



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

## **Technical Memorandum for the Phased Redevelopment of Governors Island FGEIS**

Evaluating the Proposed Demolition of Governors Island  
Buildings 96, 146, 147 and 148, the Pool of Building 324, and Additions to Building 400

**February 14, 2012**

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### **A. INTRODUCTION**

Acting as lead agency for the purposes of environmental review, the New York State Urban Development Corporation d/b/a the Empire State Development Corporation (ESDC) prepared an Environmental Assessment Form (EAF) in 2008 that examined opening portions of Governors Island south of Division Road (the South Island) to the public, removing buildings throughout the Island to make it safe for public recreation, relocating the New York Harbor School to the Island from Brooklyn, creating a temporary food and entertainment facility, and introducing art studios to Building 110. The sponsor of that project was the Governors Island Preservation and Education Corporation (GIPEC), a subsidiary of ESDC. As part of the effort to enhance public access, the EAF considered the demolition of all South Island buildings and certain buildings in the area north of Division Road (the North Island)—Buildings 134, 293, 309, S-571, and Wing O of Building 400. ESDC, acting under the New York State Environmental Quality Review Act, issued a negative declaration for these actions on April 17, 2008.

The 2008 EAF stated that the proposed demolition of the North Island buildings would “remove buildings that create a potentially unsafe condition for visitors and inhibit public access.”<sup>1</sup> In continuing the efforts to enhance public access and eliminate potentially unsafe conditions in a manner that is consistent with goals of historic preservation and architectural integrity, The Trust for Governors Island currently plans to expand the project as proposed in 2008 by demolishing all or part of certain other structures on the North Island: Buildings 96, 146, 147 and 148 in their entirety; the pool associated with Building 324; and additions to Building 400. While situated within the Governors Island Historic District (a National Historic Landmark District and New York City Historic District), these structures have been identified in the *Governors Island Preservation and Design Manual (Design Manual)* as either noncontributing elements or additions, or contributing elements that have lost a significant amount of integrity and are therefore eligible for demolition. The *Design Manual* was prepared by the General Services Administration (GSA) and published in 2003. It was developed to help guide the reuse of the Historic District portion of the Island, while ensuring preservation of the historic and architectural resources that contribute to the Island’s importance. The *Design Manual*’s “Preservation and Design Standards” were developed by the GSA in consultation with the New York City Department of City Planning, LPC,

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<sup>1</sup> Governors Island Enhanced Public Access Program and Harbor School EAF, 2008, p. 2B-9.

OPRHP, the Advisory Council on Historic Preservation, and the National Trust for Historic Preservation. The *Design Manual's* "Preservation and Design Standards" and "Design and Development Guidelines" were intended to be the basis for project review by OPRHP and LPC and are, therefore appropriate for purposes of environmental review pursuant to the State Environmental Quality Review Act and the Rules of Procedure for City Environmental Quality Review.

The proposed work within the Historic District would be reviewed and approved by LPC and/or OPRHP as appropriate, before it would be effectuated.

The project sponsor, The Trust for Governors Island, is a city entity that is the successor to GIPEC (the transfer of responsibilities for Governors Island from the State to the City is described below). Therefore, the lead agency for the environmental review of this Technical Memorandum is the Office of the Deputy Mayor for Economic Development (ODMED) in the Office of the Mayor.

This Technical Memorandum assesses the potential for the proposed demolition of these additional structures to result in significant adverse environmental impacts, particularly ones that would be new or different from those considered in the 2008 EAF. It includes a discussion of the history of the project; a review and summary of the 2008 EAF; an update of major changes to the Island since 2008; a brief discussion of 2010 *CEQR Technical Manual* updates, as warranted; and a description of the current proposal for demolition. Building on the analyses conducted in 2008, this Technical Memorandum includes an examination of each applicable technical area to determine the currently proposed project's potential to result in significant adverse environmental impacts similar to and/or different from those considered in the 2008 EAF.

