

## **A. INTRODUCTION**

This chapter assesses the potential for the Proposed Actions to affect public health. As defined by the 2021 *City Environmental Quality Review (CEQR) Technical Manual*, public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability, and premature death; and reducing inequalities in health status. The goal of CEQR with respect to public health is to determine whether adverse impacts on human health may occur as a result of a proposed project and, if so, to identify measures to mitigate such effects. The potential effects of the Proposed Actions were considered with regard to effects on the surrounding community.

The *CEQR Technical Manual* states that a public health assessment is warranted for a specific technical area if there is a significant adverse impact found in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. As described in Chapter 15, “Air Quality,” the mobile source analysis determined that the maximum annual incremental particulate matter (PM<sub>2.5</sub>) concentration is predicted to potentially exceed the annual *de minimis* criterion at the three analyzed intersection locations under the Proposed Project and one of the analyzed intersection locations under the Alternative Scenario; therefore, the Proposed Actions have the potential to result in a significant adverse air quality impact. In addition, as identified in Chapter 20, “Construction,” construction of either With Action scenario has the potential to result in construction noise levels that exceed the additional construction noise impact criteria defined by CEQR at receptors near the Development Site. Therefore, this chapter provides a public health assessment of air quality and construction-period noise at these locations. As described in the relevant analyses of this Environmental Impact Statement (EIS), the Proposed Actions would not result in significant unmitigated adverse impacts in any of the other technical areas related to public health.

In addition to the technical areas related to public health outlined in the *CEQR Technical Manual*, this chapter provides information regarding problem gaming issues, given the potential for a gaming facility to be developed on the WRY Site in the future with the Proposed Project.

## **PRINCIPAL CONCLUSIONS**

The analyses presented in this EIS concluded that the Proposed Actions would not result in unmitigated significant adverse impacts in the areas of water quality, hazardous materials, or operational noise. The analysis presented in Chapter 15, “Air Quality,” determined that the Proposed Project and the Alternative Scenario would potentially exceed the annual *de minimis* criterion for the maximum annual incremental particulate

matter (PM<sub>2.5</sub>) concentration at one or more of the analyzed intersection locations in the With Action condition. This would be considered a significant adverse air quality impact in the absence of traffic mitigation measures. Therefore, traffic mitigation measures were examined to avoid any potential significant impacts at these intersection locations. Mitigation measures are discussed in Chapter 22, "Mitigation."

Between the Draft and Final EIS, additional review and evaluation will be performed which is expected to determine that the identified impacts related to mobile source annual average PM<sub>2.5</sub> increments will be avoided. Additional modeling of PM<sub>2.5</sub> concentrations (Grid Analysis) will be performed using more refined or comprehensive analysis procedures to determine the magnitude and extent of neighborhood-scale PM<sub>2.5</sub> impacts from mobile sources. It is anticipated that the grid analysis will show that the PM<sub>2.5</sub> concentrations are below the annual *de minimis* criterion threshold.

In addition, at each of the affected intersection locations, the Proposed Actions would not contribute to or exacerbate a violation of the PM<sub>2.5</sub> annual average National Ambient Air Quality Standards (NAAQS) even with the very conservative assumptions relating to traffic, vehicle emissions, meteorology, and background PM<sub>2.5</sub> concentration levels used in this analysis. Therefore, the exceedances of the PM<sub>2.5</sub> *de minimis* criterion on an annual basis would not constitute a significant adverse impact on public health.

Chapter 15, "Air Quality," also identifies that maximum concentrations from the LIRR ventilation exhaust system are predicted to occur on Site C podium locations closest to the exhaust. These concentrations, which require further evaluation and refinement, would potentially constitute a significant adverse impact on air quality. However, design modifications, including restrictions on the location of air intakes and operable windows on the Building C podium could preclude the potential for any significant adverse impact associated with the LIRR ventilation exhaust system. Between the Draft and Final EIS, further evaluation and refinement will be performed to confirm this finding. As necessary, based on this review, measures, such as building design modifications, would be developed and implemented by the Applicant to eliminate or address any significant adverse impact associated with emissions from the LIRR ventilation exhaust system. Therefore, the maximum concentrations from the LIRR ventilation exhaust system would not constitute a significant adverse impact on public health.

