Appendix D:
Written Comments Received on the DGEIS

Governors Island ALLIANCE

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Donna Milrod
Deutsche Bank

Kent Barwick
Laurie Beckelman
Beckelman & Capalino LLC
Peg Breen
NY Landmarks Conservancy
Tonio Burgos
Tonio Burgos and Associates, Inc / Nyprocoa, Inc.
Michael Burke
Statue Cruises
Albert Butzel
Albert K. Butzel Law Office
Vin Cipolla
Municipal Art Society
Jay Clayton
Sullivan & Cromwell
Ian Danic
Electra Information Systems
Helena Durst
Durst Organization
Kenneth Fisher
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Trinity Real Estate
Richard Kahan
The Urban Assembly
Edith Kean
Landscape Designer
Richard Kennedy
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Robert Levine
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Amelia Rea Maguire
University of Miami Business School
Sean McDevitt
Maren Group
Sara Mirski
Recycled House
Cristyne Nicholas
Nicholas & Lence Communications
Marc Ricks
Goldman Sachs
Judith Rivkin
Christodora
Jay Schippers
Housing Resource Foundation
Thomas Secunda
Bloomberg LP
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Regional Plan Association
Ivan Thornton
Fiduciary Management Group
Robert Yaro
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Executive Director
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Testimony of Robert Pirani
Executive Director

December 2, 2011

Draft Generic Environmental Impact Statement for the Phased Redevelopment of Governors Island

Thank you for this opportunity to testify on the proposed Phased Redevelopment of Governors Island.

Since 1995, the Governors Island Alliance has worked to celebrate the Island's rich history, create memorable parks and public spaces, and ensure appropriate reuse of the Island and its historic structures.

We are delighted by the considerable progress that has been made over the last year on the Island. The completion of the Generic Environmental Impact Statement is another tangible sign and one that should lead directly to construction as soon as possible so that work can be completed by 2013. We appreciate the work by the Trust and their consultants in advancing this timetable, one that we very much support.

The proposed Phase I Park improvements and the creation of needed water, transportation, and communications infrastructure will transform the Island. The decision to focus park improvements around Liggett Hall, the historic district, and move forward on the sports fields are excellent choices for this initial action. The designs are spectacular and well thought out. The provision of potable water and modern telecommunications has clearly been a priority and we are pleased that the Trust is moving forward. It our hope that this new amenity and infrastructure will help attract the development that is vital to the future of the National Historic Landmark District and the Island as a whole.

The tiered analysis of the impacts with the project, with more detailed analysis for Phase I of the Park Plan and less details on the later phases of the Park and the redevelopment areas, is warranted given uncertainty in the redevelopment plans *and* the Trust's expectation that any future development on the Island will require a rezoning, design guidelines, and a robust public consultation, supplemental analysis and public disclosure of subsequent impacts.

While we appreciate the need for this parsing, it does require that the Trust take care to ensure that decisions made now about Phase I circulation, site improvements, and storm water management consider

how these will be affected by any future changes the development zones and historic district.

In terms of the issues and impacts discussed in the DGEIS, we offer the following comments:

- The DGEIS describes elements of the later phase of the Park and Open Space Plan. We would suggest that this include discussion of the maritime uses on the Island, in particular around the protected northern end of the Island. This is the most suitable location on the Island for small boats and human powered vessels like kayaks and rowboats. The area was historically used by the Army and Coast Guard for their marina. Pier 101 is currently used by ferry operators and the Downtown Boathouse and the adjoining Pier 102, owned by the National Park Service, will soon be opened for such uses. The Harbor School Marine Science Technology Center – which will include a boat house - is also located along this stretch and we understand there are on- going discussions about improvements for docking boats in the area.

