



The City of New York

Manhattan Community Board 1

Tammy Meltzer CHAIRPERSON | Lucian Reynolds DISTRICT MANAGER

March 12, 2021

Clare Newman
President and CEO
Trust for Governors Island
10 South Street, Slip 7
New York, NY 10004

Dear President Newman,

Thank you for your February 26 letter outlining amendments to your zoning application and commitments surrounding the Governors Island South Island redevelopment proposal. We appreciate the efforts that have been made thus far to address some of the prevailing concerns. Community Board 1 (CB1) spent many hours soliciting public comment and deliberating this proposal, and our comprehensive resolution captures a wide range of concerns and suggested amendments. While some of the major concerns were partially addressed, there is still work to be done and many items to discuss that have not yet been addressed. Particularly, we have ongoing concerns related to:

Density

One of the most prominent concerns exhibited through recurring comments was regarding the substantial increase in density proposed as part of the South Island redevelopment. Serious objections and wide ranging concerns have been raised over the impact of this scale of development, especially without having access to the detailed financial model used to justify it. Furthermore, the change of the heights without corresponding reduction in the scale of square footage does nothing to reduce the bulk, but only shifts the density to result in wider buildings. CB1 is very disappointed that no reduction in density has been proposed thus far and we urge this to be addressed and amended as soon as possible.

Height

As we understand, building heights in parcels E-2 and W-1 will be reduced from 300' to 250'; bulkhead and permitted obstruction heights will be limited to 40'; and building base heights will be reduced to 60' or less. CB1 believes that the modest height reductions offered are not adequate in addressing the critical issues surrounding height. CB1 requests that more work be done to achieve height reductions closer to the 125' cap requested by CB1.

Open Space Subarea

While we appreciate that certain problematic uses have been eliminated or scaled back within the Open Space Subarea, we have major concerns over the amount of as-of-right development that could still occur in this space that should have protections closer to what is customary for NYC parks. CB1 still maintains that the Open Space Subarea should be designated as public parkland.

Parking

The December 2020 and February 2021 letters we received from the Trust do not contain commitments to reducing the amount of parking between the two development zones. CB1 is still concerned that a generous as-of-right parking allowance creates incentives to establish more ways for vehicular access to the island for non-essential purposes and urges the Trust to work with City Planning towards a meaningful reduction in parking.

Of the 34 requests made in our December 2020 resolution, 2 have been fully addressed, 9 have been partially addressed and 23 have not been addressed. We are requesting that the Trust respond to these unaddressed items below, and we hope to meet with you as soon as possible to discuss:

1. The proposed development on Governors Island must meet the restrictions, conditions and covenants as contained in the Deed from 2003 and that the following mitigations and conditions are needed: “ensure the protection and preservation of the natural, cultural and historic qualities of Governors Island, guarantee public access to this magnificent island, promote the quality of public education, and enhance the ability of the public to enjoy Governors Island and the surrounding waterways, thereby increasing the quality of life in the surrounding community, the City, the State and the United States.”

Use and Open Space Regulations

2. The zoning must redefine “Open Space Areas” and “Open Space Subareas” as “public parkland,” including “open spaces” in the North Island to assure consistency with the Deed’s “Parkland Restriction Terms”.
3. The zoning must allow for adequate additional open space for the development of new fields, passive and active recreation spaces and waterfront touch down areas, and those areas that exist should be preserved and prioritized for community use with continued programming for child/youth recreation leagues.
4. The zoning must establish a Pierhead and Bulkhead line to define the end-points of the piers and other important controls.
5. The zoning text must be amended so that the “streets”/“connections” are not closed to the public outside of hours of operation. “Reasonable hours of operation” should be written into the zoning, or hours of operation could reference NYC park hours.
6. The permitted uses in the zoning text must align with the Governors Island 2003 Deed requirements and the scope of the environmental reviews.
7. A Supplemental Environmental Review must be provided to capture and study the expanded uses which has not yet been provided. This must include the potential development of the

Open Space Subarea, including “permitted obstructions” under 35 feet. For example, the impact of an amusement park in the open space or a boatel on an open pier would need to be reviewed as concerns the potential environmental impacts.

8. The zoning must indicate that 0.5 FAR for housing should be used only as staff housing and not for any other type of permanent housing.
9. The zoning and/or Deed must be amended to prohibit permanent, long-term housing uses in perpetuity.

Environment and Sustainability

10. CB1 urges that the project seek to achieve self-powered, off-grid or near off-grid environmental self-sustainability, or near self-sustainability within 3 years of inception.
11. CB1 urges the Trust provide clear and precise plans and as to how the laudable mission to become a true model of environmental sustainability will be realized and CB1 requests that the Trust review and respond to the community as to how the zoning might better assure the public that any development will adhere to the most innovative and stringent global resiliency and sustainability practices.
12. CB1 urges for further engagement with the Trust to address the public’s concern that large-scale development of this scope and scale is neither climate friendly nor resilient.
13. The EIS must take into consideration how Governors Island will be affected by the city’s current proposal to build an offshore extension in the FIDI Seaport area in Lower Manhattan which will include many potential impacts including the modification of the Battery Maritime ferry terminal.

Density, Floor Area Ratio (FAR), Height, Bulk, Parking Regulations

14. "The zoning must be amended to reduce the density, height and bulk for the development on the Island to respond to the community’s many concerns including but not limited to: context of the Historic District, views from on and off the island, shadows on the Harbor School, etc.."
15. Urban design and architectural guidelines for development on the Island must be provided.
16. The Trust must prioritize phasing development to allow for leasing the existing millions of square feet already existing on the Island prior to the construction of new buildings.
17. The zoning must reduce the parking allowance on the two development zones as per the conditions set forth in the Deed which indicates parking as a Prohibited Use.
18. CB1 requests assurance that buildings are not built out to the southern edge of parcel E-4 so that it is left open for public use and does not encroach on Picnic Point.

Financial Considerations

19. CB1 demands that the detailed pro forma financial modeling for the alternative development scenario provided in the DSSGEIS showing plans for development at a reduced scale, as well as the 2013 FGSEIS be provided to CB1 for review. The public understands the current development program was based on the earlier less dense models and does not accept the dramatic increase in density.

20. Additionally, CB1 reiterates the request that the Trust provides detailed pro forma financial modeling for the currently proposed scale of development and the minimum scale of development that would be needed to achieve financial sustainability (including assumptions for taxes, inflation, etc).
21. CB1 asks that the Trust identify and consider what the State and Federal government each provide currently to the Island and how this might be increased under the new administration to provide additional support to the Island.

Public Engagement & Oversight

22. CB1 urges the Trust to work with all existing tenants on the Island to assure their tenancy and to assist with their needs going forward (including but not limited to, Billion Oyster Project, Earth Matters, Harbor School).
23. CB1 urges that a similar provision be incorporated into the South Island zoning text which allows for CB1 to have oversight on certain new uses and their respective scale on the South Island. More engagement must be conducted with CB1 to further define this provision.

This is a major proposal that will have permanent cascading impacts for decades to come. CB1 has already accepted that redevelopment of the South Island is necessary. We all have a responsibility to ensure that the proposal that moves forward is one that both supports the Island and protects the aspects that make it such a beloved City resource. We thank the Trust and City Planning for the work they have done thus far to address prevailing concerns, and we look forward to working together towards a better version of this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Meltzer", with a long horizontal flourish extending to the right.

Tammy Meltzer, Chairperson

CC: Marisa Lago, Chair, NYC City Planning Commission
Manhattan Borough President Gale Brewer
NYC Councilmember Margaret Chin
NYC Public Advocate Jumaane D. Williams