

**A. INTRODUCTION**

The Proposed Project would involve changes to a number of sites within the Governors Island Historic District (a National Historic Landmark District that is also a New York City Historic District [NYCHD] and listed on the State and National Registers of Historic Places [S/NR]), in the area of the North Island administered by The Trust. This chapter considers the potential for the Proposed Project to affect those historic and cultural resources. The analysis updates changes in background conditions since the *Final Generic Environmental Impact Statement for the Phased Redevelopment of Governors Island* (2011 FGEIS) and assesses whether any changed background conditions and the differences in program elements between the proposed development program and those assessed in the 2011 FGEIS would result in any significant adverse impacts to historic and cultural resources that were not addressed in the 2011 FGEIS.

As described in Chapter 1, “Project Description,” the Proposed Project consists of the following components:

- A zoning text amendment to create the Special Governors Island District and a Zoning Map amendment to map the special district on the North Island;
- Reuse and re-tenanting of approximately 1.2 million square feet (sf) of space on the North Island by 2022, rather than by 2030 as anticipated in the 2011 FGEIS. As part of the re-tenanting, it is anticipated that two non-historic building additions within the Governors Island Historic District may be demolished and potentially replaced with new structures of the same area and similar volume. In addition, a new structure would be constructed within the Historic District, in the open area north of Building 110;
- Full development of the Park and Public Space Master Plan (the Park Master Plan) for the entire Island by 2022, rather than by 2030 as anticipated in the 2011 FGEIS;
- Ferry service seven days per week to support the uses in the re-tenanted buildings and the expanded Park and Public Space; and
- Future redevelopment of the two South Island Development Zones by 2030, as anticipated in the 2011 FGEIS.

Overall, this analysis considers the potential cumulative impacts of the Proposed Project along with the previously approved Phase 1, which consisted of specific portions of the park and public spaces and infrastructure improvements.

Given the Island’s physical isolation, the area to be considered for the architectural resources analysis is defined as the Island itself. While the Proposed Project assumes an increase in ferry trips from the Battery Maritime Building (BMB) and Pier 11 in Manhattan and from Pier 6 in Brooklyn, no new construction, alteration to, or expansion of the existing structures at those locations would be required, nor would any subsurface disturbance be anticipated. The areas to be considered for the archaeological resources analysis are the on-Island sites where ground-disturbing activities may be required.

The *Governors Island Disposition Final Environmental Impact Statement* (FEIS) published in 1998 led to the development of the *Governors Island Historic District Preservation and Design Manual* (Design Manual). Prepared by the General Services Administration (GSA) and published in 2003, the Design Manual 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 (DCP), New York City Landmarks Preservation Commission (LPC), the New York State Office of Parks, Recreation, and Historic Preservation (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. The standards and guidelines of the Design Manual are described below in Section E, "Existing Conditions," as relevant for evaluation of the Proposed Project.

## **B. PRINCIPAL CONCLUSIONS**

### **2022 ANALYSIS YEAR**

#### *ARCHAEOLOGICAL RESOURCES*

The Proposed Project would re-tenant more than 1.2 million square feet of vacant space in existing historic structures on the North Island by 2022. While more information on proposed disturbance is necessary to identify potential adverse effects, subsurface disturbance would be required for the reuse of the buildings as part of the Proposed Project. Any subsurface disturbance required in or around the specific North Island buildings identified below would be conducted in coordination with LPC and OPRHP (as appropriate).

The Design Manual's archaeological probability map (see discussion below under Section E, "Existing Conditions/Archaeological Resources") does not show the areas of demolition and excavation for the proposed new structures as having identified or potential archaeological sensitivity; furthermore, these areas were previously evaluated in the 2008 *Governors Island Enhanced Public Access Program and Harbor School Environmental Assessment* (2008 EAF), and no archaeological work was requested at that time by LPC or OPRHP. The 2008 EAF did note that anchoring of temporary structures on the Soissons Concession Site would be supervised by an unexploded ordnance (artillery) expert. If requested by LPC and OPRHP, construction plans for any work in these project areas would be submitted for review to determine if any archaeological studies or work would be appropriate.

The Yankee Landing and Great Promenade project areas also have not been identified in previous studies as having potential archaeological sensitivity, and the work in these areas would not be anticipated to have any adverse impacts to archaeological resources. However, coordination with LPC and/or OPRHP (as appropriate) will be conducted to determine the need for any additional work for these areas.

The activity and subsurface disturbance that would occur on the South Island by 2022 for the Proposed Project would not affect archaeological resources.

*ARCHITECTURAL RESOURCES*

The proposed rezoning would facilitate the re-tenanting of more than 1.2 million square feet of vacant space in existing historic structures on the North Island. Any alteration, renovation, or restoration of buildings in the Governors Island Historic District related to such re-tenanting would require compliance with the guidance of the Design Manual and coordination and review by LPC and/or OPRHP (as appropriate).

The Proposed Project also would include construction of a new building on the Soissons Concession Site, and Wing O of Building 400 (Liggett Hall) and Building S-517 could be renovated, or demolished and replaced by new structures with the same floor area. While Building 400 is a Category 2/contributing resource within the Governors Island Historic District (see descriptions of Design Manual categorizations below in Section E, “Existing Conditions/Architectural Resources”), the Design Manual identifies the additions within the building’s west courtyard (which include Wing O) as being without architectural merit and inappropriate in scale and design, and notes that they can be removed. Building S-517 is a Category 3/non-contributing resource, and according to the Design Manual, it can be demolished. Furthermore, the demolition of these structures was evaluated by the Empire State Development Corporation (ESDC) in 2008. The demolition of these structures would also be reviewed by OPRHP (as appropriate) and presented to LPC at a public hearing, where the agency would issue comments.

Since the demolition and new construction activities would occur on or in close proximity to contributing elements of the Governors Island Historic District, a CPP would be developed to ensure that historic structures and landscape elements within 90 feet of construction activities would not be inadvertently affected during construction. The CPP would be reviewed and approved by LPC and/or OPRHP (as appropriate).

The design and construction of the proposed new structures on the North Island would be subject to the requirements of the Design Manual. The three proposed new structures within the Historic District—as well as the new open canopy ferry shelter at Yankee Landing, if sited within the Historic District’s boundaries—would be designed and constructed so as to be consistent with these standards and in coordination with The Trust, LPC, and OPRHP (as appropriate), and avoid any potential visual or contextual impacts to contributing structures within the Historic District. The proposed new structures would also be reviewed by OPRHP (as appropriate) and presented to LPC at a public hearing, where the agency would issue comments on the appropriateness of the new construction within the Historic District.

Any changes to the roadways, pedestrian walkways, and landscaping in the area around Yankee Landing would be consistent with the guidelines for site development, lighting, and landscaping in the Design Manual. The Great Promenade work also would be consistent with the Design Manual’s guidelines for site development, lighting, and landscaping. Furthermore, the new construction for these project elements, including construction staging, would be undertaken in a manner that avoids damage to existing buildings, structures, landscapes, and landscape features.

Work on the South Island by 2022 would not involve the construction of any new buildings within the transition zone immediately south of Division Road. Therefore, the Proposed Project’s work on the South Island would not have any adverse effects on architectural resources. Furthermore, the open space improvements to be developed on the South Island would enhance the context of the North Island’s historic buildings.

The park and open space improvements to be developed on the North Island also would enhance the surrounding context of the National Monument’s resources. The proposed re-tenancing of buildings and construction of new structures on the North Island is anticipated to bring additional visitation to the Island, which is consistent with National Park Service (NPS) planning efforts to engage the public with the Monument and the wider Harbor through other new uses and programs of their own.