Additionally, the analysis presented in Chapter 20, "Construction," determined that construction activities would result in unmitigated significant adverse construction-period noise impacts at receptors adjacent to the work areas for the Proposed Project or the Alternative Scenario. However, construction of the Proposed Project or the Alternative Scenario would not result in chronic exposure to high levels of noise, prolonged exposure to noise levels above 85 dBA, or episodic and unpredictable exposure to short-term impacts of noise at high decibel levels, as per the *CEQR Technical Manual*. Consequently, construction of the Proposed Project or the Alternative Scenario would not result in a significant adverse public health impact.

The proposed gaming facility at the WRY Site would incorporate a robust problem gaming approach to address this public health concern.

## B. METHODOLOGY

### AIR QUALITY

A quantitative assessment of emissions from traffic generated by the Proposed Actions was performed to evaluate the potential for air quality impacts, as described in Chapter 15, "Air Quality." The *CEQR Technical Manual* thresholds for particles with an aerodynamic diameter less than 2.5 microns in diameter (PM<sub>2.5</sub>) include NAAQS. The NAAQS represent levels that are requisite to protect the public health, allowing an adequate margin of safety. In addition, *de minimis* criteria, which for annual average PM<sub>2.5</sub> is quantified based on the incremental change in concentrations, is used to determine the potential for significant adverse PM<sub>2.5</sub> impacts under CEQR.

For stationary source emissions associated with the LIRR platform ventilation system, a quantitative assessment of emissions was performed to evaluate the potential for air quality impacts, as described in Chapter 15, "Air Quality." Concentrations of 1-hour nitrogen dioxide (NO<sub>2</sub>) and other pollutants were modeled. For NO<sub>2</sub>, concentrations are added to background levels and are compared to NAAQS to determine the potential for significant adverse PM<sub>2.5</sub> impacts under CEQR.

### CONSTRUCTION NOISE

The construction noise analysis presented in Chapter 20, "Construction," was used to identify the extent of the potential construction-period noise exposure to the public as a result of the Proposed Project or the Alternative Scenario. The *CEQR Technical Manual* thresholds for construction noise are based on quality-of-life considerations. In this chapter, the potential for the construction-period noise exposure identified in Chapter 20, "Construction," to affect the health of the affected population is evaluated.

## C. PUBLIC HEALTH ASSESSMENT

### AIR QUALITY

#### INTRODUCTION

##### *Mobile Sources*

As discussed in Chapter 15, "Air Quality," the maximum annual incremental PM<sub>2.5</sub> concentration is predicted to potentially exceed the annual *de minimis* criterion at Eleventh Avenue and West 33rd Street, Eleventh Avenue and West 30th Street and Tenth Avenue and West 30th Street in the With Action condition for the Proposed Project, and at Eleventh Avenue and West 30th Street for in the With Action condition for the Alternative Scenario. However, the maximum daily (24-hour) incremental PM<sub>2.5</sub> concentration is not predicted to exceed the CEQR *de minimis* criterion at the three analyzed intersections. No other exceedances of air quality standards (i.e., the National Ambient Air Quality Standards [NAAQS], the New York City carbon monoxide *de minimis*, or the New York State Department of Environmental Conservation [DEC] 24-hour particulate matter *de minimis*) were projected as a result of the Proposed Actions. Therefore, this section focuses on the potential public health effects related to annual incremental PM<sub>2.5</sub> concentrations in the future with the Proposed Actions.

### *LIRR Platform Ventilation System*

As discussed in Chapter 15, “Air Quality,” in terms of stationary sources, maximum concentrations of 1-hour  $\text{NO}_2$  from the LIRR platform ventilation system are predicted to occur on Site C podium locations closest to the exhaust. These concentrations, which require further evaluation and refinement, would potentially constitute a significant adverse impact on air quality. However, design modifications, including restrictions on the location of air intakes and operable windows on the Building C podium could preclude the potential for any significant adverse impact associated with the LIRR ventilation exhaust system. Between the Draft and Final EIS, further evaluation and refinement will be performed to confirm this finding. As necessary, based on this review, measures, such as building design modifications, would be developed and implemented by the Applicant to eliminate or address any significant adverse impact associated with emissions from the LIRR ventilation exhaust system.

No other exceedances of NAAQS were projected as a result of the Proposed Actions. Therefore, this section focuses on the potential public health effects related to annual incremental  $\text{PM}_{2.5}$  concentrations in the future with the Proposed Actions.

