Chapter 26: Response to Comments[1]

A. INTRODUCTION

This chapter of the Final Environmental Impact Statement (FEIS) summarizes and responds to the substantive oral and written comments received during the public comment period for the Draft Environmental Impact Statement (DEIS) for the Cornell NYC Tech project. The public hearing on the DEIS was held concurrently with the hearing on the project's Uniform Land Use Review Procedure (ULURP) draft applications on February 6, 2013 at Spector Hall at the New York City Department of City Planning (DCP) located at 22 Reade Street, New York, NY 10007. The comment period for the DEIS remained open until 5:00 PM on Monday, February 19, 2013. Written comments received on the DEIS are included in **Appendix 26**.

Section B identifies the organizations and individuals who provided relevant comments on the DEIS. Section C contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim.

B. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT

ELECTED OFFICIALS

1. Brian Cook, Director of Planning, Office of the Manhattan Borough President, oral testimony dated February 6, 2013 (Cook)
2. Scott Stringer, Borough President, Borough of Manhattan, written comments dated January 24, 2013 (Stringer)

COMMUNITY BOARDS

3. Manhattan Community Board 8 Resolution dated December 20, 2012 (CB8)

INTERESTED INDIVIDUALS AND ORGANIZATIONS

4. Adek Afpelbaum, oral and written testimony dated February 6, 2013 (Afpelbaum)
5. Jim Allen, Director of Economic Programs, Shakeways, oral testimony dated February 6, 2013 (Allen)

[1] This chapter is new to the FEIS.

6. Jim Bates, President, Roosevelt Island Disabled Associated, written testimony dated February 6, 2013 (Bates)
7. Mandana Beckman, Principal, PS/IS 217, written testimony dated February 6, 2013 (Beckman)
8. Paula Beltrone, oral and written testimony dated February 6, 2013 (Beltrone)
9. Fouad Bennani, written testimony dated February 6, 2013 (Bennani)
10. Judith Berdy, oral and written testimony dated February 6, 2013 (Berdy)
11. Seth Bornstein, Executive Director, Queens Economic Development Corporation, oral and written testimony dated February 6, 2013 (Bornstein)
12. Eva Bosbach, Roosevelt Island Parents Network, oral and written testimony dated February 6, 2013 (Bosbach)
13. LaRay Brown, Senior Vice President, New York City Health and Hospitals Corporation, oral testimony dated February 6, 2013 (Brown)
14. Judy Buck, Board member, Roosevelt Island Community Coalition, oral and written testimony dated February 6, 2013 (Buck)
15. Brian Dennis, Associate Planner, Regional Plan Association, oral testimony dated February 6, 2013 (Dennis)
16. Doyle Family, written testimony dated February 6, 2013 (Doyle)
17. Althea Erickson, Etsy, oral testimony dated February 6, 2013 (Erickson)
18. David Evans, Elected Member, Island Residents Associated—Common Council, oral and written testimony dated February 6, 2013 (Evans)
19. Paul Fernandez, Chief of Staff, Building Construction Trades Council for Greater New York, oral testimony dated February 6, 2013 (Fernandez)
20. Jack Friedman, Executive Director, Queens Chamber of Commerce, oral and written testimony dated February 6, 2013 (Friedman)
21. Leonore Grandizio, written testimony dated February 6, 2013 (Grandizio)
22. Linda Heimer, Board Member, Roosevelt Island Community Coalition, oral and written testimony dated February 6, 2013 (Heimer)
23. Sherie Helstein, written testimony dated February 6, 2013 (Helstein)
24. Jennifer Hensley, Executive Director, Association for a Better New York, oral and written testimony dated February 6, 2013 (ABNY)
25. Dan Hirsch, representing Donna Sectman of PS/IS 217, oral testimony dated February 6, 2013
26. Andrew Hollweck, Vice President, New York Building Congress, oral testimony dated February 6, 2013 (Hollweck)
27. Jonathan Kalkin, Co Chair, Roosevelt Island Community Coalition, oral and written testimony dated February 6, 2013 (Kalkin)
28. Jukay Hsu, oral testimony dated February 6, 2013 (Hsu)

29. Matthew Katz, Director, Roosevelt Island Community Coalition, oral and written testimony dated February 6, 2013 (Katz)
30. Lorraine Lasker, written testimony dated February 6, 2013 (Lasker)
31. Mark Lyon, Board Member, Roosevelt Island Community Coalition, oral and written testimony dated February 6, 2013 (Lyon)
32. Olga McCain, written testimony dated February 6, 2013 (McCain)
33. Bryn Bass McCleary, written testimony dated February 6, 2013 (McCleary)
34. Joyce Mincheff, oral and written testimony dated February 6, 2013 (Mincheff)
35. Therese Munfakh, written testimony dated February 6, 2013 (Munfakh)
36. Larry Parnes, CB8, oral testimony dated February 6, 2013 (Parnes)
37. Ellen Polivy, Co-Chair, Roosevelt Island Community Coalition, oral and written testimony dated February 6, 2013 (Polivy)
38. Roosevelt Island Community Coalition (RICC), written testimony dated February 17, 2013 (RICC)
39. Joseph B. Rose, The Georgetown Group, oral testimony dated February 6, 2013 (Rose)
40. Leonard Rothbart, written testimony dated February 6, 2013 (Rothbart)
41. Jaranimo Saldwa, Local 32-J, oral testimony dated February 6, 2013 (Saldwa)
42. Ali N. Schwayri, M.D., oral and written testimony dated February 6, 2013 (Schwayri)
43. Beth Schrum, written testimony dated February 6, 2013 (Schrum)
44. Joseph Strong, on behalf of City Council Candidate Benjamin Kallos, oral testimony dated February 6, 2013 (Strong)
45. Lynne Strong-Shinokazi, oral and written testimony dated February 6, 2013 (Shinokazi)
46. Sanjiv Tandon, written testimony dated February 6, 2013 (Tandon)
47. Jessica Walker, Vice President, Partnership for New York City, oral and written testimony dated February 6, 2013 (PNYC)
48. April Leithleiter Ward, written testimony dated February 6, 2013 (Ward)

C. COMMENTS AND RESPONSES

PROCESS

Comment 1: Given its relationship with the Island, the State of New York needs to be heard as part of, or in parallel to, ULURP (Evans). The General Development Plan (GDP) should be amended by RIOC and the City of New York. (RICC)

Response: The Roosevelt Island Operation Corporation (RIOC), which is a State agency, is an involved agency for the Cornell NYC Tech project. As discussed in Chapter 2, "Land Use, Zoning, and Public Policy," RIOC was established in 1984 and

was charged with assuming the 99-year lease with the City of New York that was entered into in 1969 (and held by other State agencies until RIOC was established). RIOC is also responsible for implementing the GDP. The Goldwater Hospital site was never included in the premises leased to RIOC, and the GDP anticipated that the Goldwater Hospital site would remain under city control. The 1969 lease requires the city and RIOC to cooperate on the development of a new plan for the Goldwater Hospital site in the event that it is no longer needed for hospital purposes. RIOC and the city have carried out this cooperation through the development of the Cornell NYC Tech project. For the proposed project, RIOC would have to approve a modification of its lease with the city, but would not have to amend the GDP.

ANALYSIS FRAMEWORK

Comment 2: Cornell must provide a diligent analysis of the effects of the relocation of the occupants of Goldwater Hospital (Munfakh). The DEIS does not address the economic impact on Roosevelt Island of closing Goldwater Hospital, and the attendant loss of 1,000 jobs on the Island (Berdy).

Response: As stated in the DEIS, the closure of Goldwater Hospital and relocation of its patients to other locations will occur irrespective of whether the proposed Cornell project is approved. Chapter 2, "Land Use, Zoning, and Public Policy," notes that planning for the relocation of Goldwater Hospital, which has been undertaken by the New York City Health and Hospitals Corporation (NYCHHC), has been on-going since approximately 2007. This effort has occurred independently of the proposed project, and an analysis of its potential impacts is outside the scope of the DEIS. NYCHHC conducted its own City Environmental Quality Review (CEQR) analysis and issued a Negative Declaration on December 6, 2011 for the Goldwater North project, which includes the closure, relocation, and right-sizing of operations currently housed at the Goldwater Hospital (CEQR No. 12HHC001M).

Comment 3: Cornell has not considered nor coordinated with the developer of the three residential towers that will be under construction at the same time as Phase 1 of the Cornell NYC Tech project (CB8). The DEIS does not account for the population impact of the three new buildings that will be built at Southtown nor does it account for population from recent development on the island. (RICC)

Response: The three residential buildings that will be built in Southtown are accounted for in the relevant sections of the EIS in the No Action condition. As discussed in Chapter 20, "Construction," the construction analysis included both Southtown construction traffic and traffic from Southtown's residential units on Roosevelt Island. Population from recent development on the Island is reflected in existing conditions.

Comment 4: The DEIS assumes 250 square feet per worker, but a February 2012 study found that the current U.S. average is 176 square feet per worker, which is expected to decrease to below 100 square feet per worker by 2017. Therefore, the worker estimates for the project should be 55 percent greater, including 43 percent greater during Phase 1 (Katz).

Response: The population assumptions in the DEIS use multipliers that are commonly used in EIS analyses, and have been accepted as reasonable in numerous environmental reviews. For example, the EISs for the Goldman Sachs building within Battery Park City and the proposed development at 15 Penn Plaza assumed 1 worker per 250 sf of office space. In the Environmental Assessment Statement (EAS) for the NYU Center for Urban Science and Progress (CUSP), another project under development as part of the City's Applied Sciences initiative, population estimates for the industry partner use, as well as for incubator employees, were 1 worker per 300 sf of space.

Comment 5: Transient visitors will be attracted to the campus in high numbers, and this population was not reflected in the DEIS (Shinokazi, Mincheff).

Response: The EIS provides a projection of future trip-making to and from the proposed campus, including transient visitors. In addition to the academic-related trip-making by Cornell students, faculty, administrative staff, residents, and visitors, the corporate co-location, university retail, and executive education center uses were all projected to generate trips made by their employees and other visitors. These trips were accounted for in the EIS's analysis of potential transportation impacts. The daytime population is also accounted for in the analysis of open space.

CHAPTER 1, "PROJECT DESCRIPTION"

Comment 6: Land given to Cornell should not be for commercial activities. Commercial and non-educational applicants should contribute to the City and to RIOC (Shinokazi).

Response: Comment noted. Cornell believes that given the mission of the campus to encourage industry-academic partnerships and commercialization, the presence of commercial (both for-profit and not-for profit organizations) on campus is critical to the future success of Cornell NYC Tech.

Comment 7: The application is too open-ended and would permit a project or uses that could be different from the Cornell proposal. If Cornell is no longer the developer, an entirely different project, such as a fully commercial development could be built without ULURP review (CB8, Stringer, Shinokazi, Parnes). The commercial use and occupancy of the space are approximate, have not been fully explained, and include few limitations. (RICC)

Response: Under Cornell's lease with the City, a campus of at least 1.8 million square feet must be built over the next 25 years, including a minimum of at least 620,000 square feet of academic space. The lease will prohibit uses unrelated to the mission of the campus, such as big box retail. In order to change any of the material terms of the lease, that lease or an amended lease would require its own review and approval pursuant to City Charter Section 384(b)(4), including any CEQR review that would be required by such changes. If a new lease was granted for a substantially different program, then a reopening of the environmental record would be required as part of that process.

Comment 8: The disposition action should be limited to the proposed program as described in the DEIS. (CB8, RICC) Use of the project site should be limited to a college or university campus and related activities, with a maximum of 620,000 gross square feet (gsf) of academic space, 800,000-gsf of faculty and/or student housing, 25,000-gsf of conference facilities, 145,000-gsf of hotel uses, 25,000-gsf of campus-related retail, and 500,000-gsf of corporate co-location. The first phase of construction should be limited to 790,000 square feet. Upon completion of the project, there should be 500 off-street parking spaces (CB8).

Response: Under its lease with the City, Cornell will be required to develop a mixed-use campus containing a variety of uses, including academic space. Under the agreement between the City of New York and the New York City Economic Development Corporation, Cornell is committed to building a minimum of 300,000 square feet by 2017 and a minimum of 1.8 million square feet (sf) by 2037, including at least 200,000 sf of academic space by 2017 and 620,000 sf of academic space by 2037. The program analyzed in the EIS reflects a reasonable worst case mixture of uses that might occur on the project site.

Comment 9: The zoning map amendment action should not include the portion of the RIOC-controlled waterfront promenade, which is not subject to the disposition application. Any rezoning of this parcel would be more appropriate at such time development might be proposed for this parcel, such as when RIOC relinquishes the property to the City. Thus, the relevant section of the proposed zoning text (133-05) should be deleted (CB8, RICC).

