

## **A. INTRODUCTION**

In accordance with City Environmental Quality Review (CEQR), this chapter presents and analyzes alternatives to the Proposed Project. Under CEQR, alternatives selected for consideration in an Environmental Impact Statement (EIS) are generally those which have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of the action.

As described in the *Final Generic Environmental Impact Statement for the Phased Redevelopment of Governors Island* (2011 FGEIS), the consideration of alternatives has been central to the planning of Governors Island. Alternative proposals have been considered for both the programming and design of the facilities and open space on the Island. These planning efforts, including extensive public input, led to the selection of a Park and Public Space Master Plan (the Park Master Plan) that incorporates elements of various proposals. The alternatives development process is outlined in Section B of this chapter.

CEQR requires the examination of a No Action Alternative, the alternative in which the Proposed Project would not be undertaken. The technical chapters of this SGEIS have described the No Action Alternative (referred to as “The Future without the Proposed Project”) and have used it as the basis to assess the potential impacts and associated mitigation for the Proposed Actions. The following sections describe the No Action Alternative and then compare its likely impacts with those expected from the Proposed Project. This analysis considers potential effects in 2030 when development associated with the Proposed Project is expected to be complete.

The Proposed Project is expected to include the reuse of more than 1.2 million square feet in existing North Island historic buildings by 2022, and the development and construction of 1.625 million square feet of uses in the two future development zones on the South Island by 2030. Collectively, including existing uses, the Proposed Project would result in a total of three million square feet of development on Governors Island (roughly equivalent to the total square footage of development on the Island in the U.S. Coast Guard era). The specific future uses for the South Island development zones have not yet been proposed, defined, or designed and would likely be the subject of a supplemental environmental review. However, for analysis purposes in this SGEIS, two options were identified for the North Island re-tenanting and the South Island Development Zones—a University/Research Option and a Mixed-Use Option. Chapters 3 through 13 of this SGEIS considered the potential environmental effects of these representative development programs relative to future no build conditions. Section D of this chapter compares their potential effects.

## **B. ALTERNATIVES DEVELOPMENT PROCESS**

Immediately after taking control of the Island in 2003, the Governors Island Preservation and Education Corporation (GIPEC) initiated a pre-planning effort as a first step in identifying appropriate future uses. This process, which included a broad outreach to civic groups, the

public, agencies, and potential developers and tenants, developed project objectives and produced a development framework. In 2005, GIPEC issued a Request for Expressions of Interest to developers, and the responses were helpful in creating four island concepts in the development framework: Minimum Build Island, Iconic Island, Innovation Island, and Destination Island. The results of the pre-planning were incorporated into the Governors Island Land Use Improvement and Civic Project General Project Plan (GPP), which both the GIPEC and ESDC boards adopted in January 2006.

Once the GPP was adopted, GIPEC issued a Development Request for Proposals (RFP) for whole-island and component proposals in accordance with the GPP development principles. Although several developers and tenants from both commercial and not-for-profit sectors responded, no major proposals could be selected. However, the RFP did yield a proposal, which became the Urban Assembly New York Harbor School, a New York City public high school which began operation in June of 2010 in an existing building.

Following the RFP process, GIPEC focused on planning for the expansion of public access, particularly by providing a major park and public spaces as a first step in a phased mixed-use development strategy and issued a Request for Qualifications in 2006. In 2007, GIPEC selected five teams to participate in a competition for the future public open space and park design. GIPEC selected a team of landscape architects and engineers, headed by West 8, to create a park and public space master plan. As noted above, the responsibility for 150 acres of the Island was transferred to the City in July 2010 under the direction of The Trust.

## **C. NO ACTION ALTERNATIVE**

### **DESCRIPTION**

The No Action Alternative assumes that the Proposed Project is not implemented. It is assumed that Governors Island will continue to operate as an open space resource as previously anticipated with the approval of Phase 1 of the Proposed Project. Phase 1 park and public space improvements are now under construction with an expected completion date in 2013. Water main and seawall improvements are expected to be completed by 2014. The previously-approved demolition of non-historic structures is ongoing.

However, there would be no re-tenancing of historic structures in the North Island, no completion of the park and open spaces, and no development of new uses in two South Island Development Zones. Visitation would be dependent on certain factors that can be controlled, such as the ability to access the Island (number of operating days and hours, ferry capacity, and frequency). Public outreach and enhancements in recent years have made Governors Island a highly visited summer weekend destination, and at peak times, ferries already operate at capacity. This alternative essentially reflects conditions described as the “Future Without the Proposed Project” in Chapters 3 through 13. This analysis that follows compares conditions under the No Action Alternative to conditions with the Proposed Project in the 2030 analysis year.