### *LIMITATIONS OF DISPERSION MODELS*

Chapter 15, “Air Quality,” provides the results of microscale analyses that evaluated the potential effect of the Proposed Actions on air pollutant concentrations at critical intersections from the emission of pollutants from mobile sources and their dispersion in the surrounding areas. The emissions and dispersion models utilized available traffic data from different periods of the day; however, for certain periods of the day where traffic data was not available (e.g., overnights, weekend off-peak periods), traffic model outputs from the most representative periods were used in the air quality analysis, which resulted in some hours of the 24-hour weekday and weekend periods utilizing more conservative traffic conditions.

For stationary sources, the analysis used conservative estimates of locomotive operations and conservative assumptions on the flowrate from the ventilation system.

Furthermore, as described in that chapter, the air pollutant dispersion models used in the analysis mathematically simulate how vehicle characteristics, meteorology, and physical configuration combine to affect pollutant concentrations. The mathematical expressions and formulations contained in the various models attempt to predict an extremely complex physical phenomenon as closely as possible. However, because all models contain simplifications and approximations of actual conditions and interactions, and since it is necessary to predict the reasonable worst-case condition for regulatory purposes, most dispersion analyses predict conservatively high concentrations of pollutants, particularly under adverse meteorological conditions.

### *POTENTIAL AREA OF IMPACT*

For the mobile source analysis, the predicted increase in annual average  $\text{PM}_{2.5}$  concentrations is determined at a distance of 15 meters (approximately 50 feet) from a roadway corridor, which is similar to the minimum distance defined for locating neighborhood scale monitoring stations. The potential exceedances would be limited to the immediate areas around an intersection. The areas with modeled exceedances of the

*de minimis* criterion include the sidewalk locations at the affected intersections and the immediate surroundings. The affected areas are primarily used by transient users (pedestrians), therefore, the overall exposure to the predicted PM<sub>2.5</sub> exceedances at the affected locations near these intersections would be brief, and average exposure would be below the short-term (24-hour) PM<sub>2.5</sub> *de minimis* criterion. Because the areas affected represent a very small portion of the area within the neighborhood, the effect on PM<sub>2.5</sub> concentrations would not represent a neighborhood-wide effect but rather a localized one, primarily associated with areas near the roadways.

For the stationary source analysis, the maximum concentrations from the LIRR platform ventilation system are predicted to occur on the Site C Podium, along portions of the north and west facades. No 1-hour NO<sub>2</sub> concentrations exceeding the NAAQS are predicted at off-site locations, and no receptors at ground level were identified as exceeding the NAAQS.

### **POTENTIAL EFFECT ON PUBLIC HEALTH**

#### **Mobile Sources**

While the maximum incremental increase in PM<sub>2.5</sub> concentration was predicted to exceed the *CEQR Technical Manual de minimis* criterion on an annual basis, it should be noted that the *de minimis* criteria by itself is not a direct indicator of unhealthy air quality. When added to the current measured background concentration at the nearest representative DEC monitoring station (7.6 µg/m<sup>3</sup>, measured at JHS 126 in Brooklyn), the maximum total concentration is 8.47 µg/m<sup>3</sup>, which is below the NAAQS of 9 µg/m<sup>3</sup> (see Table 15-18). The NAAQS are established at a level that reduces risk sufficiently that is protective of public health with an adequate margin of safety. Future background concentrations are expected to be lower, continuing a long-term trend in improvements in ambient air quality, due to ongoing efforts at the state and local levels to improve air quality. These include DEC's implementation plans for regional haze, the New York City Climate Mobilization Act and the New York State Climate Leadership and Community Protection Act, which seek to reduce emissions from fossil fuels through use of renewable energy sources and increased energy efficiency. In addition, on December 15, 2021, the New York City Council passed a bill that would effectively ban the installation of most new natural gas and other fossil fuel-fired systems in buildings in New York City prior to the Build Year for the Proposed Actions.

The prediction of future PM<sub>2.5</sub> concentrations from construction of the Proposed Project or the Alternative Scenario are based on very conservative assumptions of future traffic conditions and vehicle emissions (in particular, the analysis does not assume any significant change in current utilization of gasoline and diesel-powered vehicles versus electric vehicles). When accounting for the above-mentioned factors, both the incremental PM<sub>2.5</sub> concentrations from the Proposed Project's and Alternative Scenario's mobile sources and the ambient background PM<sub>2.5</sub> concentrations are anticipated to be reduced in the 2031 analysis year as compared to current levels.

