Chapter 2: Analytical Framework

A. INTRODUCTION

The Trust for Governors Island (The Trust) is sponsoring an initiative by the City of New York to implement a comprehensive redevelopment plan for Governors Island (the "Proposed Project"). This redevelopment of the Island is a complex process and an overall plan for all requirements for the Island has not yet been adopted; therefore, not all the specifics of future development are known at this time. However, the initial phase would be park and open space development and infrastructure improvements, with completion of the park and open space, retenancies in historic buildings, and new development occurring at a later date. This chapter provides an overview of the analytical framework used to guide the technical analyses presented this Generic Environmental Impact Statement (GEIS).

B. ENVIRONMENTAL REVIEW PROCESS

Most state, county, and local government agencies in New York State, except the State Legislature and the courts, must comply with the State Environmental Quality Review Act (SEQRA; Article 8 of the New York State Environmental Conservation Law) when undertaking or approving discretionary actions that could affect the environment. New York City has promulgated City Environmental Quality Review (CEQR) procedures to implement SEQRA for such actions involving City agencies.

To understand the environmental consequences of their decision-making, and to afford the public an opportunity to participate in identifying such consequences, all discretionary decisions of an agency to approve, fund, or directly undertake an action are subject to review under CEQR, unless explicitly excluded or exempted under the regulations. Discretionary decisions involve choices to be made by the decision-makers that determine whether and how an action is to be taken. Non-discretionary or ministerial decisions for which the only determination of an action's approval is verification of compliance with specific and pre-determined criteria (e.g., issuance of a building permit) are not subject to CEQR.

In the case of the Proposed Project, in order to develop and construct Phase 1, the City of New York is providing funding, a discretionary action subject to CEQR. In addition, it is anticipated that numerous city discretionary actions would be required for the Later Phases of the Proposed Project (see Chapter 1, "Project Description"). As set forth below, the SEQRA/CEQR process for this GEIS follows a prescribed path, to enable the agencies to make informed decisions after public disclosure of the expected environmental impacts of the Proposed Project.

LEGISLATIVE APPLICABILITY

This document has been prepared pursuant to the SEQRA, Article 8 of the New York State Environmental Conservation Law, and its implementing regulations (6 NYCRR Part 617) and CEQR requirements as established in Executive Order No. 91 of 1977, as amended, and in Title 62 of the Rules of the City of New York, Chapter 5.

GENERIC ENVIRONMENTAL IMPACT STATEMENT (GEIS)

A GEIS is a broader, more general EIS that analyzes the impacts of a concept or overall plan rather than those of a specific project plan. The GEIS is useful when the details of a specific impact cannot be accurately identified, as no site-specific project has been proposed, but a broad set of future projects is likely to result from the agency's action. The GEIS follows the same format as an EIS for a more specific project, but its content is necessarily broader.

Subsequent discretionary actions under the program studied in the GEIS may require further environmental review. According to NYCRR Section 617.10, "GEISs and their findings should set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQR compliance." Therefore, the GEIS, where appropriate, discusses possible conditions under which further environmental review would be required (e.g., changes in the mix of uses or increases in the size of the development program). Often, the GEIS is used as the foundation for the subsequent environmental review for a site-specific project, since it would have established the analysis framework. Therefore, the subsequent supplemental environmental review need only target the specific narrow impacts associated with the subsequent action.

In particular, the reason for preparing a GEIS under the requirements of SEQRA and the guidelines of CEQR is that the programming associated with the Later Phases for the North Island historic buildings and the two South Island development zones are not specifically proposed, defined, or designed and their operations have not yet been planned. Not all the actions required for the Later Phases-Park and Public Space have been conclusively identified. Therefore, the studies contained in this GEIS for the Later Phases-Island Redevelopment component of the Proposed Project will necessarily be less detailed and will focus on identifying potential associated environmental concerns. To the extent required under CEQR/SEQRA, it is possible that further environmental review may be necessary when certain, as yet undefined components of the Later Phases are considered.