As discussed in greater detail below, the proposed changes would not result in any significant adverse environmental impacts—the same conclusion arrived at in the 2008 analyses.

## **B. BACKGROUND**

### **HISTORY**

Governors Island is a 172-acre island in New York Harbor, situated between Brooklyn and Manhattan. The Island was used by the military for about 200 years, most recently by the United States Coast Guard from 1966 to 1996. In January 2003, the federal government transferred 22 acres of the Island to the National Park Service as a National Monument and the remaining 150 acres of the Island to GIPEC, which had been established in 2002 as a subsidiary of ESDC.

In April 2010, Mayor Bloomberg and Governor Paterson agreed that the primary responsibility for the long-term development, funding and governance of Governors Island should reside with New York City; as of July 2010 that responsibility was transferred to the City and is now under the direction of the Governors Island Corporation, d/b/a The Trust for Governors Island ("The Trust"), a New York State not-for-profit corporation created by the City of New York that is responsible for the planning, redevelopment, and ongoing operations of 150 acres of Governors Island. The Trust is the successor entity to GIPEC.

Since the 2008 EAF, a number of major changes have happened on the island. Most notably, the entire 2.2 mile perimeter roadway was opened for bicycles and pedestrians, along with Picnic Point—a new 8-acre open space on the southern tip of the Island. The Trust continues to make the Island available as a venue for unique and diverse programming including field and lawn sports; boating; concerts; lectures; and cultural, food, and art festivals. As a result, the Island is more popular than ever—in 2011 more than 448,000 visitors used the Island to picnic, bike, walk, and participate in on-Island cultural and recreational programming.

## **2008 EAF**

Acting as lead agency for the purposes of environmental review, ESDC prepared an EAF in 2008 that examined the project components summarized below. On April 17, 2008 ESDC determined that the proposed project would not result in any significant adverse impacts on the environment and issued a Negative Declaration pursuant to SEQR.

### *ENHANCED PUBLIC ACCESS*

To enhance public use of the Island with an initial phase of access to the South Island, the 2008 proposal sought to open portions of the South Island to the public for both programmed and unprogrammed uses. In order to make the Island safe for public recreation GIPEC proposed the demolition of all buildings on the South Island as well as the demolition of Buildings 293, 309, 400 (Wing O), S-517, and possibly Building 134 on the North Island (non-contributing buildings in the Historic District).

Since the 2008 EAF, a number of structures have been demolished on the South Island, including those at the southwest corner of the Island that were removed to create Picnic Point. On the North Island, Building 293—a former Super 8 Motel—and its associated hardscapes (parking lots and tennis courts) were demolished, substantially opening up the Parade Ground vistas. In addition, Building 309 is scheduled for demolition in 2012. The other North Island buildings previously proposed for demolition have not yet been demolished.

### *RELOCATION OF HARBOR SCHOOL*

The 2008 proposal also included the relocation of the New York Harbor School, a public high school, from its former location in Bushwick, Brooklyn to Building 550 on the North Island. Since Building 550 is a contributing building in the Historic District, the required renovation work, including alterations to the exterior façade and exterior landscaping, was reviewed and approved by OPRHP and LPC.

The New York Harbor School moved into Building 550 in the Fall of 2010.

### *TEMPORARY FOOD AND ENTERTAINMENT FACILITY*

The 2008 EAF accounted for the creation of a temporary food and entertainment facility in the area north of Building 110 and between Buildings 111 and 112 on the North Island. The “Water Taxi Beach” was built in this area in 2009 and includes a food vendor, a sandy “beach,” sitting areas with picnic tables, and a stage used for performances.

### *ART STUDIOS*

Finally, the 2008 EAF examined using all or part of Building 110 on the North Island for artists’ studios. In 2010, the Lower Manhattan Cultural Council began using portions of Building 110 as a multi-use arts facility for the development and presentation of new work in the performing and visual arts. The facility includes visual artist studios, rehearsal studios, and an exhibition space.