The Proposed Actions would not contribute to or exacerbate a violation of the PM<sub>2.5</sub> NAAQS even with the very conservative assumptions relating to traffic and future build year background PM<sub>2.5</sub> concentration levels used in this analysis. Therefore, the exceedances of the PM<sub>2.5</sub> *de minimis* criterion on an annual basis would not constitute a significant adverse impact on public health.

### *LIRR Platform Ventilation System*

As discussed earlier, maximum concentrations from the LIRR ventilation exhaust system are predicted to occur on Site C podium locations closest to the exhaust. The same considerations described above for future background levels associated with PM<sub>2.5</sub> would apply to NO<sub>2</sub> as regulatory programs to improve air quality (particularly ozone) would result in reduction of NO<sub>2</sub> emissions. Therefore, NO<sub>2</sub> concentrations from the LIRR platform ventilation system under both the Proposed Project and the Alternative Scenario are anticipated to be reduced in the 2031 analysis year as compared to current levels.

As discussed in Chapter 22, “Mitigation,” between the Draft and Final EIS, further evaluation and refinement will be performed to confirm the LIRR ventilation exhaust system finding. As necessary, based on this review, measures, such as building design modifications, would be developed and implemented by the Applicant to eliminate or address any significant adverse air quality impact associated with emissions from the LIRR ventilation exhaust system. Such design modifications could include restrictions on the location of air intakes and operable windows on the Building C podium. If these design modifications eliminate the exceedance of the 1-hour NO<sub>2</sub> NAAQS, the NO<sub>x</sub> emissions from the LIRR ventilation exhaust system would not constitute a significant adverse impact on public health.

### **CONSTRUCTION NOISE**

Construction of the Proposed Project or the Alternative Scenario would be required to follow the New York City Noise Control Code, which requires the implementation of construction noise control measures. Additionally, the Proposed Project and the Alternative Scenario would include construction noise control measures beyond those required by the Code. Specific noise control measures would be incorporated in noise mitigation plan(s) required under the New York City Noise Code. These measures could include a variety of source controls (i.e., reducing noise levels at the source or during the most sensitive construction time periods) and path controls (e.g., placement of equipment, implementation of barriers or enclosures between equipment and sensitive receptors).

Even with the implementation of these noise control measures, the analysis presented in Chapter 20, “Construction,” concluded that construction of the Proposed Project or the Alternative Scenario has the potential to result in construction noise levels that exceed the construction noise impact criteria at ten receptors under either With Action scenario (i.e., The High Line north of West 30th Street, Hudson Yards Public Square and Gardens, the Vessel, Hudson River Park between West 26th Street and West 30th Street, Bella Abzug Park, 311 Eleventh Avenue, 606 West 30th Street, the west façade of 553 West 30th Street, the west façade of 34 Hudson Yards, and the west façade of 380 Eleventh Avenue) and one additional receptor (i.e., Site C1) under the Alternative Scenario. Although the thresholds for significant adverse construction noise impacts are predicted to be exceeded at certain locations during construction, these exceedances would not constitute a significant adverse public health impact. An impact found pursuant to a quality-of-life framework (i.e., a significant adverse construction noise impact) does not necessarily indicate that an impact would occur when the analysis area is evaluated in terms of public health (i.e., a significant adverse public health impact).

The predicted construction-period noise impacts identified and described in Chapter 20, “Construction,” would not constitute chronic exposure to high levels of noise because of the temporary and intermittent nature of construction-period noise. The maximum predicted construction noise levels associated with the Proposed Project or the Alternative Scenario would occur over a limited duration during the construction period based on the amount and type of construction work occurring in the construction work areas. Construction activity other than platform construction would typically be limited to the typical construction hours of 7 AM to 3 PM with extended shifts not going beyond 6 PM, leaving the remainder of the day and the evening unaffected by construction noise, except during platform construction. The residential locations at which significant adverse construction noise impacts were predicted to occur all provide at least 28 dBA of window/wall attenuation, ensuring interior noise levels during construction activity no greater than 55 dBA, which is within 10 dBA of the threshold considered acceptable for residential use according to *CEQR Technical Manual* noise exposure guidance and as such would not be considered “exposure to high levels of noise.”. Since the construction noise would fluctuate in level and would not occur constantly throughout the construction period, which itself is limited in duration, construction noise would not be described as “chronic.” Therefore, construction associated with the Proposed Project or the Alternative Scenario would not have the potential to result in chronic exposure to high levels of noise.