The City should modify the proposed zoning text to require the waterfront esplanade to be open 24 hours. (RICC, Stringer) To clarify the text, the City should modify Zoning Resolution (ZR) Section 133-05 to say "open recreational uses, and shall be **publicly** accessible daily" (Stringer).

Response: The waterfront promenade is not part of the Cornell campus. The intention of the text is to ensure that this area remains open and accessible. Cornell would not object to either CB8's approach or the Borough President's proposal to change the proposed ZR 133-05 to provide for 24-hour access to the waterfront areas outside of the Cornell NYC Tech Campus and to require that the width of

the existing promenade not be reduced. Similarly, Cornell would support a text amendment that would make it clear that the area is to be "publicly" accessible. Cornell does not have control or ownership interest in the waterfront areas so the zoning controls would not apply as long as RIOC retains jurisdiction of the waterfront areas.

Comment 10: The proposed publicly accessible open space should be open from 6 AM to 10 PM year round (CB8).

Response: Cornell is amenable to modifications to proposed ZR Section 133-32 to make the hours for the publicly accessible open space on the Cornell NYC Tech Campus 6 AM to 10 PM year round, as recommended by Community Board 8. Such a change would not alter any of the conclusions in the EIS.

Comment 11: The proposed Use Group 17-B laboratories should be required to follow the performance standards in M1 districts (Stringer, CB8). Such uses should require a special permit issued by the City Planning Commission, which requires review pursuant to ULURP (CB8).

Response: Cornell is amenable to a modification to proposed ZR Section 133-11 to require that any Use Group 17 research labs comply with the performance standards applicable to such use in an M1 zoning district as proposed by Community Board 8. Such a change would not alter any of the conclusions in the EIS.

Comment 12: The applicant should add Use Group 18B, Electric Power and Steam Plants to the proposed text as a permitted use, to enable cogeneration on the campus (Stringer).

Response: While Cornell has been advised by DCP that it believes that an energy substation is already permitted as an accessory use, Cornell is amenable to the addition of language to this Section that makes it clear that a co-generation or other utility building is a permitted use within the Special District. Such a change would not alter any of the conclusions in the EIS.

Comment 13: The proposed authorization to modify bulk regulations should become a special permit. The applicants should bifurcate the approval process for waiving bulk controls. Minor waivers would be allowed to go through an authorization process and larger waivers should require a special permit (CB8, Stringer).

Response: Comment noted. Whether future bulk modifications are allowed by authorization or special permit would not alter any of the conclusions of the EIS.

Comment 14: ZR Section 133-233 of the proposed text is confusing and should explicitly state that if a building has multiple segments that rise above 180 feet, each segment can have a maximum floor plate of 15,000 square feet (Stringer).

Response: Cornell supports changes to ZR Section 133-233 to clarify the intention of the text, namely that in the event a single building has two or more separate portions above a height of 180 feet above curb level, the 15,000 sf floor plate limitation applies to each such portion separately.

Comment 15: The proposed zoning text amendment would allow open air cafes in the publicly accessible open space. It is not clear if it would be necessary to be a patron of the café to use the tables and chairs within them (CB8).

Response: Cornell is amenable to modifications to proposed ZR Section 133-32 to make it clear that the public may use seating associated with a café or kiosk when not used by a patron, as recommended by Community Board 8. Such a change would not alter any of the conclusions in the EIS.

Comment 16: Section 133-50 of the proposed zoning text does not indicate who determines that the various requirements of sections (a) through (d) are substantially complete. Section 133-60 of the proposed zoning text would allow elimination or reconfiguration of the publicly accessible open space without any review (CB8). Changes to the campus open space should be subject to a City Planning Commission Chair certification that the campus open space is consistent with the proposed zoning (CB8).

Response: Comment noted. Neither of these changes, if they were to be implemented, would alter any of the conclusions in the EIS.

Comment 17: Once the project is complete, I believe Cornell will make the campus private, and residents will not have access to that part of the Island. Guarantees in law should be provided for Island residents (Schrum).

Response: The proposed zoning text, which is legally binding, requires that 20 percent of the Campus be dedicated to publicly accessible open space. There will not be any fences around the Campus (other than as necessary during construction), and the open space network will be fully accessible.

CHAPTER 2, "LAND USE, ZONING, AND PUBLIC POLICY"

Comment 18: The DEIS recognizes that the Island's GDP must be amended if Goldwater is no longer needed for hospital purposes, but ignores the broad outline for the island set forth in the GDP. Instead, the DEIS focuses on PlaNYC, which is applicable but not as tailored to the character of the island as the GDP. (RICC)

Response: Chapter 2 of the DEIS, "Land Use, Zoning, and Public Policy," summarizes the GDP and analyzes the consistency of the proposed project with the GDP's plans and goals. As noted in the analysis, the Goldwater Hospital site was never included in premises leased to RIOC, and the GDP anticipated that the Goldwater Hospital site would remain under city control. The proposed project would be consistent with the GDP, including its goals for housing, community facilities, retail uses, transportation, and open spaces. As the GDP's goals do not rely upon the project site for their realization, the proposed project would not conflict with the GDP. In addition, as stated above, the GDP would not need to be modified.

Comment 19: The DEIS contains several errors: (1) WIRE buildings were not built as Mitchell Lama coops: Eastview is Section 236; Rivercross is the only co-op. (2) One building in Southtown is condo, not rental. (3) Page 2-6 omits Main Street Theatre, Jewish congregation, synagogue. (RICC)

Response: (1) According to the *Roosevelt Island Northtown Phase II Development FEIS* (February 1986), all four of the Northtown Phase I buildings were built under the Mitchell-Lama program, and in addition, Eastwood also received a Section 236 subsidy from the U.S. Department of Housing and Urban Development for low- to moderate-income tenants. As noted in the DEIS, Roosevelt Landings (formerly Eastwood) has left the Mitchell-Lama program. The *Wall Street Journal* reported in September 2011 that the three other Northtown Phase I buildings were considering leaving the Mitchell-Lama program. In Spring 2012, the owner of Westview and Island House submitted notices of intent for those buildings to leave the program. Accordingly, the FEIS has been updated to include these recent developments.

(2) The description of the Southtown development in the DEIS does not specify whether these buildings contain rental or condominium units. Therefore, no revision is necessary in the FEIS.

(3) The community facility uses noted by the commentor have been added to the FEIS.

CHAPTER 3, "SOCIOECONOMIC CONDITIONS"

Comment 20: How is it possible that the presence of a world-class university will not increase property values and rents on the island? The DEIS does not include residents of WIRE buildings, which have general lower incomes. The DEIS states that the average income of Cornell faculty, executive leaders, students, and workers is $56,000; this may or may not be accurate, and Cornell's presence means property values will go up for everyone, regardless of what Cornell employees earn. The DEIS fails to account for the likelihood that graduate students and startup businesses would seek roommate arrangements in private apartments,

allowing workers to pool resources and edge out existing renters. The EIS should include a full examination of residential impacts that includes multiple unrelated individuals seeking apartment space on the island. (RICC)

Response: The analysis in Chapter 3, "Socioeconomic Conditions," follows the Scope of Work and *CEQR Technical Manual* guidelines in determining that the proposed project would not result in significant indirect residential displacement impacts on Roosevelt Island due to increased rents.

As described in the Scope of Work, the analysis begins by considering whether the proposed project would add new population with higher average incomes compared to the average income of the study area population. The proposed project's 1,094 residential units would introduce 2,326 residents to the study area, consisting of University leadership, faculty, postdoctoral fellows, Ph.D. candidates, and master's students, as well as their residential partners and children. These residential units will not be available in the larger residential market. Moreover, the analysis estimates that the average household income of the on-campus academic population would be $56,590. This estimate is based on average annual incomes provided by Cornell, averages reported in *Reversing Course in Pennsylvania Higher Education: The Two Tiers in Faculty Pay and Benefits and a Way Forward*, and a survey of housing costs of graduate students collected from NYU, Weill Cornell Medical College and the New School. Income of residential partners was estimated based on per capita income for New York City.

While it is possible that the off-campus academic population of 1,552 students, faculty, and staff, as well as the estimated 2,228 non-academic employees could seek new housing opportunities in the study area, this "worker" population would be dispersed over a broader residential area that includes Manhattan, Queens, other areas of the City and beyond. The off-campus postdoctoral fellows and faculty population—which are populations that have a greater need to locate in close proximity to their workplaces as compared to a typical worker—may seek off-campus housing opportunities on Roosevelt Island. But similar to Rockefeller University and Weill Cornell Medical College faculty and postdoctoral fellows currently residing in the study area, this population would not be expected to demand housing at rents higher than currently offered. While there is no income profile available for the 2,228 non-academic employees, the project-generated employment base is expected to reflect that of a typical commercial office building, and it is therefore reasonable to assume that these workers would have a combined average household income similar to the average household income for the City ($80,944). This population also would be expected to consider housing options within a reasonable commuting distance, which is a geographic area much greater than the study area.

According to the *CEQR Technical Manual*, if the expected average incomes of the new population would be similar to or less than the average incomes of the

study area populations, no further analysis is necessary. The average household income of the academic and worker population living on campus, as well as the average incomes of the off campus populations would be lower than the average household income of the study area ($90,423). Therefore, potential new demand would not be expected to substantially change the market profile. Roosevelt Island is already within close proximity to numerous world-class institutions and to Midtown Manhattan, a world-renowned Central Business District. Market-rate rents on the island already reflect the locational value of this housing stock.

The DEIS estimate of the average household income of the Roosevelt Island study area population include residents of the WIRE buildings. Low- and moderate-income residents of the WIRE buildings who are protected from rent increases through their lease terms are not subject to indirect residential displacement as a result of the proposed project. One of the WIRE buildings is rent-protected through the Mitchell-Lama program, while one building has transitioned out of the program and the remaining two are in the process of transitioning out of the program. The buildings transitioning out of the Mitchell Lama program are expected to provide rent protection for existing residents who decided not to buy their units.

Comment 21: Workers on campus will have a strong incentive to seek a single-fare commute to work. Roosevelt Island is ideally located in the path of the Q102 bus, the tram, and the subway to provide such a commute; this should be included in displacement calculations. (RICC)

Response: As stated above in response to Comment 20, the analysis in Chapter 3, "Socioeconomic Conditions," follows the Scope of Work and *CEQR Technical Manual* guidelines in determining that the proposed project would not result in significant indirect residential displacement impacts on Roosevelt Island due to increased rents. The study area for the analysis of indirect residential displacement is defined as Roosevelt Island in its entirety—the area in which the proposed project has the greatest potential to affect socioeconomic conditions. Outside of this study area, project-generated workers who do not already live within a reasonable commuting distance of the project site and who seek housing are not expected to be concentrated in any specific geographic area in a way that would significantly affect market conditions. While the analysis does not factor in specific transportation services, it is expected that future residents would seek housing based on a number of factors, such as price, neighborhood character and amenities, and community distance.

Comment 22: The DEIS states that off-campus Cornell employees will "possibly" seek housing on Roosevelt Island. The population numbers in the chapter appear inconsistent: one statement is that there will be, after Phase 1, 805 Cornell-

related personnel living off campus, with 1,552 faculty, students, and workers at full build. Elsewhere it states that "the new employment base at the campus associated with the corporate co-location space, the Executive Education Center, and the retail and residential buildings (estimated at about 2,228 employees in 2038), combined with an off-campus academic population could seek new housing opportunities in the study area." (RICC)

Response: The analysis in the DEIS considers both the academic and non-academic populations that would be introduced by the proposed project. Upon the full build out of the project, there would be a forecasted academic population of 1,552 persons who are estimated to reside off campus. This academic population who would reside off campus includes all staff directly employed by Cornell, including funded researchers, and the portion of faculty, visitors/adjuncts, post-doctoral fellows, master's degree students, and Ph.D. candidates who would not be accommodated in on-site housing. In addition to this population, the project would result in 2,228 non-academic workers at full build out, none of whom would reside on the campus. This non-academic population includes workers who would be employed in the corporate co-location space, Executive Education Center, and the retail and residential buildings.

Comment 23: The DEIS dismisses indirect business displacement, indicating that the island has traditionally struggled to provide a vibrant retail corridor. The DEIS represents that additional retail on its property would not impact new and existing businesses on the island. It might, however, prove appealing to the island's existing businesses to move to the Cornell campus, if the campus provides parking, and students, staff and faculty provide constant demand. Currently, Roosevelt Island businesses see peak demand during commute hours. The campus would provide a different demand profile, which businesses like Subway and Starbucks may find more attractive. The impact on existing and planned island retail should be reconsidered. (RICC)

Response: The DEIS follows the Scope of Work and *CEQR Technical Manual* guidelines in its preliminary assessment of indirect business displacement. The analysis finds that the proposed project would not result in significant adverse indirect business displacement impacts on Roosevelt Island, and would not be expected to adversely change the overall supply and demand for retail in the core Main Street and Southtown areas. Existing retailers would not be expected to migrate to the Cornell campus any more than they would be expected to migrate to off-island locations in Manhattan, for example, if other locations appear to be more attractive. In the future with or without the proposed project, there will continue to be a demand for neighborhood retail uses as part of Main Street and Southtown, evidenced by the recent tenanting of five retail spaces on Main Street. The additional expenditure potential generated by the proposed project's estimated 2,326 residents and a project-generated daily academic and worker population of approximately 3,780 would be met, in part, by the proposed

project's retail component, but would also result in new sales for the existing retail base on the Island.