### **2030 ANALYSIS YEAR**

No additional work is proposed for the North Island by 2030, beyond what is analyzed below under “Probable Impacts of the Proposed Project—2022 Analysis Year.” Therefore, the potential effects in 2030 of the Proposed Project on archaeological and architectural resources on the North Island would be the same as described above. The South Island is not considered to be potentially archaeologically sensitive; therefore, the activity and subsurface disturbance that would occur on this portion of the Island with the Proposed Project through 2030 would not affect archaeological resources.

The Proposed Project would develop new buildings and uses in the two future development zones on the South Island by 2030. The uses associated with the two South Island Development Zones are not specifically proposed, defined, or designed and their operations have not yet been planned. The Trust anticipates developing design guidelines for the South Island Development Zones. These guidelines will incorporate the Design Manual’s recommendations regarding development in the transition zone. The South Island design guidelines would be provided to LPC and OPRHP for comment (as appropriate).

While specific design plans have not been developed for the South Island, the design guidelines for the South Island Development Zones would be intended to create a harmonious relationship between the new buildings, the historic buildings and landscapes, and the new landscapes. Further, when such development has been planned and designed, it is anticipated that it would require land use actions that would be subject to New York City Environmental Quality Review (CEQR), and the associated future environmental review would take into account potential impacts to historic and cultural resources.

Overall, this analysis concludes that the changes in background conditions and the differences in program elements between the proposed development program and those assessed in the 2011 FGEIS would not result in any significant adverse impacts to historic and cultural resources that were not addressed in the 2011 FGEIS.

## **C. SUMMARY OF 2011 FGEIS FINDINGS**

### **PHASE 1**

The 2011 FGEIS found that Phase 1 of the Approved Project would not be expected to have significant adverse impacts on historic and cultural resources. The design for the Phase 1 park and public space improvements within the Historic District would be reviewed and approved by LPC under the New York City Landmarks Law and/or OPRHP (as appropriate). The proposed landscaping work within the Historic District would be consistent with the guidelines for new landscaping in the Design Manual, and changes to Colonels Row Green, Nolan Park, and the Parade Ground would not adversely affect the character-defining elements of those features. In particular, the improvements to the Parade Ground for active recreation would not significantly

affect the overall appearance of this character-defining element of the Historic District or its visual appearance as an open lawn.

The 2011 FGEIS also concluded that since Phase 1 of the Approved Project would occur on or within close proximity to contributing elements of the Governors Island Historic District and the Governors Island National Monument, a CPP would be developed—based on the requirements stipulated in the New York City Department of Buildings (DOB) *Technical Policy and Procedure Notice* (TPPN) #10/88—to ensure that historic structures and landscape elements within 90 feet of construction activities would not be inadvertently affected during construction. Furthermore, construction of the Approved Project would be conducted in accordance with the guidelines of the Design Manual and with the New York City Landmarks Law.

Since Phase 1 of the Approved Project would not alter any buildings in the Historic District, the 2011 FGEIS concluded that it would not be expected to have an adverse contextual effect on historic resources in the surrounding area, including adjacent portions of the Governors Island Historic District and the Governors Island National Monument.

#### **LATER PHASES**

The 2011 FGEIS concluded that the parks and open space improvements to be developed on the Island during the Later Phases of the Approved Project would not be anticipated to have significant adverse visual or contextual effects on architectural resources. The design for the park and public space improvements that would be located within the Historic District, including plans for the new open canopy ferry shelter at Yankee Landing if sited within the Historic District's boundaries, would be reviewed and approved by LPC under the New York City Landmarks Law and/or OPRHP (as appropriate), pursuant to the Design Manual.

As for Phase 1 of the Approved Project, a CPP would be developed for the Later Phases of the Approved Project to ensure that historic structures and landscape elements within 90 feet of construction activities would not be inadvertently affected during construction. The CPP would be reviewed and approved by LPC and/or OPRHP (as appropriate).

At the time of preparation of the 2011 FGEIS, the uses associated with the Later Phases of the Island's redevelopment, including for the North Island historic buildings and the two South Island Development Zones, were not specifically proposed, defined, or designed and their operations were not yet planned. Details were not available regarding the renovations of any buildings within the Historic District; nor were any details available regarding the siting, height, massing, design, or materials of the buildings to be developed on the South Island in the Later Phases. Given the lack of plans to review, it was not possible to determine whether the full development of the Approved Project would or would not be consistent with the character of the Governors Island Historic District or the Governors Island National Monument. The 2011 FGEIS noted that The Trust intended to develop design guidelines for the South Island's two development zones. These guidelines would be intended to create a harmonious relationship between the new buildings, the historic buildings and landscapes, and the new landscapes. The guidelines would also take into account potential shadow impacts from the new buildings on the existing historic properties and character-defining landscape features. Further, when such development has been planned and designed, it is anticipated that it would require land use actions that would be subject to CEQR, and the associated future environmental review would take into account potential impacts to historic resources.

## **D. REGULATORY CONTEXT**

The State Environmental Quality Review Act (SEQRA) requires the consideration of potential impacts to historic resources. In addition, potential effects on historic resources are considered in conformance with the New York State Historic Preservation Act of 1980 (SHPA). The New York City Landmarks Law and potential impacts to New York City Landmarks (NYCLs) and NYCHDs also have been considered.

### **STATE HISTORIC PRESERVATION ACT**

The SHPA closely resembles the National Historic Preservation Act (NHPA) of 1966, and requires that state agencies consider the effect of their actions on properties listed on or determined eligible for listing on the State Register of Historic Places. The requirements of SHPA are set forth in Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law.

### **NEW YORK CITY LANDMARKS LAW**

LPC designates historically significant properties in New York City as NYCLs and/or NYCHDs, following the criteria provided in the Local Laws of the City of New York, New York City Charter, Administrative Code, Title 25, Chapter 3. Properties designated as NYCLs or NYCHDs are protected under the NYCL Law, which requires LPC review and approval before any new construction, alterations, or demolition can occur.

### **GSA PRESERVATION AND DESIGN MANUAL**

As described above, the design guidelines in the Design Manual were intended to be the basis for project review by OPRHP and LPC. As such they lead the design process as well as the reviews of potential impacts to historic resources under SEQRA and SHPA.