- As discussed in Chapter 15, "Transportation," Peter Minuit Plaza and the intersection of State Street and Whitehall Street will experience challenges in accommodating pedestrian movements under the proposed action (as it does now). We assume that the Mitigation will require that a widened sidewalk be constructed in front of the Manhattan ferry portal at the BMB to adequately accommodate the projected visitation demand, as well as an increase in the pedestrian crossing time and widening the west crosswalk at State Street and Whitehall Street, as these are both discussed in the Probable Impacts section of the document. Our understanding is that construction of the widened sidewalk will have to wait until BMB construction plans proceed. In the interim, we believe that the Trust should work with DOT on additional and perhaps temporary measures, including distinct paving or markings – to differentiate the eastern travel lane in front of the Battery Maritime Building. Such marking would increase safety for pedestrians during peak hours while ensuring that vehicles could use the space as needed at other times.

- Removing and replacing the sea wall outside of the historic district with a rip-rap revetment is an excellent choice. As the Alliance noted in our 2010 comments on the Park and Public Space Master Plan, this is a creative engineering solution that will not only save public money, but is likely to better protect the island's shoreline and improve its ecology at the same time. As the Trust moves forward with design and permit approvals, we suggest that they and the relevant state and federal agencies consider how to expand this thinking by incorporating the creation of oyster and shellfish habitat into the revetment design, and to consider how the creative placement of rip-rap could positively impact fishing and public appreciation of the shoreline.

- The Proposed Project will create two ball fields for use by "Little League, adult softball, and soccer." Currently, and under the No Action Alternative, the Urban

Assembly New York Harbor School and other public high school and other users in the area are able to use the seven ball fields currently on the Great Lawn. As a result, the Proposed Project under its present design will limit the use by schools and users seeking regulation-sized ball fields for high school baseball. We are hopeful that, with minor reconfigurations to the Proposed Project, one of the two proposed fields on the Play Lawn could be sized to accommodate high school baseball, if only during specific times when the other field is not in use. Additionally, ensuring that playing fields on the parade grounds could accommodate the temporary striping and/or portable goal posts for soccer and other field sports would greatly increase the utility of these facilities, which are sorely lacking in the lower Manhattan.

- The DGEIS notes that the Proposed Project would not affect the physical operations of, or access to and from, a fire station house. While the Fire Department does provide service to the Island, the lack on an on-Island fire company means that response times to a fire on the Island are, at best, three times and more likely six times the four minute standard travel time recommended by the National Fire Protective Association for first responders (and roughly the current city average). The DGEIS should address steps to ensure fire safety during construction.

Thank you.

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Comments on
Draft Generic Environmental Impact Statement
for
The Phased Redevelopment of Governors Island

December 2, 2011

Submitted by
Urban Assembly New York Harbor School
New York City Department of Education

Nathan Dudley, Principal

The Urban Assembly New York Harbor School ("Harbor School") is a long-term tenant on Governors Island with a 40-year renewable lease to Building 550 in the Historic District. As a New York City public high school that serves approximately 430 students in grades 9 through 12, the majority of whom qualify for free or reduced lunch, and all of whom study marine science or marine technology, Harbor School takes pride in its unique home on Governors Island. Since summer 2010, students, teachers, parents, and staff have enjoyed the benefits of a school surrounded by open fields and located far from the noisy streets of their big city home.

We feel very lucky to be a part of the redevelopment of Governors Island, and we are supportive of the city's efforts to make Governors Island one of the best environments for teaching and learning. The overall plan for redevelopment presents exciting opportunities for anyone who steps onto Governors Island.

As a city entity, a New York City public high school, that provides a public service on Governors Island, the Harbor School is deeply committed to promoting the general welfare of New York City residents, with particular interest in supporting the education and development of the city's children. As the first permanent tenant and largest on-going user of Governors Island, we are disappointed that findings of the Draft Generic Environmental Impact Statement (DGEIS) for The Phased Redevelopment of Governors Island were submitted to the Office of the Deputy Mayor for Economic Development ("Lead Agency") without any formal interview or discussion with students or parents at Harbor School about the Proposed Project. It has felt difficult for our community to engage in a process that has great significance to our school's future.