### **LAND USE, ZONING, AND PUBLIC POLICY**

Under the No Action Alternative, the Trust would continue with the improvements that were approved in the 2011 FGEIS, including the Phase 1 park and public space improvements that will be completed by 2013, and the water main and seawall improvements that will be completed by 2014. The Trust would also continue with the previously-approved demolition of buildings in the South Island. These sites and other areas of the Island that have not already been

developed with open space or other uses would remain vacant and unused. The No Action Alternative would not result in the development of new uses that would enliven the Island and enhance the City's economy. The No Action Alternative would not result in the creation and mapping of the Special Governors Island District, and would not enhance ferry service to the Island or expand and improve publicly accessible open space to the degree that the Proposed Project would. The No Action Alternative would be inconsistent with the Park Master Plan for the Island and would be less supportive of the goals of PlaNYC, compared to the Proposed Project. Like the Proposed Project, the No Action Alternative would not result in significant adverse impacts on land use, zoning, and public policy; however, it would not achieve many of the benefits of the Proposed Project.

## **SHADOWS**

The No Action Alternative would not result in the construction of a new structure on the Soissons Concession site and would not cast new shadow on the portions of the adjacent publicly accessible open space areas and the Upper New York Bay. However, even with the shadows cast by the new building the Proposed Project would not result in significant adverse shadow impact.

## **HISTORIC AND CULTURAL RESOURCES**

The No Action Alternative includes the previously approved Phase 1 park and public space improvements, the water main and seawall improvements, and the demolition of existing buildings on the Island. As discussed in the 2011 FGEIS, Phase 1 would not be expected to have an adverse contextual effect on historic resources.

As compared to the Proposed Project, the No Action Alternative would not result the re-tenanting of historic structures on the North Island that reviewed and approved by the New York City Landmarks Preservation Commission (LPC) and the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), as appropriate to meet the objectives of the *Governors Island Historic District Preservation and Design Manual* (Design Manual). Many of the historic North Island buildings would not be renovated and could experience deterioration. There would also be less new open space on the South Island and sites of existing buildings that have been and will be demolished would remain vacant, making the Island less attractive than with the Proposed Project. While the No Action Alternative would not directly impact historic resources, it offers limited potential to benefit historic resources through the revitalization and enhancement of their surroundings.

## **URBAN DESIGN AND VISUAL RESOURCES**

### *URBAN DESIGN*

The Proposed Project would reuse most of the buildings within the Governors Island Historic District. The No Action Alternative would not reuse buildings, and the North Island would not change substantially. The unused buildings on the North Island would remain vacant. Demolition of existing buildings on the South Island and limited buildings on the North Island would be completed, noticeably altering the urban design of the South Island. However, unlike the Proposed Project, which would include active new buildings and substantial new open space, this alternative would instead result in undeveloped and underutilized space—which would be detrimental to the Island in terms of urban design character.

Under the No Action Alternative, the completion of the park and public spaces on the Island, pursuant to the Park Master Plan, would not occur. Under the No Action Alternative, the

cohesive streetscape program for the Great Promenade, considered an enhancement to the Island's urban design, would not be implemented. The proposed change to the South Island's topography would not occur with the No Action Alternative; therefore, the area's wind characteristics would not improve and a better environment for trees and more shade opportunities would not be provided. Certain proposed improvements, including the Hills and the Great Promenade, would also not occur and additional new open space opportunities beyond those in Phase 1 would not be provided.

#### *VIEW CORRIDORS AND VISUAL RESOURCES*

The Proposed Project includes park elements that would substantially enhance views from the Island. Under the No Action Alternative, improvements to the Great Promenade would not occur, and the context of the Island's existing views and the visual resources on the North Island would not be improved. On the South Island, the South Prow, Liberty Terrace, and the Hills would not be created and the Island's current viewing opportunities would not be expanded. Because there would be no new buildings in the South Island Development Zones, there would be no potential for this alternative to affect off-Island view corridors.

#### **TRANSPORTATION**

The No Action Alternative would have none of the new student, employee and visitor populations associated with the Proposed Project and thus none of the trips associated with those populations. Public access to the Island would continue to be restricted to Fridays, weekends and holiday Mondays during four months of the year.

