THE CITY OF NEW YORK
OFFICE OF THE MAYOR
NEW YORK, NY 10007

TECHNICAL MEMORANDUM 004
Phased Redevelopment of Governors Island South Island Development Zones
Harbor School Annexes
CEQR No. 11DME007M
Marcch 21, 2024

A. INTRODUCTION

The Phased Redevelopment of Governors Island was previously analyzed in three environmental impact statements:

- A Final Generic Environmental Impact Statement (FGEIS) issued by the Office of the Deputy Mayor for Economic Development (ODMED) in December 2011 (the 2011 FGEIS);
- A Final Supplemental Generic Environmental Impact Statement (the 2013 FSGEIS) issued by ODMED in May 2013; and
- A Final Second Supplemental Generic Environmental Impact Statement (the FSSGEIS) issued by the Office of the Deputy Mayor for Housing and Economic Development (ODMHED) in March 2021.

As described in greater detail below, analyses were conducted consistent with the requirements of the New York State Environmental Quality Review Act (SEQRA) and New York City Environmental Quality Review (CEQR).

Governors Island Corporation, doing business as The Trust for Governors Island (the Trust), is a not-for-profit corporation and instrumentality of the City of New York. The Trust holds title to 150 acres of the 172-acre Governors Island (the Island) located in Upper New York Bay. In coordination with the New York City School Construction Authority (SCA), the Trust proposes certain updates to the FSSGEIS project (the proposed modifications). The proposed modifications include adaptive reuse and new construction for two ancillary school facilities for the existing Urban Assembly New York Harbor School (the Harbor School). The Harbor School (existing Building 550) has been in its current location on the Island since 2010 and serves high school students focused on marine science and technology. In addition to Building 550, the Harbor School includes Building 134 on the north shore of the Island (134 Carder Road), serving as its Marine and Science Technology (MAST) Center, boathouse, and oyster hatchery. According to the New York City Department of Education (DOE) school utilization profile for 2022 to 2023, the Harbor School has an enrollment of 496 students with a target capacity of 460 in the existing school building, operating at 108 percent of target capacity.

The two project components include: (1) renovation and reuse of Building 555 as a Harbor School Annex for classrooms; and (2) a new Harbor School Annex Building (M533) that would include a pool, gymnasium, and science laboratories. Building 555 is on the North Island (north of Division Road) and within the Governors Island Historic District, while the proposed new building would be located within the Western Development Zones on the South Island (south of Division Road).

The purpose of this Technical Memorandum is to determine whether the proposed modifications, coupled with any relevant changes in circumstances or newly discovered information, would result in any significant adverse environmental impacts that were not previously identified. As described below, this Technical Memorandum concludes that there would be no new significant adverse environmental impacts compared to those disclosed in the March 2021 FSSGEIS for the Phased Redevelopment of Governors Island.

Overall, development proposed under the proposed modifications would be consistent with uses previously anticipated and analyzed. The project would include reuse of a historic North Island building, which has long been part of the master plan for redevelopment of the Island, as well as new construction of an academic building in the South Island Development Zones, which was previously proposed and analyzed for new development including educational uses. The project would continue to serve the same purpose and need identified in the FSSGEIS, and the uses, project location, and analysis year would be unchanged from that previously identified in the FSSGEIS.

B. BACKGROUND

The Trust's mission is to transform the Island into a vibrant resource for New York City, making the Island a destination with extraordinary public open space, as well as educational, not-for-profit, and commercial facilities. The Island is divided into two sections: (1) the "North Island" is the section of the Island north of Division Road and is approximately coterminous with the Governors Island Historic District (the Historic District), and (2) the "South Island" is the section of the Island south of Division Road and is composed of nearly 80 acres. The South Island is home to 43 acres of new public open space completed in 2016 as part of the 2010 Park and Public Space Master Plan (the 2010 Park and Public Space Master Plan or "Master Plan") for the Island, and approximately 33 acres designated in the same plan for future development consisting of East and West Development Zones (the Development Zones). The major access point for the Island is the Battery Maritime Building (BMB) in Lower Manhattan, where ferries owned by the Trust pick up and return visitors and freight. Additional weekend ferry service is provided from Pier 6 in Brooklyn to Yankee Pier on the Island, through service chartered by the Trust, and by an NYC Ferry shuttle from Pier 11 in Manhattan during the Island's public season.

Redevelopment of the Island was previously analyzed in three documents, the *Final Generic Environmental Impact Statement for the Phased Redevelopment of Governors Island* issued by the ODMED in December 2011 (the 2011 FGEIS);the *Final Supplemental Generic Environmental Impact Statement for the Phased Redevelopment of Governors Island*, issued by the ODMED in May 2013 (the 2013 FSGEIS); and the *Final Second Supplemental Generic Environmental Impact Statement* (the FSSGEIS) issued be ODHMED in March 2021.

- The 2011 FGEIS analyzed potential future development of the Island as follows: Phase I (2013) which consistent of park and open space development that has been largely completed and the Later Phases (through 2030), which consisted of subsequent phases of development. The Later Phases—Park and Public Space development consisted of proposed open space development established in a Park and Public Space Master Plan developed by the Trust with significant public input. The Later Phases—Island Redevelopment consisted of two components: reuse of the North Island Historic Structures and development within two designated South Island Development Zones. Technical Memoranda TM001 and TM002 were prepared for the FGEIS and considered the long-term lease of Slips 6 and 7 of the BMB and

the demolition of Governors Island buildings 96, 146, 147, and 148, the Pool of Building 324, and Additions to Building 400, respectively.

- The 2013 FSGEIS analyzed the creation of the Special Governors Island District on the North Island; the reuse and reactivation of approximately 1.2 million square feet (sf) of space on the North Island, in addition to the 176,000 sf already in use in 2013; and the completion of the 2010 Park and Public Space Master Plan. In addition, a new structure was contemplated on the open area north of Building 110, immediately west of Soissons Landing (the Soissons Concession Site). Ferry service seven days per week to support the uses in the reactivated buildings and the expanded park and public spaces was also anticipated. The 2013 FSGEIS also considered the development of the two Development Zones by 2030 based on generic development programs (a university research option and a mixed-use option including faculty and student housing and offices uses) since there were no specific development plans or proposals for those areas. The overall floor area was anticipated to be three million sf for the entire Island, and included potential "educational uses similar to the Harbor School" on the South Island.
- The FSSGEIS in 2021 considered the development of up to 4.5 million gsf of university, dormitories, hotels, biotech/research laboratories, office space, cultural and accessory service retail, restaurant, and conference identified for analysis purposes (see **Table 1**), a University/Research Option in which the majority of the development area would be dedicated to university and dormitory land uses, and a Mixed-Use Option, which would dedicate significant area to office use. The FSSGEIS also analyzed accessory actions in the context of the previously approved and developed park and public spaces as well as the previously approved renovation and reactivation of the North Island.

Table 1
2021 FSSGEIS South Island Development Options

Land Use	University/Research Option	Mixed-Use Option
University	1,170,000 gsf	360,000 gsf
Housing – Student Dorms	556,079 gsf (1,390 beds)	136,079 gsf (340 beds)
Hotel	408,832 gsf (1,363 rooms)	408,832 gsf (1,363 rooms)
BioTech/Research	1,500,000 gsf	1,500,000 gsf
Office	75,223 gsf	1,705,223 gsf
Cultural	459,101 gsf	59,101 gsf
Service Retail/Restaurant (Not destination, accessory to Island)	147,208 gsf	147,208 gsf
Conference Center (Not destination, accessory to Island)	43,582 gsf	43,582 gsf
Maintenance, Support, Other	140,000 gsf	140,000 gsf
Total South Island Development	**4,500,025 gsf**	**4,500,025 gsf**

C. PROPOSED MODIFICATIONS

In coordination with the SCA, the Trust proposes the updates below to the FSSGEIS project (the proposed modifications). The proposed modifications include adaptive reuse and new construction for two ancillary school facilities for the existing Harbor School. The two project components include: (1) renovation and reuse of Building 555 as a Harbor School Annex for classrooms; and (2) a new Harbor School Annex Building (M533) that would include a pool, gymnasium, and science laboratories. Building 555 is on the North Island (north of Division Road) and within the Governors Island Historic District, while the proposed new building would be located within the

Western Development Zone on the South Island (south of Division Road). (see **Figure 1**). The site of the proposed new building is currently a dog park, a temporary public restroom trailer, and two fenced transformer areas.

HARBOR SCHOOL ANNEX – BUILDING 555 ADAPTIVE REUSE

The existing Building 555 is approximately 32,128 gsf and would be renovated to accommodate 275 seats for the Harbor School Annex. The annex would include up to 11 classrooms, a resource room, library, lobby, and basement storage. Additionally, administrative staff would occupy four offices. Exterior renovations include a new entrance along Short Avenue to connect to the existing Harbor School with a pedestrian walkway. Additionally, a new entrance complaint with the Americans with Disabilities Act (ADA) would be constructed to allow for a wheelchair lift with a floodgate. A total of 17 windows would be replaced with new aluminum louvers at specific locations for electrical and mechanical system upgrades. As Building 555 is considered a contributing resource within the National Historic Landmark and the Governors Island Historic District, the proposed modifications require approval from the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP).

NEW HARBOR SCHOOL ANNEX BUILDING – POOL, GYMNASIUM, AND SCIENCE LABORATORIES

The new five-story Harbor School Annex Building would be approximately 78,923 gsf, including a pool, locker rooms, gymnasium, science classrooms, and science laboratories (see **Figure 2**). In addition to an approximately 4,969-square-foot green roof, terraces would be located on the 4th and 5th floors. The maximum building height is estimated at 73 feet, plus mechanical and bulkhead areas. The main building entrance would be located along Division Road.

D. POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROPOSED MODIFICATIONS

This section includes a discussion of the potential for impacts of the proposed modifications compared to the project analyzed in the FSSGEIS. Some areas—Socioeconomics, Natural Resources, and Public Health were screened out of the FSSGEIS, and this determination would not be affected by the proposed modifications.

LAND USE, ZONING, AND PUBLIC POLICY

The proposed modification includes approximately 78,923 gsf of new institutional use, which would be consistent with the range of uses identified in the two the Reasonable Worst Case Development Scenario programs that were studied in the FSSGEIS (see **Table 1** above). The proposed modifications would be compatible with existing uses and planned future development on the Island. The proposed modifications are consistent with the Special Governors Island District controls. The following certifications are needed from the Chairperson of the City Planning Commission (CPC) to facilitate the proposed modifications:

i. Zoning Resolution (ZR) Section 134-40 Requirements for Connections and Open Areas;

ii. ZR Section 134-42 Secondary Connection; and

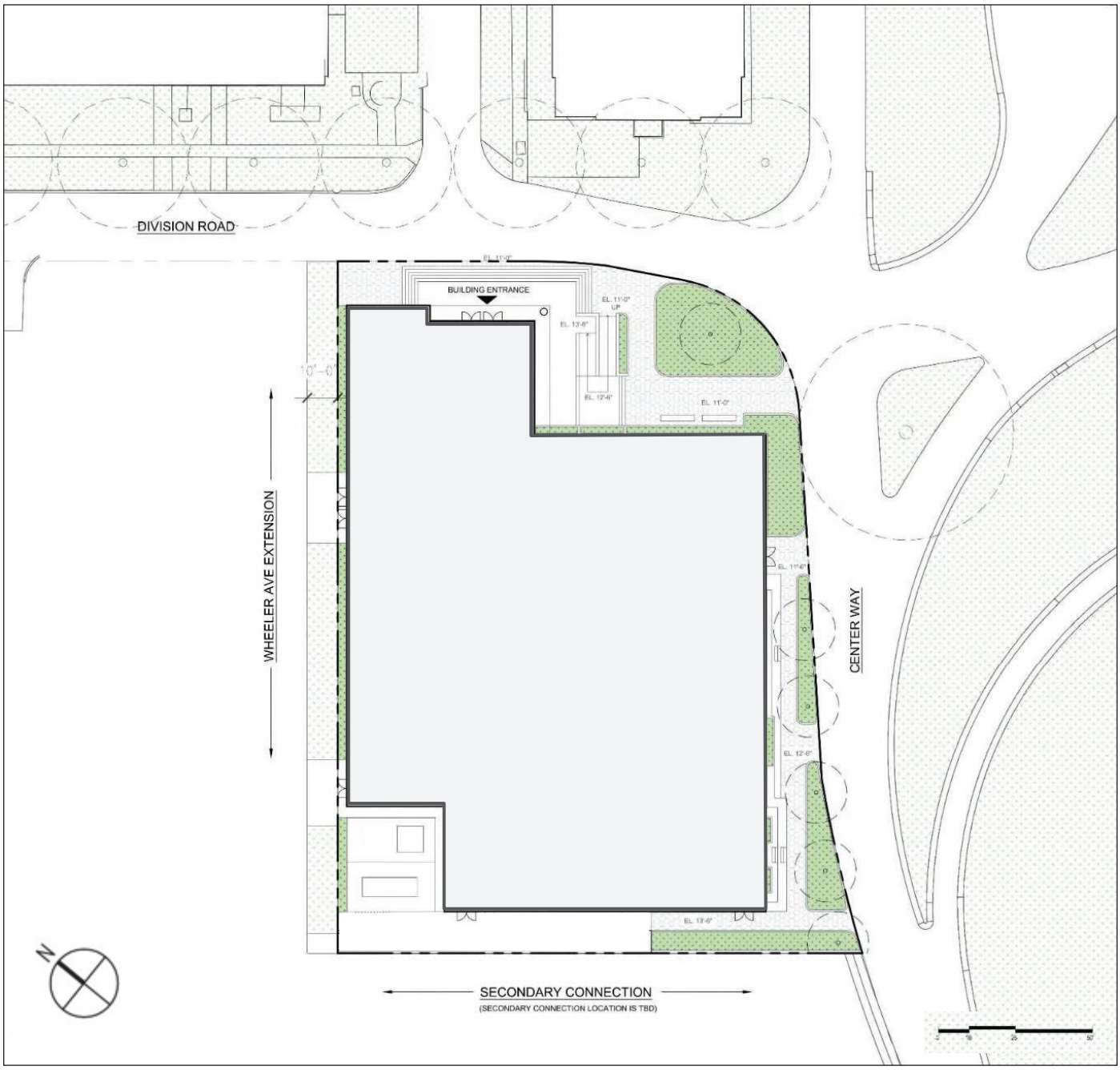
iii. ZR Section 134-44 Other Open Areas (c) Adjacent to portions of the Open Space Subarea.