## **E. EXISTING CONDITIONS**

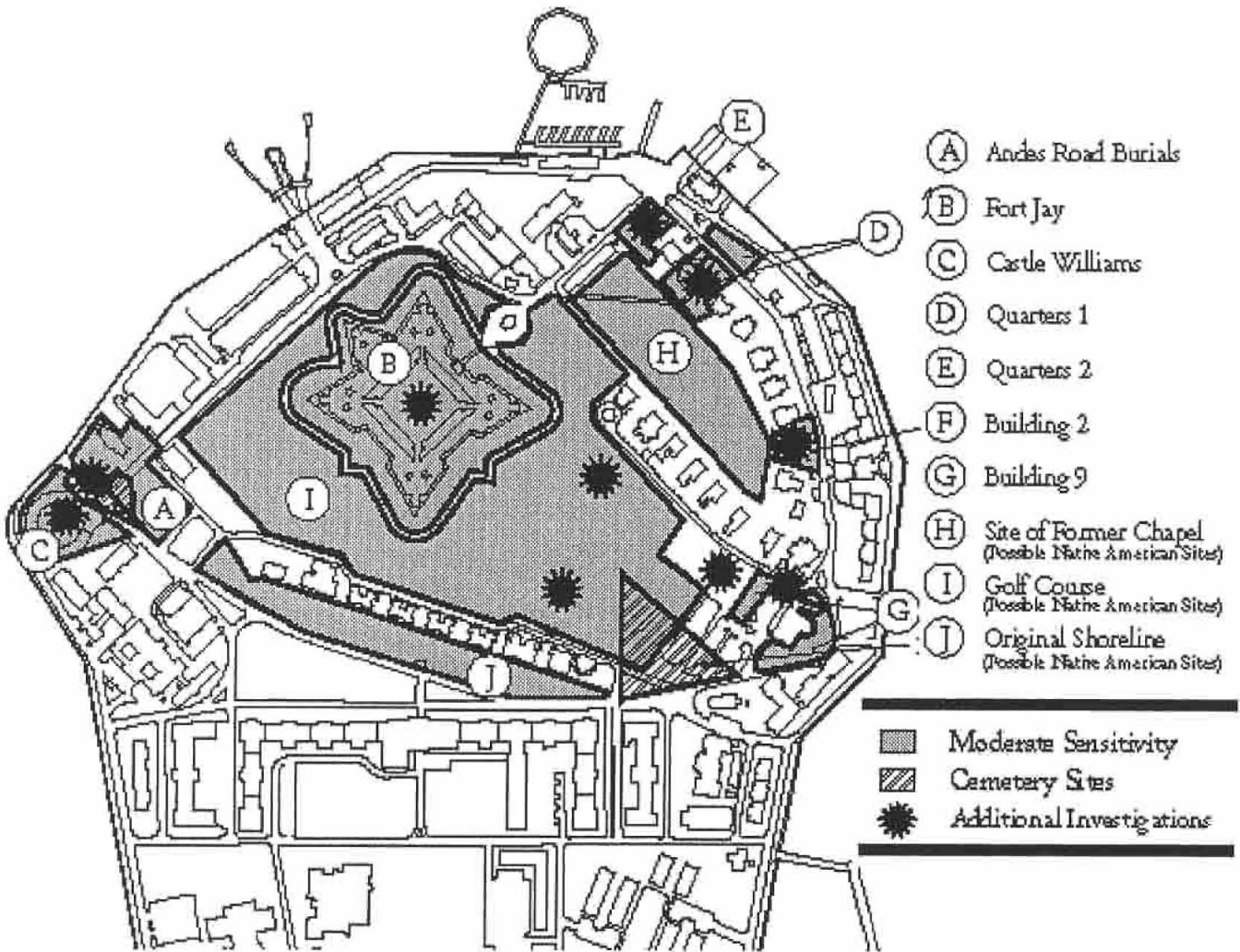
### **ARCHAEOLOGICAL RESOURCES**

#### *NORTH ISLAND AREA OF POTENTIAL EFFECT*

The potential archaeological sensitivity of the North Island is documented in previous planning studies, the 1998 FEIS, designation reports for the Historic District, and the Design Manual. Portions of the North Island have been determined to be sensitive for both pre-contact and historic-period archaeological resources. The Design Manual includes an archaeological probability map showing identified and potential archaeological sites within the North Island (see **Figure 5-1**) and notes that:

“Any project that involves ground disturbing activity, such as building demolition, new construction, the planting of trees, installation of utility lines outside of existing trenches, and similar projects, has the risk of encountering both historic and prehistoric artifacts. Accordingly, all such projects in these areas must be submitted to SHPO (the New York State Historic Preservation Office) for review.”

LPC also reviews potential impacts to archaeological resources within the Governors Island Historic District.



*Plan showing identified and potential archeological sites within the Historic District (Beyer Blinder Belle Consortium)*

Since the issuance of the Design Manual, a number of reports have been prepared documenting the results of archaeological testing and monitoring of sites and activities on the North Island. The information these reports provide should be used to inform the approach to future projects within the North Island. Significant data resulted from these investigations which can inform, and in some cases supplant, further investigation.

The portions of the North Island which are included in the Proposed Project are discussed below and mapped on **Figure 5-2**. These include the elements of the previously approved Phase 1 park and open space improvements that are not currently being constructed as part of the future without the Proposed Project.

*Soissons Concession Site Project Area*

The Soissons Concession Site comprises the area north of Building 110 and Ferry Line Road. The Design Manual's archaeological probability map does not show the area of proposed excavation as having identified or potential archaeological sensitivity. Furthermore, the development of this area for the temporary food and entertainment center was evaluated in the 2008 EAF, and no archaeological work was requested at that time by LPC or ORPHP. The 2008 EAF did note that anchoring of temporary structures for the temporary food and entertainment center would be supervised by an unexploded ordnance (artillery) expert.

*Liggett Hall (Building 400/Wing O) Project Area*

The Liggett Hall (Building 400) project area comprises Wing O, which is a large addition to the historic structure that the Design Manual has identified as being without architectural merit. The area of potential demolition and excavation is not identified as a potential area of interest on the Design Manual's archaeological probability map. Furthermore, the demolition of this structure was previously evaluated in the 2008 EAF, and no archaeological work was requested at that time by LPC or OPRHP.

*Medical Clinic (Building S-517) Project Area*

This project area is Building S-517, a one-story structure attached by an enclosed walkway to the south side of Building 515. The area of potential demolition and excavation is not identified as a potential area of interest on the Design Manual's archaeological probability map. Furthermore, the demolition of this structure was previously evaluated in the 2008 EAF, and no archaeological work was requested at that time by LPC or OPRHP.