## **2010 CEQR TECHNICAL MANUAL UPDATE<sup>2</sup>**

Subsequent to the 2008 EAF, the City released a revised *CEQR Technical Manual* (May 17, 2010) which updates the methodologies and criteria set forth in the 2001 *CEQR Technical Manual* that was the basis for the analyses contained in the 2008 EAF. Applying the revised guidelines of the 2010 *CEQR Technical Manual* to the technical analyses would not change the conclusions presented in the EAF that there would be no significant adverse impacts. Neither the previously approved demolition work nor the current

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<sup>2</sup> A subsequent update to the *CEQR Technical Manual* was released on February 2, 2012, but the changes would not affect any of the analyses in this Technical Memorandum.

proposal would have significant adverse impacts (as described below). Even when considered together as a whole, the selective removal of buildings would not have an adverse impact on the environment.

## **THE PHASED REDEVELOPMENT OF GOVERNORS ISLAND**

To create the vibrant, mixed-use destination that is envisioned for the Island, The Trust has undertaken a public planning effort that resulted in a plan that would be implemented over a number of years. That project will include the creation of parks and open spaces pursuant to the Park and Public Space Master Plan, reuse of historic buildings, two areas of mixed-use development, and modernization and upgrade of certain infrastructure. Actions necessary to implement the project, including the approval of capital funding, were discretionary, therefore, the Phased Redevelopment of Governors Island was the subject of a Generic Environmental Impact Statement (GEIS) prepared pursuant to CEQR and New York State Environmental Quality Review Act (SEQRA). The Office of the Deputy Mayor for Economic Development (ODMED) in the Office of the Mayor was the lead agency for the preparation of the GEIS, with The Trust as the applicant. A notice of completion for the Final GEIS was issued on December 20, 2011.

### **C. PROPOSED DEMOLITION**

Demolition is proposed for five areas on the North Island (see Figure 1). The proposed demolition would include Buildings 96, 146, 147 and 148 in their entirety; the pool associated with Building 324; and two additions to Building 400—a building wing and a mechanical/storage shed area. While situated within the Governors Island Historic District (a National Historic Landmark District and New York City Historic District), these structures have been identified as either noncontributing elements or additions, or contributing elements that have lost a significant amount of integrity and are therefore eligible for demolition.

Each of the areas proposed for demolition is described below.

#### **BUILDING 96**

Building 96 is a modern one-story steel frame building with a red brick façade (see photo 1 of Figure 2). It is located on the northeast end of the Island along Kimmel Road just south of Pier 102. The “Group Engineering” building was constructed in 1986 and was used as a workshop. According to the *Design Manual*, Building 96 is a Category 3 property, a non-contributing element within the Governors Island Historic District. The *Design Manual* describes the building as a “modern structure that is eligible for demolition.”

#### **BUILDING 146**

Building 146, located between Building 148 and the seawall just west of Soissons Dock, is a defunct red brick utility structure housing a generator (see photo 2 of Figure 2). There is also a storage tank associated with the Building 146 generator located west of Building 147. Building 146 is a Category 3 non-contributing element to the Governors Island Historic District.

#### **BUILDING 147**

Building 147, adjacent to the seawall just west of Building 146, is an unused concrete utility structure containing mechanical equipment (see photo 3 of Figure 3). It is identified as a Category 4 intrusion on the Governors Island Historic District.

#### **BUILDING 148**

Building 148, adjacent to Soissons Dock, is a one-story red brick structure built in 1917 to serve as a waiting area for the ferry (see photo 4 of Figure 3). While the building is a Category 2 contributing

element to the Governors Island Historic District, numerous alterations have degraded its value as a historic resource. According to the *Design Manual*, major alterations have included “a new entrance on the east side with a large concrete landing and steps; concrete windows and doors; a clock window on the southeast corner of the east façade; a handicap access ramp at the southeast corner; and windows on the south façade infilled with glass block.” Because these changes detract from the building’s architectural and historical integrity, the *Design Manual* concludes that the building is eligible for demolition.