PROCESS OVERVIEW

The following section provides a summary of the procedural framework utilized to comply with environmental review regulations.

ESTABLISHING A LEAD AGENCY

Under SEQRA and CEQR, the "lead agency" is the public entity responsible for conducting the environmental review of a proposed action. Where the proposed action is governmental in nature, the lead agency is also the entity primarily responsible for carrying out, approving, or funding the proposed action. Other agencies can also participate in the review process as involved or interested agencies. Involved agencies are those with discretionary decisions to make regarding some aspect of the proposed project. Interested agencies are agencies without jurisdiction to fund, approve, or undertake an action, but that wish to comment during the review process. The Office of the Deputy Mayor for Economic Development (ODMED) in the Office of the Mayor is the lead agency for the preparation of this GEIS, with The Trust as the applicant.

DETERMINATION OF SIGNIFICANCE

The lead agency's first decision is to determine whether a proposed action may have a significant adverse impact on the environment. This is based on an Environmental Assessment Statement (EAS), which includes information about the existing environmental setting of the proposed action, as well as a screening analysis to determine its potential to have significant

adverse impacts. On reviewing the EAS prepared for the Proposed Project, ODMED determined that it could have a significant adverse effect on the environment, requiring that an EIS be prepared. ODMED issued a Positive Declaration for the Proposed Project on March 4, 2011.

SCOPING

Once a lead agency issues a Positive Declaration, the scope of the environmental studies to be undertaken as part of the EIS is established and shared with interested and involved agencies and the public. "Scoping" is the process of focusing the environmental impact analyses on the key issues that are to be studied and creating an opportunity for the public to comment on the intended effort. The lead agency provides a draft scope to all involved agencies and makes it available to anyone who has expressed interest in the project. Although SEQRA does not mandate public scoping, CEQR does require a public scoping meeting. Under CEQR, governmental agencies and the public are given the opportunity to provide comments on the draft scope of work. After considering such comments, the lead agency prepares and issues a final scope of work.

For the Proposed Project, a draft scoping document (the "Draft Scope") was issued by ODMED on March 4, 2011. A public scoping meeting was held on April 5, 2011 at Spector Hall, 22 Reade Street, New York, New York 10007. The public review period for agencies and the public to review and comment on the Draft Scope was open through April 15, 2011. A final scoping document (the "Final Scope") was issued on October 19, 2011.

PREPARATION OF THE DGEIS

The Draft GEIS (DGEIS) is a comprehensive document used to consider systematically the probable environmental effects of a proposed action, evaluate reasonable alternatives, and identify feasible mitigation measures that, to the maximum extent practicable, can address any potentially significant adverse environmental impacts of a proposed action. The lead agency reviews all aspects of the document to determine its adequacy and adherence to the work effort outlined in the Final Scope. Once the lead agency is satisfied that the DGEIS is complete for purposes of public review, it issues a Notice of Completion and circulates the DGEIS for public review. A Notice of Completion for the DGEIS was issued on October 21, 2011.

PUBLIC REVIEW

Publication of the DGEIS and issuance of the Notice of Completion starts public review, which must include a public hearing and a public comment period that must extend for at least 30 days and must remain open for at least 10 days after the close of the hearing. The lead agency must publish a notice of the hearing at least 14 days before it takes place. All substantive comments become part of the CEQR record and must be summarized and responded to in the Final GEIS (FGEIS). A public hearing on the DGEIS was held in Spector Hall at 22 Reade Street in Manhattan, on November 21, 2011. Comments were accepted throughout the public comment period, which remained open until December 2, 2011.

PREPARATION AND COMPLETION OF THE FGEIS

After the close of the public comment period, the lead agency prepares the Final EIS (FEIS) (or for this project, the FGEIS). The FGEIS must include a summary of the substantive comments received and the lead agency's responses to the comments. When the lead agency has reviewed the FGEIS and determines it is a complete and adequate document, a Notice of Completion of the FGEIS is issued. The completed FGEIS is available to agencies and the public for a minimum of 10 days before the lead agency and the involved agencies can make their respective

findings as to the expected environmental impacts of the Proposed Project, after which such agencies are in a position to make their respective decisions on the Proposed Project.