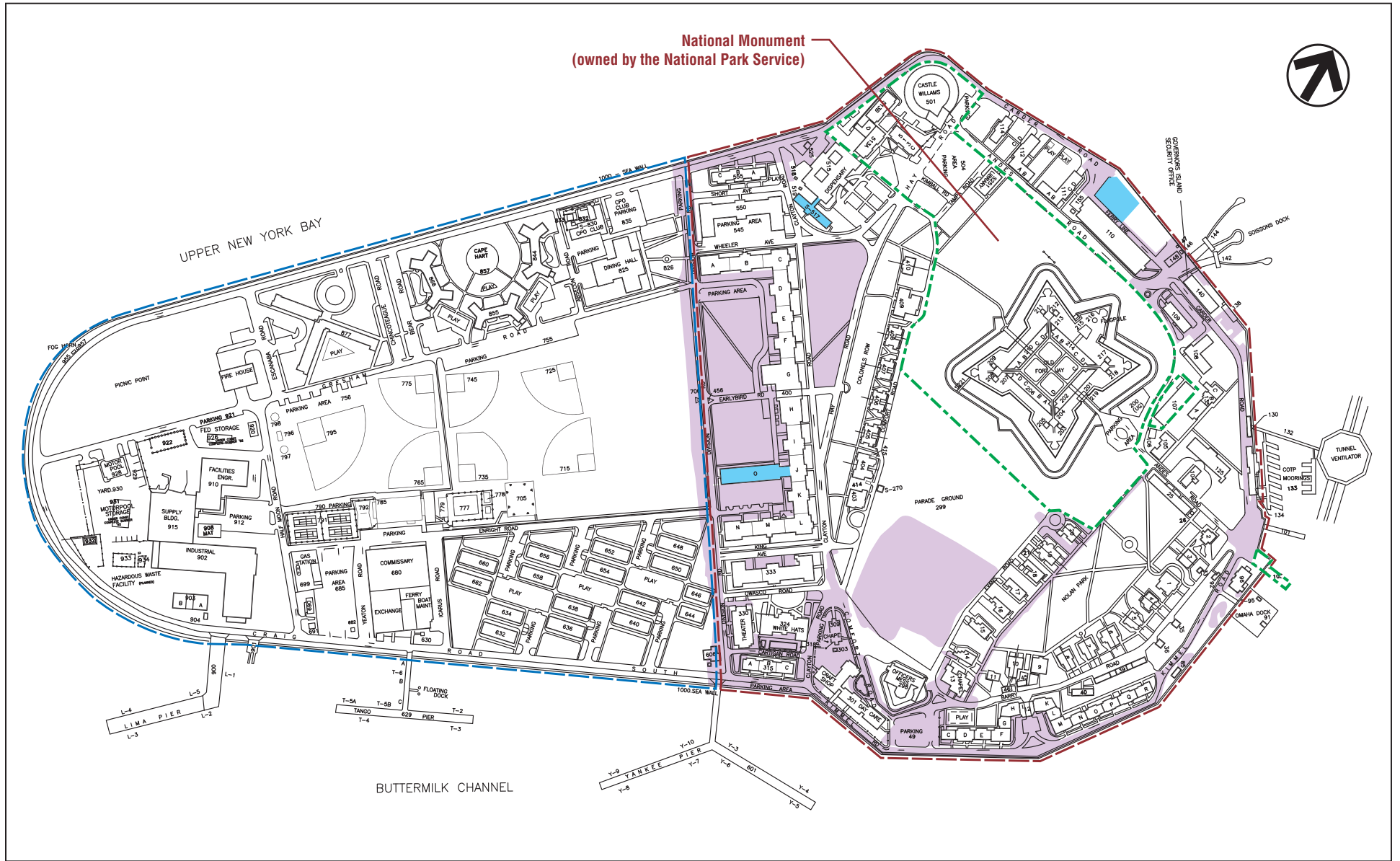
*Great Promenade Project Area*

The Design Manual's archaeological probability map does not identify the proposed areas of excavation for the Great Promenade as having identified or potential archaeological sensitivity. However, as part of its review of the 2011 FGEIS, OPRHP recommended that these proposed work areas be considered archaeologically sensitive.

*Yankee Landing Project Area*

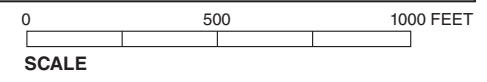
The Yankee Landing project area is located on the Island's east side, at Division Road, the boundary between the North Island and South Island. This area is not identified on the Design Manual's archaeological probability map as having identified or potential archaeological sensitivity. However, as part of its review of the 2011 FGEIS, OPRHP recommended that this proposed work area be considered archaeologically sensitive.





--- North Island (Coterminous Historic Districts)  
--- South Island

--- Owned by the National Park Service  
 Areas of Potential Subsurface Disturbance for Phase I Park Improvements, North Island  
 Areas of Proposed Demolition and /or New Construction



North Island Areas of Potential Subsurface Disturbance  
**Figure 5-2**

*Governors Island Historic District Buildings*

Some or all of the buildings within the Governors Island Historic District could be re-tenanted as part of the Proposed Project. The Design Manual’s archaeological probability map identifies the following Historic District buildings as potential areas of interest: the Governor’s House (Area E-Quarters/Building 2); the Admiral’s House (Area D-Quarters/Building 1); the Block House (Area F-Building 9); and the area around the South Battery—Building 298 (Area G-Original Shoreline).<sup>1</sup> Thus, these areas are considered archaeologically sensitive. Other than these areas, the buildings within the Governors Island Historic District (excluding those in the Governors Island National Monument) are not identified in the Design Manual as having potential archaeological sensitivity.

*SOUTH ISLAND AREA OF POTENTIAL EFFECT*

The South Island, which comprises approximately 80 acres south of Division Road, was created between 1901 and 1912 from fill material from the excavation of the Lexington Avenue subway line. Therefore, this portion of the island is not considered to be potentially archaeologically sensitive, and it is not included in the Governors Island Historic District.

**ARCHITECTURAL RESOURCES**

*NORTH ISLAND PROJECT AREA*

The Proposed Project would involve changes to a number of sites within the 80-acre portion of the North Island which is administered by The Trust and which is part of the Governors Island Historic District (see **Figure 5-3**). Portions of the North Island to be altered by the Proposed Project are listed below and in **Table 5-1**. These include the elements of the previously approved Phase 1 park and open space improvements that are not currently being constructed as part of the future without the Proposed Project. Historic District structures within 90 feet of the North Island project areas are identified within the discussion of the individual project areas and in **Table 5-1**.

The Design Manual classifies each of the buildings and sites within the Historic District based on their individual historic and architectural significance. The categories are as follows:

- Category 1: Properties are individually listed in the National Register of Historic Places, or have been designated as individual landmarks by LPC, and contribute to the significance of the Governors Island Historic District.
- Category 2: Properties are contributing resources within the National Historic Landmark and the NYCHD Governors Island Historic District.
- Category 3: Properties are non-contributing elements within the National Historic Landmark and the NYCHD Governors Island Historic District.
- Category 4: Properties are intrusions into the NYCHD Governors Island Historic District.<sup>2</sup>

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<sup>1</sup> The Design Manual’s archaeological probability map inaccurately denotes Area F as “Building 2” rather than “Building 9,” and Area G as “Building 9” rather than “Original Shoreline.”

<sup>2</sup> There are four structures noted as Category 4 in the Design Manual: Structures 91/95 and Buildings 134, 513, and 293. The Design Manual’s historic resources map identifies Soissons Dock as Structures 91/95 [Omaha Dock], and as Category 4 resources; however, the accompanying table and building inventory



- Category 1
- Category 2
- Category 3
- Category 4

Governors Island Preservation and Design Manual,  
Map of Resources within Historic District

**Figure 5-3**

**Table 5-1  
Historic Resources within North Island Project Areas**

North Island Project Area	Adjacent Structures	Structure Number	Design Manual Category	Design Manual Status	S/NR Status	NYCL Status
Soissons Concession Site	Storage Depot	110	2	Contributing	Contributing	District Level
	Family Housing	111	2	Contributing	Contributing	District Level
Liggett Hall (Building 400/Wing O)	Liggett Hall	400	2	Contributing	Contributing	District Level
Medical Clinic (Building S-517)	Medical Clinic	S-517	3	Non-contributing	Non-contributing	District Level
	Post Hospital	515	2	Contributing	Contributing	District Level
	Barracks	550	2	Contributing	Contributing	District Level
	Family Housing	555	2	Contributing	Contributing	District Level
	Liggett Hall	400	2	Contributing	Contributing	District Level
Great Promenade	Various <sup>1</sup>	—	—	—	—	—
Yankee Landing Governors Island Historic District Buildings	School	301	2	Contributing	Contributing	District Level
	Catholic Chapel	309	3	Non-contributing	Non-contributing	District Level
	Family Housing	315	2	Contributing	Contributing	District Level
	YMCA	324	2	Contributing	Contributing	District Level
	Theater	330	2	Contributing	Contributing	District Level
	Detachment Barracks	333	2	Contributing	Contributing	District Level
	Various <sup>1</sup>	—	—	—	—	—

**Notes:** <sup>1</sup>See **Figures 5-2** and **5-3** for details.

It should be noted that the Design Manual’s map and accompanying tables are occasionally inconsistent in the categorization and identification of properties. Where relevant for this analysis, these inconsistencies are noted below. **Table 5-1** also indicates the categorization of the properties on the North Island as noted in the LPC designation report and S/NR nomination for the Historic District.

*Soissons Concession Site Project Area*

The Soissons Concession Site comprises the area north of Building 110 and Ferry Line Road, which is a paved area currently used as a temporary food and entertainment facility (see Photo 1 of **Figure 5-4**). Building 111 is located directly west of this project area.

Building 110 was constructed between 1870 and 1879 to house obsolete Civil War munitions for the New York Arsenal. It was converted for office use during World War I and contained offices through the remainder of the U.S. Army and Coast Guard periods. The building is 2½ stories tall and Romanesque Revival in style. It is clad in brick and has a shallow-pitch gable roof. Building 110 is surrounded by paved parking lots and roadways, concrete walkways, and sloped grassy areas containing mature trees. The building has excellent views of Lower Manhattan. According to the Design Manual, the trees and view are important features to be preserved and maintained.

Building 111 was designed by the firm of Rogers and Poor and constructed in 1934. The building was intended as family housing for officers of the 16th Infantry, and continued to function as officers’ housing until the closing of the Coast Guard base. Building 111 is a 3½-story, L-shaped residential structure, built in the Neo-Georgian style. The limestone base

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pages identify Soissons Dock as Structures 142/144, and as Category 3 resources. Building 293 was demolished in 2008.





