

APPENDIX E

Response to Comments on FEIS

Response to Comments on the FEIS

The notice of availability of the FEIS was published in the Federal Register on June 1, 2007. The comment period for the FEIS closed on July 2, 2007. Three comment letters were received on the East River Waterfront Esplanade and Piers FEIS following its publication. The comments and written responses are shown below.

1. United States Environmental Protection Agency, written comments dated June 21, 2007 (EPA)
2. Governors Island Preservation and Education Corporation, written comments dated July 2, 2007 (GIPEC)
3. Chinatown Tenants Union, written comments dated July 2, 2007 (CTU)

Comment 1: At the Chinatown Tenants Union, we strongly believe that there will be significant primary and secondary displacement due to the development of the waterfront. A broader study is necessary to examine the impacts of the development with respect to both tenants and small business owners in Chinatown. In addition, we call on the city to develop proactive measures as part of an overall strategy to mitigate the pressures for the displacement of current residents and businesses that will arise as the waterfront development increases the neighborhood's desirability. (CTU)

Response: The Proposed Action would not result in the direct, or primary, displacement of residents or businesses. *CEQR Technical Manual* guidelines recommend an analysis of the potential for indirect residential displacement if a proposed action would introduce substantial new development that is markedly different from existing uses, development, and activities within the neighborhood. According to the *CEQR Technical Manual*, residential developments of 200 or fewer units and commercial developments of fewer than 200,000 square feet are not likely to result in significant adverse socioeconomic impacts.

The Proposed Action includes up to approximately 100,000 square feet of retail space and 90,000 square feet of community space. No residential development is included in the Proposed Action. The proposed retail and community space would be developed at a number of locations between the Financial District and Chinatown. The amount of development analyzed in the FEIS is not considered substantial enough to result in indirect business or residential displacement.

Comment 2: Waterfront commercial space provided by the proposed project should be affordable space for small businesses that cater to the existing Chinatown community. Preference should be given to locally owned and existing small businesses. The city should also make the creation of community spaces for the elderly and for young people a priority as part of the project. (CTU)

Response: Comment noted. Commercial spaces will provide amenities for all local residents and users of the esplanade, while providing revenue for park operation and maintenance. Decisions on community space programming will be made with input from community representatives.

Comment 3: GIPEC supports the Proposed Action and seeks to ensure that access to the Battery Maritime Building (BMB) for GIPEC and other tenants is considered during the construction of the BMB plaza. As transportation to and from Governors Island is critical to the redevelopment of the island, GIPEC's space and logistics requirements must be factored into the Proposed Action. (GIPEC)

Response: The City will ensure access to the BMB for GIPEC and other tenants during construction of the BMB plaza.

Comment 4: The FEIS addresses EPA concerns regarding the traffic analysis, general conformity, and expected growth for the project. (EPA)

Response: Comment noted.