CHAPTER 4, "COMMUNITY FACILITIES"

PUBLIC SCHOOLS

Comment 24: The student enrollment data in the DEIS is dated and did not include pre-kindergarten students. The DEIS states that PS/IS 217 has 325 students, but the school actually has 482 students enrolled for the 2012-2013 school year (Beckman, RICC). The DEIS should use the school's updated numbers to create a more accurate projection. (RICC)

Response: The schools analysis in the DEIS utilized 2010-2011 DOE data, which was the most recent information available at that time. The analysis in the FEIS has been updated with the New York City Department of Education (DOE) 2011-2012 enrollment figures. The schools analysis in Chapter 4, "Community Facilities" actually accounts for 416 students at PS/IS 217, including 323 elementary school students and 93 intermediate school students (see Table 4-2). However, officials at PS/IS 217 report 482 students at the school, which is 66 more students than are accounted for in the DOE information. Following the guidelines of the *CEQR Technical Manual*, the FEIS utilizes DOE's enrollment data. However, if it is assumed that PS/IS 217 instead has 482 students, the findings of the schools analysis would not be altered.

Comment 25: The DEIS contains faulty capacity assumptions concerning the increase of students in PS/IS 217, using data that stops at 2010. The school will reach capacity sooner than projected. (RICC)

Response: Consistent with the guidance of the *CEQR Technical Manual*, the DEIS utilizes DOE's enrollment projections through 2018, which is the farthest projection currently available.

Comment 26: The DEIS indicates it based its population projection on faculty, post-doctoral fellows, Ph.D. candidates, and master's students. It fails to mention the additional population that will result from its corporate co-location population. (RICC)

Response: With regard to the schools analysis, an estimate of the students generated by the future Southtown development has been specifically accounted for and included in the analysis (see Table 4-3). The portion of the corporate co-location population that resides on the Island would either inhabit existing residential units, or residential units that will be built in the future Southtown development (which has been accounted for, as noted above). To the extent that this population would reside in existing housing units, they would not place a new

burden on schools, as they would replace existing residents. Therefore, the analysis properly accounts for the commentor's populations of concern.

Comment 27: The DEIS includes a table that has no bearing whatsoever on Roosevelt Island. It indicates the elementary and intermediate schools that service the district that PS/IS 217 is located in. It fails to consider that Roosevelt Island is indeed an island, separated from the island of Manhattan, and that no district school can turn away a child who lives in the zone for the school. The consideration made regarding the impact on District 2 schools has no relevance to this project. (RICC)

Response: Consistent with the methodology of the *CEQR Technical Manual* and the guidance of the School Construction Authority (SCA), the schools analysis considers the sub-district that the project site is located in. Even if the analysis only considered PS/IS 217, significant impacts would not be identified. Currently, the SCA and DOE enrollment data show there is a surplus of 234 elementary school seats and 58 intermediate school seats at PS/IS 217. Using the multipliers recommended in the *CEQR Technical Manual*, the three Southtown buildings would generate 65 additional elementary students and 22 additional intermediate students, reducing the surplus to 169 elementary school seats and 36 intermediate school seats. The proposed project is estimated to result in 49 elementary school students and 16 intermediate school students, leaving PS/IS 217 with an estimated surplus of 120 elementary school seats and 20 intermediate school seats.

In addition, members of the community have commented that PS/IS 217 actually houses 482 students. Assuming that DOE's capacity information for the school is correct (708 seats), that leaves a combined surplus of 227 elementary and intermediate school seats. Adding the 87 elementary and intermediate students generated by Southtown and the 65 elementary and intermediate students generated by the proposed project results in a reduced surplus of 75 seats.

LIBRARIES

Comment 28: There is an inconsistency that should be corrected. On page 4-10, "Methodology," it states "the catchment area for the library is limited to Roosevelt Island itself for the purposes of this analysis, as the East River acts as a physical barrier that would discourage residents from accessing library resources in Manhattan and Queens." On page 4-10, it states, "many of the residents in the catchment area for the Roosevelt Island branch also reside within ¾-miles of other nearby libraries such as the 67th Street branch and the Long Island City branch." This latter statement should be deleted. (RICC)

Visiting other libraries within a ¾-mile radius is not viable for children and disabled residents. (RICC)

Response: As per the commentor's request, this latter statement has been struck in the FEIS.

Comment 29: The DEIS does not consider that the population of Roosevelt Island will increase above 11,661, which is generally believed to be an undercount. (RICC)

Response: The increase in the population of Roosevelt Island that is attributable to the proposed project has been accounted for in the relevant EIS analyses. Chapter 4, "Community Facilities" assumes for analysis purposes that the population of the Island will increase from 11,661 under existing conditions to 12,884 in the No Action condition, and to 15,170 by 2038 in the With Action condition. The EIS utilizes data from the 2010 US Census, which is an appropriate source for population information.

Comment 30: The Cornell NYC Tech library will be both technical and digital and will not serve the same need as the presently existing library it is being compared to. (RICC)

Response: As noted in the DEIS, the Cornell NYC Tech community would have access to the Cornell University Library system (CUL), one of the world's largest research libraries, with approximately 7.8 million print volumes and over 80,000 electronic serial titles. CUL users may request copies of books, journal articles, and other materials located in the print collection of the Ithaca/Geneva Cornell Libraries, and requested documents would be made available electronically. While not the principal part of the collection, CUL libraries (including the proposed library services at Cornell NYC Tech) include collections of literature, children's books, youth books, and other non-academic materials.

Comment 31: The DEIS has used percentages rather than raw figures of population growth to claim no adverse effects. Further, it has used a projection of future development on Roosevelt Island to artificially make it appear that the Cornell population increase will diminish rather than add to the impact on the library. (RICC)

Response: The DEIS discloses both the population figures and percentage changes, throughout the analysis (see Table 4-10 for this information). The impacts discussion focuses on percentages because the impact threshold criteria in the *CEQR Technical Manual* are presented in this manner. The libraries analysis does not state that the proposed project would diminish an impact on public library services. Instead, consistent with the *CEQR Technical Manual*, the analysis considers the project's potential adverse impacts on the environmental setting. Because the proposed project would be operational in future years, its environmental setting is not the current environment, but the future

environment. Therefore, throughout the DEIS, the technical analyses first assess current conditions and then forecast these conditions to 2018 and 2038, corresponding to the completion of Phases 1 and 2, respectively, for the purposes of determining potential impacts. This analytic framework ensures that the project's potential effects are comprehensively considered and disclosed.

POLICE AND FIRE PROTECTION AND AMBULANCE SERVICES/PUBLIC SAFETY

Comment 32: While the DEIS mentions police and fire protection, the unique nature of Roosevelt Island's Public Safety department is not fully considered. The DEIS indicates in a conclusory manner that no new neighborhood needs will be created, but as compared with the vacant as-delivered condition, the proposed development will require significant additional police and fire resources. A more thorough analysis on the impact on police and fire needs should be undertaken. (RICC) Fire protection and ambulance services on the Island come from Queens and are inadequate. Sometimes there is confusion because they do not know where to go. (Mincheff)

Response: As described in the DEIS, the proposed project does not meet the *CEQR Technical Manual* threshold for an analysis of police, fire, or ambulance services, and significant adverse impacts are not expected. The campus will have a security department that will work cooperatively with the Roosevelt Island Public Safety Department and the New York City Police Department (NYPD).

Comment 33: Cornell should implement security measures to ensure the safety of Island residents during and after construction. As the project will bring increased security risks to the Island, Cornell and the City should establish an NYPD presence on or near the campus (CB8, Evans, Bennani, Tandon, Rothbart, Grandizio). The project will require increased security Island-wide. (RICC)

Roosevelt Island has approximately 14,000 residents and only one part-time police officer for an 8 hour shift, three days per week. The Public Safety staff has 37 officers, far less than is necessary. The City needs to provide for greater security as a result of this project (Mincheff, Bennani). The additional Cornell population will likely result in uncompensated increased demand on the Public Safety Department. (RICC) Cornell should contribute to the cost of the necessary expansion of policing that will be necessitated by the project (CB8, Stringer, Shinokazi, Mincheff, Bennani, Munfakh, Tandon, RICC).

Response: The campus will have a security department that will work cooperatively with the Roosevelt Island Public Safety Department and the NYPD. Cornell has met with the Mayor's Office and will meet with NYPD to make sure that these concerns are properly addressed and that there is an effective plan for responding to any broader security concerns. As described in the EIS, the

proposed project does not meet the *CEQR Technical Manual* threshold for an analysis of police services.

Comment 34: Owing to the location of the project site, situated on an isolated island, directly opposite the Keystone power plant, adjacent to the Queensboro Bridge and the tramway, and directly opposite the United Nations, there is the potential for the campus and the island to be targeted for terrorism. (RICC)

Response: Comment noted. In accordance with SEQRA, the EIS focuses on the impacts of the potential reasonable worst case from construction and operation of the proposed project. Emergency scenarios, such as a terrorist attack, are outside the scope of an EIS. However, as indicated in response to Comment 33, the proposed project would implement its own site security plan. In addition, Cornell has met with the Mayor's Office and the New York City Office of Emergency Management (OEM) and will meet with NYPD to make sure that these concerns are properly addressed and that there is an effective plan for responding to any broader security concerns.

Comment 35: Cornell should meet with the Island's CERT team, RIOC, RIOC's Public Safety Department, and the NYC Office of Emergency Management to develop an effective evacuation plan and a relief plan for residents in the event of emergencies (CB8).

Response: Cornell is investigating with the community ways that the Campus might be a resource for the Island community in the event of a natural disaster or other emergency. A preliminary meeting was held in December 2012 with the Mayor's Office and OEM, and further discussions are planned. Ultimately Cornell's role must be consistent with OEM guidelines and protocols.

OPEN SPACE

Comment 36: The proposal should be amended to conform with Cornell's public presentation of more than 35 percent open space (Strong).

Response: The DEIS provides a reasonable worst-case analysis and therefore provides an assessment of the *minimum* amount of publicly accessible open space that Cornell is required to provide. As discussed in Chapter 5, "Open Space," there would be no significant adverse impacts on open space.

Comment 37: The DEIS shows large decreases in the amount of open space allotted per person (over 80 percent), but the explanation of why that is okay is unclear. (RICC)

Response: The DEIS discloses that the ratio of passive open space resources per 1,000 workers would decrease by 83.8 percent by 2018 and 95.8 percent by 2038 (the

percentage changes for the ratios of total, passive, and active open space resources per 1,000 residents are substantially smaller).

As noted in the DEIS, these percentage decreases would not be considered significant adverse impacts for the following reasons: (1) the With-Action passive open space ratio would still be more than 20 times greater than the DCP planning goal of 0.15 acres per 1,000 non-residents; (2) the large decrease in the ratio is due to the fact that, in the future without the Cornell NYC Tech project, there will be very few workers in the commercial study area (142 workers), as a result of the closure of Goldwater Hospital. As the analysis compares conditions with the proposed project to conditions absent the proposed project, the change in the ratio of acres of passive open space to workers appears unusually large due to the absence of a substantial worker population in the No Action condition. Overall, the commercial study area would remain well-served, as the ratio of open space to workers would far exceed DCP's planning goal.

Comment 38: The population figures used to measure the number of people who enjoy public space is from the 2010 Census and does not consider increased visitors to the island. (RICC)

Response: The 2010 Census is considered to provide reasonable and reliable data for analytic use. As discussed in response to Comment 5, the EIS provided a detailed projection of future trip-making to and from the proposed campus that does include visitors.

Comment 39: It is unclear if Sportspark recreational center will need to be closed during construction. (RICC)

Response: Construction of the proposed Cornell NYC Tech project will not require the closure of the Sportspark recreational center.

Comment 40: There is a lack of discussion about how the proposed campus public open space connects to other open spaces on Roosevelt Island. An analysis of pedestrian connectivity on the Island and how the campus open space fits into the existing network should be included. (RICC)

Response: As noted in the DEIS, the proposed zoning text establishes a variety of requirements for the campus open space, including: ensuring public access in perpetuity; delineating view corridors; prescribing features such as a Central Open Area, a North-South connection, and a Waterfront Connection Corridor; and imposing a set of detailed design requirements that are consistent with the existing promenade. While an analysis of pedestrian connectivity on the Island is beyond the scope of the EIS, these requirements will ensure that the campus

open space is well-integrated with surrounding open spaces, and becomes a major benefit to all Island residents.