Soissons Concession Site 1



Liggett Hall (Building 400, Wing O) 2

supports brick walls laid in a Flemish bond. Prominent chimneys punctuate the flat, brick, gable end walls. The main entrances are articulated by large 1½-story limestone surrounds with broken pediments, and an arched stucco panel in which is set a large double-hung Palladian window. With its mirror structure Building 112, Building 111 defines a relatively sheltered, pleasantly landscaped waterside courtyard with sweeping views of the Hudson River, Lower Manhattan, and New Jersey. According to the Design Manual, the scale and formality of the building is important to maintain, as is the park-like open space created by the ell configuration.

*Liggett Hall (Building 400/Wing O) Project Area*

Designed as the centerpiece of McKim Mead and White’s 1930s “Island Beautiful” plan, Liggett Hall (Building 400) is a massive, U-shaped Neo-Georgian structure that transverses the Island. It was completed in 1930, and at that time housed the entire 16th Infantry, some 1,375 soldiers. Liggett Hall was erected just south of the former southwestern shoreline of the Island and was the first permanent structure built entirely on landfill. The central block of Liggett Hall is covered by a steeply pitched slate-covered gable roof, and the four corner pavilions each have a cupola. Prominent paired-end chimneys are present on either end of the central block. Extending from the central block are three-story wings with two-story galleries that line the courtyard façades. Simple, slightly projecting portico entrances lead into each wing. Liggett Hall’s most distinctive feature is the sallyport, the monumental archway that connects the Governors Island Historic District public spaces to a four-acre open area of lawns and parking lots. Wing O, which the Design Manual identifies as being without architectural merit, is a large, non-contributing addition on the western side of the building’s central block (see Photo 2 of **Figure 5-4**).

According to the Design Manual, exterior elements of the building that should be preserved include the formal design, its scale and form; brick masonry walls; stone detailing; the central cupola; slate chimney; monumental sallyport; paired-end chimneys; pedimented entrances; location of window and door openings; and the galleries. Any new construction in this area must take into consideration the original design intent of the building, its scale, and detailing. The mature trees and historic monuments located around the building also should be preserved. Site constraints prevent additions to be placed on the north, east, or south portions of the building; however, previously constructed additions within the building’s west courtyard (which, as noted above, include Wing O) are inappropriate in scale and design and can be removed.

Demolition of Wing O was evaluated in the 2008 EAF. In addition, a technical memorandum to the 2011 FGEIS prepared in 2012 evaluated the proposed demolition of an addition to Wing G and mechanical equipment and storage sheds abutting Wing J and found that the proposed demolitions would have no significant adverse effect on historic resources.

*Medical Clinic (Building S-517) Project Area*

Building S-517 was constructed circa 1942 as a “temporary” medical clinic and was later used as a dental clinic by the Coast Guard. It is one of the few surviving temporary structures from World War II in the Historic District. The one-story frame structure is attached by an enclosed walkway to the south of Building 515 (the Post Hospital), described below. Irregular in plan, the building has tongue-and-groove wood siding covered with asbestos shingles (see Photo 3 of **Figure 5-5**). The intersecting gabled roof has prominent eave brackets. According to the Design Manual, the building can be demolished; however, if new construction is planned for its site, care must be taken to ensure that the new design is compatible with Building 515. The mature trees located on grassy plots around the building site should, to the extent possible, be preserved and maintained. Demolition of Building S-517 was evaluated in the 2008 EAF.

Building 515 was designed by McKim, Mead and White and constructed in 1935. Originally built as the Post Hospital, the building was subsequently converted for use as Enlisted Bachelor's Housing and functioned as housing until the closing of the Coast Guard base. Building 515 is composed of a central four-story gable-roofed section with three-story flanking wings with hip roofs, built in the Neo-Georgian style. Walls are of red brick in common bond, with limestone belt courses and window sills. The rear of the building commands remarkable views across the Hudson River to Ellis, Liberty, and Staten Islands. According to the Design Manual, the overall design, scale, and siting of the building are important issues to address in any reuse or redevelopment. The interior courtyards should be retained, and care must be taken in placing additions on the building, to preserve the historic elevations from both the Island and water sides of the structure. Building 515 is surrounded by concrete and asphalt paving. The mature trees located within grassy plots around the building should be preserved and maintained.

Building 550 was built by the Construction Division of the Office of the Quartermaster General between 1938 and 1940, and was intended to be paired with Building 333 on the opposite side of Building 400. It served as barracks for soldiers of the First Army of the United States; a portion of the building was later converted to office use when it was turned over to the Second Service Command. The building was subsequently renovated for classroom use and then again for use as the base clinic. Building 550 is currently in use as the Urban Assembly New York Harbor School, a New York City public high school. According to the Design Manual, because of its relationship to Building 400, any additions placed on the east side of the building must take into consideration the association with that building and its dominant design; there appears to be no opportunity for additions on the north, south, or west sides of the building.

Building 555 was constructed in 1938–40 along with 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. The design and details of the building are identical to Building 315. The building overlooks New York Harbor. According to the Design Manual, the scale and design of the building are important, as are the vistas to and from the structure. Because of site constraints, there appears to be no area suitable for additions. 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.

Building 400 is described above, under “Liggett Hall (Building 400/Wing O)—Category 2.”

#### *Great Promenade Project Area*

The Great Promenade—the roadway that follows the seawall around the entire Island—is not classified as a historic resource in the Design Manual. It is, however, adjacent to a number of contributing structures within the Historic District.

#### *Yankee Landing Project Area*

As described above, the Yankee Landing project area is located on the Island's east side, at Division Road, which is the boundary between the historic North Island and the non-historic South Island. Yankee Pier/Yankee Landing is not classified as a historic resource in the Design Manual.

Some of the roadways and pedestrian walkways between Yankee Landing, the Parade Ground, and the South Battery are within the Proposed Project's project area. Specifically, these are the



Building S-517 3



areas surrounding Buildings 301, 315, 324, 330, and 333, and the area of existing Building 309, which is being demolished in the future without the Proposed Project.

Building 301 was constructed in 1934 when the Island's army base expanded to accommodate the needs of the 16th Regiment. Designed by Eric Kibbon, this school is a one-story Neo-Georgian style structure with a modified L plan. The central section of the building has an asphalt-covered pyramidal roof with a cupola and a projecting pedimented entrance pavilion on the north side. Wings at the east and north were added in 1959-1960. Building 301 is surrounded by concrete and asphalt roads and walkways, and mature trees are located within grassy plots around the building. The Design Manual notes that mature trees and landscapes around the building should be preserved.

Building 309 was built as Our Lady Star of the Sea Catholic chapel ca. 1942, during the Army base's World War II expansion. It is a one-story rectangular frame structure covered with vinyl siding. As described above, Building 309 is being demolished in the future without the Proposed Project.

Building 315, built in 1938-1940, is a 3½-story, rectangular-shaped Neo-Georgian-style structure, constructed of red brick with cast stone accents at the entrance and sills. It was designed by the firm of McKim, Mead & White and is typical of the residential buildings built by the Army in the 1930s to accommodate the permanent military community on the Island. Building 315 is surrounded by concrete and asphalt paving, but mature trees are located along the southern edge of the building, edging Craig Road South. The Design Manual notes that this landscaping should be preserved and maintained. See also the discussion of its paired structure, Building 555, above.

Building 324 was designed by the firm of May and Hillard. Built in 1926 as the Fort Jay YMCA, it was the first of the large, brick buildings constructed between the wars. It is a rectangular, red brick Neo-Georgian-style structure with a two-story central section flanked by one-story wings. A limestone beltcourse bearing the date "1926" marks the foundation. The Design Manual notes that the mature trees and landscaping surrounding the building should be preserved. A swimming pool to the rear of the building would be removed in the future without the Proposed Project.