Project Location

NYCSCA GOVERNORS ISLAND

Figure 1

11.17.23



New Harbor School Annex Building Site Plan

The proposed modifications would facilitate the construction of a new building, the related open areas along Center Way, and the future secondary connection located south of the project site. The new Harbor School annexes will provide a benefit to the people of New York City and the surrounding region by expanding an important institutional use within the context of the active mix of uses on the Island. Development of the project with the proposed modifications would continue to work towards fulfilling long-term public policies and the Master Plan for the Island, and the proposed expansion of the school would continue to support the Island as a year-round destination, a longtime goal of the Trust.

The underlying zoning on the South Island was changed in the FSSGEIS from the R3-2 to a C4-1 mid-density commercial district, while the underlying zoning district on the North Island remains R3-2. The FSSGEIS zoning framework allowed up to 2.98 floor area ratio (FAR) with a maximum of 4.275 million zoning square feet (zsf) of floor area within the Development Zones. Since there would not be any notable changes to background development from those specified in the FSSGEIS, there would not be any substantial changes to projected background conditions that would alter conclusions for any of the areas of analyses addressed in the FSSGEIS.

As the land uses and purpose of the project are unchanged from the Proposed Project in the FSSGEIS, and conditions within the Project Area and the larger study area are not notably different than presented in the FSSGEIS, conclusions regarding land use and public policy would be unchanged, and as before, the project is not expected to result in any significant adverse land use or zoning and public policy impacts.

The project site is located in New York City's coastal zone, and the proposed modifications are therefore subject to the policies of the New York City Waterfront Revitalization Program (WRP). The WRP Consistency Assessment Form and an evaluation of the consistency of the proposed modifications with the applicable WRP policies are provided in **Attachment 1**. As shown in **Figure 3**, the new Harbor School Annex building would be within the 1-percent annual chance floodplain, and a Flood Elevation Worksheet demonstrating the proposed building's potential vulnerability to flooding and sea level rise under Policy 6.2 is also included in **Attachment 1**.

COMMUNITY FACILITIES AND SERVICES

The proposed modifications would have no potential for indirect effects on community facilities and services. The conclusions of the FSSGEIS regarding potential impacts on community facilities and services would not change.

OPEN SPACE

The proposed modifications would be consistent with the 2010 Park and Public Space Master Plan guiding open space development on the South Island and would not result in any significant adverse direct effects on the Island's open spaces. As the proposed modifications would not result in greater effects on open space than under the Proposed Project in the FSSGEIS, and conditions within the Project Area and the open space study area are not notably different than presented in the FSSGEIS, conclusions regarding direct and indirect effects on open space would be unchanged, and as before, the project is not expected to result in any significant adverse open space impacts.

FEMA Floodplains PFIRM 2015

NYCSCA GOVERNORS ISLAND

Figure 3

SHADOWS

The proposed new Harbor School Annex building would cast incremental shadows on the adjacent and nearby open spaces of the Island, specifically Liggett Terrace and Hammock Grove to the south of the project site. Though overall durations of incremental shadow coverage may be long, typically only a relatively small portion of a given open space area would be cast in incremental shadow with the majority of the open space area remaining sunlit. Despite the areas of incremental shadow, there would always be adjacent or nearby sunlit areas of open space with similar active or passive amenities for users to enjoy. The incremental shadow from the proposed modifications would not cause any significant adverse impacts to use or users of any open spaces, nor would it create any significant shading impacts to the health of the trees, plantings, and other vegetation in any resource. Therefore, as with the Proposed Project analyzed in the FSSGEIS, no significant adverse shadows impacts would result from the proposed modifications.

HISTORIC AND CULTURAL RESOURCES

Building 555 is considered a contributing resource within the National Historic Landmark and the Governors Island Historic District. Building 555 was constructed in 1938–40 along with the identical Building 315, anchoring the two ends of Division Road, as family housing for officers of the 16th Regiment. It is a 3½-story, rectangular shaped Neo-Georgian style structure constructed of red brick with cast stone accents at the entrance and sills. According to the Design Manual, the scale and design of the building are important, as are the vistas to and from the structure. While the building is surrounded by non-historic concrete and asphalt paving, the mature trees located within grassy plots around the building should be preserved and maintained.

The proposed modifications at Building 555 include the installation of a new entrance and stair along Short Avenue to facilitate circulation across Short Avenue from the existing Harbor School (Building 550). The proposed modifications would not damage or eliminate any significant architectural features and supports the reactivation of this long-vacant building. The large scale of the building can support the presence of new entrances along Short Avenue, which currently lacks a primary entrance. The new exterior stairwell would be constructed of concrete stairs with red brick and cast stone sidewalls with black ironwork, keeping with the materials found at the building and throughout the historic district. The at-grade ADA-compliant entrance would provide barrier-free access at a return façade close to the new primary entrance. A proposed wall adjacent to this entry would support a deployable barrier related to flood-mitigation and would align with the base of the building to help it recede from view. Additionally, a total of 17 windows would be replaced with new aluminum louvers at specific locations for electrical and mechanical system upgrades. The new louver frames would be white and integrated into the windows frames, while the louvers and muntin grilles would be charcoal grey to harmonize with the existing frames.

Consultation with the OPRHP was initiated regarding the proposed modifications. In a comment letter dated May 19, 2023, OPRHP determined that the proposed modifications would not result in impacts on historic resources (see **Attachment 2**). As a courtesy, SCA presented the proposed modifications to the NYC Landmarks Preservation Commission (LPC) and received their Findings on July 11, 2023 (see **Attachment 2**). In response to LPC comments, SCA has made design modifications, mainly to materiality. In a comment letter dated October 7, 2023, OPRHP determined that the revised design would have No Adverse Impact to historic resources (see **Attachment A**).

Therefore, as with the Proposed Project analyzed in the FSSGEIS, no significant adverse impacts on historic resources would result from the proposed modifications.

URBAN DESIGN AND VISUAL RESOURCES

URBAN DESIGN

As defined in the FSSGEIS, the proposed modifications would introduce new development to the Development Zone on the South Island. The new building would replace vacant areas and temporary seasonal uses with active uses that are intended to enliven the South Island year-round and complement the surrounding open spaces. The zoning controls on the Island serve to connect and establish a harmonious relationship between the South Island's open spaces, the Historic District on the North Island, and the Development Zones. Furthermore, new development within defined areas of the South Island was always part of the long-term plan for the Island as envisioned in the 2010 Park and Public Space Master Plan. Similar to the Proposed Project analyzed in the FSSGEIS, the proposed modifications are not anticipated to have significant adverse impacts on urban design and visual resources.

VISUAL RESOURCES

The proposed new building in the Development Zone on the South Island would partially eliminate some current views of the historic North Island buildings and Lower Manhattan and Brooklyn in the distance from elevated portions of the South Island, such as Outlook Hill. However, by limiting the building heights within the transition zone identified in the FSSGEIS and requiring setbacks along the western edge of the West Development Zone (the Esplanade Area), most northward views from the Hills toward the North Island and Manhattan would be maintained. The Open Space Subarea as part of the Southern Subdistrict further preserves a view corridor through the center of the South Island towards the North Island, particularly of Liggett Hall. Therefore, as with the Proposed Project analyzed in the FSSGEIS, no significant adverse impacts on visual resources would result from the proposed modifications.

HAZARDOUS MATERIALS

A Phase I Environmental Site Assessment (ESA), a Phase II Environmental Site Investigation (ESI), and a Remedial Action Plan (RAP) were prepared by H2M architects + engineers (H2M) in October 2022, February 2023, and November 2023, respectively. A separate RAP for the Annex at Building 555 was prepared by TRC Engineers, Inc. in December 2023.

Soil and fill materials containing concentrations of polycyclic aromatic hydrocarbons (PAHs), metals, and pesticides above applicable criteria were identified at the project site and may be encountered during soil disturbance. Areas where soil excavation occurs and would not be capped with impervious materials, a 24-inch "soil cap" would be applied. The cap would consist of either approved imported environmentally clean fill or reuse of approved excavated soil from the site that meets the definition of environmentally clean fill. As a standard SCA practice, a soil vapor barrier would be integrated into the design of the proposed new building, including integration with any proposed damp-proofing or waterproofing components. A gas vapor barrier system would be installed for the proposed new building to create a continuous vapor tight seal beneath the entire extent of the new construction.

SCA would comply with the November 2023 and December 2023 RAPs in accordance with applicable federal, state, and local requirements for measures to minimize potential impacts. The

proposed modifications would have no effect on hazardous materials, and they would not alter the conclusions of the FSSGEIS with regard to potential impacts due to hazardous materials.

WATER AND SEWER INFRASTRUCTURE

Like the Proposed Project analyzed in the FSSGEIS, no significant adverse water and sewer impacts would result from the proposed modifications. It should be noted that the New York City Department of Environmental Protection (NYCDEP) has published a Unified Stormwater Rule (USWR) that increases the amount of stormwater to be managed on-site as part of new development; the new rules became effective on February 15, 2022. Therefore, as the proposed project comprises a new development that will require site connection approval from the NYCDEP, the proposed project is required to develop a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP will be prepared in accordance with all applicable permit requirements for stormwater management as outlined in the New York City Stormwater Manual (SWM) published by the NYCDEP; the SWPPP will be implemented upon review and approval by the NYCDEP.

New roof surface area resulting from the proposed building would be the same as under the Proposed Project analyzed in the FSSGEIS, and therefore stormwater runoff would remain similar.

SOLID WASTE

The proposed modifications would not directly affect a solid waste management facility and would not result in an increase in solid waste that would overburden available waste management capacity. As with the Proposed Project analyzed in the FSSGEIS, no significant adverse solid waste impacts would result from the proposed modifications.

ENERGY

The proposed buildings would utilize all-electric systems for heating, cooling and domestic hot water. The proposed modifications would generate an incremental increase in energy demand that would be negligible when compared to the overall demand within Consolidated Edison's (Con Edison's) New York City service area. As with the Proposed Project analyzed in the FSSGEIS, no significant adverse energy impacts would result from the proposed modifications.

TRANSPORTATION

As with the full build out of the Island analyzed in the FSSGEIS, there would be significant adverse impacts to traffic and pedestrians with the proposed modifications. The mitigation measures identified in Chapter 20, "Mitigation" would continue to be implemented as required in coordination with the New York City Department of Transportation and the New York City Transit Authority. See the "Mitigation" section below.

AIR QUALITY

As with the FSSGEIS, no significant adverse air quality impacts would occur with the proposed modifications at intersections from project-generated trips.

The new Annex would include science laboratories; therefore, an evaluation was performed of the expected use of potentially hazardous materials in the proposed laboratories and systems that would be employed to ensure the safety of staff, students and the surrounding area in the event of a chemical spill in one of the proposed laboratories.

METHODOLOGY FOR PREDICTING POLLUTANT CONCENTRATIONS

Potential impacts due to a chemical spill were evaluated using information, procedures, and methodologies described in the *CEQR Technical Manual*. Maximum concentrations were compared to the short-term exposure levels (STELs) or to the ceiling levels recommended by the U.S. Occupational Safety and Health Administration (OSHA) for each chemical examined.

Two quantitative analyses employing mathematical modeling were prepared to determine potential impacts at: (1) operable windows and air intakes in nearby buildings and at nearby places of public access; and (2) the school itself due to recirculation into air intake systems, windows, and open-air terraces.

All science laboratories in which hazardous chemicals are used would be equipped with fume hoods. that are maintained under negative pressure and continuously vented to the outside when work is taking place. For the purpose of this analysis, it was assumed that fume hood exhausts would be combined and vented to the building roof through a single stack. The minimum fume hood exhaust stack height was assumed to be three feet above the upper building roof, at a height of 78 feet above grade. An exhaust fan sufficient to maintain a minimum exit velocity of 1,500 feet per minute through a 12-inch stack discharge was also assumed.

An inventory of the types and quantities of typical chemicals that are likely to be used in a public school laboratory was used for the analysis. From the chemical inventory, 14 chemicals were selected for further examination, based on their toxicity and potential for air quality impacts. Non liquids were eliminated as potential air quality constituents of concern and non-volatile chemicals (i.e., with a vapor pressure of less than 10 mm Hg) were excluded since they would largely not be released in a spill.

The hazardous chemicals selected are presented in **Table 2**. The vapor pressure shown for each chemical is a measure of its volatility (tendency to evaporate) or to form vapors, which is a critical parameter in determining potential airborne impacts from chemical spills. Exposure standards are safety- and health-based standards indicative of the chemical's toxicity—substances with higher toxicity have lower exposure standards. These include OSHA's permissible exposure limit (PEL), National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit (REL) and/or OSHA's STEL, ceiling, and immediately dangerous to life or health (IDLH) values. For all chemicals, the lowest value was chosen as the threshold to determine potential impacts.

Table 2
Expected Hazardous Materials in the Proposed School Laboratories

Chemical [CAS #]	Vapor Pressure mm Hg	PEL PPM	STEL PPM	REL PPM	IDLH PPM	Ceiling PPM
Acetone [67-64-1]	180	1,000	–	250	2,500	--
Allyl Alcohol [107-18-6]	17	2	4	2	20	--
Benzene [71-43-2]	75	1	1	--	500	–
Cyclohexene [110-83-8]	67	300	–	300	2,000	--
Ether [60-29-7]	442	400	–	--	1,900	–
Ethyl Acetate [141-78-6]	73	400	–	400	2,000	–
Ethyl Alcohol [64-17-5]	44	1,000	–	1,000	3,300	--
Isopropyl Alcohol [67-63-0]	33	400	500	400	2,000	--
Methyl Alcohol [67-56-1]	96	200	250	200	6,000	--
Nitric Acid [7697-37-2]	48	2	4	2	25	--
n-Butyl Acetate [123-86-4]	10	150	200	150	1,700	--
Petroleum distillates (Naphtha) [80002-05-9]	40	500	–	86	1,100	445
t-Butyl Alcohol [75-65-0]	31	100	–	100	1,600	-
Toluene [108-88-3]	21	100	150	100	500	300

Notes:
PEL: Permissible Exposure Limit, Time Weighted Average (TWA) for up to an 8-hour workday during a 40-hour workweek; set by OSHA.
STEL: Short-Term Exposure Limit, a 15-minute TWA exposure that should not be exceeded at any time during a workday.
IDLH: Immediately Dangerous to Life or Health.
REL: Recommended Exposure Limit, TWA for up to a 10-hour workday during a 40-hour workweek; set by NIOSH.
Ceiling: Level set by NIOSH or OSHA not to be exceeded in any working exposure.
PPM: parts per million.
Where a hyphen (-) appears there is no recommended corresponding guideline value.
Source: *NIOSH Pocket Guide to Chemical Hazards,* September 2007.