#### **ADDITION TO BUILDING 400**

This addition abuts the “G” wing of Building 400 and is located just northwest of Earlybird Road at the center of the Island (see photos 5 and 6 of Figure 4). This modern addition is a two-story steel frame structure with a flat roof and brick facade. Building 400 itself, known as Liggett Hall, was designed by McKim, Mead and White and completed in 1930. Building 400 is considered a contributing element to the Governors Island Historic District and is considered significant in the history and development of the Island. However, the modern additions constructed in the west courtyard are considered to have no architectural merit and according to the *Design Manual* are “inappropriate in scale and design and can be removed.”

#### **BUILDING 400 MECHANICAL EQUIPMENT AND STORAGE SHEDS**

Also within the western courtyard of Building 400 and proposed for removal are two storage sheds and HVAC mechanical equipment (see photo 7 of Figure 5). The small storage sheds, constructed of corrugated steel, abut the façade of Building 400 near the J Wing. Both the storage sheds and mechanical equipment are modern elements that, while not specifically cited in the *Design Manual*, are not original to the building.

#### **POOL AT BUILDING 324**

Building 324 was constructed in 1926 as the Fort Jay YMCA and served as a community center for the Island. The building itself, considered to be a contributing element to the Governors Island Historic District, is executed in a neo-Georgian brick design with a two-story pedimented portico facing Owasco Road. At the rear of the building, along Cartigan Road, is a swimming pool constructed above grade and surrounded by a concrete deck (see Photo 8 of Figure 5). The pool is identified in the *Design Manual* as suitable for removal.

### **D. EVALUATION OF POTENTIAL IMPACTS**

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

The 2008 analysis concluded that there would be no significant adverse impacts to land use, zoning, and public policy. The project was determined to be compatible with the surrounding land uses and to have a positive effect by increasing public access to the Island. Similarly, no significant adverse impacts on zoning were identified, and the project was determined to be in support of public policy.

Like the 2008 project, the demolition now proposed for the North Island would work towards the goal of increased public access and making the Island safe and enjoyable for public use. The proposed demolition of the buildings and other structures would not significantly affect land use on the Island as a whole, but would represent an improvement in conditions as underutilized and vacant structures would be demolished. The context in which the Island’s primary land uses—open space and recreation, education, entertainment, and the arts—are set would no longer include the outmoded, modern-era elements proposed for removal.

The proposed project would also be consistent with the public policies that apply to the Island, including the plan for the Phased Redevelopment of Governors Island. The proposed demolition would enhance the

public experience of the waterways that surround New York and allow additional public circulation and access on the Island. No significant adverse impacts to public policy would result from the proposed project.

### **SOCIOECONOMIC CONDITIONS**

The 2008 analysis concluded that there would be no significant adverse impacts to socioeconomic conditions. The proposed demolition would not add or displace residents, workers, or businesses, would not affect conditions in a specific industry, and would not result in socioeconomic changes in a larger area. Like the 2008 project, the proposed demolition would not result in any significant adverse socioeconomic impacts.

### **COMMUNITY FACILITIES AND SERVICES**

The 2008 analysis concluded that there would be no significant adverse impacts to community facilities. The proposed demolition would have no direct or indirect effect on community facilities, including public schools, libraries, child care centers, health care facilities, or fire and police protection. No new residents or permanent workers would be generated by the proposed demolition and there would be no direct changes to community facilities as part of the proposed project. Therefore, based on the guidelines of the *2010 CEQR Technical Manual*, the proposed demolition does not have the potential to result in significant adverse impacts to community facilities.