#### *TRAFFIC*

Under the No Action Alternative, there would be fewer vehicle trips than with the Proposed Project. None of the significant adverse impacts projected for the 2022 analysis year at intersections near the Battery Maritime Building and Pier 6 would occur, and no mitigation measures would be needed. None of the potential significant adverse impacts associated with the full development of the Island by 2030 would occur.

#### *TRANSIT*

The No Action Alternative would not have the significant adverse impact at the Bowling Green station (Nos. 4/5 lines) stairway at the State Street entrance projected with the Proposed Project in the 2022 analysis year, and mitigation would not be needed. Full development of the Island by 2030 may result in additional significant adverse transit impacts from the Proposed Project; these potential impacts would not occur with the No Action Alternative.

#### *PEDESTRIANS*

With the Proposed Project, three crosswalk locations in Manhattan would be significantly impacted by increased pedestrian activities; however, measures have been identified to fully mitigate these impacts. These impacts would not occur with the No Action Alternative and mitigation would not be needed. Full development of the Island by 2030 may result in additional significant adverse pedestrian impacts that would not occur with the No Action Alternative.

#### **AIR QUALITY**

The No Action Alternative would result in lower emissions from new vehicle trips, increased ferry service, and building heating and cooling and hot water than the Proposed Project. However, neither the No Action Alternative nor the Proposed Project would result in significant

adverse impacts to air quality in the 2022 analysis year. As concluded in the FGEIS, any air quality impacts with full development by 2030 can be avoided by design measures or other mitigation measures. The No Action Alternative would avoid potential impacts with the need for mitigation or design measures.

### **GREENHOUSE GAS EMISSIONS**

The No Action Alternative would result in lower emissions from vehicle trips, ferry service, and building uses than the Proposed Project. However, neither the Proposed Project nor the No Action Alternative would affect greenhouse gas emissions such that there would be inconsistency with the City's policies. Unlike the Proposed Project, the No Action Alternative would not reduce the Island's vulnerability to storm surges by designing new topography on the island at 4 feet above the current 100-year flood levels.

### **NOISE**

Since there would be no increase in ferry traffic under this alternative, the significant adverse noise impacts at open space locations immediately adjacent to ferry landings would not occur. Since there would not be any additional schools, there would be no potential noise impacts related to playgrounds. In addition, since the North Island buildings would not be re-tenanted, there would be no need for building attenuation. The new open space that is part of the 2022 development would not be created and would therefore not be subject to noise levels in excess of the 55 dBA  $L_{10(1)}$  prescribed by CEQR criteria. Unlike the Proposed Project, under this alternative, the South Island Development Zones would not include new land uses by 2030 and would not generate additional ferry traffic, increased noise levels, or require any window/wall attenuation.

### **PUBLIC HEALTH**

Like the Proposed Project, the No Action Alternative would not result in significant unmitigated adverse impact on air quality, water quality, or hazardous materials. The No Action Alternative would not have any of the potential noise impacts associated with the Proposed Project, but as described in Chapter 11, "Public Health," the noise impacts associated with the Proposed Project would not result in public health impacts. Therefore, like the Proposed Project, the No Action Alternative would have no adverse impacts on public health.

### **NEIGHBORHOOD CHARACTER**

The No Action Alternative would result in the minimal changes to neighborhood character projected with the Proposed Project, but it would also not result in any neighborhood character benefits. The No Action Alternative would not result in significant impacts in any of the technical areas related to neighborhood character. Unlike the Proposed Project, the No Action Alternative would not replace underutilized land and vacant buildings with new uses that would enliven the Island with new residential, worker, student, and visitor populations. Whereas the Proposed Project would create a new, unique neighborhood for New York City, the No Action Alternative would not.

### **CONSTRUCTION**

Under the No Action Alternative, there would be significantly less construction activity compared to the Proposed Project; only background work associated with the completion of Phase 1 improvements would take place. Like the Proposed Project, construction activities would have potential effects on park use, cultural resources, hazardous materials, transportation,

air quality, noise, vibration, and water quality and natural resources. However, as the No Action Alternative would involve less construction activity over a shorter timeframe, the duration and intensity of its potential impacts would be less intrusive than for the Proposed Project.