Evaporation rates for volatile hazardous chemicals expected to be used in the proposed laboratory were estimated using the model developed by the Shell Development Company.[1] The Shell model, which was developed specifically to assess air quality impacts from chemical spills, calculates evaporation rates based on physical properties of the compound, temperature, and rate of air flow over the spill surface. Room temperature conditions of 20°C and an air flow rate of 0.5 meters per second were assumed for calculating evaporation rates.

Based on the relative STELs and the vapor pressures of the chemicals listed in **Table 2**, the most potentially hazardous chemicals, shown in **Table 3**, were selected for the "worst-case" spill analysis. Since the chemicals selected for detailed analysis are most likely to have a relatively higher emission rate and the lowest exposure standards, if the analysis of these chemicals results in no significant adverse air quality impacts, it would indicate that the other chemicals listed in **Table 2** would also not present any significant potential impacts.

[1] Fleischer, M.T. An Evaporation/Air Dispersion Model for Chemical Spills on Land. Shell Development Company. December 1980.

Table 3
Chemicals Selected for Worst-Case Spill Analysis

Chemical	Quantity (liters)	Evaporation Rate (gram/meter^2/sec)	Emission Rate* (gram/sec)
Allyl Alcohol	0.081	0.069	0.077
Benzene	0.42	0.36	0.41
Nitric Acid	0.18	0.27	0.30

Note: * Average emission rate.

The analysis conservatively assumes that a chemical spill in a fume hood would extend to an area of 12 square feet (sf) (approximately 1.11 square meters). The emission rates were determined using the evaporation rates and assuming this maximum spill area. For modeling purposes, the emission rates shown in **Table 2** are assumed to continue for a 15-minute time period after which the spill would be contained. The vapor from the spill would be drawn into the fume hood exhaust system and released into the atmosphere via the roof exhaust fans. The high volume of air drawn through this system provides a high degree of dilution for hazardous fumes before they are released above the roof. The exhaust height of the fan was conservatively assumed to be at an elevation of three feet above the building roof.

The potential for recirculation of the fume hood emissions back into the proposed laboratory building air intakes was assessed using the Wilson method.[2] The procedure determines the worst-case, absolute minimum dilution between exhaust vent and air intake.

Maximum concentrations at elevated receptors downwind of the fume exhaust(s) were estimated using the EPA AERMOD dispersion model. AERMOD is EPA's preferred regulatory stationary source model.

AERMOD calculates pollutant concentrations from simulated sources (e.g., exhaust stacks) based on hourly meteorological data and surface characteristics, and has the capability to calculate pollutant concentrations at locations where the plume from the exhaust stack is affected by the aerodynamic wakes and eddies (downwash) produced by nearby structures. The analysis of potential impacts from exhaust stacks assumed stack tip downwash, urban dispersion and surface roughness length, and elimination of calms.

AERMOD incorporates the Plume Rise Model Enhancements (PRIME) downwash algorithm, which is designed to predict concentrations in the "cavity region" (i.e., the area around a structure which under certain conditions may affect an exhaust plume, causing a portion of the plume to become entrained in a recirculation region). AERMOD also uses the Building Profile Input Program for PRIME (BPIPPRM) to provide a detailed analysis of downwash influences on a direction-specific basis.

The analysis was prepared both with and without downwash in order to assess the worst-case impacts at elevated locations close to the height of the source, which would occur without downwash, as well as the worst-case impacts at lower elevations and ground level, which would occur with downwash, consistent with the *CEQR Technical Manual* guidance.

Concentrations were evaluated at nearby buildings and publicly accessible areas. This included locations along the façades and roof of the buildings, operable windows, intake vents, open spaces,

[2] D.J. Wilson. A Design Procedure for Estimating Air Intake Contamination from Nearby Exhaust Vents, ASHRAE TRAS 89, Part 2A, pp. 136-152, 1983.

sidewalks, and otherwise accessible locations. Multiple elevations were analyzed at spaced intervals on the buildings. The power law relationship was used to convert the calculated 1-hour average maximum concentrations to short-term 15-minute averages. The 15-minute average concentrations were then compared to the STELs or to the ceiling levels for the chemicals examined.

PROBABLE IMPACTS WITH THE PROPOSED MODIFICATIONS

The recirculation analysis indicates that the minimum potential dilution factor between the fan exhausts and the nearest sensitive receptor is 229 (i.e., pollutant concentrations at the nearest intake to the exhaust fan would be 229 times less than the concentration at the fan exhaust).

The results of the recirculation analysis are presented in **Table 4**. The results indicate that a spill in a fume hood as described above would produce a maximum concentration at the nearest intake location below the corresponding STELs or ceiling values set by OSHA and/or NIOSH for each of the chemicals analyzed. Consequently, no significant impact would be expected due to recirculation of fume hood emissions back into the Annex building air intakes in the event of a chemical spill.

Table 4
Maximum Predicted Concentrations – Recirculation Analysis (ppm)

Chemical	STEL/OSHA Ceiling	15-Minute Average
Ally Alcohol	2	0.018
Benzene	1	0.99
Nitric Acid	2	0.067
Note: * Permissible Exposure Limit (PEL).		

The results of the analysis of potential emissions from the fume hood exhaust systems in the event of a chemical spill are shown below in **Table 5**. The maximum concentrations at elevated receptors downwind of the fume hood exhausts were estimated using the methodology previously described, and were determined to be well below the STEL levels. The results of the dispersion analysis demonstrate that no significant adverse impacts from the fume hood exhaust system would be expected with the proposed modifications.

Table 5
Maximum Predicted Concentrations on Off-Site Receptors from a Chemical Spill (ppm)

Chemical	STEL/OSHA Ceiling	15-Minute Average
Allyl Alcohol	2	0.18
Benzene	1	0.70
Nitric Acid	2	0.64
Note: * Permissible Exposure Limit (PEL).		

To ensure that there are no potential significant adverse air quality impacts, laboratory fume hood exhausts should be a minimum of three feet above the tallest portion of the building roof.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

The proposed modifications would support greenhouse gas (GHG) goals by virtue of the nature and location of the development, i.e., reliance on public transportation to ferry landings; and their use of all-electric systems for heating, cooling and domestic hot water. Additionally, SCA uses the NYC Green Schools Guide and Rating System to incorporate sustainable design, construction and operation of new schools and to achieve compliance with Local Law 86 of 2005 (New York City's Green Building Law). Therefore, the proposed modifications would be consistent with the City's emissions reduction goals, as defined in the *CEQR Technical Manual*. The potential for climate change to affect the proposed modifications has been considered and measures and adaptive management strategies will be incorporated to increase climate resilience and to account for potential changes in environmental conditions resulting from climate change. Like the Proposed Project analyzed in the FSSGEIS, no significant adverse impacts in the technical area of Greenhouse Gas Emissions and Climate Change would result from the proposed modifications.

NOISE

The introduction of the Harbor School annexes would generate additional ferry traffic to accommodate an increase in people traveling to and from the Island. The FSSGEIS analysis concluded that noise generated by ferries would be noticeable only at open spaces adjacent to Yankee Pier, but that the total noise level would be comparable to existing levels elsewhere on the Island, and consequently would not result in significant adverse impacts. The proposed modifications would have no effect on noise, and they would not alter the conclusions of the FSSGEIS with regard to potential noise impacts.

NEIGHBORHOOD CHARACTER

Neither the Proposed Project analyzed in the FSSGEIS nor the proposed modifications would result in significant adverse impacts associated with most of the factors that contribute to neighborhood character: land use, zoning, and public policy; socioeconomic conditions; shadows; open space; historic and cultural resources; urban design and visual resources; or noise. Any significant adverse transportation impacts disclosed in the FSSGEIS would not be exacerbated by the proposed Harbor School Annexes.

Overall, the character of the Island would continue to be defined by its unique setting in Upper New York Bay, its geographic isolation, its historic district and landscape, plentiful landscaped open spaces, and sweeping views of the harbor. Neighborhood character would be improved by introducing appropriate uses in place of underutilized land and vacant buildings and enliven the South Island with new 24/7 worker, student, and visitor populations.

CONSTRUCTION

The Proposed Project analyzed in the FSSGEIS considered a conceptual Reasonable Worst Case Development Scenario, resulting in significant adverse impacts to traffic and pedestrians during construction. Potential significant adverse transportation impacts would only be expected during peak periods if construction occurred at the pace assumed in the conservative FSSGEIS analyses. The conceptual construction schedule for the Proposed Project in the FSSGEIS assumed a 10-year period with complex overlap between the development parcels. Construction of the Proposed Project would be reduced with the proposed modifications due to the reduced bulk and program as compared to the FSSGEIS. Therefore, no new impacts are anticipated.

SCA would coordinate with the Trust to implement any necessary mitigation measures during the construction period. Measures would be taken to minimize pollutant emissions during construction in accordance with all applicable laws, regulations, and building codes. At some open space areas on the Island immediately adjacent to the construction work areas, noise would at times be noticeable and potentially intrusive. However, noise from construction would be intermittent and of limited duration at any individual receptor. Consequently, noise associated with the construction of the proposed modifications would not rise to the level of a significant adverse noise impact. As no significant adverse impacts with respect to air quality or noise during construction were anticipated for the Proposed Project analyzed in the FSSGEIS, the effects of construction on these technical areas would be similar with the proposed modifications.

MITGATION

With the proposed modifications for the Harbor School Annexes, there would be no changes in significant impacts due to the Phased Redevelopment of Governors Island – South Island Development Zones project. The mitigation previously identified in the FSSGEIS would continue to be appropriate with the modified project.

E. CONCLUSION

The proposed modifications would not substantially alter the proposed program, future uses, activities, or construction plans analyzed in the FSSGEIS. As described above, the proposed modifications to the previously assessed Governors Island – South Island Development Zones project for the Harbor School Annexes would not result in any new significant adverse environmental impacts beyond those identified in the March 2021 FSSGEIS. ✷

Hilary Semel
Assistant to the Mayor

Date: March 21, 20224

Attachment 1
Waterfront Revitalization Program

FOR INTERNAL USE ONLY	WRP No. _____
Date Received: _____	DOS No. _____

NEW YORK CITY WATERFRONT REVITALIZATION PROGRAM
Consistency Assessment Form

Proposed actions that are subject to CEQR, ULURP or other local, state or federal discretionary review procedures, and that are within New York City's Coastal Zone, must be reviewed and assessed for their consistency with the *New York City Waterfront Revitalization Program (WRP)* which has been approved as part of the State's Coastal Management Program.

This form is intended to assist an applicant in certifying that the proposed activity is consistent with the WRP. It should be completed when the local, state, or federal application is prepared. The completed form and accompanying information will be used by the New York State Department of State, the New York City Department of City Planning, or other city or state agencies in their review of the applicant's certification of consistency.

A. APPLICANT INFORMATION

Name of Applicant: The Trust for Governors Island

Name of Applicant Representative: _____

Address: 10 South Street, Slip 7, New York, NY 10004

Telephone: _____ Email: _____

Project site owner (if different than above): _____

B. PROPOSED ACTIVITY

If more space is needed, include as an attachment.

1. Brief description of activity

Modifications to the Phased Redevelopment of Governors Island - South Island Development Zones zoning text amendment that was analyzed in the Final Second Supplemental Generic Environmental Impact Statement (FSSGEIS), which was finalized in March 2021. The modifications include: 1) adaptive reuse/renovation of existing Building #555 as an Annex for classrooms; and 2) construction of a new Harbor School Annex Building (M533) including a pool, gymnasium, and science laboratories. The new building would be within the South Island Development Zone.

2. Purpose of activity

Purpose of the overall Phased Redevelopment of Governors Island, including the proposed modifications, is to activate Governors Island into a year-round resource for New Yorkers after centuries of use as a military base. The creation of new academic, research, cultural, and/or mixed-use facilities and additional public open space is an important public benefit and a catalyst for Island redevelopment.

C. PROJECT LOCATION

Borough: Manhattan Tax Block/Lot(s): BLock 1 Lot 10

Street Address: Governors Island

Name of water body (if located on the waterfront): Upper New York Harbor

D. REQUIRED ACTIONS OR APPROVALS

Check all that apply.