We are taking advantage of the public comment period to raise our concerns with the *Phase 1* of the Proposed Project. The enumerated comments below represent our concerns with the DGEIS, specifically how the Proposed Project may and will impact Harbor School, its community, and the success of its students. Included in our comment on the Play Lawn is a recommendation for a change that may and will alleviate some, if not all, of our concerns on the issue.

1. Comments for the impact of the Proposed Project:

We disagree with the findings of the DGEIS that (i) "the Proposed Project would not result in significant adverse impact with respect to land use (p. 14)," that (ii) the "proposed open spaces would support the existing institutional and open space uses, including the Urban Assembly New York Harbor School (p. 14)," and that (iii) "there would be no significant adverse impacts from the full development of the Proposed Project due to direct business and institutional displacement (p. 15)."

As a result of the Proposed Project under its present design, Harbor School will be forced to leave Governors Island to use regulation-sized ball fields for high school baseball or any Public School Athletic League (PSAL) sanctioned field sport where striping of field lines is required. This would mean being forced to leave the Island in order to play every field sport. The Proposed Project allocates two ball fields on the proposed Play Lawn, which have been stipulated as regulation size for "Little League, adult softball, and soccer." The No Action Alternative, however, would allow Harbor School to continue using the already available Great Lawn, which can accommodate up to seven ball fields suitable to high school students for practice, competition, and scrimmage in a variety of sports occurring simultaneously, including baseball, flag football, soccer, softball, outdoor volleyball, lacrosse, ultimate Frisbee, field hockey, rugby, outdoor badminton, and other non-specific general aerobic activities. The Proposed Project puts an undue burden on the Harbor School that would require its students and coaches to travel off of Governors Island to use regulation-sized ball fields for high school students, which increases time constraints, costs, and safety concerns, and undercuts one of Harbor School's principal reasons for being on the Island in the first place. It also deprives Harbor School of the opportunity to actually host any PSAL events on Governors Island. The travel that will be imposed on the Harbor School as a result of the Proposed Project is, in our view, an unnecessary direct institutional displacement, which can be easily rectified with minor reconfigurations to the Proposed Project.

At the Harbor School, we would be pleased to see the reconfiguration of at least one of the two proposed fields on the Play Lawn to be sized to accommodate high school baseball. The PSAL should be consulted to provide dimensions appropriate for use as a high school baseball field. We are happy to provide appropriate contacts there if The Trust for Governors Island has not engaged them already.

2. Comments on the impact of the Proposed Project on the sea wall:

We agree with the comments submitted by the Governors Island Alliance, and for emphasis, we have quoted them here:

> "Removing and replacing the sea wall outside of the historic district with a rip-rap revetment is an excellent choice. As the Alliance noted in our 2010 comments on the Park and Public Space Master Plan, this is a creative engineering solution that will not only save public money, but is likely to better protect the island's shoreline and improve its ecology at the same time. As the Trust moves forward with design and permit approvals, we suggest that they and the relevant state and federal agencies consider how to expand this thinking by incorporating the creation of oyster and shellfish habitat into the revetment design, and to consider how the creative placement of rip-rap could positively impact fishing and public appreciation of the shoreline."

3. Comments on the tiered analysis of the Proposed Project:

We are concerned with procedural interpretations of the City Environmental Quality Review (CEQR), the New York State Environmental Quality Review Act (SEQRA), and the National Environmental Policy Act (NEPA) used to justify the broad scope of the DGEIS. We believe the analyses of Later Phases-Island Redevelopment of the Proposed Actions are too vague in the DGEIS and *should require* additional environmental impact statements for any projects to come in the development zones or the historic district.

Thank you for your attention to these matters. We hope the Office of the Deputy Mayor for Economic Development, as the Lead Agency, will take our comments into consideration as it reviews the environmental impact of the Proposed Project on the Harbor School.

Respectfully submitted,

Nathan Dudley

Nathan Dudley
Principal