Building 330 is a two-story Neo-Georgian-style theater faced with brick laid in American bond. It was constructed between 1937 and 1939 and is typical of theaters constructed on military bases during that period. Building 330 is surrounded by concrete and asphalt paving, which have no significance; however, the Design Manual notes that the mature trees located within grassy plots around the building should be preserved.

Building 333 is a three-story Neo-Georgian style structure arranged in a U-shaped plan and constructed of brick on a sandstone/concrete foundation. A central projection contains an entrance porch composed of stone columns and pilasters supporting an iron balustrade. The building was constructed in 1932, along with Building 550 (described above), as barracks for enlisted men. These two buildings flank Building 400 (see description above) and are very similar to it in general design features. The Design Manual notes that the brick sidewalks and mature landscaping surrounding the building should be preserved.

*Governors Island Historic District Buildings*

Some or all of the buildings within the Governors Island Historic District could be re-tenanted as part of the Proposed Project. The buildings that could be re-tenanted include both contributing and non-contributing structures.

*Landscape*

The Design Manual notes the following regarding the Historic District's landscape:

Although the Governors Island Historic District was not designed with a unified landscape concept or plan, simple patterns have been developed over the years. These vary from tree-lined streets and walkways to park settings. Each is important within its defined physical environment, and as a contributing part of the Historic District. Those patterns should be preserved and maintained, and used as a guide for new development.

The Design Manual provides specific guidelines for landscaping and site development.

*SOUTH ISLAND PROJECT AREA*

OPRHP and LPC have previously determined that the portion of the Island south of Division Road does not contain any architectural resources.

*ON-ISLAND STUDY AREA*

The on-Island study area consists of the Governors Island National Monument, a 22-acre area administered by the NPS that includes Fort Jay and Castle Williams. Both Fort Jay and Castle Williams are individually designated NYCLs.

Fort Jay, originally Fort Columbus, is located on Andes Road. An earthen fortification known as Fort Jay was erected on this site as part of the earliest attempt to fortify New York Harbor. In 1806 this was replaced by Fort Columbus, the current star-shaped structure that was inspired by French fortifications. The fort was designed by Lieutenant Colonel Jonathan Williams, who had lived in France in 1776–85 under the auspices of his great-uncle, Benjamin Franklin. The sandstone structure has four bastions enclosed by a dry moat. The entrance is crowned by a large sandstone trophy sculpture with an eagle and military symbols. The interior of the fort contains Greek Revival barracks with colonnaded porticoes that were constructed in 1834–36. The fort was renamed for John Jay in 1904.

Castle Williams, on Hay Road, is a massive bastion forming three-fifths of a circle, with a two-story entrance pavilion filling in the remainder of the form. Erected to support more than 100 cannons, it is one of a series of forts built to fortify New York as tensions rose between America and the British in the early 19th century. At the time of its construction it served as a prototype for seacoast fortifications in America. The fort served as a prison for Confederate soldiers during the Civil War, and was later used as quarters for new recruits, as a military prison, and as storage. The three-tiered fort is constructed of red Newark sandstone, and its walls are eight feet thick at the base and seven feet thick at the top.

**F. THE FUTURE WITHOUT THE PROPOSED PROJECT**

**2022 ANALYSIS YEAR**

In the future without the Proposed Project, it is assumed that Governors Island will continue to operate as an open space resource as previously anticipated, with Phase 1 of the Approved

Project. The North Island will continue to be made accessible to the public on designated visitation days. Vacant historic buildings within the Governors Island Historic District will remain vacant. The South Island will contain a mix of open space uses and vacant land. Demolition of existing buildings on South Island and a handful of buildings on the North Island was evaluated in the 2008 EAF and is expected to be completed. Specifically, the 2008 EAF evaluated the proposed demolition of Buildings 134, 293, 309, 400 (Wing O), and S-517. In addition, a technical memorandum to the 2011 FGEIS, prepared in 2012, evaluated the proposed demolition of Buildings 96, 146, 147, and 148 in their entirety, as well as the swimming pool adjacent to Building 324 and an addition to Building 400/Wing G and mechanical equipment and storage sheds abutting Building 400/Wing J. Buildings 146, 147, 148, 293, and Building 400/Wing X have been demolished to date.

The Phase 1 park and public space improvements are now under construction with an expected completion date in 2013. These include Soissons Landing, the South Battery, Liggett Terrace, and a multipurpose lawn area on the Parade Ground that could support baseball, softball, soccer, and pick-up games. Approximately 23 acres of new open space in the center of the South Island will become Hammock Grove and the Play Lawn. Water main and seawall improvements are expected to be completed by 2014. Phase 1 will not result in the construction of any substantial new buildings.

The Trust is also undertaking several projects to rehabilitate, repair, replace, and upgrade utility and waterfront infrastructure on the Island in the future without the Proposed Project. The utility infrastructure work includes on-Island replacement and upgrade to the following services: storm sewer, including consolidating outfalls; domestic and fire protection water service; sanitary sewer; and electrical and telecommunications service (also includes upgrades of service to the Island). The waterfront infrastructure work includes rehabilitation of both Pier 101 and Yankee Pier, and rehabilitation of the transfer bridges and fenders at both Soissons Dock and the BMB. The BMB is an NYCL and is listed on the State and National Registers of Historic Places; thus, the rehabilitation and new construction underway at this building is being reviewed and approved under the New York City Landmarks Law on an ongoing basis.

### **2030 ANALYSIS YEAR**

In the 2030 future without the Proposed Project, no additional changes to background conditions are anticipated.

Architectural resources that are listed on the National Register or that have been found eligible for listing are given a measure of protection from the effects of federally sponsored or assisted projects under Section 106 of the National Historic Preservation Act. Although preservation is not mandated, federal agencies must attempt to avoid adverse impacts on such resources through a notice, review, and consultation process. Properties listed on the State Register are similarly protected against impacts resulting from state-sponsored or state-assisted projects under SHPA. Private property owners using private funds can, however, alter or demolish their properties without such a review process. Privately owned sites that are NYCLs or within NYCHDs are protected under the New York City Landmarks Law, which requires LPC review and approval before any alteration or demolition can occur.

## G. PROBABLE IMPACTS OF THE PROPOSED PROJECT

### 2022 ANALYSIS YEAR

As detailed in Chapter 2, “Analytical Framework,” potential impacts for the 2022 analysis year are examined cumulatively by including the impacts identified for Phase 1 of the Park Master Plan. As described in detail in the 2011 FGEIS, Phase 1 of the Park Master Plan would not be expected to have significant adverse impacts on historic and cultural resources. The design for the Phase 1 park and public space improvements within the Historic District has been reviewed and approved by LPC under the New York City Landmarks Law and by OPRHP. The proposed landscaping work within the Historic District would be consistent with the guidelines for new landscaping in the Design Manual, and would not adversely affect the character-defining elements of any landscape features. In particular, the improvements to the Parade Ground for active recreation would not significantly affect the overall appearance of this character-defining element of the Historic District or its visual appearance as an open lawn.

Since the Phase 1 park and public space improvements would occur on or within in close proximity to contributing elements of the Governors Island Historic District and the Governors Island National Monument, a CPP has been developed—based on the requirements stipulated in the DOB’s TPPN #10/88—to ensure that historic structures and landscape elements within 90 feet of construction activities would not be inadvertently affected during construction. Furthermore, construction of the Phase 1 work would be conducted in accordance with the guidelines of the Design Manual and with the New York City Landmarks Law. Since Phase 1 of the Park Master Plan would not alter any buildings in the Historic District, the 2011 FGEIS concluded that it would not be expected to have an adverse contextual effect on historic resources in the surrounding area, including adjacent portions of the Governors Island Historic District and the Governors Island National Monument.

The Phase 1 elements of the Park Master Plan that are not currently under construction are discussed below.