City Actions/Approvals/Funding

City Planning Commission ☐ Yes ☑ No

- ☐ City Map Amendment
- ☐ Zoning Map Amendment
- ☐ Zoning Text Amendment
- ☐ Site Selection – Public Facility
- ☐ Housing Plan & Project
- ☐ Special Permit
  (if appropriate, specify type: ☐ Modification ☐ Renewal ☐ other) Expiration Date: _____
- ☐ Zoning Certification
- ☐ Zoning Authorizations
- ☐ Acquisition – Real Property
- ☐ Disposition – Real Property
- ☐ Other, explain: _____
- ☐ Concession
- ☐ UDAAP
- ☐ Revocable Consent
- ☐ Franchise

Board of Standards and Appeals ☐ Yes ☑ No

- ☐ Variance (use)
- ☐ Variance (bulk)
- ☐ Special Permit
  (if appropriate, specify type: ☐ Modification ☐ Renewal ☐ other) Expiration Date: _____

Other City Approvals

- ☐ Legislation
- ☐ Rulemaking
- ☐ Construction of Public Facilities
- ☐ 384 (b) (4) Approval
- ☐ Other, explain: _____
- ☑ Funding for Construction, specify: _____
- ☐ Policy or Plan, specify: _____
- ☐ Funding of Program, specify: _____
- ☐ Permits, specify: _____

State Actions/Approvals/Funding

- ☐ State permit or license, specify Agency: _____ Permit type and number: _____
- ☐ Funding for Construction, specify: _____
- ☐ Funding of a Program, specify: _____
- ☐ Other, explain: _____

Federal Actions/Approvals/Funding

- ☐ Federal permit or license, specify Agency: _____ Permit type and number: _____
- ☐ Funding for Construction, specify: _____
- ☐ Funding of a Program, specify: _____
- ☐ Other, explain: _____

Is this being reviewed in conjunction with a Joint Application for Permits? ☐ Yes ☑ No

E. LOCATION QUESTIONS

1. Does the project require a waterfront site? ☐ Yes ☑ No
2. Would the action result in a physical alteration to a waterfront site, including land along the shoreline, land under water or coastal waters? ☐ Yes ☑ No
3. Is the project located on publicly owned land or receiving public assistance? ☑ Yes ☐ No
4. Is the project located within a FEMA 1% annual chance floodplain? *(6.2)* ☑ Yes ☐ No
5. Is the project located within a FEMA 0.2% annual chance floodplain? *(6.2)* ☑ Yes ☐ No
6. Is the project located adjacent to or within a special area designation? *See Maps – Part III of the NYC WRP. If so, check appropriate boxes below and evaluate policies noted in parentheses as part of WRP Policy Assessment (Section F).* ☐ Yes ☑ No

- ☐ Significant Maritime and Industrial Area (SMIA) (*2.1*)
- ☐ Special Natural Waterfront Area (SNWA) (*4.1*)
- ☐ Priority Maritime Activity Zone (PMAZ) (*3.5*)
- ☐ Recognized Ecological Complex (REC) (*4.4*)
- ☐ West Shore Ecologically Sensitive Maritime and Industrial Area (ESMIA) (*2.2, 4.2*)

F. WRP POLICY ASSESSMENT

Review the project or action for consistency with the WRP policies. For each policy, check Promote, Hinder *or* Not Applicable (N/A). *For more information about consistency review process and determination, see* ***Part I*** *of the NYC Waterfront Revitalization Program. When assessing each policy, review the full policy language, including all sub-policies, contained within* ***Part II*** *of the WRP. The relevance of each applicable policy may vary depending upon the project type and where it is located (i.e. if it is located within one of the special area designations).*

For those policies checked Promote *or* Hinder, *provide a written statement on a separate page that assesses the effects of the proposed activity on the relevant policies or standards. If the project or action promotes a policy, explain how the action would be consistent with the goals of the policy. If it hinders a policy, consideration should be given toward any practical means of altering or modifying the project to eliminate the hindrance. Policies that would be advanced by the project should be balanced against those that would be hindered by the project. If reasonable modifications to eliminate the hindrance are not possible, consideration should be given as to whether the hindrance is of such a degree as to be substantial, and if so, those adverse effects should be mitigated to the extent practicable.*

		Promote	Hinder	N/A
1	**Support and facilitate commercial and residential redevelopment in areas well-suited to such development.**	☑	☐	☐
1.1	Encourage commercial and residential redevelopment in appropriate Coastal Zone areas.	☐	☐	☑
1.2	Encourage non-industrial development with uses and design features that enliven the waterfront and attract the public.	☑	☐	☐
1.3	Encourage redevelopment in the Coastal Zone where public facilities and infrastructure are adequate or will be developed.	☑	☐	☐
1.4	In areas adjacent to SMIAs, ensure new residential development maximizes compatibility with existing adjacent maritime and industrial uses.	☐	☐	☑
1.5	Integrate consideration of climate change and sea level rise into the planning and design of waterfront residential and commercial development, pursuant to WRP Policy 6.2.	☑	☐	☐

		Promote	Hinder	N/A
2	**Support water-dependent and industrial uses in New York City coastal areas that are well-suited to their continued operation.**	☐	☐	☑
2.1	Promote water-dependent and industrial uses in Significant Maritime and Industrial Areas.	☐	☐	☑
2.2	Encourage a compatible relationship between working waterfront uses, upland development and natural resources within the Ecologically Sensitive Maritime and Industrial Area.	☐	☐	☑
2.3	Encourage working waterfront uses at appropriate sites outside the Significant Maritime and Industrial Areas or Ecologically Sensitive Maritime Industrial Area.	☐	☐	☑
2.4	Provide infrastructure improvements necessary to support working waterfront uses.	☐	☐	☑
2.5	Incorporate consideration of climate change and sea level rise into the planning and design of waterfront industrial development and infrastructure, pursuant to WRP Policy 6.2.	☐	☐	☑
3	**Promote use of New York City's waterways for commercial and recreational boating and water-dependent transportation.**	☐	☐	☑
3.1.	Support and encourage in-water recreational activities in suitable locations.	☐	☐	☑
3.2	Support and encourage recreational, educational and commercial boating in New York City's maritime centers.	☐	☐	☑
3.3	Minimize conflicts between recreational boating and commercial ship operations.	☐	☐	☑
3.4	Minimize impact of commercial and recreational boating activities on the aquatic environment and surrounding land and water uses.	☐	☐	☑
3.5	In Priority Marine Activity Zones, support the ongoing maintenance of maritime infrastructure for water-dependent uses.	☐	☐	☑
4	**Protect and restore the quality and function of ecological systems within the New York City coastal area.**	☐	☐	☑
4.1	Protect and restore the ecological quality and component habitats and resources within the Special Natural Waterfront Areas.	☐	☐	☑
4.2	Protect and restore the ecological quality and component habitats and resources within the Ecologically Sensitive Maritime and Industrial Area.	☐	☐	☑
4.3	Protect designated Significant Coastal Fish and Wildlife Habitats.	☐	☐	☑
4.4	Identify, remediate and restore ecological functions within Recognized Ecological Complexes.	☐	☐	☑
4.5	Protect and restore tidal and freshwater wetlands.	☐	☐	☑
4.6	In addition to wetlands, seek opportunities to create a mosaic of habitats with high ecological value and function that provide environmental and societal benefits. Restoration should strive to incorporate multiple habitat characteristics to achieve the greatest ecological benefit at a single location.	☐	☐	☑
4.7	Protect vulnerable plant, fish and wildlife species, and rare ecological communities. Design and develop land and water uses to maximize their integration or compatibility with the identified ecological community.	☐	☐	☑
4.8	Maintain and protect living aquatic resources.	☐	☐	☑

		Promote	Hinder	N/A
5	**Protect and improve water quality in the New York City coastal area.**	☑	☐	☐
5.1	Manage direct or indirect discharges to waterbodies.	☐	☐	☑
5.2	Protect the quality of New York City's waters by managing activities that generate nonpoint source pollution.	☑	☐	☐
5.3	Protect water quality when excavating or placing fill in navigable waters and in or near marshes, estuaries, tidal marshes, and wetlands.	☐	☐	☑
5.4	Protect the quality and quantity of groundwater, streams, and the sources of water for wetlands.	☐	☐	☑
5.5	Protect and improve water quality through cost-effective grey-infrastructure and in-water ecological strategies.	☐	☐	☑
6	**Minimize loss of life, structures, infrastructure, and natural resources caused by flooding and erosion, and increase resilience to future conditions created by climate change.**	☑	☐	☐
6.1	Minimize losses from flooding and erosion by employing non-structural and structural management measures appropriate to the site, the use of the property to be protected, and the surrounding area.	☑	☐	☐
6.2	Integrate consideration of the latest New York City projections of climate change and sea level rise (as published in *New York City Panel on Climate Change 2015 Report, Chapter 2: Sea Level Rise and Coastal Storms*) into the planning and design of projects in the city's Coastal Zone.	☑	☐	☐
6.3	Direct public funding for flood prevention or erosion control measures to those locations where the investment will yield significant public benefit.	☐	☐	☑
6.4	Protect and preserve non-renewable sources of sand for beach nourishment.	☐	☐	☑
7	**Minimize environmental degradation and negative impacts on public health from solid waste, toxic pollutants, hazardous materials, and industrial materials that may pose risks to the environment and public health and safety.**	☑	☐	☐
7.1	Manage solid waste material, hazardous wastes, toxic pollutants, substances hazardous to the environment, and the unenclosed storage of industrial materials to protect public health, control pollution and prevent degradation of coastal ecosystems.	☑	☐	☐
7.2	Prevent and remediate discharge of petroleum products.	☐	☐	☑
7.3	Transport solid waste and hazardous materials and site solid and hazardous waste facilities in a manner that minimizes potential degradation of coastal resources.	☐	☐	☑
8	**Provide public access to, from, and along New York City's coastal waters.**	☑	☐	☐
8.1	Preserve, protect, maintain, and enhance physical, visual and recreational access to the waterfront.	☑	☐	☐
8.2	Incorporate public access into new public and private development where compatible with proposed land use and coastal location.	☐	☐	☐
8.3	Provide visual access to the waterfront where physically practical.	☐	☐	☐
8.4	Preserve and develop waterfront open space and recreation on publicly owned land at suitable locations.	☐	☐	☐

		Promote	Hinder	N/A
8.5	Preserve the public interest in and use of lands and waters held in public trust by the State and City.	☐	☐	☐
8.6	Design waterfront public spaces to encourage the waterfront's identity and encourage stewardship.	☐	☐	☐
9	**Protect scenic resources that contribute to the visual quality of the New York City coastal area.**	☑	☐	☐
9.1	Protect and improve visual quality associated with New York City's urban context and the historic and working waterfront.	☑	☐	☐
9.2	Protect and enhance scenic values associated with natural resources.	☐	☐	☑
10	**Protect, preserve, and enhance resources significant to the historical, archaeological, architectural, and cultural legacy of the New York City coastal area.**	☑	☐	☐
10.1	Retain and preserve historic resources, and enhance resources significant to the coastal culture of New York City.	☑	☐	☐
10.2	Protect and preserve archaeological resources and artifacts.	☐	☐	☑

G. CERTIFICATION

The applicant or agent must certify that the proposed activity is consistent with New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program. If this certification cannot be made, the proposed activity shall not be undertaken. If this certification can be made, complete this Section.

"The proposed activity complies with New York State's approved Coastal Management Program as expressed in New York City's approved Local Waterfront Revitalization Program, pursuant to New York State's Coastal Management Program, and will be conducted in a manner consistent with such program."

Applicant/Agent's Name: Christopher Tepper

Address: 10 South Street

Telephone: 2124402215 Email: christophertepper@gmail.com

Applicant/Agent's Signature: 

Date: 11/22/23

Submission Requirements

For all actions requiring City Planning Commission approval, materials should be submitted to the Department of City Planning.

For local actions not requiring City Planning Commission review, the applicant or agent shall submit materials to the Lead Agency responsible for environmental review. A copy should also be sent to the Department of City Planning.

For State actions or funding, the Lead Agency responsible for environmental review should transmit its WRP consistency assessment to the Department of City Planning.

For Federal direct actions, funding, or permits applications, including Joint Applicants for Permits, the applicant or agent shall also submit a copy of this completed form along with his/her application to the NYS Department of State Office of Planning and Development and other relevant state and federal agencies. A copy of the application should be provided to the NYC Department of City Planning.

The Department of City Planning is also available for consultation and advisement regarding WRP consistency procedural matters.

New York City Department of City Planning
Waterfront and Open Space Division
120 Broadway, 31st Floor
New York, New York 10271
212-720-3696
wrp@planning.nyc.gov
www.nyc.gov/wrp

New York State Department of State
Office of Planning and Development
Suite 1010
One Commerce Place, 99 Washington Avenue
Albany, New York 12231-0001
518-474-6000
www.dos.ny.gov/opd/programs/consistency

Applicant Checklist

- ☐ Copy of original signed NYC Consistency Assessment Form
- ☐ Attachment with consistency assessment statements for all relevant policies
- ☐ For Joint Applications for Permits, one (1) copy of the complete application package
- ☐ Environmental Review documents
- ☐ Drawings (plans, sections, elevations), surveys, photographs, maps, or other information or materials which would support the certification of consistency and are not included in other documents submitted. All drawings should be clearly labeled and at a scale that is legible.
- ☐ Policy 6.2 Flood Elevation worksheet, if applicable. For guidance on applicability, refer to the WRP Policy 6.2 Guidance document available at www.nyc.gov/wrp

A. INTRODUCTION

All proposed actions subject to City Environmental Quality Review (CEQR), Uniform Land Use Review Procedure (ULURP), or other local, state, or federal agency discretionary actions that are situated within New York City's designated coastal zone must be reviewed and assessed for their consistency with New York City's Waterfront Revitalization Program (WRP). The project site is located within the City's designated coastal zone boudaries. Therefore, in accordance with the guidelines of the *CEQR Technical Manual*, an evaluation of the proposed project's consistency with the revised WRP policies was undertaken for the proposed modifications.

The 2021 FSSGEIS[1] concluded that the Phased Redevelopment of Governors Island – South Island Development Zone project was consistent with the coastal policies established through the City's WRP. Like the approved project, the proposed modifications would occur within the South Island Development Zone. It would include adaptive reuse of an existing historical building and would introduce a new structure within the coastal zone, but would continue to serve the same purpose and need identified in the FSSGEIS, and the uses, project location, and analysis year would be unchanged. Assessments of the proposed modifications' consistency with the applicable WRP policies are provided below for all policy questions answered "Promote" or "Hinder" on the Coastal Assessment Form (CAF).

B. CONSISTENCY WITH THE WATERFRONT REVITALIZATION PROGRAM POLICIES

Policy 1: Support and facilitate commercial and residential redevelopment in areas well-suited to such development.

Policy 1.2: Encourage non-industrial development with uses and design features that enliven the waterfront and attract the public.

The proposed modifications are intended to provide public services for the existing Urban Assembly New York Harbor School (the Harbor School) which is currently located at the project site. The renovation of Building 555 would provide an Annex for Harbor School classrooms, and the construction of a new Harbor School Annex building (M533) would provide additional amenities for the Harbor School including science laboratories. The proposed modifications are necessary to support the development of university/research uses in the South Island Development Zone, as evaluated in the 2021 FSSGEIS, and would be consistent with the current zoning and land uses of the project site (i.e., C4-1 and R3-2). The proposed construction activities would not

[1] Final Second Supplemental Generic Environmental Impact Statement, Office of the Deputy Mayor for Housing and Economic Development, March 2021.

preclude the use of the waterfront for other purposes or result in restricted access. Therefore, the proposed modifications would promote this policy.

Policy 1.3: Encourage redevelopment in the Coastal Zone where public facilitates and infrastructure are adequate or will be developed.

As described in the 2021 FSSGEIS, Governors Island is currently served by public sewer with conveyance to the Red Hook Wastewater Treatment Plant and a separate storm sewer system. The new Harbor School Annex building would not result in additional roof surface area compared to the project evaluated in the 2021 FSSGEIS, and stormwater from the site would continue to be conveyed to the Upper New York Harbor through existing stormwater outfalls. The existing water and sewer infrastructure have sufficient capacity for the construction of a new building, and the proposed modifications would not result in significant adverse impacts to water or sewer infrastructure. Therefore, the proposed modifications would promote this policy.