STATEMENT OF FINDINGS

The lead agency and each involved agency must adopt a formal set of written findings based on the FGEIS, reflecting its conclusions about the potential significant adverse environmental impacts of the Proposed Project, potential alternatives, and potential mitigation measures. The Statement of Findings may not be adopted until 10 days after the Notice of Completion for the FGEIS has been issued.

In accordance with 6 NYCRR Part 617.11(d), a SEQRA Findings Statement issued in connection with a project approval must (i) consider the relevant environmental impacts, facts, and conclusions disclosed in the FEIS; (ii) weigh and balance environmental impacts with relevant social, economic, and other considerations; (iii) provide the rationale for the agency's decision; (iv) certify that the requirements of 6 NYCRR Part 617.11(d) were met; and (v) certify that consistent with social, economic, and other essential considerations, and considering the reasonable alternatives available, the action is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigation measures identified as practicable.

Once the findings are adopted, the SEQRA/CEQR process is completed, and the lead agency and involved agencies may approve and implement the proposed action.

COORDINATION WITH WATERFRONT REVITALIZATION PROCESS

The City has adopted the Local Waterfront Revitalization Program (LWRP) pursuant to the New York State Waterfront Revitalization of Coastal Areas and Inland Waterways Act. Discretionary actions subject to CEQR and occurring within the program's boundaries are to be reviewed by the lead agency for consistency with the program's policies. Since the Island is located within the designated Coastal Zone of New York City, the LWRP consistency assessment is incorporated into this GEIS. In accordance with 6 NYCRR Part 617.11(e), for actions located in coastal areas, written findings must first be issued that that action is consistent to the maximum extent practicable with the local waterfront revitalization program before any agency can make a final decision.

C. FRAMEWORK FOR ENVIRONMENTAL ANALYSIS

SCOPE OF ENVIRONMENTAL ANALYSIS

As set forth in the Positive Declaration, the lead agency has determined that the Proposed Project may result in one or more significant adverse environmental impacts and, thus, has required preparation of a GEIS. This document applies methodologies and follows the guidelines set forth in the *CEQR Technical Manual*, where applicable. These are consistent with SEQRA and generally considered to be the most appropriate technical analysis methods and guidelines for the environmental impact assessment of projects in the City.

For each technical analysis in the GEIS, the assessment includes a description of (1) existing conditions, (2) an assessment of conditions in the Future without the Proposed Project, and (3) an assessment of conditions in the Future with the Proposed Project. Identification and evaluation of impacts of the Proposed Project are based on a comparison between conditions in the Future without the Proposed Project and conditions in the Future with the Proposed Project. Where

significant adverse environmental impacts are identified, potential mitigation measures are proposed and analyzed. An important element of the GEIS is the analysis of alternatives that reduce or eliminate the significant adverse effects disclosed in the technical analyses; such alternatives also include a "No Action" alternative, as described at the end of this chapter.

ANALYSIS YEARS

An EIS analyzes the effects of a proposed action on its environmental setting. Since a proposed action, if approved, would take place in the future, the action's environmental setting is not the current environment but the environment as it would exist at project completion. Therefore, future conditions must be projected. This prediction is made for a particular year, generally known as the "analysis year" or "build year," which is the year when the action would be substantially operational.

As described in Chapter 1, "Project Description," implementation of the Proposed Project would be phased. It is anticipated that Phase 1 construction would begin in early 2012 and be completed by the end of 2013. Although at this time there is no schedule for funding for any portion of the Later Phases, it is assumed for purposes of analysis that construction of the Later Phases would begin after 2013 and be ongoing to 2030 as funding is obtained for additional portions of the park and future development is accomplished, including retenancy of historic buildings on the North Island and new development in designated zones on the South Island.