### **OPEN SPACE**

The 2008 analysis concluded that there would be no significant adverse impacts to open space. The proposed demolition would not generate residential or worker populations that would indirectly affect the use of open space. In terms of direct effects, the proposed project would not result in a physical loss of public open space; would not change the use of an open space so that it no longer serves the same user population; would not limit public access to an open space; and would not cause increased noise or air pollutant emissions, odors, or shadows on public open space. Therefore, like the 2008 project, based on the guidelines of the *2010 CEQR Technical Manual* the proposed demolition would not result in significant adverse impacts to open space. Conversely, the proposed demolition would allow for improved circulation within and access to the Island's open spaces.

### **SHADOWS**

As with the 2008 project, the proposed demolition would not result in the construction of new buildings. Existing structures would be demolished, resulting in small decreases in shadows. Therefore, there would be no potential for significant adverse shadow impacts.

### **HISTORIC AND CULTURAL RESOURCES**

The 2008 analysis concluded that there would not be a significant adverse impact to historic resources. Although that project involved some excavation activities on the North Island, including an area identified in the *Design Manual* as potentially archaeologically sensitive, work was reviewed and approved by OPRHP and LPC. Similarly, the conversion plans for existing buildings were reviewed by LPC and OPRHP. Since the buildings on the South Island were determined to be non-historic, their proposed demolition was found to have no effect on architectural resources.

Similarly, the work now proposed will be reviewed by LPC and OPRHP. As noted above, Building 96 has been identified as a modern structure that is eligible for demolition. Building 148, while categorized as a contributing element to the historic district, has undergone numerous additions and changes that detract from its integrity and therefore the *Design Manual* concluded that its demolition is also appropriate. The two small utility structures adjacent to Soissons Dock, Building 146 and 147, have been

identified as either non-contributing or intrusive. Their removal would not have an adverse effect. The Building 400 addition, as well as the storage sheds and mechanical equipment, are historically inappropriate and their removal would not have an adverse effect. Finally, the pool at Building 324 has been determined to have no architectural value, and is therefore suitable for removal. In terms of archaeology, the sites proposed for demolition have not been identified as sensitive for archaeological resources (see Figure 6).

The proposed demolition would remove elements that have been deemed inconsistent with the historic character of the Island, and would increase public access, improve public safety, and enhance views. Overall, there would not be a significant adverse impact to historic and cultural resources.

### **URBAN DESIGN AND VISUAL RESOURCES**

The 2008 analysis concluded that there would be no significant adverse impacts to urban design. As noted above, like the 2008 project the proposed demolition would not result in the construction of any new buildings. According to the *CEQR Technical Manual*, an assessment of urban design is appropriate when a project involves a physical alteration beyond that allowed by existing zoning, including a modification of yard, height, and setback requirements, or when a project would result in an increase in built floor area beyond what would be allowed as-of-right. The proposed project does not meet any of these criteria and does not require further analysis. As with the 2008 project, the proposed demolition would not result in a significant adverse urban design impact.

### **NATURAL RESOURCES**

A natural resources assessment is conducted when a natural resource is present on or near the project area and when an action involves the disturbance of that resource. Like the 2008 project, the proposed project would involve minimal construction activity and would consist of the demolition of existing buildings. No new permanent construction would take place and the proposed project does not include any in-water construction activities or discharges to the Upper New York Bay. There would be no increase in impervious surfaces that could affect the discharge of stormwater to the Upper Bay. In any event, the Upper Bay is not considered Significant Coastal Fish and Wildlife Habitat.

The New York Natural Heritage Program (2010) identified no state-listed animals or plants, significant natural communities, or other significant habitats on or in the immediate vicinity of the project site. The US Fish and Wildlife Service and National Marine Fisheries Service have identified the federally endangered shortnose sturgeon (*Acipenser brevirostrum*) as occurring in the Hudson River within New York County, and Atlantic sturgeon (*Acipenser oxyrinchus*), marine mammals, and marine turtles may occur in the waters near Governors Island.