### ARCHAEOLOGICAL RESOURCES

#### *North Island Area of Potential Effect*

More than 1.2 million square feet of vacant space in existing historic structures on the North Island are expected to be re-tenanted by 2022. While more information on proposed disturbance is necessary to identify potential adverse effects, it is possible that some subsurface disturbance may be required for the reuse of the buildings as part of the Proposed Project. If subsurface disturbance is required in or around the specific North Island buildings identified above (Area D-Quarters/Building 1, Area E-Quarters/Building 2, Area F-Building 9, and Area G-Original Shoreline), coordination with LPC and/or OPRHP (as appropriate) would be conducted to determine the need for any additional work for this area. Any such additional work would be conducted according to the protocol described below. Other than these areas, the buildings within the Governors Island Historic District are not identified as having potential archaeological sensitivity, and thus the re-tenanting of other buildings within the Historic District would not be anticipated to adversely affect archaeological resources.

As detailed in the 2011 FGEIS, the archaeological protocol for any excavations within the Historic District would be as follows. Plans for excavations will be submitted to LPC and/or OPRHP, and the agency(ies) will make recommendations as to whether any archaeological work

is needed. If work is required, an archaeological work plan will be submitted from an accredited archaeologist, to be reviewed and approved by LPC and/or OPRHP (as appropriate). Upon completion of the pre-approved excavation within these areas, an archaeological summary report will be sent to LPC and/or OPRHP. LPC and/or OPRHP (as appropriate) will be informed immediately if any artifacts are identified during excavations at any location within the Historic District.

The Proposed Project would also build a new structure on the Soissons Concession Site. In addition, Wing O of Building 400 (Liggett Hall) and Building S-517 could be renovated, or demolished and replaced with new structures of the same floor area. As described above, the Design Manual's archaeological probability map does not show the areas of proposed demolition and excavation for these structures as having identified or potential archaeological sensitivity. Furthermore, these areas were previously evaluated in the 2008 EAF, and no archaeological work was requested at that time by LPC or OPRHP. The 2008 EAF did note that anchoring of temporary structures on the Soissons Concession Site would be supervised by an unexploded ordnance (artillery) expert. If requested by LPC and OPRHP, construction plans for any work in these project areas would be submitted for review, to determine if any archaeological studies or work would be appropriate.

Also within the North Island, a new open canopy ferry shelter would be developed at Yankee Landing, and the Great Promenade would be widened and repaved and new lighting, way-finding elements, and guardrails would be installed. Yankee Landing also would serve as a stop on the Island's internal tram circulation program, and bicycle racks would be provided in the vicinity of Yankee Landing. No in-water work would be required for Yankee Pier itself.

Construction of the new structure at Yankee Landing, planting trees, the widening and repaving of the Great Promenade and utility work for its new lighting, and installation of bicycle racks all would be anticipated to require subsurface disturbance. Since the Yankee Landing and Great Promenade project areas have not been identified in previous studies as having potential archaeological sensitivity, the work in these areas would not be anticipated to have any adverse impacts to archaeological resources. However, as noted in the 2011 FGEIS, coordination with LPC and/or OPRHP (as appropriate) will be conducted to determine the need for any additional work for these areas.

#### *South Island Area of Potential Effect*

As described above, the South Island is not considered to be potentially archaeologically sensitive. Therefore, the activity and subsurface disturbance that would occur on this portion of the Island by 2022 with the Proposed Project would not affect archaeological resources.

### **ARCHITECTURAL RESOURCES**

#### *North Island Project Area*

As described above, the Proposed Project would re-tenant more than 1.2 million square feet of vacant space in existing historic structures on the North Island by 2022. The specific historic structures to be reutilized have not been identified; however, those buildings associated with any previous housing-related and office-related uses are considered most conducive for future uses such as dormitories, housing for faculty, and hotels, as well as smaller classroom and office uses. Any reuse of buildings within the Governors Island Historic District would require compliance with the guidance of the Design Manual and coordination and review by LPC and/or OPRHP (as appropriate). There are only a few structures in the Historic District that contain interior

detailing which contributes to the significance of the property. As relevant, the Design Manual indicates which interior features of buildings in the Historic District should be preserved. These recommendations would be considered during the review of reutilization plans by LPC and/or OPRHP (as appropriate).

Since the proposed re-tenanting would occur on or in close proximity to contributing elements of the Governors Island Historic District, a CPP would be developed. At this time it is assumed that no blasting, pile driving, or other vibration-intensive construction activities would be required in the North Island for the proposed re-tenanting. Therefore, it is assumed that the CPP for this work would generally require protective fencing and netting around adjacent structures, rather than vibration monitors and pre-construction structural surveys. If blasting, pile driving, or other vibration-intensive activities are required, the CPP shall be amended to include vibration specifications and pre-construction surveys.

As described above, the Proposed Project would build a new structure on the Soissons Concession Site, which is north of Building 110 and east of Building 111. As currently envisioned, the new structure would have a 4,000 square foot (sf) footprint and would be two stories (approximately 25 feet) tall. It would provide restaurant and support space for the adjacent event facility. In addition, Wing O of Building 400 (Liggett Hall) and Building S-517 could be renovated, or demolished and replaced with new structures of the same floor area.

In general, direct historic resource impacts include demolition of a resource, and alterations to a resource that cause it to become a different visual entity. A resource also can be damaged by adjacent construction, either from vibrations (i.e., from construction blasting or pile driving) or from falling objects, subsidence, collapse, or damage from construction machinery.<sup>1</sup> Since the demolition and new construction described above would occur on or in close proximity to contributing elements of the Governors Island Historic District, a CPP would be developed—based on the requirements stipulated in TPPN #10/88—to ensure that historic structures and landscape elements within 90 feet of construction activities would not be inadvertently affected during construction. The CPP would be reviewed and approved by LPC and/or OPRHP (as appropriate). With the implementation of the CPP, no construction-related impacts on historic resources would be anticipated with the Proposed Project by 2022.

While Building 400 (Liggett Hall) is a Category 2/contributing resource within the Governors Island Historic District, the Design Manual identifies the additions within the building's west courtyard (which include Wing O) as being without architectural merit and inappropriate in scale and design, and notes that they can be removed. Building S-517 is a Category 3/non-contributing resource, and according to the Design Manual, it can be demolished. These demolitions were evaluated in the 2008 EAF. The demolition of these structures would also be reviewed by OPRHP (as appropriate) and presented to LPC at a public hearing, where the agency would issue comments.

Therefore, the Proposed Project would not have any direct impacts on architectural resources in 2022.

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<sup>1</sup> Adjacent construction, as defined in the New York City Department of Building's *Technical Policy and Procedure Notice* (TPPN) #10/88, is any construction activity that would occur within 90 feet of an architectural resource.

## **Governors Island—North Island Re-Tenancing and Park and Public Space Master Plan**

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The design and construction of the proposed new structures on the North Island would be subject to the requirements of the Design Manual. The Design Manual’s “Standards for New Construction and Additions” states the following:

- All new construction within the Governors Island Historic District will be designed to be compatible with, but not duplicate, existing structures, and will not attempt to create “historic” buildings;
- All new construction within the Governors Island Historic District will be designed to preserve the character and significant features of the Island, including vistas and view sheds;
- New construction within the Governors Island Historic District will use materials consistent with their setting and environment; and
- New construction, including construction staging, will be undertaken in a manner that avoids damage to existing buildings, structures, landscapes, and landscape features.

Application of these standards to individual projects within the Historic District is reviewed by LPC and OPRHP.