Comment 41: The campus open space should open until at least 10 PM and any café seating should be available to the general public (Stringer).

Response: Café seating will be available to the general public. As discussed above, Cornell is amendable to modifications to proposed ZR Section 133-32 to make the hours for the publicly accessible open space on the Cornell NYC Tech Campus 6 AM to 10 PM year round, as recommended by Community Board 8.

Comment 42: Cornell should contribute to the cost of the necessary expansion of open space and recreational facility resources on the Island that will be necessitated by the project, including improvements to Sportspark (CB8, Lyon, Mincheff, McCain, Doyle, Schrum, McCleary, Rothbart, Grandizio). The island's recreational facilities will be stretched thin with a larger population, and will need increase maintenance, staffing, and equipment. (RICC)

Response: The proposed project will include a minimum of 2.5 acres of new publicly accessible open space, which will serve the entire Island. The EIS does not identify any significant adverse impacts on open space from the new residents and non-residents (i.e., workers and non-resident students). The Cornell NYC Tech open space will provide a wide variety of space that will be attractive to multiple age groups, including spaces designed for children.

Comment 43: Cornell should repair or replace the railing along the promenade (Munfakh).

Response: Comment noted. The promenade is not part of the Cornell NYC Tech project site and would not be affected or modified by the proposed project.

CHAPTER 6, "SHADOWS"

Comment 44: The sun/shade models require further study, with an hour by hour layout in the summer. There is significant shade on Southpoint because the tallest buildings are on the south end. (RICC)

Response: The shadow study follows the methodology of the *CEQR Technical Manual*, analyzing and presenting the entry and exit times and total duration of project-generated shadow on all sunlight-sensitive resources that could be affected, including South Point Park, and providing detailed graphic representations of the incremental shadows. The tallest proposed building would be located in the northern portion of the project site. South Point Park is located south of the project site, whereas solar shadows generally fall to the west, north and east at the latitude of New York City. The analysis concluded that project-generated shadow would fall on the northwestern portion of South Point Park early in the

late spring and summer mornings only, would be limited in extent and duration, and that this area of the park would continue to receive direct sun for the remainder of the day in those seasons due to the lack of structures to its south and west.

CHAPTER 7, "HISTORIC AND CULTURAL RESOURCES"

Comment 45: Cornell should preserve the Works Progress Administration (WPA) murals and consider preserving and displaying other Island historic artifacts (CB8). Cornell should preserve six art deco bronze lanterns on granite plinths that are currently in Goldwater. This should be put in writing. (RICC)

Response: Cornell has consulted with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) and the New York City Landmarks Preservation Commission (LPC) to develop appropriate measures to partially mitigate the significant adverse impact to the Goldwater Hospital complex. These measures will be implemented by Cornell in consultation with OPRHP and LPC, as set forth in a Letter of Resolution (LOR) among Cornell, OPRHP, LPC, and RIOC. These measures are described in Chapter 22, "Mitigation," and include the preparation of Historic American Buildings Survey (HABS) documentation, the removal and restoration of the four extant WPA murals to the extent practicable, the development of a digital media display about the murals, and the installation of one or more plaques or historic markers on the new academic campus that would provide information and a photograph describing and illustrating the history of the site, the Goldwater Hospital, and the WPA murals.

Comment 46: There is a need for archaeological research after the demolition and excavation of the Goldwater site (Berdy).

Response: As discussed in Chapter 7, "Historic and Cultural Resources," a Phase 1A Archaeological Documentary Study was prepared in March 2012 to evaluate the archaeological study area's potential to contain archaeological resources. Documentary research was undertaken, including the review of historic maps and atlases, photographs, local histories, previous archaeological studies, and other documentary information. The Phase 1A study determined that the archaeological study area is not sensitive for archaeological resources dating to either the precontact or historic periods. In a comment letter dated March 26, 2012, LPC concurred with the conclusions and recommendations of the Phase 1A study. As indicated in its June 19, 2012 findings letter, OPRHP has no further archaeological concerns for the project site (see Appendix 7, "Historic and Cultural Resources"). Therefore, no additional archaeological research is warranted.

CHAPTER 8, "URBAN DESIGN AND VISUAL RESOURCES"

Comment 47: The DEIS does not present the proposed residential tower's height of 320 feet fully in the photographs. (RICC)

Response: The residential building that is projected for development in Phase 1, which is closest to the Queensboro Bridge, is depicted at its full potential height of 320 feet. The two residential buildings that are projected for development in the later phases of the project—which are further south on the Island—are depicted at their anticipated maximum height of 280 feet.

Comment 48: If the center of campus is raised 21 feet, then the total height of the complex must be adjusted to reflect that. The concern is that the new buildings will tower over the Queensboro Bridge. (RICC)

Response: As described in the EIS, buildings within 500 feet of the loop road section north of the site would be capped at 320 feet in height from ground level, and buildings on the remaining (southern) portion of the project site would be capped at a height of 280 feet from ground level. At approximately 320 feet in height, the proposed residential building to be constructed in Phase 1 would be lower than the height of the two Queensboro Bridge anchorages on the Island, which are approximately 350 feet tall (including the stone towers, metal framework, and finials). Raising the site was accounted for in the EIS analyses of shadows, urban design and visual resources, and historic resources. As shown in these analyses, the new buildings would not tower over the Queensboro Bridge. As further discussed in Chapter 7, "Historic and Cultural Resources," the bridge would remain a highly visible resource in the study area.

Comment 49: The FEIS should include more information about the proportions of new buildings in comparison with the Queensboro Bridge and Roosevelt Island appearance. The EIS should include a view of the entire island with current residential buildings north of Queensboro Bridge and new campus buildings on the south. (RICC)

Response: The EIS provides an analysis of the project's potential effects on urban design and visual resources (see Chapter 8). The analysis considers the project site and its relation to Roosevelt Island to the north and provides information on building heights of the Northtown, Northtown II, and Southtown buildings, among others. The relation of the proposed project to the Queensboro Bridge is discussed in Chapter 7, "Historic and Cultural Resources," and Chapter 8. These analyses conclude that the project would not result in significant adverse impacts on Roosevelt Island or the Queensboro Bridge.

CHAPTER 9, "NATURAL RESOURCES"

Comment 50: To the maximum extent feasible, Cornell should minimize the removal of trees, and replace those that must be removed (CB8, RICC). How will Cornell preserve mature trees on the site? How will raising the center of the site up to 21 feet impact existing trees? (RICC) Cornell must commit to a specific plan to protect the trees from damage and give them the best opportunity to survive. (Ward)

Response: To the extent possible, Cornell will preserve mature trees on the project site, which are located primarily along the perimeter of the site. Measures will be implemented to protect the trees to be preserved from damage during construction activities. Health of the trees to be preserved will also be taken into account in developing the grading and landscaping plans for the project. The central portion of the project site that would be raised in elevation as a result of the project has no trees as it is occupied by the hospital. As discussed on page 9-17 of the EIS, the proposed project would be consistent with the tree planting requirements required as part of the New York City street tree zoning amendment and Local Law 3 of 2010. Landscaping within the publicly accessible open space would be planted with woody and herbaceous vegetation that is native to New York, consistent with the New York City Department of Parks and Recreation tree planting standards. Because many of the trees that would be removed are non-native species, their replacement with native trees would increase native plant richness and diversity, and likely improve conditions for the few species of native wildlife inhabiting the area.

Comment 51: An extended "site reconnaissance" should be undertaken during spring migration and nesting periods. Wildlife on the site is not limited to "disturbance tolerant" species as the DEIS suggest, but includes species that thrive in undisturbed, healthy ecosystems. These include: black-crowned night herons (*Nycticorax nycticorax*), great egrets (*Ardea alba*), Brant goose (*Branta bernicla*), and Canada geese (*Branta canadensis*). In addition, Dekay's brown snakes (*Storeria dekayi*) and raccoons may use the project site, and large silvery fish have been seen jumping out of the water in the west channel (possibly anadromous species: tomcod, striped bass, American shad, hickory shad, bluefish, weakfish). There are discrepancies in the DEIS, such as migratory species and resident ones. The DEIS states the opposite of what was stated in the December 2010 Tidal Energy project study—that the abundant source of pigeons is a likely source of forage for peregrine in urban habitat. There is no mention of the bald eagle (*Haliaeetus leucocephalus*) in the DEIS. (RICC)

Response: On the basis of the limited habitat availability and high levels of human disturbance, it can be predicted what wildlife species have the potential to occur within the project site. Wildlife within the project site is in fact limited to urban-

adapted species, including those mentioned in the comment. Black-crowned night heron, great egret, Canada goose, and Brant goose are all considered urban-adapted species and are common in New York City and many other urban areas. The DEIS noted the presence of anadromous fish in the East River and the expected presence of raccoons on Roosevelt Island, and concludes that there would be no impact to these species from the proposed project. Dekay's brown snake is another urban-adapted generalist species that is one of the most abundant and widespread snakes in the northeast; the proposed project would not have the potential to cause significant adverse impacts to the species. Pages 9-11 to 9-13 of the DEIS identified the bird species with the potential to occur within the project site during the breeding season, migration, and winter. There are no discrepancies between migratory and resident species.

Consistent with the excerpt from the Tidal Energy study that was included in the comment, the DEIS noted on page 9-19 that migrating peregrine falcons or those associated with nest sites elsewhere in the city have the potential to occur in the vicinity of the project site in pursuit of rock pigeons or other avian prey. The proposed project would not alter the current abundance of pigeons or other small birds, and therefore would not affect prey availability for any peregrine falcons potentially occurring in the area. The DEIS did not mention bald eagles because the occurrence of a bald eagle at the project site is an extreme improbability. On rare occasions, migrating bald eagles may be seen high above Roosevelt Island, but otherwise, there are no circumstances under which bald eagles are likely to occur near the project site. The proposed project has no potential to impact bald eagles.

Comment 52: Geese must be protected during construction of the project. (RICC)

Response: The proposed project would not affect Canada geese foraging or nesting in the area mentioned. It is beyond the project's limit of disturbance, and Canada geese are aggressive and extremely tolerant of human activity.

Comment 53: The developers should strive, during all phases of the project, to maintain a safe corridor between the areas north and south of the project site that are seeing increased wildlife diversity, and as much as possible develop the site in a way that supports extant wildlife and encourages the return of even more species. (RICC)

Response: As discussed in the DEIS, some wildlife inhabiting areas adjacent to the project site could be temporarily disturbed by noise or other construction activity, but this effect would be temporary and would not significantly alter the diversity of wildlife in these areas. The same species would be expected to occur as at present. Following completion of the proposed project, conditions for native wildlife within the project site would be slightly improved from the existing

condition due to the increased structural diversity of vegetation and the replacement of non-native trees with native species.

CHAPTER 10, "HAZARDOUS MATERIALS"

Comment 54: How will the Goldwater Hospital buildings be demolished and buried without resulting in contamination? (RICC)

Response: Prior to demolition, any remaining chemicals would be removed and properly disposed of and asbestos would be abated in accordance with regulatory requirements. Any activities with the potential to disturb lead-based paint would be performed in accordance with the applicable Occupational Safety and Health Administration (OSHA) regulations. Any suspected polychlorinated biphenyl (PCB)-containing equipment (such as fluorescent light ballasts) would be evaluated and disposed of at properly licensed facilities. Demolition would occur in accordance with the New York City Department of Buildings (NYCDOB) guidelines/requirements. In general, the first step is to remove any economically salvageable materials. Then the building is deconstructed; typical demolition requires fencing to prevent accidental dispersal of building materials into areas accessible to the general public. The demolition debris would be sorted to maximize recycling opportunities. Remaining non-recyclable material would be sent for disposal at licensed landfills. Reuse of certain demolition debris on site (e.g., crushed brick/concrete) is sometimes permitted, but only when conducted in accordance with City and State requirements (including New York City Rules and Regulations [NYCRR] Part 360 requirements for solid waste management).

Comment 55: The ground beneath Goldwater Hospital contains fly ash used to fill a quarry. Fly ash contains high levels of arsenic, lead, mercury, and boron, each of which has been known to cause cancer, neurological and development problems, and other illnesses. How does Cornell intend to deal with removal of fly ash? (Lyon, RICC)

Response: As noted in the Phase 1A Archaeological Documentary Study prepared in March 2012 on Figure 5, the location of the quarry was not within the boundaries of the Cornell NYC Tech project site, but rather was located to the north.