DEFINITION OF STUDY AREAS

For each technical area in which impacts may occur, a study area is defined for analysis. This is the geographic area likely to be affected by the Proposed Project for a given technical area, or the area in which impacts of that type could occur. Appropriate study areas differ depending on the type of impact being analyzed. In general, the study area for the GEIS analyses includes the entire Island, including that portion of Governors Island owned by the National Park Service and not belonging to The Trust, and depending on the specific analysis, may also include the area within 400 feet of the ferry landing at Pier 6 in Brooklyn Bridge Park and the area within 400 feet of the Battery Maritime Building~~Pier 11 at the South Street Seaport~~. The methods and study areas for addressing impacts are discussed in the individual technical analyses sections.

DEFINING BASELINE CONDITIONS

EXISTING CONDITIONS

For each technical area assessed in the GEIS, the current conditions are first described. The assessment of existing conditions establishes a baseline—not against which the Proposed Project are measured, but from which future conditions are projected. The projection of future conditions begins with an assessment of existing conditions because these can be measured and observed. Existing conditions are generally studied, where relevant, during the time periods that reasonable worst-case conditions would be expected with the Proposed Project. For example, the time periods when the greatest number of new vehicular, pedestrian, and transit trips to and from the ferry landings would occur are measured for the transportation analysis. The project impacts are then assessed for those same transportation peak periods. The description of existing conditions for the GEIS relies on the most current information and available data regarding the surrounding study areas.

DEFINITION OF FUTURE WITHOUT THE PROPOSED PROJECT

The future without the Proposed Project condition (the No Action or No Build condition) provides a baseline condition that is evaluated and compared with the incremental changes due

to the Proposed Project. The future without the Proposed Project conditions are assessed for the same analysis years as the future with the Proposed Project—i.e., 2013 and 2030.

The future without the Proposed Project condition uses existing conditions as a baseline and adds to it changes known or expected to be in place at various times in the future. In the Future without the Proposed Project, Governors Island will continue to operate as it does today. Visitation is dependent on the ability to access the Island. 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. Governors Island, through ramped-up programming and public outreach, has achieved very high and rising levels of visitation in the past several years, contributing to a rising baseline of visitation that would be anticipated to continue into the future without the Proposed Project. The Trust estimates that in the future without the Proposed Project, visitation would increase by approximately 40 percent, with annual visitation increasing to almost 614,000 and the number of visitors in the summer on a busy day[1] during the weekend would be approximately 17,684 respectively.

In the future without the Proposed Project, The Trust will undertake a number of projects that have undergone prior environmental review and approval separate from this Generic Environmental Impact Statement.[2] This will include the demolition of all remaining buildings on the South Island. In addition, on the North Island, The Trust will demolish Buildings 309, 517, 148, 96, Wing O of Building 400 (Liggett Hall) as well as two small non-historic additions to Building 400 and the swimming pool adjacent to Building 324 (see Figure 1-2).

Several routine projects to rehabilitate, repair, replace, and upgrade utility and waterfront infrastructure will also be undertaken in the future without the Proposed Project. The utility infrastructure work includes on-Island replacement and upgrade to meet current standards for the following services: domestic and fire protection water service; sanitary sewer; and electrical and telecommunications service. It also includes upgrades of electrical and telecommunications service to the Island. The waterfront infrastructure work includes rehabilitation of both Pier 101 and Yankee Pier, and demolition of Tango Pier, and rehabilitation of the transfer bridges and fenders at both Soissons Dock and the Battery Maritime building.[3] All of these infrastructure projects are required to ensure that the existing level of public access and other current activities (such as the Harbor School) can be maintained, and are considered Type II actions under NYCRR §617.5, Type II actions are those that have been determined not to have a significant impact on the environment or are otherwise precluded from environmental review.

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[1] Defined as the 85th percentile of in-season visitation. In other words, the level of visitation that is higher than 85 percent of all other days.

[2] In 2008 an Environmental Assessment Form was prepared and a Negative Declaration was issued for GIPEC's Enhanced Public Access program, which included demolition of the South Island buildings and some non-contributing North Island buildings; the relocation of the Harbor School to Building 550 from Brooklyn; enhanced public access to portions of the South Island; a temporary food and entertainment facility; and conversion of Building 110 to artists' studios.