As noted above, the proposed project does not include any in-water construction activities and would not result in discharges to the Upper Bay. Therefore, it would not result in any significant adverse impacts to these species. Based on its modest scale and the fact that there would be no in-water work, the proposed project would not result in any significant adverse impacts to existing terrestrial plant and wildlife communities, floodplains, wetlands, water quality, aquatic biota in the Upper New York Bay, or threatened or endangered species.

### **HAZARDOUS MATERIALS**

The 2008 analysis concluded that although the renovation and demolition of buildings could increase pathways for human exposure—resulting from the potential presence of asbestos-containing materials, lead-based paint, and PCB-containing materials—potential impacts would be avoided by performing work in accordance with all applicable regulations and guidelines.

Although potential subsurface contamination resulting from petroleum tanks and/or historic fill was noted, the analysis concluded no significant adverse impacts would occur, because at most a minimal amount of subsurface disturbance would be required. In addition measures were identified for the North Island work to avoid potential impacts that included:

- Bringing any known ASTs or UST (as well as any additional tanks unexpectedly encountered) into compliance with NYS DEC registration requirements; maintaining and testing such tanks according to applicable regulations; and removing or closing in place any tanks that will not remain in service, in accordance with federal, state, and local regulations.
- Although there is at most a minimal potential of encountering contaminated soil or unexploded ordnance during the shallow excavation associated with the project, all such work will be conducted in accordance with a Health and Safety Plan (HASP) so that if suspected ordnance or any signs of contamination are encountered, work will be stopped until the suspected ordnance is properly removed by an ordnance specialist or, in areas of contaminated soil, removal and segregation of contaminated material can be conducted under the guidance of an appropriate specialist.
- Soil excavated in the North Island area during the proposed project would be stockpiled for future reuse, unless evidence of contamination, such as staining or odors, is encountered. The stockpile(s) would be located in a securely fenced area. Stormwater management measures, such as hay bales or silt fencing, would be placed around stockpiles and properly maintained to ensure that stormwater runoff complies with applicable requirements.
- Demolition debris consisting of crushed brick and concrete would be stockpiled for future reuse. All other demolition debris would be removed from the project site and recycled or disposed of in accordance with all applicable regulations. The stockpile(s) would be located in a securely fenced area. Stormwater management measures, such as hay bales or silt fencing, would be placed around stockpiles and properly maintained to ensure that stormwater runoff complies with applicable requirements.

Based on their ages, the structures to be demolished may include asbestos-containing materials (ACM) and lead-based paint, and potentially PCB-containing electrical equipment and fluorescent lighting components. Additionally, fluorescent lights may include mercury-containing components. Existing legal requirements control procedures that are required to be followed before and during demolition (including those relating to removal and handling of ACM and lead-based paint), serving to avoid or minimize the potential for adverse effects from human or environmental exposure. All applicable rules and regulations will be followed and the measures previously identified above will be adhered to. Therefore, the proposed project is not expected to result in significant adverse hazardous materials impacts.

The emergency generator in Building 146 was fueled by a concrete-encased, approximately 250-gallon diesel aboveground storage tank (AST) located on a rack within a concrete brick secondary enclosure. A January 2011 Phase I Environmental Site Assessment (ESA) noted no petroleum staining on the AST or within the enclosure. This AST would be properly closed and removed, along with any contaminated soil (if encountered), in accordance with applicable regulatory requirements including DEC requirements for

spill reporting and cleanup. The Governors Island Petroleum Bulk Storage listing with NYSDEC would be updated to reflect the closure and removal of this AST.

### **WATER AND SEWER INFRASTRUCTURE**

The 2008 analysis concluded that there would not be a significant adverse impact on infrastructure. The proposed demolition would not have an exceptionally large incremental demand for water, would not involve construction of a new stormwater outfall, would not increase the amount of impervious area on the affected sites, and would not result in wastewater discharges requiring industrial pretreatment. Therefore, according to the thresholds of the 2010 *CEQR Technical Manual*, no analysis of water supply or wastewater and stormwater conveyance and treatment is needed and the proposed project would not have a significant adverse impact on water and sewer infrastructure.