The three proposed new structures within the Historic District would be designed and constructed consistent with these standards and in coordination with The Trust, LPC, and OPRHP (as appropriate). According to the Design Manual, new construction on the site of Building S-517 should be designed to be compatible with Building 515 (the Post Hospital), and new construction in the Building 400 (Liggett Hall) area must take into consideration the original design intent of the building, its scale, and detailing. Building 110 is the closest structure to the Soissons Concession Site. The proposed structure at this site is anticipated to be two stories tall and would have a 4,000-sf footprint. At this size, it would be of similar height to Building 110, and would have a somewhat smaller bulk; however, because of the site’s topography, it would appear lower in height. Furthermore, the proposed new structures would also be reviewed by OPRHP (as appropriate) and presented to LPC at a public hearing, where the agency would issue comments on the appropriateness of the new construction within the Historic District.

In summary, the proposed work at the Soissons Concession Site, Building 400 (Liggett Hall/Wing O), and Building S-517 locations would not be anticipated to have any visual or contextual effects on architectural resources.

As the Great Promenade and Yankee Landing areas are not classified as historic resources in the Design Manual, the work that would be done for these portions of the North Island would not adversely affect architectural resources. The new open-air ferry shelter to be constructed at Yankee Landing—if sited within the boundaries of the Governors Island Historic District—would be required to comply with the Design Manual’s “Standards for New Construction and Additions” described above and undergo review by LPC and/or OPRHP (as appropriate). Specifically, the perceived scale of the new construction would need to be similar to adjacent buildings; the new construction would need to preserve significant views and vistas to and from the Governors Island Historic District; and the materials used would need to be consistent with the new buildings’ historic setting and environment. Furthermore, the new construction, including construction staging, would be undertaken in a manner that avoids damage to existing buildings, structures, landscapes, and landscape features. Any changes to the roadways, pedestrian walkways, and landscaping in the area around Yankee Landing would be consistent with the guidelines for site development, lighting, and landscaping in the Design Manual. The

Great Promenade work also would be consistent with the Design Manual’s guidelines for site development, lighting, and landscaping.

As detailed above, various changes will be made to the overall landscape of the Historic District with the Proposed Project. These changes would be designed consistent with the guidelines for site development and landscaping in the Design Manual, and would be reviewed by LPC and/or OPRHP (as appropriate). Therefore, the proposed landscape work would not be anticipated to adversely affect architectural resources.

In summary, the Proposed Project in 2022 would not be anticipated to adversely affect architectural resources.

#### *South Island Project Area*

Work on the South Island by 2022 would not involve the construction of any new buildings within the transition zone immediately south of Division Road (see description of transition zone below). Furthermore, the open space improvements to be developed on the South Island would be anticipated to enhance the context of the North Island’s historic buildings. Therefore, the Proposed Project’s work on the South Island would not have any adverse effects on architectural resources.

#### *On-Island Study Area*

Construction work for the Great Promenade would occur within 90 feet of Castle Williams. Therefore, the Proposed Project’s CPP would include stipulations to ensure that Castle Williams would not be inadvertently affected during construction activities for the Great Promenade.

The park and open space improvements to be developed on the surrounding North Island would enhance the surrounding context of the National Monument’s resources. The proposed re-tenanting of buildings and construction of new structures on the North Island would bring additional visitation to the Island, which is consistent with NPS planning efforts to engage the public with the Monument and the wider Harbor through other new uses and programs of their own. Since coordination and review by LPC and/or OPRHP (as appropriate) would be required for the reuse of any buildings within the Governors Island Historic District, it is anticipated that this reuse would not significantly alter the exteriors of the buildings utilized, and thus it would not be expected to have an adverse contextual effect on historic resources in the surrounding area, including adjacent portions of the Governors Island Historic District and the Governors Island National Monument.

### **2030 ANALYSIS YEAR**

#### *ARCHAEOLOGICAL RESOURCES*

##### *North Island Area of Potential Effect*

No additional work is proposed for the North Island by 2030, beyond what is analyzed above under “Probable Impacts of the Proposed Project—2022 Analysis Year.” Therefore, the potential effects in 2030 of the Proposed Project on archaeological resources in the North Island would be the same as described above.



*South Island Area of Potential Effect*

As described above, the South Island is not considered to be potentially archaeologically sensitive. Therefore, the activity and subsurface disturbance that would occur on this portion of the Island with the Proposed Project through 2030 would not affect archaeological resources.

**ARCHITECTURAL RESOURCES**

*North Island Project Area*

No additional work is proposed for the North Island by 2030, beyond what is analyzed above under “Probable Impacts of the Proposed Project—2022 Analysis Year.” Therefore, the potential effects in 2030 of the Proposed Project on architectural resources in the North Island would be the same as described above.

*South Island Project Area*

In addition to the completion of the proposed park and public spaces, the Proposed Project would develop new buildings and uses in the two future development zones on the South Island by 2030. Completion of this redevelopment would be substantially the same as described in the 2011 FGEIS. While the mix of uses would be somewhat different than those analyzed in the 2011 FGEIS, there would still be the same amount of overall development. The South Island would be developed with 1.625 million square feet of new uses in 80 acres and would be confined to the 33-acre development zones. Although the future uses in these two areas have not yet been specifically proposed, determined, or defined, potential uses on the Island are limited by the land use and historic resource covenants contained in the transfer deed from the federal government.

The Design Manual provides the following guidance regarding new development on the South Island:

All properties south of Division Road are outside of the Governors Island Historic District, and none are historically or architecturally significant. As such, development on this portion of the Island would not be subject to review by either LPC or OPRHP. However, the design of new construction immediately south of Division Road, directly across from the [Governors Island] Historic District, will have a relationship to and interact with elements in the National Historic Landmark. The transition zone provides an opportunity for a clear transition from the historic buildings north of the road, to new construction and development on the south. Development in the transition zone should be sensitive to the scale and massing of the existing buildings, their siting, and their design. Development in the transition zone should be neither diminutive nor overwhelming in scale, should recognize the appropriate setbacks and pedestrian qualities of Division Road, and should maintain the character of the historic buildings to the north.

The Trust anticipates developing design guidelines for the South Island Development Zones. These guidelines will incorporate the Design Manual’s recommendations regarding development in the transition zone. The South Island design guidelines would be provided to LPC and/or OPRHP for comment (as appropriate).

The *CEQR Technical Manual* provides the following examples of potential visual or contextual effects to architectural resources:

- Isolation of the property from, or alteration of, its setting or visual relationships with the streetscape, including changes to the resource's visual prominence;
- Introduction of incompatible visual, audible, or atmospheric elements to a resource's setting;
- Elimination or screening of publicly accessible views of the resource; and
- Introduction of significant new shadows, or significant lengthening of the duration of existing shadows, over an historic landscape or on an historic structure (if the features that make the resource significant depend on sunlight) to the extent that the architectural details that distinguish that resource as significant are obscured.

While specific design plans have not been developed for the South Island, the design guidelines for the South Island Development Zones would be intended to create a harmonious relationship between the new buildings, the historic buildings and landscapes, and the new landscapes. Further, when such development has been planned and designed, it is anticipated that it would require land use actions that would be subject to CEQR, and the associated future environmental review would take into account potential impacts to historic and cultural resources.

#### *On-Island Study Area*

The proposed buildout of the two future development zones on the South Island is anticipated to bring additional visitors to the Island, which is consistent with NPS planning efforts to engage the public with the Monument and the wider Harbor through other new uses and programs of their own.

As described above, while specific design plans have not been developed for the South Island, the design guidelines for the South Island Development Zones would be intended to create a harmonious relationship between the new buildings, the historic buildings and landscapes, and the new landscapes. Further, when such development has been planned and designed, it is anticipated that it would require land use actions that would be subject to CEQR, and the associated future environmental review would take into account potential impacts to historic and cultural resources.

Overall, this analysis concludes that the changes in background conditions and the differences in program elements between the proposed development program and those assessed in the 2011 FGEIS would not result in any significant adverse impacts to historic and cultural resources that were not addressed in the 2011 FGEIS. \*