As noted in the EIS, an assessment of the site's potential to contain hazardous materials was undertaken as part of the project's environmental review. A *Phase I ESA* was prepared in May 2011, and a *Subsurface (Phase II) Investigation* of the project site was undertaken in July 2011. Both reports were submitted to and reviewed by the New York City Department of Environmental Protection (NYCDEP). The Phase II investigation included the collection and laboratory analysis of 17 soil and 3 groundwater samples from 10 on-site borings. The

Phase II borings advanced on the project site (as well as information on historical borings at the present location of Goldwater Hospital Building J) encountered sand with silt, gravel, urban fill materials, and/or organic matter with a thickness of approximately 3 to 20 feet, underlain by a layer of decomposed bedrock (generally less than 5 feet thick), with competent bedrock beneath. Urban fill materials in NYC often contain small amounts of cinder, coal, and ash. However, ash was not specifically noted in any of the on-site borings. As described in Chapter 10, "Hazardous Materials," ash was noted in some geotechnical borings that were advanced outside of the Cornell NYC Tech project site (specifically, approximately 300 feet north of the project site near the Queensboro Bridge and approximately 50 feet west of the project site near the western shore of the Island).

Demolition and excavation on the project site will be undertaken in accordance with a Remedial Action Plan (RAP) and a Construction Health and Safety Plan (CHASP). The RAP and CHASP have been submitted to and approved by NYCDEP. The RAP and CHASP will address requirements for items such as soil stock piling, soil disposal and transportation, dust control, dewatering procedures, quality assurance, procedures for the closure of known petroleum storage tanks, and contingency procedures if unexpected conditions are encountered. The CHASP will specify appropriate health and safety measures to be undertaken to ensure that demolition and soil disturbance is undertaken in a manner protective of workers and the community, including air monitoring.

CHAPTER 11, "WATER AND SEWER INFRASTRUCTURE"

Comment 56: A full examination of water and sewer infrastructure should be completed and published in time to allow a full review before the FEIS is prepared. (RICC)

Response: Chapter 11, "Water and Sewer Infrastructure," of the FEIS has been updated with the results of the additional study of the potential impacts of the project's flow increase on the operations of the pump station, the force mains, and the interceptor in Vernon Boulevard, and more detail on the study has been added in Appendix 11 of the FEIS. This analysis was undertaken in coordination with NYCDEP. As detailed in Chapter 11 of the FEIS, the south pump station has adequate capacity to handle the flows from Phase 1. When design begins for the final phase of the project, NYCDEP will be consulted to determine if upgrades are needed at the south pump station.

CHAPTER 12, "SOLID WASTE AND SANITATION SERVICES"

Comment 57: The costs and benefits of using the AVAC system instead of trucking for wastes should be more fully considered. A more detailed explanation of the difference between existing waste generation (including actual generation, not just

projections), and projected campus waste generation should be provided. (RICC)

Response: Cornell has explored the possibility of connecting to the AVAC system, and it was determined that it would not be practicable for the campus to connect to the existing AVAC system.

The analysis of the proposed project's waste generation has been conducted in accordance with the guidelines of the *CEQR Technical Manual*.

Comment 58: To prevent traffic congestion, Cornell should provide areas of loading/unloading that are situated away from the main road. (RICC)

Response: The campus' proposed loading/unloading areas would be located within the site or in designated loading zones that do not interfere with free flow of traffic on the roadway.

CHAPTER 13, "ENERGY"

Comment 59: The DEIS does not account for the following: 1. Energy needs of the three remaining buildings in Southtown; 2. Energy related strategic initiatives of WIRE buildings, particularly the potential conversion from electric heat to low temperature hydronic heat; 3. Consolidation of the hospitals on Roosevelt Island, specifically the closure of Goldwater Hospital and continuing steam needs of Coler Hospital; 4. Potential decommissioning of the steam plant and its alternative use for Cornell NYC Tech. Overall, the DEIS should consider the total energy needs (electric, natural gas, steam, and hot water) of Roosevelt Island in detail. (RICC) No provision is made for use of tidal currents. (Lyon, RICC)

Response: A detailed assessment of the energy needs of other buildings on Roosevelt Island is beyond the scope of the Cornell project and is therefore not discussed in the EIS. In any case, Cornell has begun to participate in Island-wide conversations concerning energy including a RIOC study for alternative uses for the existing steam plant facility located north of the project site.

Comment 60: The DEIS is misleading regarding the high pressure natural gas line—this will be provided by Con Edison and is not a direct benefit from Cornell NYC Tech. (RICC)

Response: The DEIS notes that, in support of the Cornell NYC Tech project, Con Edison would upgrade an existing gas line to Roosevelt Island, which would require the replacement of some piping and the change-out of pressure regulators within the Con Edison system. Cornell is partially funding this project. Con Edison would not implement this improvement absent the proposed project.

CHAPTER 14, "TRANSPORTATION"

Comment 61: Additional students and residents will overburden Red Bus service on the Island (Beltrone, Schrum, Mincheff, RICC). Cornell should assume the cost of necessary improvements to the Island's transportation services, including the Red Bus (CB8, Stringer, Kalkin, Tandon). Cornell and the Roosevelt Island community should develop an objective formula that measures use of Red Bus service, so that when these measurements increase, Cornell will be obligated by prior agreement to take appropriate action (i.e., subsidize more buses). An independent advisor should devise this formula. (RICC)

Response: The DEIS did project a need for increased Red Bus service under the Full Build-2038 condition by one bus, from 8 buses per hour to 9 buses per hour during the weekday PM peak, and by two buses, from 8 to 10 buses per hour during the weekday AM peak. During the construction period, the DEIS also projected a need for increased Red Bus service in the off-peak hours to accommodate construction workers who would park at Motorgate and travel to/from the project site by Red Bus. Cornell has committed to fund the operating costs associated with providing additional Red Bus service if project activity adversely impacts the Red Bus service during the construction period.

Comment 62: Cornell should provide funding and technical assistance to relevant agencies to update Island transportation services and explore the possibility of additional Metropolitan Transportation Authority (MTA) bus routes (CB8).

Response: The EIS identifies the need to increase the frequency of the Q102 bus service during the peak hours (see Table 22-4 of the DEIS). New York City Transit (NYCT) practice is to monitor changes in bus ridership and make the necessary service adjustments where warranted. Cornell intends to work with the community to advocate for improvements to mass transit systems.

Comment 63: Additional students and residents will overburden the subway service on the Island (Beltrone, Schrum, Mincheff, RICC). In a 2009 study, the MTA noted that the F train was one of the most crowded train lines in New York City. More than 700 more passengers than currently during the 8 AM to 9 AM period are expected. Further developments in Queens served by the F train could lead to greater overcrowding. The DEIS says there is nothing to be done about the overcrowding. (RICC) By not providing enough parking on the site, the F train will see even greater overuse. (RICC)

Response: Following the methodology of the *CEQR Technical Manual*, the EIS includes an analysis of the project's potential to affect subway service. This analysis determined that the proposed project would not result in significant adverse impacts to subway line-haul or the Roosevelt Island Station.

Comment 64: The DEIS underestimates tram usage. (RICC) For the tramway, certain assumptions are made: Conference Center estimate 59% of people go out during AM hours but only 2% exiting by tramway. Estimated 7% of students during AM would be traveling—only 5% inbound and only 1.7% of them by tram. Therefore, tram usage could be underestimated in my opinion. Spouses and faculty, postdocs and grad students and others taking kids to school and going to jobs during AM peak hours are probably underestimated, as are those taking tram versus subway. Students may have work internships off campus and travel during rush hour as well. While 7% of students are supposedly traveling from campus to other sites during AM rush, they are essentially estimating none of them will take the tram. According to the estimates the DEIS does make, there are currently 753/hour taking tram to Manhattan during peak AM hours. Estimated increase to 793 with new Southtown buildings and to 803 in 2018 with Cornell, 852 in 2038 (includes some extra Southtown traffic as well). As mentioned above, the number of people per hour taking tram from RI during AM peak appears to be an underestimate. Overall, this may mean delays during most crowded times with more people having to wait for next tram due to overcrowding. RIOC will need to modify schedule to run on fill and go protocol to have an extra tram trip per hour (9-10 instead of 8) from 8-9 AM. No comment on this issue in report—there is an assumption that Cornell's contribution is minor. No significant impact during other times of the day. (RICC)

Response: Travel demand factors for tramway ridership were developed in coordination with New York City Department of Transportation (NYCDOT) based on a review of demographic data, Journey-to-Work census data, and site observations. As indicated in Table 14-3 of the DEIS, subway is expected to be the primary mode of travel. Compared with the tramway, the subway provides broader geographic destinations, higher frequency of service, greater capacity and far better connectivity to other transit options. Based on site observations and discussions with RIOC staff, the profile for a tramway rider is typically a Roosevelt Island commuter with a destination in Midtown East or a tourist. The tramway is nearby to MTA bus service including the Q32 and Second Avenue buses but does not offer direct connectivity to the subways. Overall, tramway ridership for some user group such as researchers and corporate co-location workers was projected to be as high as 6 percent, which is comparable to MTA bus ridership projections. Overall, there is expected to be adequate capacity on the tram to accommodate future Roosevelt Island demand, including new trip-making from the Cornell and Southtown developments.

Comment 65: As Motorgate is not walkable to the campus for many people, vehicles will unload at the campus before turning back to park at Motorgate, creating double traffic that is not accounted for in the DEIS (Mincheff, Shinokazi). Traffic impacts are likely underestimated in the DEIS as employees of companies

serving as co-op partners may come to campus short-term to teach classes and will certainly drive to the island. (RICC) No mention is made of non-Cornell faculty and staff commuting to campus by car. (RICC)

Response: It is anticipated that people who drop off passengers at the campus before returning to park at the Motorgate will be a small minority of users. There will be readily available transportation to the campus from Motorgate via the Red Bus; limited parking is also assumed to be available on campus, including accommodations for handicap parking.

Travel demand factors including modal splits were developed in coordination with NYCDOT based on a review of demographic data, Journey-to-Work census data, and other recently approved studies. Non-Cornell faculty and staff were accounted for and are considered part of the population of the "Corporate Co-location Workers." Please see page 14-3 and Table 14-3 on page 14-7 of the DEIS. As indicated in Table 14-3, auto-share has been estimated to be 15.9 percent during the weekday AM and PM peak hours.

Comment 66: Cornell must guarantee the health of existing infrastructure and roadways, and minimize and/or mitigate project impacts (CB8, Stringer, Munfakh, Strong, Ward). The helix from the Roosevelt Island Bridge is in an increasing state of disrepair. The City and State should being regular inspections of the helix and secure funding to begin repair of the structure and prevent it from becoming unstable (Stringer, Munfakh, Schrum, Helstein, Mincheff, RICC).

Response: RIOC is responsible for maintenance and repair of the helix. While Cornell cannot undertake the long-standing infrastructure needs of Roosevelt Island (such as repairs to the helix ramp), it will be responsible for and will fix any damage caused by Cornell's construction activities in the event that such damage occurs.

Comment 67: Cornell should work with RIOC to consider development of an Island ferry dock and ferry service to the Island (CB8, Stringer, Kalkin, RICC). Cornell should help subsidize the City's endeavor to make a ferry dock available for Roosevelt Island. (RICC)

Response: In coordination with the local Council member, Cornell has indicated it would be pleased to work with other stakeholders on the Island to see if this goal can be achieved.

Comment 68: There should be adequate on-campus loading docks and trash removal areas within the property so that traffic will not jam Island streets (Berdy).

Response: Adequate loading areas and trash removal areas will be provided within the campus property.

Comment 69: The 500 onsite parking spaces will exacerbate traffic, safety, and pollution issues on the Island. Parking on the Island should be in Motorgate only, as per the 1976 master plan for the Island (Lasker).

Response: The DEIS analyzed the potential environmental effects of providing up to 500 spaces at the project site. The traffic analyses account for the fact that vehicles that park on the campus will use Roosevelt Island roadways. The projected traffic impacts on Roosevelt Island could be mitigated with the measures outlined in Chapter 22, "Mitigation."

Comment 70: The zoning text language of "up to 500 spaces" is inadequate to accommodate visitors, hotel patrons, the co-location office employees, and Cornell faculty, students, and staff. The thinking is that eliminating required parking spaces will discourage the presence of cars; the Roosevelt Island community believes that this does not reflect real life. (RICC) Hotel patrons alone, at a rate of one parking space per room, could use half of the "up to 500" on-site parking spaces. A minimum of 500 spaces should be provided on the site. Cornell needs to build at least 500 parking spaces. (Shinokazi, Kalkin, Helstein) While Cornell anticipates its employees will use mass transit, the corporate co-location and hotel uses will attract individuals who may not be familiar or comfortable with mass transit. Therefore, Cornell should ensure that adequate parking is provided for these users (Stringer). Having only limited parking on the campus after Phase 1 will cause excessive traffic on Main Street. Motorgate is insufficient to accommodate extra vehicles from this project. (Shinokazi) Adequate parking must be provided within the campus. (Berdy)

Response: The DEIS analyses accounted for all parking demand, including employees and others visiting the campus. The analyses concluded that the combined capacities of the on-site parking and the Motorgate garage are sufficient to accommodate the needs of visitors, hotel patrons, the co-location office employees, and Cornell faculty, students, and staff. As presented on page 14-83 of the DEIS, the peak parking demand under the full build condition (2038) will be approximately 615 spaces. The DEIS demonstrates that 500 vehicles can be supported on-site and the remaining 115 can be accommodated at Motorgate. During Phase 1 (2018), the peak parking demand would be approximately 220 and 250 spaces would be provided on-site. As with the full build out, the Phase 1 demand would be accommodated by the combination of Motorgate and on-site parking.