### **SOLID WASTE AND SANITATION SERVICES**

The 2008 analysis concluded that there would not be a significant adverse impact to solid waste and sanitation services. While the proposed demolition would generate a modest amount of construction waste, there would be no solid waste generated after demolition is complete. The construction waste generated during demolition that is not stockpiled for future reuse as described above would be disposed of properly pursuant to conditions that will be included in the contracts for the demolition work. The proposed project would have no effect on the City's Solid Waste Management Plan or other solid waste policies. Since the proposed project would not result in a substantial increase in solid waste that would overburden available waste management capacity and would not be inconsistent with the City's SWMP or other policies, the proposed project would not result in a significant adverse impact on solid waste and sanitation services.

### **ENERGY**

The 2008 analysis concluded that there would be only minimal energy demands within the overall context of New York City and that existing infrastructure was adequate to accommodate the proposed new uses. Therefore, the 2008 analysis concluded that there would be no significant adverse impacts on energy.

As noted in the 2010 *CEQR Technical Manual*, the incremental demand caused by most projects would not create a significant impact on energy supply. Consequently, a detailed assessment of energy impacts is limited to those projects that may significantly affect the transmission or generation of energy. The proposed project's energy demand is expected to be modest and limited to the demolition period, and would be considered negligible. The proposed demolition would not result in energy-intensive facilities that would significantly affect the transmission or generation of energy.

Overall, the proposed project would not have a significant adverse impact on energy.

### **TRANSPORTATION**

The 2008 analysis concluded that there would be no significant adverse impacts in the areas of traffic and parking or transit and pedestrians.

Upon completion of the construction work, the proposed project would not result in any vehicle, transit or pedestrian trips. Therefore, based on Table 16-1 of the 2010 *CEQR Technical Manual*, "Minimum Development Densities Potentially Requiring Transportation Analysis," there is no analysis required and the proposed project would not result in significant adverse transportation impacts.

### **AIR QUALITY**

The 2008 EAF included a screening analysis for the proposed HVAC systems that determined there would not be any significant adverse air quality impacts from stationary sources of emissions. Since the

proposed development did not exceed the threshold for vehicle trips, a quantified assessment of on-street mobile source emissions was not warranted.

The proposed project would not result in new mobile or stationary air quality sources, and would not create new parking facilities. The project area is not in an industrial zone and would not result in new sensitive uses adjacent to existing sources of pollution. Therefore, based on the criteria of the 2010 *CEQR Technical Manual*, the proposed project does not require an air quality analysis and would not result in significant air quality impacts.

### **GHG EMISSIONS**

The 2008 EAF did not include an assessment of greenhouse gas (GHG) emissions since it was not part of the *CEQR Technical Manual* at that time.

According to the 2010 *CEQR Technical Manual*, an assessment of GHG emissions is generally not warranted for projects that do not require preparation of an EIS, since larger projects have a greater potential to be inconsistent with the City's GHG reduction goals. Currently, the GHG consistency assessment focuses on those projects being reviewed in an EIS that would result in development of 350,000 square feet or greater or that would result in the construction of a building that is particularly energy-intensive.

The proposed demolition does not require the preparation of an EIS and would not result in any new buildings. Therefore, a GHG assessment is not warranted.

### **NOISE**

The 2008 analysis concluded that there would be no significant adverse noise impacts.

According to the 2010 *CEQR Technical Manual*, in many instances it is possible to determine that a project would not have the potential for a significant noise impact simply from its proposed physical characteristics. Generally, a noise analysis is conducted if a project would generate any mobile or stationary sources of noise, and/or be located in an area with existing high ambient noise levels; or if the proposed project is located in an area with high ambient noise levels, such as near airports or railways. The proposed project would not create mobile or stationary sources of noise and would not result in any new uses being placed in areas with high ambient noise levels. Therefore, the proposed demolition would not result in significant adverse noise impacts and no further analysis is necessary.