For the receptors at which significant adverse construction noise impacts were predicted to occur that represent indoor uses (i.e., not open space), the building façade at each receptor would offer at least 28 dBA reductions in noise exposure for the occupants of these spaces. As for open spaces that would experience significant adverse construction noise impact, the portions of the High Line (i.e., open space) where high construction noise levels were predicted to occur are those at which equipment would be operating immediately adjacent to the High Line (e.g. the portion of the High Line directly underneath Site A, during construction of that building). While the Applicant would coordinate with NYC Parks and Friends of the High Line to maintain pedestrian access to the High Line and minimize disruption to its use, the pedestrian access pathways through and adjacent to active work areas would not be places that people would congregate or pass time; rather, users would move along the pedestrian paths through to unaffected areas. As such, it is not expected that the portions of the High Line immediately adjacent to or within active construction areas would be occupied during this portion of the construction period, and users of the High Line would not actually be exposed to high noise levels due to construction for a prolonged period. In addition, the potential for noise effects related to construction sources would be temporary and localized and is not expected to rise to area-wide level impacts that would warrant a detailed public health assessment. Therefore, given the magnitude and duration of the construction noise at nearby spaces, construction associated with the Proposed Project or Alternative Scenario would not result in significant adverse public health impacts due to construction noise.

### **PROBLEM GAMING**

As defined by the American Psychiatric Association, gambling disorder—also known as problem gaming—is identified by a pattern of repeated and ongoing betting and wagering that continues despite creating multiple problems in several areas of an individual’s life. Problem gambling is also associated with other behavioral health concerns, including

mental health disorders and substance use disorders.<sup>1</sup> Research suggests that problem gambling disproportionately affects disadvantaged groups; that increased accessibility, availability, and acceptability of gambling facilities have been linked to increased rates of problem gambling behavior; and that onset of gambling during adolescence into early adulthood is associated with higher incidence and severity of gambling and a risk factor for gambling disorder later in life.<sup>2</sup> Problem gaming is a complex phenomenon requiring a strong public health commitment by all stakeholders. At the same time, despite gambling opportunities being readily available, a recent survey by the New York State Office of Addiction Services and Supports (OASAS) concluded that more than two-thirds of adults in New York do not gamble at all; around 4.4 percent are at risk, and less than 1 percent are problem gamblers.<sup>3</sup>

To address this issue, New York State promotes responsible gaming practices across all forms of legal gambling. OASAS certifies problem gambling treatment and prevention centers throughout the state; referrals to these resources can be accessed through a dedicated 24/7 phone number, 1-877-8-HOPENY. The New York State Gaming Commission, OASAS, and the New York Council on Problem Gaming have also formed the Responsible Play Partnership to coordinate and raise awareness of problem gambling treatment services. At the national level, the National Council on Problem Gambling operates the National Problem Gambling Helpline, which can connect people with gambling issues to local resources. At the City level, programs and services that focus specifically on treating gambling addiction include the Center for Motivation and Change, which offers comprehensive outpatient and residential treatment; the Lower East Side Recovery Center, which offers evidence-based treatment for problem gambling, including special programs for concurrent substance use disorders; and the SAFE Foundation, which operates a problem gambling treatment program combining therapy and financial counseling.<sup>4</sup> Financial counseling, including debt counseling and

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<sup>1</sup> Dowling NA, Cowlishaw S, Jackson AC, Merkouris SS, Francis KL, Christensen DR. Prevalence of psychiatric co-morbidity in treatment-seeking problem gamblers: A systematic review and meta-analysis. *Aust N Z J Psychiatry*. 2015 Jun;49(6):519-39. doi: 10.1177/0004867415575774. Epub 2015 Mar 3. PMID: 25735959; PMCID: PMC4438101.