Cornell has indicated that it will discuss parking needs with its potential corporate co-location and executive education center/hotel partners to understand the need or lack of need for on-campus parking. Cornell has also indicated its willingness to commit to undertake an operational parking study before introducing a hotel/executive education conference facility on campus and to make the results of the study available to the Borough President's office

and the Community Board. The study will look at parking capacity on the island at the time the executive education center project moves forward and will evaluate strategies for accommodating individuals coming to events.

Comment 71: If Cornell does not provide any parking, there will be a huge impact on the Red Bus as those parking in Motorgate would need to get to campus during peak rush hours. Cornell should run its own "express" bus service for employees during AM and PM peaks. (RICC)

Response: For the analysis of pedestrians and bus service, the reasonable worst-case scenario assigned all auto trips to the Motorgate parking garage and assumed that people would either walk or take the Red Bus between Motorgate and the project site. This approach provides a conservative analysis of the Red Bus service and served as the basis for the proposed mitigation measures—an increase in bus frequency—to address project-related impacts.

Comment 72: The DEIS does not account for the fact that students and visitors will undoubtedly feed the meters in Southtown. (RICC)

Response: The short-term nature of parking meters on Roosevelt Island was initiated to deter long term on-street parking. It is not likely that students and visitors will leave campus to travel to Southtown to feed the meters.

Comment 73: The DEIS does not include a weekend parking analysis, a significant deficiency in the report. (RICC) The estimates do not account for Four Freedoms park impact on parking on weekends, which is likely to be significant. (RICC)

Response: Since there is notably less activity on an academic campus on weekends, and activity at the corporate co-location use would similarly be diminished, a weekend parking analysis is not warranted.

Comment 74: Cornell should be required to analyze the project's impact on parking prior to beginning construction of phase 2 of the project, and if the City finds that there is insufficient parking, Cornell should be required to provide additional parking (Stringer). Cornell should finance additional parking spaces at the Motorgate parking garage when a specific threshold of need is reached, and conduct an engineering study to determine if additional floors can be added. Currently, there is room for a fourth quadrant. (RICC) Cornell should continue discussions with RIOC, RICC, CB8, and any other necessary agencies about parking, taking into account and giving special consideration to Island residents' requests and desires (CB8). Cornell needs to build at least 500 parking spaces, and commit to pay for extending Motorgate as the need arises (Shinokazi, Kalkin, Helstein).

Response: During Phase 1 construction of the proposed project, Cornell construction workers would generate an estimated maximum daily parking demand for up to

430 spaces (fourth quarter of 2016). It is assumed that up to 100 parking spaces would be provided on-site. Since only short-term parking is available on-street, the remaining 330 spaces would be accommodated at the Motorgate garage. During Phase 2 construction of the proposed project, Cornell construction workers would generate an estimated maximum daily parking demand of up to approximately 255 and 260 spaces (fourth quarters of 2026 and 2036, respectively). As with Phase 1, up to 100 parking spaces are expected to be provided on-site, with the remaining parking demand accommodated at the Motorgate garage. The findings of the construction parking analyses concluded that the combined capacities of the on-site parking and the Motorgate garage are sufficient to accommodate the needs of the project. Additionally, Cornell has committed to fund the costs of snow removal on the upper deck of the Motorgate garage in the event that construction worker parking requires that the upper deck of the garage be opened during winter months. This commitment is reflected in the FEIS.

Cornell has also indicated its commitment to undertake a formal evaluation of parking conditions at the campus and on the Island once the campus has developed 50 percent of the total planned square footage and in the event that parking has not already been introduced onto the campus. In the event that the evaluation demonstrates that the Cornell NYC Tech campus is causing congested parking conditions on the island, then Cornell will agree to include parking in the later phases of development.

Comment 75: Cornell should commit to paying for snow removal from the rooftop of Motorgate during and after construction, to increase the number of available parking spaces (Stringer).

Response: Cornell has committed to fund the costs of snow removal on the upper deck of the Motorgate garage in the event that construction worker parking requires that the upper deck of the garage be opened during winter months. This commitment is reflected in the FEIS.

Comment 76: Additional traffic from the project will pose a public safety risk for pedestrians, including the disabled and elderly (Polivy, Bates, RICC). Due in part to a lot of school children running around and crossing the streets, we need someone to direct traffic at the crosswalks (Doyle). A traffic simulation is needed. (RICC)

Response: A detailed analysis of vehicular and pedestrian operations is provided in the EIS. Where impacts were identified, improvement measures (i.e., new traffic signals and widened sidewalks) were recommended to mitigate the impacts to the extent practicable, in accordance with *CEQR Technical Manual* guidelines, and to also enhance pedestrian safety. The traffic analyses presented in the DEIS were prepared in conformance with *CEQR Technical Manual* guidance and

reviewed with NYCDOT and RIOC. This review did not indicate a need for a traffic simulation of Roosevelt Island roadways.

Comment 77: In 2038, there would be 110 seconds of delay in making left turns on Main Street from the Roosevelt Island bridge ramp during the AM peak and significant delays in PM getting on ramp from Main Street that could lead to traffic backup on Main Street—this is not discussed. (RICC)

Response: The proposed traffic signal at the Roosevelt Island Bridge Ramp and Main Street intersection would improve conditions to a Level of Service C or better; therefore, no traffic backups are anticipated.

Comment 78: The City's new proposed bike share program does not include Roosevelt Island, but the City does propose to have a bike share station at the Manhattan side of the Roosevelt Island tram station. Cornell should work with RIOC to realize further improvements (Stringer). The Cornell campus must support access by bicycles and bike sharing (Strong). Cornell must ensure that the bike lanes do not become car lanes. (RICC)

Response: The proposed project would widen and rebuild the loop roadway circling the project site. At full build, the roadway would include a 10-foot-wide two-way Class II bicycle path. The bicycle path would be separated from the 11-foot-wide vehicular lane by a 3-foot-wide striped buffer, ensuring that the bicycle path does not become a lane for cars.

Comment 79: The DEIS does not contain an assessment of how much bicycle traffic there would be. (RICC) The bike lane could negatively affect traffic around the campus as only one through lane will be available and delivery trucks and other vehicles could block it. (RICC) NYCDOT wants to build one lane of traffic and two bike lanes to the streets adjoining the campus. There is no need for bike lanes since the promenades serve that function. Limiting vehicle traffic will cause gridlock (Berdy).

Response: A forecast of bicycle volumes is outside the scope of the EIS. As described in Chapter 1, "Project Description," at full build, the loop roadway circling the project site would be built out to its mapped right-of-way width. The typical section (50-foot width) of the loop roadway would be configured to have (beginning on the campus side) a 15-foot-wide sidewalk, an 8-foot-wide parking lane, an 11-foot-wide travel lane, a 3-foot-wide striped buffer, a 10-foot-wide two-way Class II bicycle path, with a 3-foot buffer on the outboard side. Provision of the bicycle path would not adversely affect traffic on the loop road.

CHAPTER 15, "AIR QUALITY"

Comment 80: Roosevelt Island is located in a vortex of power plant emissions and bridge traffic pollution. Cornell must go beyond estimates and formulas and study actual conditions and plans based on site data. The cited monitoring stations are far from Roosevelt Island. Specific wind pattern studies under actual local conditions should be employed rather than information from LaGuardia airport, which is miles away. (RICC)

Response: The air quality analysis used procedures recommended in the *CEQR Technical Manual* to estimate the potential impacts from the proposed project. These procedures, which are based on U.S. Environmental Protection Agency (EPA) modeling guidance, take into account background concentrations from emission sources both near and further away. The use of LaGuardia Airport surface data is considered representative as meteorological data based on EPA modeling guidance. In general, the analysis determined that maximum concentrations from the project's fossil fuel-fired equipment are highly localized, occurring on nearby buildings that would be constructed under the proposed project. Maximum concentrations on existing sites on Roosevelt Island and elsewhere would be much lower. Similarly, the mobile source analysis determined that concentrations from vehicle emissions with the proposed project would be below applicable standards and impact criteria.

Comment 81: The Ravenswood power plant as a (clean air) "non-attainment" designation and is subject to reasonably available control technology (RACT) corrective regulations. It is troubling that the DEIS does not factor in "background pollution" rates. (RICC) Do the Sensitive Receptors/Receptor Placements (DEIS Table 15-6) provide more information about local conditions? (RICC)

Response: The air quality analysis presented in the DEIS did account for background concentrations, which represents emissions from sources including power plants in New York City.

Comment 82: We are concerned about the possible impact of the project's fossil fuel stack plumes flow and whether this will expose Roosevelt Island residents to harmful emissions beyond what is already experienced with the Ravenswood plant. (RICC)

Response: An analysis of potential impacts due to the proposed project's fossil fuel-fired emissions was presented in the DEIS. That analysis considered the potential impacts from the proposed project at ground level locations such as open spaces and elevated locations such as residential buildings. The analysis determined that the maximum concentrations from the proposed project would be below applicable impact criteria at all locations, including locations on Roosevelt Island.

Comment 83: Information should be provided on the location, capacity, exhaust mechanism, refurbishment/upgrade and operation of the proposed natural gas input line. (RICC)

Response: As discussed in Chapter 1, "Project Description," Con Edison would upgrade an existing gas line to Roosevelt Island. The upgrade would require the replacement of some piping and the change-out of pressure regulators within the Con Edison system.

Comment 84: The analysis should include a monitoring station along Main Street on Roosevelt Island where it really matters, not at 36th Avenue and Vernon Boulevard or at Astoria Boulevard and 21st Street. These intersections do not have comparable dispersion of gases and pollutants as on Main Street, which is surrounded by buildings that act as a canyon where pollutants and gases will accumulate. (RICC)

Response: As discussed in the DEIS, 36th Avenue and Vernon Boulevard and Astoria Boulevard and 21st Street were selected for analysis because they are the locations in the study area with the highest level of project-generated traffic and, therefore, where the greatest air quality impacts and maximum changes in concentrations would be expected. Other factors were considered including the existing and future volumes of traffic and levels of traffic congestion. At other locations, including locations on Roosevelt Island, concentrations from vehicle emissions with the proposed project would be anticipated to be similar or lower, based on these factors.

Comment 85: Island buildings have drafty windows that will allow diesel fumes to enter residences. The diesel fumes and particulate matter from the trucks associated with the project will impact the community (Polivy).

Response: Cornell will implement a number of best practices in connection with the development of the campus that will minimize emissions, including: minimizing use of diesel equipment and maximizing electrification where feasible; use of ultra low sulfur diesel fuel in the diesel equipment that is used; use of best available tailpipe reduction technologies for nonroad diesel engines greater than 50 Hp, including use of diesel particulate filters where feasible; utilization of newer equipment with improved emissions technology, including "Tier 3" or higher for equipment with a power rating of more than 50 Hp; strict fugitive dust control measures; source location to limit the location of construction equipment near sensitive receptors where feasible; and restrictions on construction vehicle idling of more than three minutes except where necessary for a construction activity. The construction analysis (see Chapter 20, "Construction," included an analysis of mobile sources (construction worker vehicle and truck traffic) and determined that construction of the proposed

project would not result in any significant air quality impacts due to mobile sources.

CHAPTER 17, "NOISE"

Comment 86: The EIS for New York University defines "heavy truck at 30 feet as 80-90 a-weighted decibels (dBA)" and "light car traffic" is defined at 50-60 dBA at 30 feet. Another source defines conversation in a restaurant at 60 decibels. And CEQR recommends 55 dBA $L_{10(1)}$ level for outdoor areas requiring quiet. How do these diverse figures translate? With trucks used for transport, won't Roosevelt Island experience 80-90 dBA? (RICC)

Response: There are several descriptors used to evaluate noise levels, depending on the nature of the noise source and the way it is to be considered. An explanation of these descriptors is provided on page 17-3 of Chapter 17, "Noise." As the comment mentions, CEQR noise exposure guidelines generally use the $L_{10(1h)}$ descriptor, although the impact evaluation criteria use the $L_{eq(1h)}$ descriptor. Locations on Roosevelt Island may experience L_{max} noise levels resulting from construction activities in the 80-90 dBA range, but the Island already experiences L_{max} noise levels in that range due to the operation of buses on the Island and traffic on the Ed Koch Queensboro Bridge. As is described in Chapter 20, "Construction" and in Response 1, the $L_{eq(1h)}$ noise levels at impacted noise receptors were predicted to be less than 75 dBA.