[3] The Trust is coordinating with the Federal Highway Administration (FHWA) for funding and approval of the Soissons/BMB improvements. The Trust expects to receive a categorical exclusion under the National Environmental Policy Act for this effort and has provided the appropriate documentation to FHWA and other involved agencies.

For many technical areas, the future without the Proposed Project condition incorporates known development projects in the study area that are likely to be built by the analysis years. This includes projects currently under construction or development that can be reasonably expected to occur due to the current level of planning and public approvals. Relevant future development projects that have been announced, are in an approval process, or are under construction, and proposals for rezoning and public policy initiatives likely to be built by 2013 and 2030 without the Proposed Project, are considered in the EIS analyses, as appropriate.

The future without the Proposed Project analyses for some technical areas, such as transportation, also use a background growth factor to account for a general increase expected in the future. Such growth factors may also be used in the absence of known development projects. The future without the Proposed Project analyses must also consider other future changes that will affect the environmental setting. These could include technology changes, such as advances in vehicle pollution control and roadway improvements, and changes to City policies, such as zoning regulations.

DEFINING THE ACTION FOR ENVIRONMENTAL ANALYSIS

As described in Chapter 1, "Project Description," The Trust has developed a Park and Public Space Master Plan for 87 acres of publicly accessible open space across its 150-acre parcel. Plans for Phase 1 of the Park and Public Space Master Plan consist of a series of open space improvements and key infrastructure improvements expected to be complete by 2013. Future phases of the Park and Public Space Master Plan (referred to here as the Later Phases-Park and Public Spaces) would provide 32 acres of newly designed open space through the center and perimeter of the South Island (9 acres of which would be newly opened to the public). In accordance with the Park and Public Space Master Plan, currently vacant North Island historic buildings (with a total of 1.35 million square feet) would be retenanted and development of new uses would occur in two separate areas in the South Island totaling 33 acres (referred to here as the Later Phases-Island Redevelopment). Although the land use and historic resource covenants contained in the transfer deed provide specific limitations on potential new land uses on the Island, these restrictions only provide a broad outline for future development. The Trust does not have any definite schedule or plans (except for the design of the park and public space) for the full future development of the Island beyond Phase 1 of the Park and Public Space Master Plan. **Figure 2-1** maps the expected phasing of the Proposed Project including Phase 1, the Later Phases-Park and Public Spaces, and the Later Phases-Island Redevelopment. **Table 2-1** summarizes the project components by phase, funding commitments, and anticipated times of completion.

8.19.11

Project Area

Boundary of Governors Island National Monument (not part of the project site)

Boundary between North Island and South Island

Phase I (2013)

Later Phases - Park and Public Spaces (through 2030)

Later Phases - Island Redevelopment (through 2030)

Buildings in use currently

0 1000 FEET

SCALE

PROPOSED PHASED REDEVELOPMENT OF
GOVERNORS ISLAND

Project Phasing
Figure 2-1

Table 2-1
Summary of Phased Development of Governors Island

Phase	Project Components	Defined in detail in Master Plan	Funded	Build Year
Phase 1	Soissons Landing, South Battery, Parade Ground, Liggett Terrace, Hammock Grove, Play Lawn	Yes	Yes	2013
Later Phases-Park and Public Spaces	Yankee Landing, Great Promenade, The Hills, South Prow, Liberty Terrace, The Shell	Yes	No	In or before 2030
Later Phases-Island Redevelopment	Retenanting 1.35M SF of historic structures; 1.65M SF of new development in South Island development zones	No	No	In or before 2030

Full development of the Proposed Project is assumed for analysis purposes to be completed by 2030. The full development analysis will consider the full proposed Park and Public Spaces (including Phase 1 elements) as well as 3 million square feet of development including reuse of North Island historic structures and new buildings and uses in the development zones. Since the Later Phases would generate additional visits to the Island that would require changes in public access to the Island and would likely require new or increased transportation services and longer hours of operation, the full development analysis will account for these changes in population and access. The Trust estimates that annual Park and Public Space visitation from the full development of the Proposed Project would increase to approximately 1.89 million and the number of visitors in the summer on a busy day[1] during the weekend and during the week would be approximately 21,690 and 7,998, respectively. As compared to visitation in the future without the Proposed Project, this would represent a 70 percent increase during the week, 23 percent increase during the weekend, and over 200 percent increase in annual visitation.