### **PUBLIC HEALTH**

The 2008 analysis concluded that there would be no significant adverse impacts on public health.

According to the 2010 *CEQR Technical Manual*, for most proposed projects a public health analysis is not necessary. Where no significant unmitigated adverse impact is found in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise, no public health analysis is warranted. The proposed project would not have significant adverse impacts in any of these areas and would therefore have no significant adverse impact on public health.

### **NEIGHBORHOOD CHARACTER**

The 2008 analysis concluded that there would not be significant adverse impacts on neighborhood character.

An assessment of neighborhood character is generally needed when a proposed project has the potential to result in significant adverse impacts in certain technical areas—land use, socioeconomic conditions, open space, historic and cultural resources, urban design and visual resources, shadows, transportation, or noise. An assessment may also be appropriate when a project may have moderate effects on several of the

elements that define a neighborhood's character. The proposed project would not have significant adverse impacts in any technical area, nor would it result in moderate effects that taken together could affect neighborhood character. Overall, the proposed demolition would remove elements that have been deemed inconsistent with the historic character of the Island, and would result in enhanced circulation, better views and an improved visitor experience. Thus, the proposed project would not result in significant adverse impacts to neighborhood character; rather, it would represent an improvement.

### **CONSTRUCTION IMPACTS**

Based on the anticipated demolition and construction activities presented in the 2008 EAF, it was determined that construction of that project would not result in any significant adverse impacts. The additional demolition of the buildings now being considered will not alter that conclusion.

According to the 2010 *CEQR Technical Manual*, for construction activities not related to in-ground disturbance, short-term construction generally does not warrant a detailed construction analysis. The proposed project includes the demolition of existing structures and would not include the types of in-ground disturbance usually associated with construction projects, such as excavation for foundations, drilling, or blasting. The proposed demolition activities are expected to be short-term (lasting approximately two months) and would take place over five separate sites.

Demolition debris is expected to be removed from the Island by barge; since trucks will not be used for waste removal, no analysis of truck trips is warranted. In total, based on estimates provided by the construction manager, up to 950 cubic yards of demolition debris could be generated. Approximately two barges would be used to remove the debris from the Island. There would be a designated material loading zone in the area south of Lima Pier where the demolition material will be loaded onto the barges. The location to which the material would be taken has not yet been identified, but there are a number of waste handling facilities in New York and New Jersey that could potentially be used. In any case, the number of barge trips to and from Governors Island for this project is expected to be very minimal and would not add significantly to the waterborne traffic in New York Harbor.

Activities would be modest compared to most construction projects, and there would not be a substantial long-term effect on noise, air quality, traffic, or other technical areas. Given the relative isolation of the areas that would be affected by demolition, the short duration of work, and the level of work activity anticipated, there is not expected to be any notable disruption to the surrounding community. As with any project, some work may be noisy, but construction noise is regulated by the New York City Noise Control Code and by the Environmental Protection Agency noise emission standards for construction equipment. These federal and local requirements mandate that certain classifications of construction equipment and motor vehicles meet specified noise emissions standards. Compliance with these standards will ensure that there would be no significant adverse noise impacts from construction. In addition, appropriate fugitive dust control measures would be employed to reduce the generation and spread of dust. As noted above, the construction waste generated during demolition would be disposed of properly pursuant to conditions that will be included in the contracts for the demolition work.

Overall, the proposed project would not have significant adverse construction impacts.

## E. CONCLUSIONS

As described in the analysis above, similar to the project analyzed in the 2008 EAF that supported the issuance of a negative declaration, the proposed demolition would not result in significant adverse environmental impacts.



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Date: February 14, 2012