CHAPTER 18, "PUBLIC HEALTH"

Comment 87: Many Island residents are elderly and disabled, whose health could be adversely affected by lack of sleep and irritation due to early morning noise from construction vehicle traffic (Heimer).

Response: As discussed in the EIS in Chapter 20, "Construction," the residential buildings along Main Street all have double-glazed windows and a means of alternate ventilation (i.e., air conditioning), and would be expected to achieve between 25 and 35 dBA of attenuation. Consequently, these buildings would be expected to experience interior $L_{10(1)}$ values less than 45 dBA during the construction period, which would be considered acceptable according to CEQR criteria, and would therefore not be expected to experience a significant impact.

Comment 88: Children and residents with heart and lung diseases will be at risk of adverse health impacts from pollutants from truck traffic associated with the project (Schwayri, Polivy, Evans).

Response: As analyzed in the DEIS in Chapter 20, "Construction," no significant adverse air quality impacts would be expected due to the construction activities of the proposed project. A detailed analysis of the off-site emissions determined that

the carbon monoxide (CO), particulate matter greater than 10 microns (PM_{10}), and particulate matter greater than 2.5 microns ($PM_{2.5}$) concentrations would be below their corresponding National Ambient Air Quality Standards (NAAQS) and interim guidance criteria. To ensure that the construction of the proposed project would result in the lowest practicable diesel particulate matter (DPM) emissions, the project would implement an emissions reduction program for all construction activities, including: diesel equipment reduction; clean fuel; best available tailpipe reduction technologies; utilization of newer equipment; source location; dust control; and idle restriction.

Comment 89: Traffic from the project could critically delay emergency responses, thus threatening public health on the Island (Evans).

Response: Emergency response vehicles can maneuver around and through congested areas because they are not bound by standard traffic controls. Furthermore, the traffic impacts identified in the EIS can be mitigated. Therefore, incremental traffic volumes projected to occur with the proposed project are not expected to significantly affect emergency response times.

CHAPTER 19, "NEIGHBORHOOD CHARACTER"

Comment 90: The neighborhood character chapter should focus on the area north of the Queensboro Bridge, since this is where most residents live. (RICC) Defining the neighborhood as south of the Queensboro Bridge is unacceptable. (RICC)

Response: An assessment of the possible neighborhood character impacts of the proposed project on the area of Roosevelt Island north of the Queensboro Bridge is provided in the EIS. According to the *CEQR Technical Manual*, the study area for a neighborhood character analysis should include at least the project site and the area within 400 feet of the project site boundary, and the extent of a study area may be modified, as appropriate, either to include any additional areas that may be affected by the project. Consistent with this guidance, the neighborhood character analysis in the DEIS studies both the area below the Queensboro Bridge, and the area north of it, as these are the areas most likely to be affected by the proposed project.

Comment 91: How does the Queensboro Bridge act as a "barrier" since it spans water, not land? (RICC)

Response: The Queensboro Bridge extends from Manhattan to Queens and spans both the East River and Roosevelt Island. The bridge crosses over, but does not provide access to, Roosevelt Island. As noted in the DEIS, the bridge towers over the Island and limits views from the north side of the bridge to the south side, and vice versa.

Comment 92: The neighborhood character chapter should include an analysis of Roosevelt Island as a planned, sustainable community, and address how the campus would enhance its identity as a mixed-use, mixed-income, green, pedestrian-oriented community. (RICC)

Response: The neighborhood character analysis in the DEIS has been prepared in accordance with the *CEQR Technical Manual*, which recommends that such an analysis first consider what the defining aspects of a neighborhood are, and then consider the potential of a project to affect those defining features. The consistency of the proposed project with applicable public policies, such as Roosevelt Island's General Development Plan and the City's sustainability policies, can be found in Chapter 2, "Land Use, Zoning, and Public Policy."

Comment 93: How can one truck, with its noise, every seven minutes on the sole vehicular street on the island not impact community character?

Response: As discussed in response to Comment 98, during peak construction in the third quarter of 2015 when an average of 67 daily truck deliveries were estimated, there would be on average approximately one truck delivery every 8 minutes. The DEIS acknowledges that construction would be disruptive to the nearby area and that there would be construction-period significant adverse impacts in the areas of traffic and noise on open spaces. However, as discussed in response to Comment 95, it is anticipated that there will be several significant periods of time during this period when there would no construction activity.

CHAPTER 20, "CONSTRUCTION"

Comment 94: Cornell should designate and pay for a construction coordinator/liaison and an independent environmentalist to meet on a regular basis with the community board and the residents to ensure environmental safety, to ensure that air quality monitoring is undertaken, to provide updates, and to be available to address issues that may arise. (CB8, RICC) The community advisory board should consist of representatives of the community board, RICC, RIOC, and Island residents. (CB8)

Response: Cornell has committed to provide an on-site construction field representative to serve as a contact point for the community and local leaders; this representative will be available to answer questions and address concerns that might arise during the construction process. Cornell will also maintain and regularly update a web site that will inform the community, local leaders and interested parties about anticipated construction activities. In addition, Cornell will form and participate in a construction task force comprised of Roosevelt Island residents (and others if appropriate) appointed by elected officials and Community Board 8. Cornell expects that this task force will meet at least quarterly while construction is ongoing. Cornell will also participate in public meetings on

Roosevelt Island in coordination with the Task Force to make sure that the community as a whole is aware of the construction plans and progress.

Comment 95: Residents of Roosevelt Island are being asked to endure 25 years of construction. (RICC) The work schedule described in the DEIS means that, during certain periods, we will experience the noise of heavy construction vehicles and equipment from early morning to evening, including some weekends, for the next 25 years. Cornell must change this work schedule (Heimer). Use of trucks traversing Main Street, the helix, and the Roosevelt Island Bridge should be permitted only from the hours of 9 AM to 5 PM, Monday through Friday (CB8, RICC). Advance notice of any changes to the construction schedule should be provided (CB8). Work should start at 8 AM or 9 AM. Work should not be allowed on weekends (Heimer). Demolition and construction hours should be 8 AM to 4 PM on weekdays and 9 AM to 12 PM on Saturdays (Berdy). Construction should start at 7 AM and end at 3PM (Doyle). If barging proves infeasible, Cornell should develop protocols to limit noisy truck activities, particularly during early morning hours (Stringer).

Response: Development of the proposed project it is anticipated to occur over a total build out period of approximately 25 years beginning in 2014 and continuing through 2038. However, it is anticipated that there will be several significant periods of time during this period when there would no construction activity, and even during construction periods, there would be variations in construction intensity depending on the number of buildings under construction at any one time. The construction schedule outlined in the EIS shows two significant gaps in construction activity of seven and six years. As described in Chapter 20, "Construction," weekend (Saturday) work is not anticipated except in cases where make-up work is needed due to weather. Construction hours would be in accordance with New York City laws and regulations, and would generally begin at 7:00 AM on weekdays, with most workers arriving to prepare work areas between 6:00 AM and 7:00 AM. Normal weekday work would end by 3:30 PM with some exceptions where the workday would be extended beyond normal hours (in instances where certain tasks would need to be completed, such as completing the drilling of piles or finishing a concrete pour for a floor deck).

Comment 96: According to a Crain's New York Business article on 11/30/12,[1] Cornell plans to build twice as fast as originally agreed to with the City. Therefore, shortening the work week by a few hours should not create undue hardship or endanger Cornell's compliance with contractual obligations. (Mincheff, RICC)

[1] http://www.crainsnewyork.com/article/20121130/REAL_ESTATE/121139994

Response: As referenced in Chapter 1, "Project Description," under the agreement between the City of New York and the New York City Economic Development Corporation, Cornell is obligated to build no less than 300,000 sf of buildings, of which at least 200,000 sf shall be academic space by June 30, 2017; by 2037, Cornell is obligated to build a minimum of 1,800,000 sf of total building space of which a minimum of 620,000 sf must be academic use. The Crain's article discusses a possible construction scenario in which Cornell completes construction of 790,000 square feet of space by 2017. This is the construction schedule detailed in Chapter 20, "Construction," of the EIS since this is the reasonable worst-case development scenario. As described in the response to the previous comment, construction hours would be in accordance with New York City laws and regulations, and would generally begin at 7:00 AM on weekdays and would end by 3:30 PM.

Comment 97: Table 20-4 shows that some construction tasks may have to be continuous and the work will extend to more than a typical 8-hour day. (Eleven hours per day for four years in Phase 1). (Mincheff)

Response: Construction hours would be in accordance with New York City laws and regulations, and would generally begin at 7:00 AM on weekdays and would end by 3:30 PM. Table 20-4 shows the hourly distribution of daily construction worker and truck trips and accounts for trips arriving and departing the site before and after the construction work day.

Comment 98: Chapter 20 of the DEIS indicates that there will be one truck every 7 minutes all day long during the construction period. The DEIS estimates 40,000 truck round trips for Phase 1 (i.e., 86 daily truck trips) down Main Street. The DEIS does not account for returned (rejected) truck loads from concrete trucks. The effects of truck traffic on the residents of the island, especially those living on Main Street, is not included in the DEIS. (RICC) Residents are concerned about the traffic, noise, and roadway impacts that construction trucks and worker's private vehicles would have as they utilize Main Street, which is a narrow street that runs past the Island's residential buildings and schools (CB8, Heimer, Katz , Schwayri, Evans, Beltrone, Schrum, Tandon, RICC).

Response: The EIS provides a full and comprehensive examination of the potential environmental effects of construction of the project on population near the project site, including the effect of construction worker vehicle and construction truck trips. The DEIS construction analysis reflects a reasonable worst-case projection for trucking activity and is considered a conservative analysis. As shown in Table 20-3 on page 20-12, the average daily truck deliveries during Phase 1 and Phase 2 construction were estimated at 37 and 21, respectively, which would be substantially less than what may be experienced during the peak quarter of construction. During peak construction in the third quarter of

2015 when an average of 67 daily truck deliveries were estimated, there would be on average approximately one truck delivery every 8 minutes. Rejected loads from concrete trucks at a construction site are usually due to the limited time frame that the concrete must be poured (typically within 90 minutes of batching) before going off. As described in Chapter 20, "Construction," concrete deliveries to the construction site would be strictly regimented and scheduled to avoid rejected loads. Therefore, the amount of rejected loads from concrete trucks during the construction of the proposed project would be minimal.

Comment 99: A heavy truck at 45 feet generates a common noise level of 80-90 dB. Most trucks passing along Main Street would be about 20 feet from pedestrians on the sidewalks and therefore, the noise level exposures of islanders would be much greater than 80-90 dB. The government mandates hearing conservation program for those exposed to 85 dB in 8 hours. (Schwayri, RICC).

Response: As shown in Table 20-17, heavy trucks used for construction of the proposed project, including concrete trucks, dump trucks, and tractor trailers, are mandated to produce a maximum instantaneous noise level (L_{max}) noise level of no more than 79 dBA at a distance of 50 feet. This is comparable to the noise produced by bus service that already exists on Main Street. However, during construction of the proposed project, the number of heavy vehicles traversing Main Street would increase. For this reason, the DEIS construction noise analysis considers the average hourly noise level ($L_{eq(1h)}$), which includes not only the magnitude of the noise resulting from the heavy trucks, but also the frequency of heavy truck pass-bys and the amount of time that each truck is producing noise at a given receptor location. Based on this analysis of average noise levels, $L_{eq(1h)}$ noise levels resulting from construction vehicles were predicted to range from 56.4 dBA to 74.8 dBA (see Appendix 20 for the detailed construction traffic noise analysis results) throughout construction of Phase 1 of the proposed project, which the DEIS found to be a significant adverse impact at receptors along Main Street and West Road between the Roosevelt Island Bridge and the Project Site. However, these noise levels are less than those that would mandate a hearing conservation program. Furthermore, these are the noise levels predicted to occur during the peak hour of the construction work day, and would not last a full 8 hours. Noise levels would be lower during the rest of the day, because the frequency of construction vehicle pass-bys would be lower.

Comment 100: If Cornell does not honor RICC's request for a later start time (8 AM or 9 AM) and no work on weekends, then we ask Cornell to install noise-reducing windows in the buildings facing Main Street and south, a mitigation that has been provided by developers in the past under similar conditions. (RICC)

Response: Based on the maximum predicted noise level resulting from traffic associated with construction of the proposed project at the residential buildings along Main Street and West Street between the Roosevelt Avenue Bridge and the Project Site, and a survey of the existing windows installed in these buildings, interior noise levels during the Phase 1 construction period were predicted to be within the acceptable range according to CEQR criteria. The existing windows in each of these buildings appear to be modern double-glazed windows, which would be expected to provide sufficient attenuation of construction-related noise, and all of the buildings appear to also have an alternate means of ventilation. Consequently, it is expected that no additional receptor control measures are necessary to maintain acceptable interior noise levels during the construction period.