As described above, for the purposes of this analysis, the reuse of North Island buildings and the development of the two South Island development zones would result in three million square feet of new uses on the Island. The future uses for the Later Phases-Island Redevelopment have not yet been specifically proposed, defined, or designed. Therefore, to assist in the analysis of this component of the Proposed Project, two potential development scenarios have been identified that represent a possible range of new development that could occur. The first is a primarily University/Research option and the second is a primarily 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 2-2**.

The land uses identified in Table 2-2 would also have different population characteristics. For example, faculty housing uses would generate on-site residents whereas office uses would not.

[1] Defined as the 85th percentile of in-season visitation. In other words, the level of visitation that is higher than 85 percent of all other days.

Other uses, including the park and open spaces, would generate workers and visitors that would access the island from the off-site ferry locations. Each chapter in the GEIS will identify a "reasonable worst-case development scenario" that could result in the worst environmental effect for that technical area. The reasonable worst-case development scenario will be based on the potential range of land uses and development presented in Table 2-2.

Since the potential programming for the Later Phases-Island Redevelopment component is not yet specified and their operations have not yet been planned, the analysis of the Later Phases-Island Redevelopment component will generally be less detailed than those provided for the Park and Public Spaces component. The analyses will focus on identifying potential environmental concerns associated with the potential uses identified in Table 2-2 to the extent required under CEQR/SEQRA; further environmental review may be necessary for as yet undefined components of the Later Phases.

Table 2-2
Later Phases-Island Redevelopment Potential Development Scenarios
(North Island Historic Structures and South Island Future Development Zones)

Uses	University/Research Option (sf)	Mixed-Use Option (sf)
University		
Research	400,000	0
Academic	450,000	0
Housing - Faculty Housing [1] *(assumed as apartments, not dorms)*	200,000	1,650,000
Housing - Student Dorms [1]	850,000	450,000
Conference Center/Hotel	500,000	350,000
Office	175,000	60,000
Service Retail/Restaurant *(Not destination, accessory to other uses)*	75,000	75,000
Cultural *(Gallery, small museum)*	60,000	125,000
Public School (K-12)	150,000	150,000
Maintenance, Support, Other	140,000	140,000
TOTAL	**3,000,000**	**3,000,000**

Notes:
Does not include Park and Public Spaces (For Phase 1 and Later Phases open spaces, see "Project Description" above).
[1] All academic housing: contemplated to be residential uses ancillary to educational uses on- and/or off-island.

VISITATION ESTIMATES

The additional and improved public spaces planned for Phase 1 (2013) are not expected to materially affect overall visitation. The factors considered in arriving at this expectation are as follows:

- The open space additions and improvements are consistent with the nature of existing uses and other amenities that Governors Island has added or improved upon in recent years.
- Most of the open space improvements in both the North Island and the South Island are in areas already heavily programmed—either as part of the existing Public Access program or on limited-access fields for special events.
- Visitation is directly affected by number of operating days and hours and ferry capacity and frequency—none of which would be affected by Phase 1 open space improvements.
- At peak times, ferries already operate at capacity and increased ferry access is entirely dependent on the operating budget, which is not associated with the proposed Phase 1 improvements. There are no plans to increase ferry service before 2013.
- The Trust has aggressively programmed spaces and events to attract visitation to the Island, resulting in phenomenal growth in patronage over the years. It is expected that increases in visitation will continue through 2013 with or without implementation of the Phase 1 improvements.

Increases in visitation have historically been driven by the last three points. Creative programming and publicity have attracted the visitors; and ferry service and expanding the open season have allowed the visitors to come to the Island. From 5,000 visitors the first year (2004), Governors Island received 443,000 in the summer of 2010 and was named the top destination in New York City in Time Magazine's "Summer 60" feature in 2011.