<sup>2</sup> A. A. Alegria, N. M. Petry, D. S. Hasin, S.-M. Liu, B. F. Grant, and C. Blanco (2009). Disordered gambling among racial and ethnic groups in the US: Results from the National Epidemiologic Survey on alcohol and related conditions CNS spectrums. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2737691/>;  
O'Gilvie, P. J. (2022). The impact of casino proximity on northeast urban communities: A literature review. *Humanities and Social Sciences Communications*, 9(36). <https://doi.org/10.1057/s41599-022-01055-1>;  
Moreira D, Azeredo A, Dias P. Risk Factors for Gambling Disorder: A Systematic Review. *J Gambl Stud*. 2023 Jun;39(2):483-511. doi: 10.1007/s10899-023-10195-1. Epub 2023 Mar 8. PMID: 36884150; PMCID: PMC9994414.

<sup>3</sup> Office of Addiction Services and Supports (OASAS). (2020). *Gambling survey 2020*. New York State Office of Addiction Services and Supports. [https://oasas.ny.gov/system/files/documents/2024/03/oasas\\_gambling\\_survey\\_2020.pdf](https://oasas.ny.gov/system/files/documents/2024/03/oasas_gambling_survey_2020.pdf)

<sup>4</sup> Center for Motivation and Change (2024). <https://motivationandchange.com/> Accessed October 2024; Lower East Side Recovery Center (2024). <https://www.lesc.org/we->

emergency resource referrals, is available for free through NYC Financial Empowerment Centers.<sup>5</sup> In addition, mental and behavioral health services are offered throughout New York City, including at NYC Health + Hospitals (H+H) facilities and at nonprofit organizations across the City.

As described in Chapter 1, “Project Description,” concurrently with the land use application for the Proposed Actions to facilitate the development of the Proposed Project, the Applicant is seeking a license from the New York State Gaming Facility Location Board to operate a gaming facility on the Development Site. The application for the Gaming Facility License is subject to a separate state approval process. The Request for Applications (RFA) for the gaming facility license states that “No applicant shall be eligible to receive a gaming license unless the applicant meets the following criteria and clearly states as part of an application that the applicant shall: ...demonstrate to the commission how the applicant proposes to address problem gambling concerns...” The Applicant intends to work collaboratively with local partners (including OASAS and Supports HOPEline) and an academic team to build a robust problem gambling approach, based on the latest scientific findings driven by the world’s leading academics, as well as the Applicant’s decades of comprehensive experience working to support responsible gaming. This approach would include strong prevention, education, treatment, enforcement, operations, and research programs, incorporating local, regional, national, and global expertise.

The proposed gaming facility at the WRY Site would provide responsible gaming training programs to the entire team of employees, with advanced training for “Responsible Gaming Ambassadors” tasked with connecting those in need with available resources on site and in the community. Responsible Gaming Ambassadors would be educated and tested on the science of gambling addiction, and would intercede in a dignified and appropriate manner that is sensitive to the patron. Further, all employees, upon onboarding and in annual refresher courses, would be trained in the warning signs for problem gambling, grounded in the scientific literature and the official Diagnostic and Statistical Manual for Mental Disorders (DSM) medical criteria. Trainings would be specifically connected with local New York resources. The University of Nevada, Las Vegas (UNLV) International Center for Gaming Regulation also provides regulator educational programs on problem gambling, with the Applicant’s support. The Applicant’s academic team would also work with colleagues in New York to conduct independent, scientific, peer-reviewed research on prevention, education, treatment, enforcement, and operations programs.

The Applicant would also work to support voluntary self-exclusion programs. In New York State, individuals who recognize they may have a gambling problem may self-exclude, meaning the individual can choose to be barred from gaming properties and applications, including, but not limited to commercial casinos, sports wagering, video lottery facilities and the New York Lottery. An individual may self-exclude in New York by completing and

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offer/problem-gambling/ Accessed October 2024; The SAFE Foundation (2024).  
<https://www.thesafefoundation.org/problem-gambling-treatment>. Accessed October 2024.

<sup>5</sup> New York City Department of Consumer and Worker Protection (2024). Retrieved from <https://www.nyc.gov/site/dca/consumers/get-free-financial-counseling.page>. Accessed October 2024.

## **Western Rail Yard Modifications**

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submitting a notarized Request for Voluntary Self-Exclusion form and photograph to the New York State Gaming Commission, or by self-excluding at licensed gaming facilities across the state. ssss

In summary, the proposed gaming facility at the WRY Site would incorporate a robust problem gaming approach to address this public health concern. \*