Policy 1.5: Integrate consideration of climate change and sea level rise into the planning and design of waterfront residential and commercial development, pursuant to WRP Policy 6.2.

As described in detail below under Policy 6.2, the proposed modifications would minimize the impacts of flooding and would be consistent with Policy 6.2. Therefore, the proposed modifications would promote Policy 1.5.

Policy 5: Protect and improve water quality in the New York City coastal area.

Policy 5.2: Protect the quality of New York City's waters by managing activities that generate nonpoint source pollution.

The proposed modifications would include the construction of a new building that would result in stormwater runoff from impervious surfaces. As noted above under Policy 1.3, the new Harbor School Annex building would not result in additional roof surface area compared to the project evaluated in the 2021 FSSGEIS, and stormwater from the site would continue to be conveyed to the Upper New York Harbor through existing stormwater outfalls. Additionally, the new building would incorporate an approximately 4,969 square foot green roof, which would capture some of the stormwater and minimize the potential impacts of stormwater runoff. Renovation of the existing Building 555 would not result in additional impervious surfaces or runoff. Therefore, the proposed modifications would promote this policy.

Policy 6: Minimize loss of life, structures, infrastructure, and natural resources caused by flooding and erosion, and increase resilience to future conditions created by climate change.

Policy 6.1: Minimize losses from flooding and erosion by employing non-structural and structural management measures appropriate to the site, the use of the property to be protected, and the surrounding area.

Building 555 is in the 1-percent annual chance floodplain with a base flood elevation (BFE) of +12 feet NAVD88, and the project site for the new Harbor School Annex building is partially in the 1-percent annual chance floodplain with a BFE of +11 feet NAVD88. Both locations are in Zone AE, which marks an area of high flood risk subject to inundation by the 1-percent annual chance flood event. Under Policy 6, the primary goal for projects in coastal areas is to reduce risks posed by current and future coastal hazards, particularly major storms that are likely to increase due to climate change and sea level rise. The proposed modifications would not alter the floodplain, and the new Harbor School Annex building would be constructed at a ground floor elevation of +16 feet NAVD88, which is above the Design Flood Elevation (DFE) of +12 feet

NAVD88, to remain above the projected floodplain throughout its design life, as described in detail under Policy 6.2. The new building would also include a green roof, which would reduce the flow of stormwater and minimize the potential impacts of flooding on adjacent properties. The new entrance at Building 555, which is complaint with the Americans with Disabilities Act (ADA) to allow for a wheelchair lift, would include a new floodgate to minimize potential impacts. Therefore, the proposed modifications would minimize the potential for losses from flood damage and therefore, would promote this policy.

Policy 6.2: Integrate consideration of the latest New York City projections of climate change and sea level rise (as published in New York City Panel on Climate Change 2015 Report, Chapter 2, Sea Level Rise and Coastal Storms) into the planning and design of projects in the city's Coastal Zone.

The proposed modifications are within the 1-percent annual chance floodplain. Because the project includes the construction of a new building that would be partially in the floodplain, the detailed methodology was used to determine the project's consistency with this policy in accordance with guidance from DCP.[2] A summary of this process is provided below.

1. Identify vulnerabilities and consequences: assess the project's vulnerabilities to future coastal hazards and identify what the potential consequences may be.

a. Complete the Flood Evaluation Worksheet.

The analysis below is based on the results of the completed worksheet, which is provided as **Attachment A**.

b. Identify any project features that may be located below the elevation of the 1% floodplain over the lifespan of the project under any sea level rise scenario.

The lifespan of buildings (commercial, industrial, etc.) is generally considered to be about 80 years; mechanical, electrical, and plumbing equipment (MEP) located within the buildings typically have a shorter lifespan of 50 years. Therefore, the new Harbor School Annex building that would be constructed by 2030 would reach the end of its 80-year lifespan after 2100. The MEP equipment would reach the end of its 50-year lifespan in the 2080s. The New York City Panel on Climate Change (NPCC) projected that sea levels are likely to increase by up to 10 inches by the 2020s, 30 inches by the 2050s, and up to 75 inches by 2100 under the "High Scenario" projections. Based on the NPCC projections, the 1-percent annual chance flood elevation for the site of the new Harbor School Annex building could increase to +13.5 feet by the 2050s, +15.83 feet by the 2080s, and up to +17.25 feet by 2100.

Under current conditions, the existing Building 555 and the new Harbor School Annex building would be in the 1-percent annual chance floodplain in Zone AE with BFEs of +12 feet and +11 feet NAVD88, respectively. The DFE is for the new building would be one foot above the BFE, or +12 feet NADV88. The ground floor of the new building would contain MEP equipment and would be constructed at an elevation of +16 feet NAVD88, which is 4 feet above the DFE. Considering the NPCC projections, the ground floor of the building and the MEP would be within the floodplain by 2100 under the High Scenario projections, which is at the end of the building's design life. The MEP equipment would not be within the floodplain by the end of its design life in the 2080s based on these projections. Because the renovations to existing Building 555 would

[2] NYC Planning. *The New York City Waterfront Revitalization Program: Climate Change Adaptation Guidance*. November 2018.

not alter its elevation or exterior footprint, the flood elevation worksheet in **Attachment A** is based on the +11 foot BFE where the new Harbor School Annex building would be constructed.

c. Identify any vulnerable, critical, or potentially hazardous features that may be located below the elevation of Mean Higher High Water (MHHW) over the lifespan of the project under any sea level rise scenario.

Based on the range of sea level rise predictions described above, MHHW at the project site could increase to +5.11 feet by the 2050s, +7.44 feet by the 2080s, and up to +8.86 feet by 2100. None of the project features would be vulnerable to MHHW under the projected conditions.

d. Describe how any additional coastal hazards are likely to affect the project, both currently and in the future, such as waves, high winds, or debris.

Wave action hazards (i.e., Zone VE or Coastal A Zone) have not been designated for the project site. Therefore, storm impacts due to waves, high winds, or debris would not be expected to affect the proposed modifications.

2. Identify adaptive strategies: assess how the vulnerabilities and consequences identified in Step 1 are addressed through the project's design and planning.

a. For any features identified in Step 1(b), describe how any flood damage reduction elements incorporated into the project, or any natural elevation on the site, provide any additional protection. Describe how would any planned adaptive measures protect the feature in the future from flooding?

The project site is currently within the 1-percent annual chance floodplain and would continue to be within the floodplain under the projected scenarios. As such, the new Harbor School Annex building would be constructed at an elevation of +16 feet NAVD88, which is approximately 5 feet above the current BFE (and 4 feet above the DFE) and would protect both the ground floor and the MEP equipment from flooding under current and projected conditions. The façade of the building would include 4-foot wide stone at the base, which would be resistant to flood damage. The new Harbor School Annex building would also include a green roof that would capture stormwater runoff from the roof of the building and slow its rate of discharge to the Upper New York Harbor through existing stormwater outfalls.

b. For any features identified in Step 1(c), describe how any flood damage reduction elements incorporated into the project, or any natural elevation on the site, provide any additional protection. Describe how would any planned adaptive measures protect the feature in the future from flooding?

As described in Step 1(c), none of the project features would be below MHHW within their design life based on the High Scenario projections.

c. Describe any additional measures being taken to protect the project from additional coastal hazards such as waves, high winds, or debris.

As noted in Step 1(d), the project site is not within a wave impact zone in the City's designated flood hazard area. Therefore, no specific measures are required.

d. Describe how the project would affect the flood protection of adjacent sites, if relevant.

Because the floodplain in New York City is controlled by astronomic tide and meteorological forces like hurricanes, and not by fluvial flooding, the proposed modifications would not have the

potential to adversely affect the floodplain or result in increased coastal flooding at adjacent sites or within the project area. the proposed modifications would not significantly alter the existing site elevation and would not encroach into other developments. Renovations to the existing building would not result in an increase in impervious surfaces. The new building would include a green roof to allow some capture of stormwater, which would otherwise flow over land, offering some flood protection to adjacent areas. During and following construction, activities at the project sites would be conducted in accordance with applicable stormwater regulations.

3. Assess policy consistency: conclude whether the project is consistent with Policy 6.2 of the Waterfront Revitalization Program.

The building sites are in the current 1-percent annual chance floodplain and would be within the floodplain for the duration of their design life. While the renovations to Building 555 would not affect its position within the floodplain, they would not result in an increase of impervious surfaces and would therefore not have the potential to affect adjacent areas in terms of flooding. The new Harbor School Annex building, which would include MEP equipment at the ground floor level, would be constructed 4 feet above the DFE at an elevation of +16 feet NAVD88. At this elevation, the ground flood would remain above the projected flood elevations until 2100 under the High Scenario projections, and the MEP equipment would remain above the flood elevation throughout its design life. The green roof incorporated into the design of the new Harbor School Annex building would provide some stormwater capture, minimizing the risk of flooding in adjacent areas from stormwater runoff. Therefore, with these measures in place, the proposed modifications would promote Policy 6.2.

Policy 7: Minimize environmental degradation and negative impacts on public health from solid waste, toxic pollutants, hazardous materials, and industrial materials that may pose risks to the environment and public health and safety.

Policy 7.1: Manage solid waste material, hazardous wastes, toxic pollutants, substances hazardous to the environment, and the unenclosed storage of industrial materials to protect public health, control pollution and prevent degradation of coastal ecosystems.

A Phase I Environmental Site Assessment (ESA) prepared for the project in October 2022 identified soil and fill materials containing concentrations of polycyclic aromatic hydrocarbons (PAHs), metals, and pesticides at the project site. To reduce the potential for adverse impacts associated with the subsurface disturbance required for the proposed modifications, a Phase II Environmental Site Investigation (ESI) was completed in February 2023. Construction of the new Harbor School Annex building would be conducted in accordance with the Remedial Action Plan (RAP) and Construction Phase Environmental Health and Safetey Plan (CHASP) prepared in November 2023, which was developed based on the Phase II ESI results. The RAP includes procedures for managing soil and any groundwater that might be encountered during subsurface disturbance in accordance with applicable federal, state, and local requirements, including protocols for the disposal of any contaminated materials or underground storage tanks. With these measures in place, the proposed modifications would promote this policy.

Policy 7.3: Transport solid waste and hazardous materials and site solid and hazardous waste facilities in a manner that minimizes potential degradation of coastal resources.

The proposed modifications would not include the siting of solid or hazardous waste facilities and would not involve transportation of hazardous waste. Debris associated with construction of the project, including any concrete, stone, soil, and/or asphalt, would be stockpiled onsite in accordance with measures identified in the Stormwater Pollution Prevention Plan (SWPPP) being

prepared for the project. Temporary erosion and sedimentation control measures would be implemented to prevent soil erosion and discharge of soil-bearing water runoff or airborne dust to adjacent properties. All debris would be transported offsite for disposal. Therefore, the proposed modifications would promote this policy.

Policy 8: Provide public access to, from, and along New York City's coastal waters.

Policy 8.1: Preserve, protect, maintain, and enhance physical, visual and recreational access to the waterfront.

As with the project evaluated in the FSSGEIS, the proposed modifications would be consistent with the 2010 Park and Public Space Master Plan pertaining to open space development on the South Island, and would not result in the loss of recreational access to the waterfront. The new Harbor School Annex building would replace a vacant space and temporary seasonal uses with active recreational opportunities that are intended to enliven the South Island year-round. The building design would complement the surrounding open spaces consistent with the zoning controls on the Island, which are intended to connect and establish harmonious relationships between open spaces, the Historic District, and the Development Zones. Therefore, the proposed modifications would promote this policy.

Policy 9: Protect scenic resources that contribute to the visual quality of the New York City coastal area.

Policy 9.1: Protect and improve visual quality associated with New York City's urban context and the historic and working waterfront.

As with the project evaluated in the FSSGEIS, the proposed modifications would be visually compatible with their surroundings and would be minimally disruptive to existing visual resources. The new building would use materials and design components that are consistent with the existing structures in the vicinity, and no new uses to the area would be introduced by the proposed modifications. Renovations to the existing Building 555 would be conducted such that the proposed modifications would not result in significant adverse effects to the historic structure. Therefore, the proposed modifications would promote this policy.

Policy 10: Protect, preserve, and enhance resources significant to the historical, archaeological, architectural, and cultural legacy of the New York City coastal area.

Policy 10.1: Retain and preserve historic resources, and enhance resources significant to the coastal culture of New York City.

Building 555 is a contributing resource within the Governors Island Historic District and National Historic Landmark. The building was constructed in 1938-1940 along with the identical Building 315, anchoring the two ends of Division Road, as family housing for officers of the 16th Regiment. Consultation with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) was initiated regarding the proposed modifications, and in letters dated May 19, 2023 and October 11, 2023, OPRHP determined that the modifications would not result in impacts to historic resources. The NYC Landmarks Preservation Commission (LPC) issued their findings on July 11, 2023, and SCA has made design modifications in response to comments from LPC to ensure the proposed modifications would not result in significant adverse effects to historic resources. Therefore, the proposed modifications would promote this policy.

Attachment A
Flood Elevation Worksheet

NYC Waterfront Revitalization Program - Policy 6.2 Flood Elevation Workhsheet

COMPLETE INSTRUCTIONS ON HOW TO USE THIS WORKSHEET ARE PROVIDED IN THE "CLIMATE CHANGE ADAPTATION GUIDANCE" DOCUMENT AVAILABLE AT www.nyc.gov/wrp

Enter information about the project and site in highlighted cells in Tabs 1-3. Tab 4, "Summary Charts" contains primary results. Tab 5, "0.2%+SLR" produces charts to be used for critical infrastructure or facilities. Tab 6, "Calculations" contains background computations. Appendix A contains tide elevations for station across the city to be used for the elevation of MHHW if a site survey is not available. Non-highlighted cells have been locked.