First GIPEC and then The Trust committed to welcoming a diverse array of interesting programs to the Island—concerts, food and cultural festivals, art exhibits and events, sculpture shows, fun for children and families, poetry readings, races, science experiments and Free Bike Fridays. Diverse highlights have included 1920s-themed lawn parties that draw thousands of fancy-dressing flappers and their fans; a Polo match that drew members of the British Royal Family and a crowd of socialites; and a partnership with Storm King to bring a dozen massive sculptures by world-renowned artist Mark di Suvero to the Island.

However, the annual increase in visitorship has declined over the three years of public access from 2008 to 2010 with rates of 140 percent, 100 percent, and 60 percent, and it is expected to slow over time to 10 percent, and finally 5 percent growth in 2013, leveling off at 614,000 visitors per year (see **Table 2-3**). Even without the proposed Phase I improvements, evolving and adapting programs will continue to attract visitors and cement the Island's place as a weekend haven for New Yorkers. Governors Island is already a unique park and public space defined by its evocation of summer vacation only a few minutes away from Lower Manhattan and Brooklyn on the ferry.

Table 2-3
Actual and Projected Visitation

Without the proposed improvements, The Trust would nevertheless be able to use the same spaces for its public access program. In the Future with the Proposed Project the Island is transformed into an iconic Park and Public Space which draws visitors to its well designed and lushly planted landscapes, but in the Future without the Proposed Project The Trust will continue

to use the existing, somewhat barren collection of lawns, fields, and parking lots as a highly flexible programmable space for a new burst of interesting public programs. In either case, visitors will continue to flock to the Island in increasing numbers—limited only by the capacity of the ferry services.

The Trust therefore projects visitorship to grow at the same rate with or without the Phase 1 improvements because ferry service presents the same primary constraint in both scenarios. The projected peak day visitorship is limited by the capacity of the ferries, which in both scenarios will continue on the current schedule during the current 18 weekend public access season. The improvements proposed in Phase 1, which will increase the publicly accessible Park and Public Space area from 70 to 93 acres while in turn reducing the flexible programming space (including eliminating the South Island fields used for large events), will support this trajectory but cannot increase it beyond the capacity of the ferry. In other words, visitation increases due to either new iconic landscape (Future with Proposed Project) or creative programming on flexible space (Future without Proposed Project), but in either case visitation is ultimately limited by the capacity of the ferry service.

MITIGATION

CEQR requires that any significant adverse impacts identified in the EIS be minimized or avoided to the fullest extent practicable, given costs and other factors. In the DGEIS, options for mitigation can be presented for public review and discussion, without the lead agency having selected those for implementation. Where no practicable mitigation is available, the EIS must disclose the potential for unmitigated significant adverse impacts.

Where significant adverse impacts from the Proposed Project have been identified in this DGEIS, potential mitigation measures to minimize or eliminate the expected impacts have been examined in Chapter 23, "Mitigation." Where necessary, measures to further mitigate adverse impacts will be refined and evaluated between the DGEIS and FGEIS, and the FGEIS may therefore include more complete information and commitments on all practicable mitigation measures that may need to be implemented with the Proposed Project.

ALTERNATIVES

Chapter 22, "Alternatives," assesses alternatives to the Proposed Project. CEQR and SEQRA require that a description and evaluation of the range of reasonable alternatives to an action be included in the EIS at a level of detail sufficient to allow a comparative assessment of the significant environmental impacts of these alternatives. If the environmental assessment and consideration of alternatives identify a feasible alternative that eliminates or minimizes adverse impacts while substantially meeting the project goals and objectives, the lead agency considers whether to adopt that alternative. CEQR and SEQRA require consideration of a "No Action Alternative," which compares environmental conditions that are likely to occur in the future without the Proposed Project with conditions that would occur in the future with the Proposed Project. In addition the two hypothetical development scenarios are compared to each other. ✷