## D. REDEVELOPMENT ALTERNATIVES

As described in Chapter 1, “Project Description,” the uses for the South Island Development Zones have not yet been specifically proposed, defined, or designed. Therefore, to assist in the analysis of full development of the Proposed Project, two potential development scenarios were outlined. The first is a primarily University/Research Option and the second is a Mixed-Use Option. These options do not represent any existing plans or proposals for the island; rather, they are a generalized estimate based on the type and configurations of existing buildings, the underlying conditions of the Island itself, uses required and permitted under the deed, and the general level of inquiries received by The Trust for various uses on the Island. The range of uses is presented below in **Table 14-1**.

**Table 14-1**  
**Governors Island Potential Development Scenarios**  
**(Existing and Proposed)—2030**

Land Use	Existing Re-Tenanted Space (sf) <sup>1</sup>	University Research Option Total (sf)	Mixed-Use Option Total (sf)
<b>University</b>			
Campus	0	422,000	0
Research	0	188,650	0
Academic	0	213,450	0
Housing—Faculty Housing <sup>2</sup>	0	94,300	1,120,950
Housing—Dormitories <sup>2</sup>	0	850,000	450,000
Conference Center/Hotel	0	500,000	350,000
Office	48,450	175,000	348,750
Service Retail/Restaurant <sup>3</sup> ( <i>Not destination, accessory to Island</i> )	0	75,000	75,000
<b>Cultural</b>			
General (Gallery, small museum, etc.)	0	0	128,700
Artist Studio	47,700	104,700	104,700
Movie Theater	0	9,200	9,200
Public School <sup>4</sup>	79,700	227,700	272,700
Maintenance, Support, Other	0	140,000	140,000
<b>TOTAL</b>	<b>175,850</b>	<b>3,000,000</b>	<b>3,000,000</b>
<b>Notes:</b>			
1. The existing re-tenanted North Island uses are not assessed in the SGEIS analyses.			
2. All academic housing: contemplated to be residential uses ancillary to educational uses on- and/or off-Island.			
3. Includes 8,000 sf of redevelopment for the Soissons Concession Site.			
4. In the University/Research Option, a public school for grades 6-12 would be provided. In the Mixed-Use Option, a 45,000-sf elementary school would be provided in addition to the 6-12 school.			

The following sections compare the potential environmental effects of these two options. This comparison section is for informational purposes as the two scenarios are not typical alternatives under CEQR, and the ultimate program for development of the Island may vary in terms of the programming of uses.

- **Land Use, Zoning, and Public Policy:** Both options would provide for up to 3,000,000 square feet of uses on the Island (including existing uses), comprising the re-tenancing of historic structures and new construction on the South Island. Whereas the University/Research Option would include 824,100 square feet of campus, research, and academic uses, the Mixed-Use Option would not include these uses. Under the

University/Research Option there would be more student housing and a larger conference center/hotel than in the Mixed-Use Option. The Mixed-Use Option would result in more faculty housing, office uses, and cultural space than the University/Research Option. Both options would provide for retail space and maintenance and support space of equal sizes. In the University/Research Option, a public school for grades 6-12 would be provided. In the Mixed-Use Option, an elementary school would be provided in addition to the 6–12 school.

Either option for the Proposed Project would comply with the deed restrictions for the Island, and would be consistent with the proposed Special Governors Island District on the North Island. It is anticipated that the South Island Development Zones would require zoning and other land use approvals. Although neither option is expected to result in significant adverse impacts with respect to land use, zoning, and public policy, subsequent discretionary actions will require further environmental review, the extent of which will be determined at that time. Both options would fulfill long-term public policies for the Island, would help achieve the City's waterfront and open space goals, and would result in substantial economic development.