Background Information	
Project Name	Technical Memorandum: Phased Redevelopment of Governors Island - South Island Development Zones
Location	Governors Island
Type(s)	☑ Residential, Commercial, Community Facility ☐ Parkland, Open Space, and Natural Areas ☐ Tidal Wetland Restoration ☐ Critical Infrastructure or Facility ☐ Industrial Uses ☐ Over-water Structures ☐ Shoreline Structures ☐ Transportation ☐ Wastewater Treatment/Drainage ☐ Coastal Protection
Description	Modifications to the Phased Redevelopment of Governors Island - South Island Development Zones zoning text amendment that was analyzed in the Final Second Supplemental Generic Environmental Impact Statement (FSSGEIS), which was finalized in March 2021. The modifications include: 1) adaptive reuse/renovation of existing Building #555 as an Annex for classrooms; and 2) construction of a new Harbor School Annex Building (M533) including a pool, gymnasium, and science laboratories. The new building would be within the South Island Development Zone. This worksheet pertains to the new building, as it would be considered a new vulnerable resource.
Planned Completion Date	2028
Expected Project Lifespan	80 years (2100)

For technical assistance on using this worksheet, email wrp@planning.nyc.gov, using the message subject "Policy 6.2 Worksheet."

Last update: Sept. 7, 2018

Establish current tidal and flood heights.

	FT (NAVD88)	Feet	Datum	Source
MHHW	2.61	**2.61**	**NAVD88**	*Appendix A, The Battery Station 8518750*
1% flood height	11.00	**11.00**	**NAVD88**	*NYC Flood Hazard Mapper*
Design flood elevation	12.00	**12.00**	**NAVD88**	*Requirements for Category II & III buildings*
As relevant:				
0.2% flood height	-->			

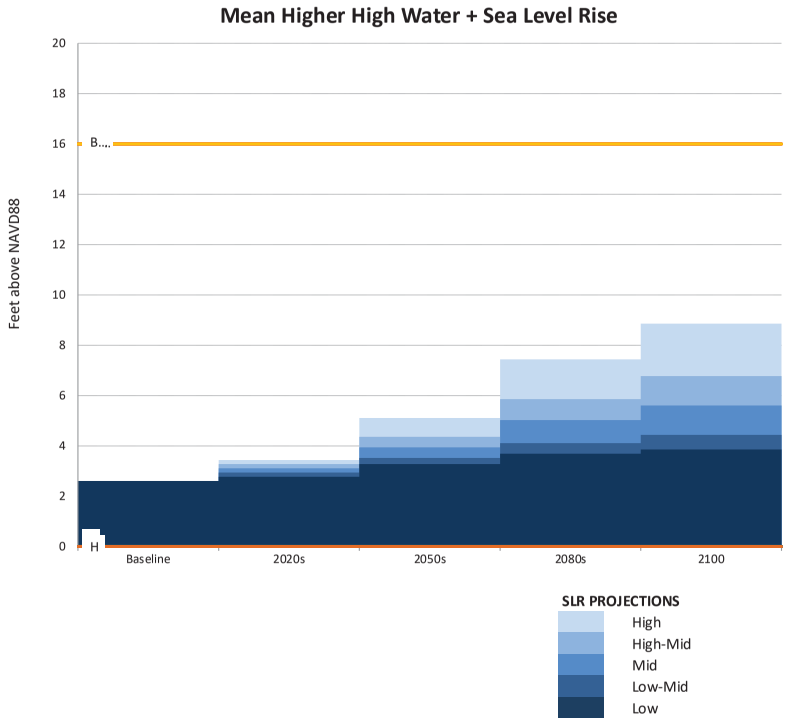
Data will be converted based on the following datums:

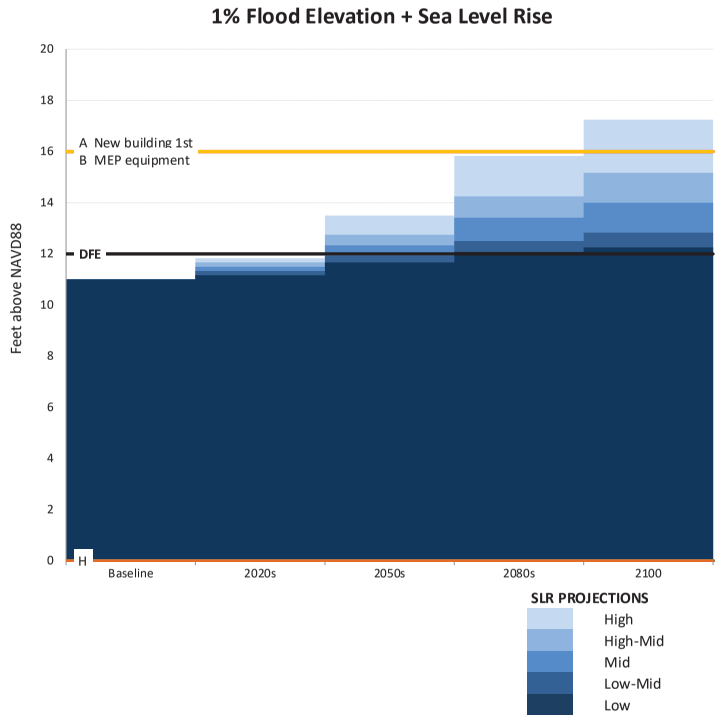
Datum	FT (NAVD88)
NAVD88	*0.00*
NGVD29	*-1.10*
Manhattan Datum	*1.65*
Bronx Datum	*1.51*
Brooklyn Datum (Sewer)	*0.61*
Brooklyn Datum (Highway)	*1.45*
Queens Datum	*1.63*
Richmond Datum	*2.09*

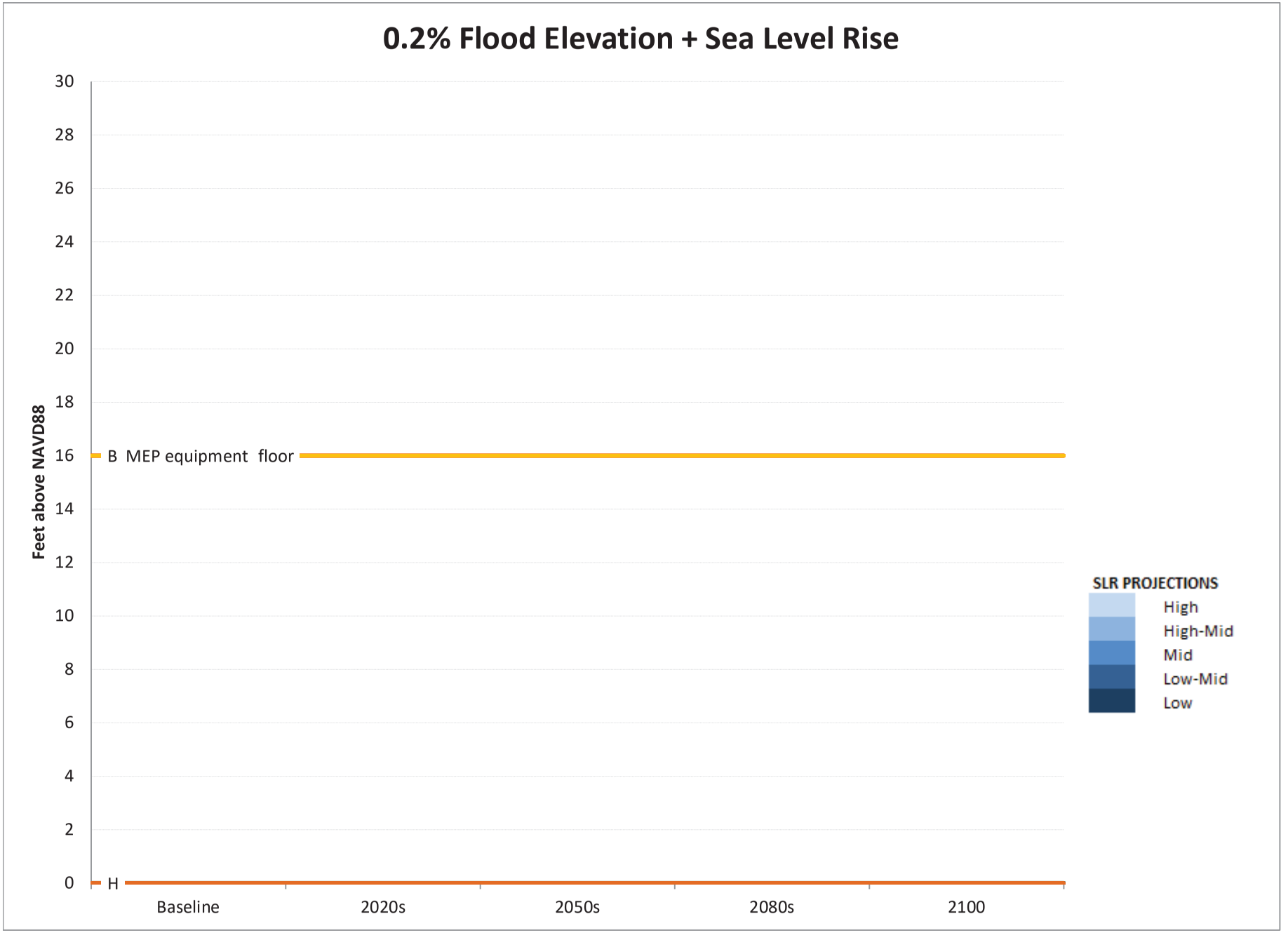
Describe key physical features of the project.

Feature *(enter name)*	Feature Category	Lifespan	Elevation	Units	Datum	Ft	Ft Above NAVD88	Ft Above MHHW	Ft Above 0.2% flood height
A New building 1st floor	☑ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other	2100	16.0	Feet	NAVD88	*16.0*	*16.0*	*13.4*	*#VALUE!*
New Harbor School Annex building - first floor elevation									
B MEP equipment	☐ Vulnerable ☑ Critical ☐ Potentially Hazardous ☐ Other	2080	16.0	Feet	NAVD88	*16.0*	*16.0*	*13.4*	*#VALUE!*
Mechanical, electrical, and plumbing equipment within the new Harbor School Annex building									
C	☐ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other			Feet	NAVD88				
Description of Planned Uses and Materials									
D	☐ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other			Feet	NAVD88				
Description of Planned Uses and Materials									
E	☐ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other			Feet	NAVD88				
Description of Planned Uses and Materials									
F	☐ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other			Feet	NAVD88				
Description of Planned Uses and Materials									
G	☐ Vulnerable ☐ Critical ☐ Potentially Hazardous ☐ Other			Feet	NAVD88				
Description of Planned Uses and Materials									
H	☐ Vulnerable ☐ Critical ☑ Potentially Hazardous ☐ Other			Feet	NAVD88				
Description of Planned Uses and Materials									

Assess project vulnerability over a range of sea level rise projections.






0.2% Flood Elevation + Sea Level Rise
Feet above NAVD88
30
28
26
24
22
20
18
16
14
12
10
8
6
4
2
0
B MEP equipment floor
H
Baseline
2020s
2050s
2080s
2100
SLR PROJECTIONS
High
High-Mid
Mid
Low-Mid
Low

	SLR (ft)				
	Low	Low-Mid	Mid	High-Mid	High
Baseline	0.00	0.00	0.00	0.00	0.00
2020s	0.17	0.33	0.50	0.67	0.83
2050s	0.67	0.92	1.33	1.75	2.50
2080s	1.08	1.50	2.42	3.25	4.83
2100	1.25	1.83	3.00	4.17	6.25

	SLR (in)				
	Low	Low-Mid	Mid	High-Mid	High
2014	0	0	0	0	0
2020s	2	4	6	8	10
2050s	8	11	16	21	30
2080s	13	18	29	39	58
2100	15	22	36	50	75

MHHW+SLR (ft above NAVD88)

	Low	Low-Mid	Mid	High-Mid	High
Baseline	2.61	2.61	2.61	2.61	2.61
2020s	2.78	2.94	3.11	3.28	3.44
2050s	3.28	3.53	3.94	4.36	5.11
2080s	3.69	4.11	5.03	5.86	7.44
2100	3.86	4.44	5.61	6.78	8.86

1%+SLR (ft above NAVD88)

	Low	Low-Mid	Mid	High-Mid	High
Baseline	11.00	11.00	11.00	11.00	11.00
2020s	11.17	11.33	11.50	11.67	11.83
2050s	11.67	11.92	12.33	12.75	13.50
2080s	12.08	12.50	13.42	14.25	15.83
2100	12.25	12.83	14.00	15.17	17.25

0.2%+SLR (ft above NAVD88)

	Low	Low-Mid	Mid	High-Mid	High
Baseline	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2020s	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2050s	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2080s	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!
2100	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!

	0	1
A New building 1st floor	16	16
B MEP equipment	16	16
C	0	0
D	0	0
E	0	0
F	0	0
G	0	0
H	0	0
DFE	12.00	12.00

NOAA Tide Station Data

(to be used only when a site survey is unavailable)

Station ID	*Station Name*	*Source MHHW (Feet, NAVD88)**	*Adjusted MHHW (Feet, NAVD88)**	*Source*
8518687	Queensboro Bridge	2.27	2.60	NOAA Tides and Currents
8530095	Alpine	2.11	2.44	NOAA Tides and Currents
8516614	Glen Cove	3.72	4.05	NOAA Tides and Currents
8516990	Willets Point	3.72	4.05	NOAA Tides and Currents
8518639	Port Morris	3.33	3.66	NOAA Tides and Currents
8518699	Williamsburg Bridge	2.14	2.47	NOAA Tides and Currents
8518750	The Battery	2.28	2.61	NOAA Tides and Currents
8531680	Sandy Hook	2.41	2.74	NOAA Tides and Currents
8518490	New Rochelle	3.71	4.04	NOAA Tides and Currents
8531545	Keyport	2.66	2.99	NOAA Tides and Currents
8516891	Norton Point	2.08	2.41	NOAA VDATUM
8517201	North Channel	2.72	3.05	NOAA Tides and Currents
8517137	Beach Channel	2.10	2.43	NOAA VDATUM
8517756	Kingsborough	2.13	2.46	NOAA VDATUM
8519436	Great Kills	2.22	2.55	NOAA VDATUM
8531142	Port Reading	2.82	3.15	NOAA VDATUM
8519483	Bergen Point	2.56	2.89	NOAA VDATUM
8519050	USCG	2.28	2.61	NOAA Tides and Currents
8518902	Dyckman St	2.01	2.34	NOAA Tides and Currents
8517251	Worlds Fair Marina	3.59	3.92	NOAA VDATUM
8518668	Horns Hook	2.54	2.87	NOAA VDATUM
8518643	Randalls Island	2.60	2.93	NOAA VDATUM
8518526	Throggs Neck	3.68	4.01	NOAA Tides and Currents

* MHHW values include an addition 0.33 feet to account for changes in sea level since the 1983-2001 tidal epoch.

