected Enrollment in 2010	Students Generated by the Proposed Action	Total Projected Enrollment in 2010	Capacity	Available Seats in Program	Program Utilization (Percent)	Change in Deficit of Available Seats (Percent)
Elementary Schools							
Totals Region 3	3,832	102	3,934	2,770	(1,164)	142	9.6
Totals CSD 2	19,003	102	19,105	16,482	(2,623)	116	4.0
Junior High/Intermediate Schools							
Totals Region 3	539	20	559	273	(286)	205	7.5
Totals CSD 2	8,912	20	8,932	7,225	(1,707)	124	1.2

Note: 2010 estimates for schools in Region 3 of CSD 2 were derived proportionally from DCP districtwide.
Sources: Totals for CSD 2 projected enrollment: DCP, Enrollment Projections (actual 2003, projected 2004-2013) for CSDs. DCP enrollment projections do not include Pre-K enrollment.
 Capacity numbers for CSD 2: DOE, Utilization Profiles: Enrollment/Capacity/Utilization, 2003-2004.

Given that there will not be sufficient available seats for the additional elementary school students in the Future Without the Proposed Action, the proposed project is a contributor to the overall shortfall of elementary school seats that is primarily generated by the extensive residential development anticipated with the Hudson Yards and West Chelsea rezonings, as well as other projects identified in the Future Without the Proposed Action. As clearly established in the Hudson Yards FGEIS, absent any increase in school capacity, there would be a potential significant adverse impact on the elementary schools near the project site with or without the proposed project. The proposed project is considered to be part of the larger Hudson Yards development and a relatively small part of this additional demand; the change in available elementary school seats in Region 3 represents a decrease of 9.6 percent from the Future

Farley Post Office/Moynihan Station Redevelopment Project

Without the Proposed Action conditions. As the school seat deficit from the proposed project was identified as part of the deficit from the Hudson Yards rezoning, no impacts or additional mitigation beyond that discussed as part of the Future Without the Proposed Action (which includes the bulk of new enrollment generated by the Hudson Yards and Chelsea rezonings) would occur with, or be required for, the proposed project. Districtwide there would be a 4.0 percent increase in seat deficiency from the Future Without the Proposed Action.

As part of the mitigation for the Hudson Yards and West Chelsea projects, a 630-seat K-8 elementary/intermediate school, a 110 seat addition to PS/IS 51, and other capacity adjustments as necessary for the increased enrollment. In addition to the mitigation specified in the Hudson Yards FGEIS, the New York City Department of Education (DOE) expects to locate one of its planned leased elementary/intermediate schools, currently in the 2005-2009 Adopted 5-Year capital Plan, with an estimated 504 school seats, within the study area by 2010. Beyond that, it is likely that a second K-8 elementary/intermediate school would be required and provided post-2010. DOE will continue to monitor trends in demand for school seats in the area. The DOE responses to identified demand could take place in stages and include administrative actions and/or construction or lease of new school facilities at an appropriate time. In conclusion, the addition of 102 elementary school students with the proposed project by itself would not generate sufficient demand for an additional school and would not be considered a significant adverse impact. In the absence of the large growth reflected in the Future Without the Proposed Action, the project increase itself would not result in a district-wide seat deficit.

INTERMEDIATE/JUNIOR HIGH SCHOOLS

Under Scenario 2, the proposed project is expected to generate 20 intermediate school students in the study area by 2010 (see Table 5-7). As shown in Table 5-8 in 2010, I.S./J.H.S. 260 Clinton School, is expected to be operating at 205 percent capacity, with a shortfall of 286 seats. Currently, I.S./J.H.S. 260 operates at 90 percent of its capacity. In the Future Without the Proposed Action, the school is expected to operate over capacity as a result of the development anticipated in the area, largely from the Hudson Yards rezoning. The 20 intermediate school students anticipated with Scenario 2 of the proposed project constitute a relatively small part of the school's future additional demand (the change in the Region 3 intermediate school seat deficit represents an increase of 7.5 percent from the Future Without the Proposed Action conditions) and on its own would not result in a significant adverse schools impact. In the Future With the Proposed Action, CSD 2 is also expected to be operating over capacity (124 percent), with a deficit of 1,707 available seats. Districtwide there would be a marginal increase (1.2 percent) in seat deficiency from the Future Without the Proposed Action conditions. Thus, no impacts or additional mitigation beyond that discussed as part of the Future Without the Proposed Action (which includes the bulk of new enrollment generated by the Hudson Yards and Special West Chelsea District rezonings) would occur with, or be required for, the proposed project. *