- ***Shadows:*** New construction associated with either development option would likely result in new shadows on portions of the open spaces created or improved by the Proposed Project. However, since South Island structures have not been designed or proposed, any difference in shadows cannot be determined at this time. Generally, in either case, open spaces and sun-sensitive historic resources that are near the South Island development zones would be more likely to experience project-generated shadows than those farther away or directly to the south.
- ***Historic and Cultural Resources:*** Both development options would result in new construction on the South Island and the re-tenanting of historic structures on the North Island. Under either development option, construction activities on the North Island have the potential to disturb archaeological resources, but there is no archeological sensitivity within the development zones on the South Island. The design and implementation of renovations to historic structures would be undertaken in consultation with LPC and OPRHP, consistent with the Design Manual. The Trust anticipates developing design guidelines for the South Island Development Zones intended to create a harmonious relationship between the new buildings, the historic buildings and landscapes, and the new landscapes. Further, when such development has been planned and designed, it is anticipated that it would require land use actions subject to CEQR, and the associated future environmental review would take into account potential impacts to historic and cultural resources. However, it is not anticipated that the potential effects of the Proposed Project on historic resources would vary substantially under either development option.
- ***Urban Design and Visual Resources:*** While the potential uses of buildings in the North Island would be somewhat different between the two options, in either case they would be an improvement over the current vacancies. Either option would reuse existing buildings, and therefore the types and arrangements of the buildings in this area, and their relationship to surrounding open spaces and natural resources would not change. The potential siting, height, massing, design, and materials of the new buildings to be developed in the South Island Development Zones have not yet been developed or designed. Therefore, it is not feasible to determine whether there would be any potential differences in the potential urban design or visual resources impacts of the two development options.
- ***Transportation:*** It is anticipated that both development options would result in significant adverse transportation impacts at certain locations in Lower Manhattan and Brooklyn. Since

the University/Research Option results in more person and vehicle trips than the Mixed-Use Option, the number and severity of its impacts would likely be greater. It is anticipated that mitigation measures could be developed to alleviate many of the impacts of either option.

- **Air Quality:** Any new buildings constructed as part of either development option would require heat and hot water systems, which will use natural gas as fuel. While a detailed assessment of these sources is not possible at this time, there are reasonable measures that could avoid the potential for significant adverse air quality impacts from building operations. The public school, research, or university laboratories that could be included in the South Island Development Zones can also be designed to avoid the potential for significant adverse impact on air quality in the event of an accidental chemical spill. While the specific effects of the University/Research or Mixed-Use development on air quality standards is not known, the University/Research Option is likely to result in higher mobile source emissions since it would generate more vehicular traffic than the Mixed-Use Option.
- **Greenhouse Gas Emissions:** While the specific effects of the two options on air quality standards is not known, the University/Research Option is likely to result in higher greenhouse gas emissions since it would generate more vehicular traffic than the Mixed-Use Option. In addition, although the South Island Development Zones have not yet been designed in detail, the final design will incorporate design measures such as raising the grade and/or protective measures such as storm barriers and sealed critical infrastructure designed to accommodate a 2-foot increase in the 100-year storm level by the end of the century, or the most recent appropriate level based on the best information available at the time final designs are made.
- **Noise:** Under either development option, the proposed school playgrounds could potentially result in significant adverse noise impacts if they are located immediately adjacent to open space areas or other noise-sensitive land uses. In either option, buildings in close proximity to a school playground would require up to 31 dBA of window/wall attenuation. Both options would also have the potential for mobile source noise impacts resulting from increased ferry service.
- **Public Health:** It is not expected that the development options would result in significant adverse impacts on air quality, water quality, or hazardous materials. However, the Proposed Project would result in significant adverse noise impacts on open space locations immediately adjacent to ferry landings.. Mitigation measures for these impacts would not be feasible. There could also be significant adverse impacts at locations near the proposed school playgrounds CEQR noise thresholds are based on quality of life considerations and not on public health considerations. While the noise level increments at these locations would be considered significant according to CEQR criteria, absolute noise levels at these locations would be comparable to other open space areas in New York City. Although noise levels in the Proposed Project's open spaces would exceed recommended CEQR thresholds, they would not result in significant adverse public health impacts
- **Neighborhood Character:** Both options would provide for a mix of uses on the Island and create a new, unique neighborhood for New York City. The University/Research Option would create a college campus, housing for its students and staff, and supporting institutional and retail uses for its students, faculty, and staff. The Mixed-Use Option would not develop a new campus on the Island, but it would provide housing for faculty and students of an off-Island institution. In either case, the Proposed Project would replace underutilized land and vacant buildings with new uses that would enliven the Island. Both



would result in a noticeable change in the character of the Island, but this change would be positive and not adverse.

- **Construction:** Both options have the potential to result in significant impacts during construction, particularly for the South Island Development Zones. Such impacts could result from the transport of construction materials and noise generated by construction activities. The extent and duration of such impacts would depend upon the ultimate design for the South Island Development Zones. Therefore, it is not feasible to determine whether there would be any potential differences in the construction impacts of the University/Research or Mixed-Use development options.

When the development program for the South Island Development Zones has been better defined, it is anticipated that additional environmental review would be undertaken. The potential effects of the South Island Development Zones would be studied in detail at that time and mitigation measures would be identified as appropriate. \*