Attachment 2
Historic and Cultural Resources

New York State
Parks, Recreation and
Historic Preservation

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

May 19, 2023

Kelly Murphy
Director, Real Estate
NYC SCA
30-30 Thomson Avenue
Long Island City, NY 11101

Re: ESDC
Building 555 Governors Island Rehabilitation
Short Avenue, Governors Island, NY 10004
15PR01662

Dear Kelly Murphy:

Thank you for continuing to consult with the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources.

We have reviewed your consultation letter dated April 5th, 2023, and the supporting drawings and specifications. Based upon our review, we find the revised design to be responsive to all of our comments to date. Therefore, it is OPRHP's opinion that the proposed work will have No Adverse Impact on historic properties.

If you have any questions, I am best reached via e-mail.

Sincerely,

Olivia Brazee
Historic Site Restoration Coordinator
olivia.brazee@parks.ny.gov

cc: C. Tepper and N. DeFeo, Trust for Governors Island via e-mail only

New York State
Parks, Recreation and
Historic Preservation

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

October 11, 2023

Kelly Murphy
Director, Real Estate
NYC SCA
30-30 Thomson Avenue
Long Island City, NY 11101

Re: ESDC
Building 555 Governors Island Rehabilitation
Short Avenue, Governors Island, NY 10004
15PR01662

Dear Kelly Murphy:

Thank you for continuing to consult with the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources.

We have reviewed the revised design described in your letter dated October 2nd, and shown in the accompanying drawings. Based upon our review, it is OPRHP's opinion that the revised design is appropriate and that the work continues to have No Adverse Impact to historic resources.

If you have any questions, I am best reached via e-mail.

Sincerely,

Olivia Brazee
Historic Site Restoration Coordinator
olivia.brazee@parks.ny.gov

cc: C. Tepper and N. DeFeo, TGI via e-mail only

October 2, 2023

Olivia Brazee
NYS Office of Parks, Recreation and Historic Preservation
Peebles Island State Park
PO Box 189
Waterford, NY 12188
Via CRIS Submission

Re: SHPO ID# 15PR01662
SCA's Response to LPC Comments Harbor School Annex

Dear Olivia,

Since the issuance of the Letter of No Adverse Impact on May 19, 2023 for the proposed Harbor School Annex at 555 Short Avenue located within the Governor's Island Historic District, the School Construction Authority (SCA) presented the proposed project to the NYC Landmarks Preservation Commission (LPC) and received their official Findings July 11, 2023.

The SCA Design Team has carefully reviewed the LPC Findings (attached), summarized below along with our proposed response that we wish to share with NYS Office of Parks, Recreation and Historic Preservation (OPRHP) for your concurrence before officially responding to LPC.

LPC Comment: Brick and Cast Stone Screen Walls (at main entry stair and barrier-free access entrance).

The SCA agrees with the commissioner's comments about the material for the brick and cast stone screen walls. In response, the two walls are revised as follows:

1. The brick and cast stone wall located at the bottom of the new entrance stairs will be removed and replaced with a wrought iron guard rail and railing. (See attached Proposed Short Avenue Elevation and Enlarged Elevations drawing nos. 03 and 04).

2. The brick and cast stone wall at the entrance to the wheelchair lift will be revised to remove the face brick. The wall, which is required for the design of the flood gate, will be entirely cast stone. (See attached Proposed Short Avenue Elevation and Enlarged Elevations drawing nos. 03 and 04).

3. The face brick on the side walls of the new entrance stair will be removed. The side walls will be exposed concrete similar to the exposed concrete side walls at the three

existing exterior stairs at the historic front façade. (See attached Enlarged Elevations drawing no. 04 and Historic Front Photos no. 07).

LPC Comment: Main Entry Door and Barrier-Free Entrance Door Design

The SCA agrees with the commissioner's comments that the height of the main entrance should align with the adjacent window headers. In response, the SCA recommends that the main entrance design be revised as follows:

1. The cast stone door surround will be raised to allow for a wood transom above each door. The configuration of the door and transom are consistent with the existing door and transoms at the historic front façade.

2. The height of the door and transom aligns with the height of the adjacent windows. (See attached Enlarged Elevations and Entrance Feature drawing nos. 04 and 05)

The contemporary design of the new main entrance establishes an identity for the school entrance which is visually distinguishable from the classical style residential entries on the historical front facade. The proposed design concept is consistent with OPRHP's acceptance of the main entrance design which follows their guidelines that designs for additions should be new not historic while also respecting the architectural character of the historic building.

At the barrier-free access entry door to the wheelchair lift, the cast stone surround is reduced in size which improves the visual proportion of the cast stone, and which preserves the cast stone sill of the window above. (See attached Enlarged Elevations and Entrance Feature drawing nos. 04 and 05)

LPC Comment: Louvers

In response to the commissioner's comments about the proposed louver details and finishes, the louver design is proposed to be modified as follows:

1. The louver frame is set back and located in the masonry opening to match the window frames.

2. The muntin grille is set back to connect to the louver frame instead of floating in front of the frame.

3. The louver frame will match the profile of the window frames.

4. The color of the louver frame will be white to match the color of the window frames. The color of the louvers will be charcoal grey (instead of black). The color of the muntin grille will also be charcoal grey to match the louver color. (See attached Louvers with Applied Frame drawing 06)

30-30 Thomson Avenue
Long Island City, NY 11101
718 472 8000 T
718 472 8840 F

The SCA is happy to set up a virtual briefing to discuss our proposed changes. Thank you in advance for your consideration.

Sincerely,

Kelly Murphy

Kelly Murphy, AICP
Senior Director, Real Estate Services

attachments

c: Austin Harris, SCA AE
Si Tao, SCA AE
Clinton Peterson, SCA DCIM

30-30 Thomson Avenue
Long Island City, NY 11101

718 472 8000 T
718 472 8840 F

Landmarks Preservation Commission

Date:	7/11/2023
LPC Docket #:	LPC-23-09608
LPC Action:	Report
Action required by other agencies:	DOB
Permit Type:	ADVISORY REPORT

Address: Governors Island - Building 555
Borough: Manhattan
Block: 1 **Lot:** 111
Historic District: Governors Island Historic District
Description: A neo-Georgian style officers' quarters building built in 1938-40. Application is to alter the façade and install a new entrance with double stair and landing, a new barrier-free access entrance, windows, louvers, and HVAC equipment with screening.

COMMISSION FINDINGS

Pursuant to Section 25-318 of the Administrative Code of the City of New York, the Commission voted to ISSUE A REPORT FOR THE PROPOSAL, noting that:

A quorum of Commissioners voted to approve the overall concept of the proposal as presented, but recommended that the New York School Construction Authority ask the applicants to explore and restudy aspects of the design.

All of the Commissioners supported the proposed installation of a new entrance and stair, and a new barrier-free access entrance, finding that the work will not damage or eliminate any significant architectural features; that the work will facilitate circulation across Short Avenue from Building 550 and support the reactivation of this long-vacant building; that the large scale of the building can support the presence of new entrances along Short Avenue, which currently lacks a primary entrance, and the proposed new entrance doors, stairs, and railings will be centrally located and well-scaled to the building; that the cast stone, red brick, concrete and black ironwork at the proposed new entrances and stairs will be in keeping with the materials found at the building and throughout the historic district; that the proposed at-grade entrance will provide barrier-free access at a return façade close to the new primary entrance, and the proposed wall adjacent to this entry, needed to support a deployable barrier related to flood-mitigation, will align with the base of the building to help it recede from view.

However, a plurality of Commissioners expressed concerns about specific aspects of the proposed design and details of the new entrances, screen walls and stair.

These Commissioners expressed concerns about the materiality and details of the brick and cast stone screen walls, noting that they will call undue attention to themselves. Most of these Commissioners recommended revising the screen wall at the barrier-free access entrance to be constructed entirely in cast stone, and some Commissioners suggested that the screen wall at the base of the stair could be changed to an open railing. One Commissioner felt that the screen walls are appropriate as designed.

Additionally, these Commissioners expressed concerns about the proposed entry door surround details, noting that they would have a too subtle presence at this designed façade, with a few Commissioners recommending specific modifications to these details in order to establish more prominence at this new entry and its relationship to the façade, including: raising the height of the door headers to align with the adjacent window headers; cladding the center mullion of the new door assembly in a material other than cast stone; and revising the entry door surround details to harmonize more closely with existing door surrounds at the west façade. However, one Commissioner noted the New York State Historic Preservation Office's and U.S. Department of the Interior's requirements that the design and details of new ornamental features be differentiated from original historic details, and that the details and materiality at the entry door surrounds are appropriate as designed, while another Commissioner recommended omitting the surround entirely at the new barrier-free access door.

All of the Commissioners supported the installation of through-window flood vents, and HVAC louver and muntin assemblies, finding that the installation of flood vents is warranted by current flood zone requirements, and will aid in long term preservation of the building; and that the proposed louvers with external grilles at various windows will be configured to match the existing fenestration pattern, helping them recede from view.

Landmarks Preservation Commission

Date:	7/11/2023
LPC Docket #:	LPC-23-09608
LPC Action:	Report
Action required by other agencies:	DOB
Permit Type:	ADVISORY REPORT

However, these Commissioners also expressed concerns about the details and finish of the HVAC louver assemblies and grilles, noting that the proposed details and finish color combinations of the louver, grille, and frame, will draw undue attention to these features and not harmonize with the existing frames. Some of these Commissioners recommended specific modifications to the details, including integrating the louvers into the windows frames; reducing the height of the louver blades; increasing the thickness of the outer louver frame; finishing the muntins and louvers in the same color; and preparing color combination mock-ups in consultation with LPC staff. One Commissioner recommended finishing the louvers in gray in lieu of the proposed black finish.

Finally, most Commissioners did not comment on the proposed HVAC equipment and screening. However, one Commissioner supported these installations, noting that, although the current standard for HVAC equipment and screening throughout the historic district should be revisited, the proposed equipment and screening design was consistent with this standard.

VOTE:

Present: Sarah Carroll, Frederick Bland, Diana Chapin, Michael Goldblum, Jeanne Lutfy, Mark Ginsberg, Angie Master, Everardo Jefferson

7-0-0

In Favor = S.Carroll, F.Bland, D.Chapin, M.Goldblum, J.Lutfy, M.Ginsberg, A.Master
Oppose =
Abstain =
Recuse = E.Jefferson

Addendum

DETAILED SUBMISSION TO

NYS HISTORIC PRESERVATION OFFICE

SHPO ID# 15PR01662

PROJECT NAME: NEW YORK HARBOR SCHOOL ANNEX

BOROUGH: MANHATTAN (GOVERNORS ISLAND)

ADDRESS: 555 SHORT AVE. NEW YORK, NY 10004

VIEW FROM CRAIG ROAD NORTH

Addendum

TABLE OF CONTENTS

Consultants:
Ciardullo
Architecture & Engineering, P.C.
417 Fifth Avenue, 8th Floor
New York, NY 10016
T: (212) 245-0010
www.ciardullo.com

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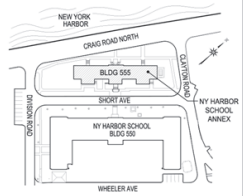
Key Plan:



Block # 1 Lot # 10

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Project Architect/Engineer:	A. DUNN, R.A.
Discipline Lead:	C. HEAPHY, R.A.
Designer:	A. DUNN, R.A.
Drawn by:	
Checked by:	C. HEAPHY, R.A.

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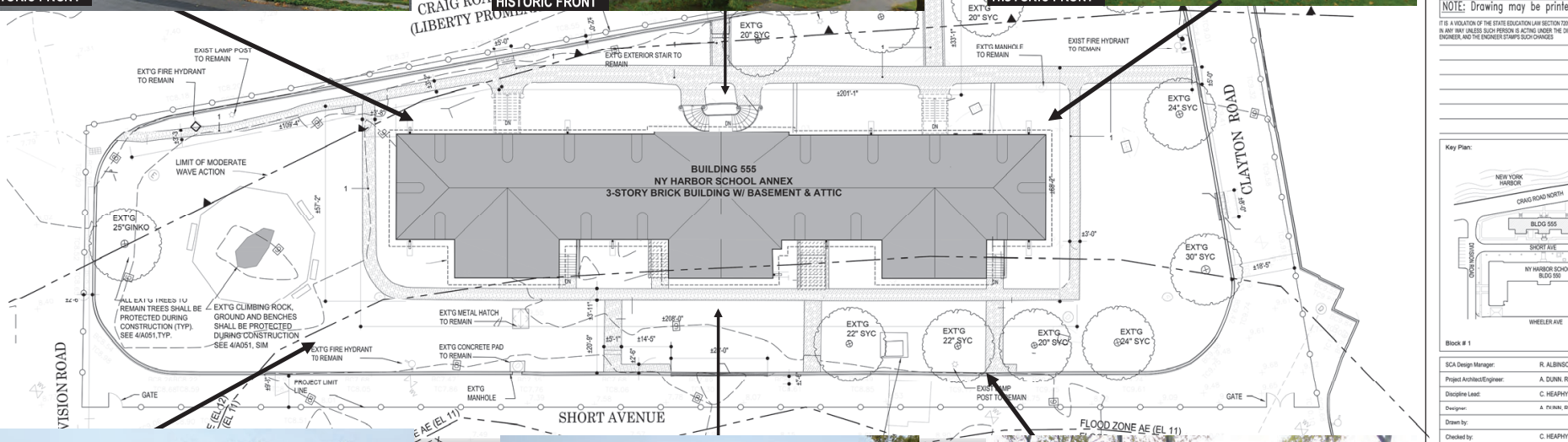
DWG. TITLE
COVER

01



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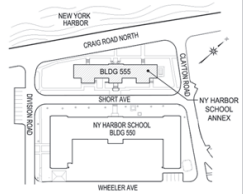

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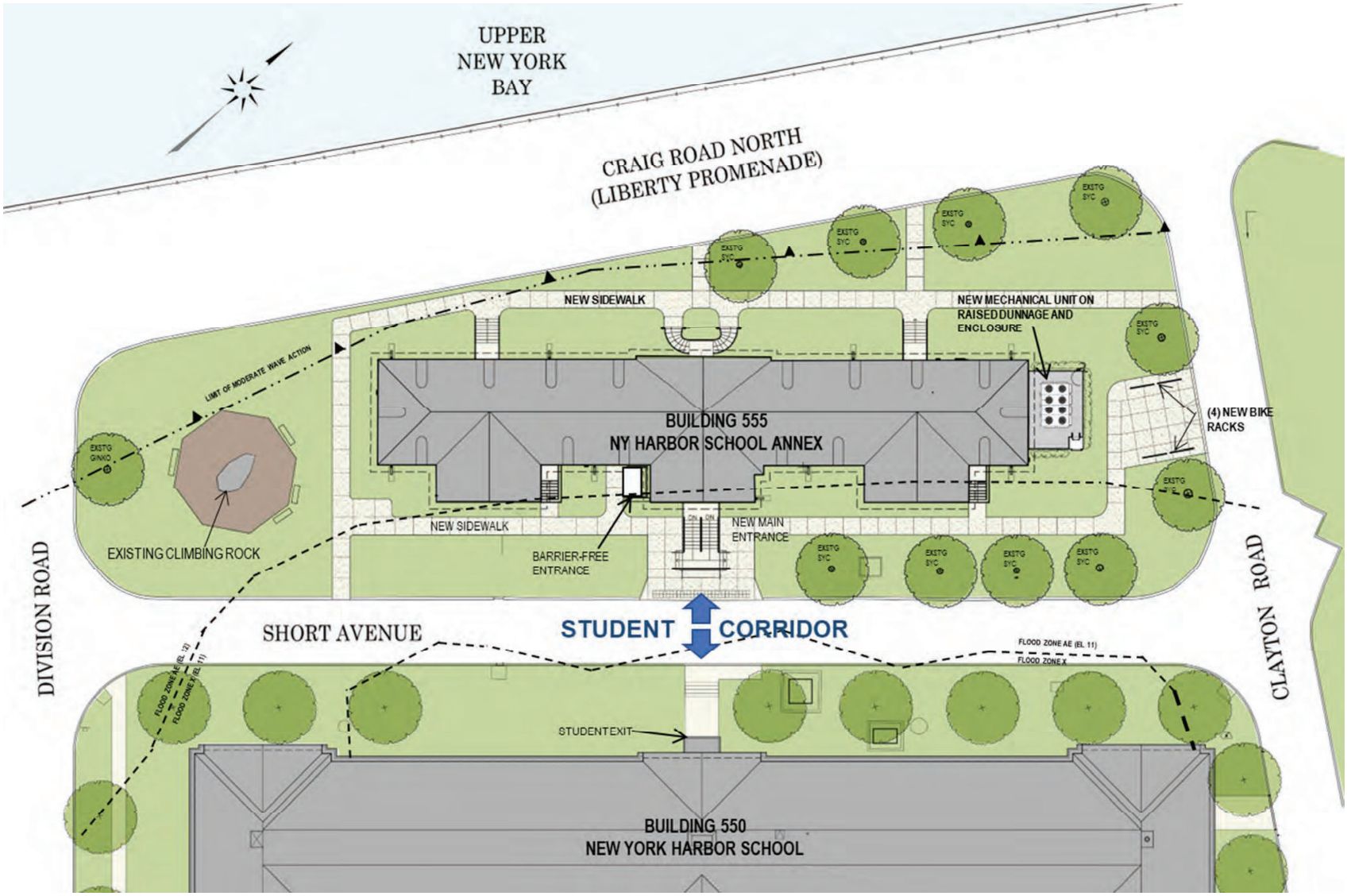
DWG. TITLE
EXISTING BUILDING PHOTOS

02



PROPOSED SITE PLAN
PROVIDED FOR REFERENCE — NO CHANGE TO PROPOSED WORK

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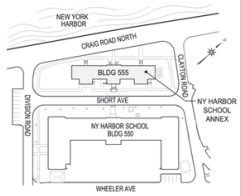

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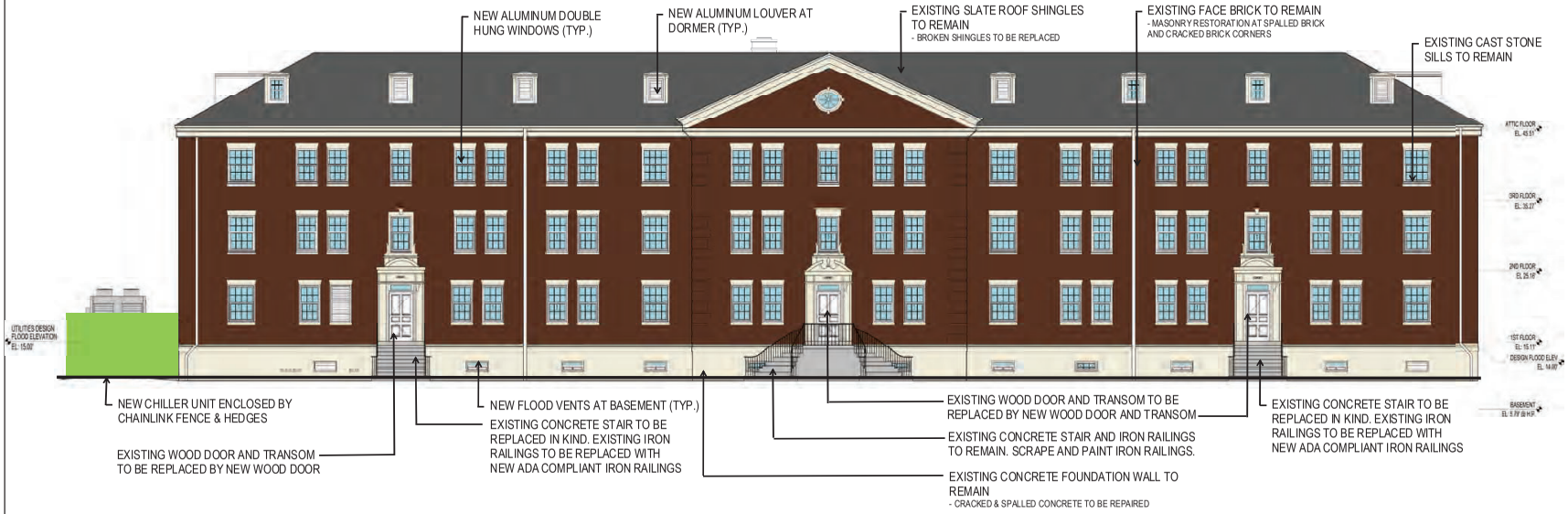
DWG. TITLE
PROPOSED SITE PLAN

03

EXISTING HISTORIC FRONT ELEVATION — CRAIG ROAD NORTH



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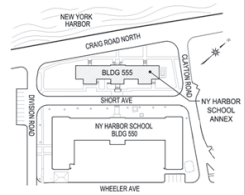

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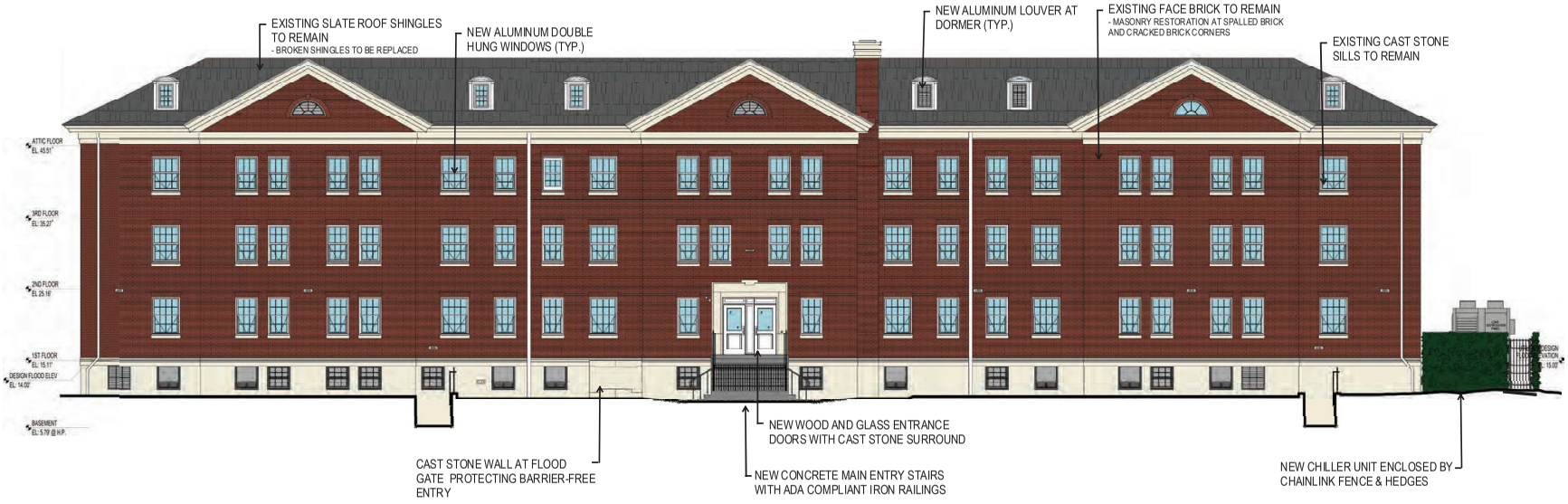
DWG. TITLE
EXISTING AND PROPOSED BUILDING ELEVATIONS

04

EXISTING HISTORIC REAR ELEVATION — SHORT AVE.



PROPOSED HISTORIC REAR ELEVATION — SHORT AVE.

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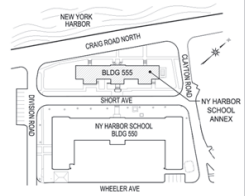

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DWG. TITLE
EXISTING AND PROPOSED BUILDING ELEVATIONS

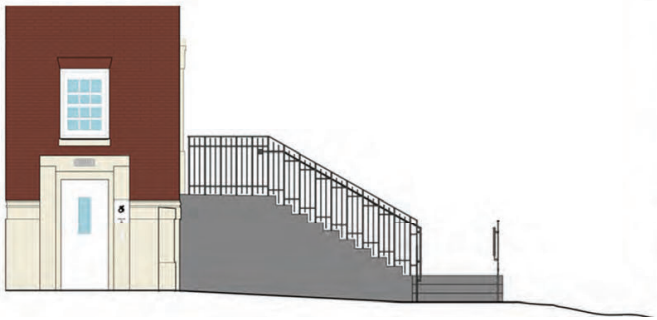
05

MAIN ENTRANCE

- Main entrance door and surround is raised.
- No face brick on the side walls of the cast-in-place exterior stair
- Hand and guardrails replace the cast stone and brick wall at the stair landing.

BARRIER-FREE ENTRANCE

- Cast stone wall at the barrier-free entrance, in lieu of a brick and cast stone wall.
- Cast stone surround at barrier-free door is reduced.



ENLARGED PROPOSED SIDE ELEVATION - CLAYTON ROAD

ENLARGED PROPOSED ELEVATION - SHORT AVENUE

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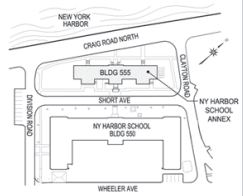

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DWG. TITLE
NEW MAIN ENTRANCE - PROPOSED

06

- At the barrier-free access entry door to the wheelchair lift, the cast stone surround is reduced in size which improves the visual proportion of the cast stone, and which preserves the cast stone sill of the existing window above.
- The brick and cast stone wall at the entrance to the wheelchair lift has been revised to remove the face brick. The wall, which is required for the design of the flood gate, will be entirely cast stone. .

BARRIER-FREE ENTRANCE

- The cast stone door surround is raised to allow for a wood transom above each door. The configuration of the door and transom are consistent with the existing door and transoms at the historic front façade.
- The height of the door and transom aligns with the height of the adjacent windows. (see attached Proposed Main Entry.
- Painted paneled wood doors have glazed lites, painted wood door frame, transom and a wide wood mullion.
- Stair railings are not shown in this view.

PROPOSED NEW MAIN ENTRANCE STAIR

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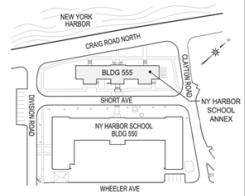

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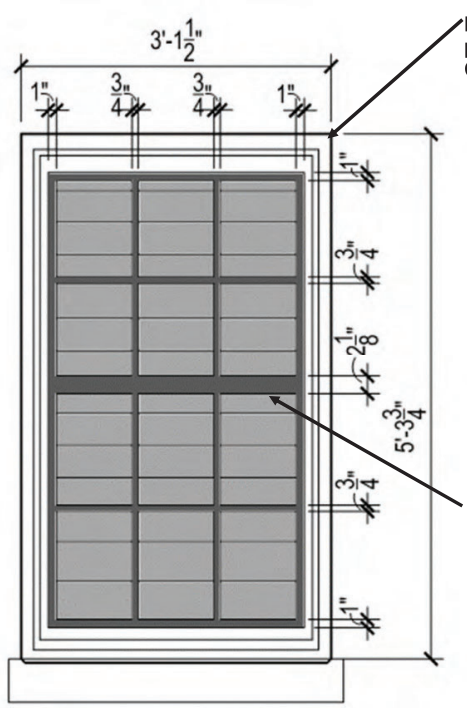
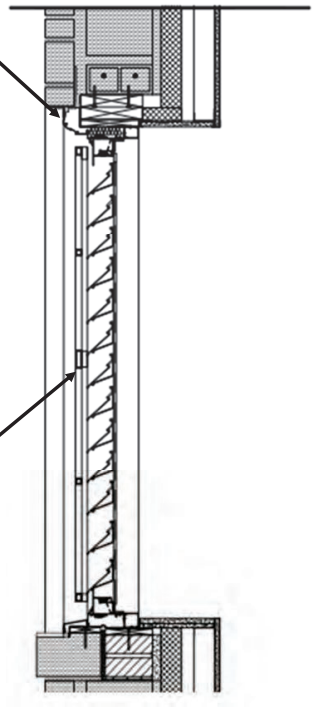
DWG. TITLE
ENTRANCE FEATURES

07



Louver frame with window panning
Color: historic white

Applied frame and louver
Color: dark grey



LOUVER WITH APPLIED MUNTINS

- Muntin frame members varied to reflect double-hung window frame

LOUVER SECTION

- Louver setback to match set-back of existing window
- Louver frame panning to match that of the window frame panning

WINDOW SECTION

- Provided for reference

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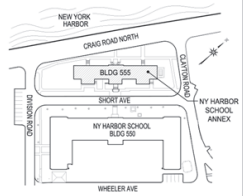

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DWG. TITLE
LOUVERS WITH APPLIED FRAMES

08