Comment 101: Removing hazardous materials by truck risks exposing residents of Roosevelt Island, Queens, and Manhattan to these toxic substances. (Lyon, RICC) These materials must be barged from the site. (RICC) Heavy construction trucks will spew hazardous pollutants, and dispersion of these pollutants will take longer to occur because Main Street is surrounded by tall buildings (Schwayri, Buck, RICC).

Response: To the extent that trucks are used either to bring in hazardous materials (e.g., fuels) or take out hazardous materials (e.g., asbestos removed prior to demolition or petroleum contaminated soil during tank removal or subsequent excavation), it would only be performed in strict accordance with the RAP/CHASP (e.g., covering of trucks containing soil) and applicable regulatory requirements, including those relating to state waste transporter permits and state/federal placarding rules.

Comment 102: Cornell must barge everything except what they are forced to truck (Polivy, Schwaryi, Evans, Buck, Berdy, Bosbach, Bennani, Doyle, Munfakh, Schrum, Helstein, Apfelbaum, Mincheff, Katz, Parnes, Ward). The commitment to barging must be binding. (RICC)

To the extent feasible, Cornell should remove all demolition waste by means other than trucks, and reduce the amount of construction truck trips by at least 55 percent. A firm commitment to barging should be provided by Cornell prior to final approval of this project by the City (CB8).

To advance the possibility of barging, Cornell should begin conversations with the relevant state agencies to ensure an expedited review and should study barging as part of the FEIS (Stringer).

Barging must be implemented to avoid construction noise and vibration on Main Street. (Schwayri, RICC) Barging must be included to eliminate traffic congestion/pollution, eliminate long-term damage to the island's access, and

avoid traffic accidents. (RICC) Hazardous materials must be barged from the site. (RICC)

Response: Cornell is investigating the feasibility of using barging techniques to help limit construction traffic on to the Island. Cornell has identified two potentially feasible barging techniques: (a) a floating harbor barge for bulk materials and (b) a fixed platform for driving trucks directly from barges to the site.

The use of barges in the construction process will require additional approvals and permits, including from the New York State Department of Environmental Conservation (NYSDEC) and the US Army Corps of Engineers (USACE). In addition, coordination with RIOC and with the New York State Historic Preservation Office (NYSHPO) and LPC will be required for work in the area of the Roosevelt Island seawall. As part of its investigation, Cornell has begun meeting with NYSDEC to discuss regulations regarding temporary installations and to determine pre-application procedures for expedited review. The FEIS includes an analysis of the environmental consequences of barging as an alternative construction measure to make sure that the effects have been fully considered in the event that barging proves to be feasible (see Section G in Chapter 20, "Construction").

In the event that barging proves to not be feasible, Cornell agrees that it will consider appropriate construction protocols to help address noisier deliveries within the framework of standard construction hours for New York City.

To the extent that trucks are used either to bring in hazardous materials (e.g., fuels) or to take out hazardous materials (e.g., asbestos removed prior to demolition of Goldwater Hospital) it would be performed in strict accordance with RAP/CHASP and include measures such as secure covering of trucks containing soil. Such work would also be in accordance with applicable regulatory requirements, including those relating to state waste transporter permits and state/federal placarding rules.

Comment 103: Large construction vehicles will likely obstruct two-way traffic on the Roosevelt Island Bridge. (RICC)

Response: Construction traffic will not obstruct two-way traffic on the Roosevelt Island Bridge. All truck traffic will conform to the bridge's height, width and weight requirements. Any special oversized deliveries will be scheduled in advance and in coordination with RIOC and NYCDOT.

Comment 104: Construction traffic poses a danger to walking elderly and disabled people. (RICC).

Response: All construction activity will be conducted in accordance with NYCDOT work zone safety requirements to ensure that the safe, smooth flow of all pedestrians

and vehicular traffic is maintained at all times, and that contractors and others performing work properly restore roadways and street hardware.

Comment 105: It is not clear how it will be enforced that construction workers park in Motorgate. Workers would want to park in Southtown spaces. (RICC) The DEIS does not include an assessment of construction parking on weekends. (RICC) Construction worker cars could take up Southtown metered parking spaces. (RICC)

Response: See response to Comment 72 regarding parking at Southtown. Regarding weekend construction, the DEIS states construction is expected to take place Monday through Friday with special exceptions and minimal weather make-up work on Saturdays. If Saturday construction does occur, parking demand would be met similar to during the week.

Comment 106: Cornell should consider preparing concrete/cement on site (Evans, Berdy, Apfelbaum). A temporary batch plant would minimize diesel pollution, traffic tie-ups, and vibration damage (RICC). The argument that run off from the batch plant would be environmentally damaging is untrue; a containment, gunite ring, is standard, and if concrete saturated water is dangerous, then no foundation could ever be put in place. (RICC)

Response: Cornell has determined that such a plant may not be feasible due to the fact that the volume of concrete needed for construction during Phase 1 will not support the permitting effort and cost of implementing an on-site concrete plant.

Comment 107: Cornell should commit to best practices to reduce particulate matter from equipment emissions and commit to air quality monitoring throughout construction (Stringer, Evans, RICC).

Response: As detailed in Chapter 20, "Construction," of the EIS, Cornell will implement a number of best practices in connection with the development of the campus that will minimize emissions, including: minimizing use of diesel equipment and maximizing electrification where feasible; use of ultra low sulfur diesel fuel in the diesel equipment that is used; use of best available tailpipe reduction technologies for nonroad diesel engines greater than 50 Hp, including use of diesel particulate filters where feasible; utilization of newer equipment with improved emissions technology, including "Tier 3" or higher for equipment with a power rating of more than 50 Hp; strict fugitive dust control measures; source location to limit the location of construction equipment near sensitive receptors where feasible; and restrictions on construction vehicle idling of more than three minutes except where necessary for a construction activity.

Comment 108: The Goldwater Hospital site is known to contain hazardous materials. Independent air and water monitoring programs must be implemented to protect Island residents when these materials are removed. (Lyon, Bennani, Schrum, Helstein, RICC). Cornell should establish a fund to compensate for the independent monitoring program. (RICC) Cornell must create a remedial action plan and a construction health and safety plan that would evaluate the conditions of soil and existing buildings, and create protocols enforceable by the relevant agencies to ensure that contamination does not spread during construction activities (Stringer).

Response: Demolition of the Goldwater buildings will require the participation of an independent third party monitor and the use of air monitors to assure that the remediation is proceeding in accordance with all applicable regulations and that there is no opportunity for exposure to hazardous materials by workers or the surrounding community. In addition, demolition and excavation on the project site will be undertaken in accordance with a RAP and CHASP, which have been submitted to and approved by NYCDEP. The RAP and CHASP will address requirements for items such as soil stock piling, soil disposal and transportation, dust control, dewatering procedures, quality assurance, procedures for the closure of known petroleum storage tanks, and contingency procedures if unexpected conditions are encountered. The CHASP will specify appropriate health and safety measures to be undertaken to ensure that demolition and soil disturbance is undertaken in a manner protective of workers and the community, including air monitoring.

Comment 109: Cornell should ensure that Island streets are not littered with dust and dirt (Doyle).

Response: As discussed in Chapter 20, "Construction," dust control measures—including watering of exposed areas and dust covers for trucks—would be implemented to ensure compliance with the New York City Air Pollution Control Code, which regulates construction-related dust emissions.

Comment 110: The drilling of 400 geothermal wells in such a small space is unwise; since the site is near water, developers simply run hose into river. (RICC) Information and schematic detailing on the placement of the proposed geothermal wells and related pump system venting should be shared. (RICC)

Response: "Closed loop" geothermal wells (those that continuously recirculate the same fluid through a closed system to exchange heat from the earth to the building interior) of depths of less than 500 feet, such as those that are being proposed for the Cornell NYC Tech project, are not subject to special regulation beyond general NYSDEC State Pollutant Discharge Elimination System (SPDES) permit requirements and a possible EPA approval. As discussed in Chapter 20, "Construction," of the DEIS, all land-disturbing construction activities during

the proposed project would be conducted under, and compliant with the conditions of, a SPDES General Permit for Stormwater Discharges from Construction Activity (GP-0-10-001). A Stormwater Pollution Prevention Plan (SWPPP) would also be developed and implemented, and construction of the geothermal wells would follow best management practices for the industry (e.g., U.S. Department of Energy-sponsored "Handbook of Best Practices for Geothermal Drilling") to the greatest extent practicable. Overall, construction of the proposed geothermal wells would not directly or indirectly impact the East River, and as a closed-loop system, operation of the wells would not have the potential to impact the river.

Comment 111: No mention is made of what happens to the tram station and subway if demolition is used. (RICC)

Response: Neither the tram station nor the subway would be affected by construction activities as both are located at a sufficient distance from the construction site.

Comment 112: Any damage to Roosevelt Island streets, the helix, and the Roosevelt Island Bridge should be repaired and paid for by Cornell. Cornell should ensure the continued operation of the helix (CB8, Stringer, Schwayri, Evans, Schrum, Helstein, RICC). Cornell has agreed to replace any damages caused by construction. Cornell should work with RIOC to establish a baseline to determine when damage has occurred (Stringer).

Response: Cornell will be responsible for and will fix any damage caused by Cornell's construction activities in the event that such damage occurs. Cornell will work with RIOC to establish a baseline that will help determine if any future damage is the result of Cornell's construction activities or stems from another source.

Comment 113: Cornell must preserve green space and trees, and should ensure public access to Southpoint Park is maintained throughout construction and work with the management of the Four Freedoms memorial (CB8, McCain, Rothbart, Grandizio, RICC).

Response: As discussed in Chapter 20, "Construction," access to both South Point Park and the Four Freedoms Park would be maintained throughout the construction period.

CHAPTER 21, "ALTERNATIVES"

Comment 114: The Island is too small to handle this project. An alternative site in Queens or Manhattan should be selected, where it is clearly defined as to what agencies are responsible for the upkeep of the infrastructure (Schrum).

Response: While upgrades to some infrastructure would be needed to accommodate the proposed project at the project site, the island infrastructure is adequate to

handle the Cornell NYC Tech campus. The EIS analyzed the potential for impacts on infrastructure—for example: water and sewer, solid waste, energy, and transportation. The EIS identifies that some upgrades would be needed, including the relining or replacing of sewers in East and West Roads surrounding the project site.

CHAPTER 22, "MITIGATION"

Comment 115: Cornell should present solutions to the unmitigated issues and be responsible for the cost of implementation (Munfakh).

Response: Between publication of the DEIS and FEIS, Cornell continued to work with the reviewing agencies to identify mitigation measures for those impacts identified as unavoidable significant adverse impacts in the DEIS. See response to Comment 45 for a discussion of the mitigation measures to be undertaken by Cornell to address the historic and cultural resources impact. For the pedestrian impacts, which were projected to occur during both the construction and operation periods, additional coordination was undertaken with both NYCDOT and New York City Fire Department (FDNY). NYCDOT and FDNY determined that the sidewalk widening measures identified in Chapter 22, "Mitigation," are feasible; therefore, the pedestrian impacts would be mitigated and is no longer considered unavoidable. NYCDOT and RIOC have determined that the mitigation measures identified for the two significantly impacted intersections on Roosevelt Island under Full Build – 2038 condition are feasible. No feasible mitigation has been identified for the temporary construction-period noise impacts on open space.

Comment 116: Mitigation measures for traffic impacts are superficial, citing only traffic signals, left to Cornell discretion, and if deemed not feasible, need not occur at all. There is no consideration of alternative solutions should traffic prove to be a major concern (e.g., staggered start times for employees, class scheduling to distribute arrival time, etc.). (RICC)

Response: The DEIS identified traffic mitigation measures that included signal timing and phasing changes, installation of new traffic signals, parking regulation changes to gain or widen a travel lane at key intersections, and lane restriping. These are the types of measures outlined in the *CEQR Technical Manual* and are standard mitigation measures. On Roosevelt Island, traffic signals and other measures at two locations were proposed to address traffic impacts. As discussed in response to Comment 115, between publication of the DEIS and FEIS, additional coordination was undertaken with NYCDOT, reducing the number of unmitigated intersections from five to two unmitigated plus one partially mitigated intersection. Staggered start times for employees and class scheduling has not been identified as appropriate or necessary mitigation.

Comment 117: The mitigation proposed for West Road/Main Street includes a suggestion to not allow U-turns at this intersection. The EIS does not discuss the fact that this would greatly increase traffic in Southtown as drivers would have to drive to the next circle or loop around on West Road. It would greatly inconvenience drivers dropping off at WIRE buildings. Most importantly, traffic signals could lead to significant traffic backups on the bridge during AM peak on Main Street and West Drive during the PM peak. (RICC)

Response: The DEIS accounts for the additional traffic that would be diverted to the traffic circle upon removal of the U-turn movement and signalization of West Road/Main Street. Traffic signals at Main Street and the Roosevelt Island Bridge Ramp and West Road would mitigate significant impacts and reduce delays when compared to the With Action condition without mitigation.

Comment 118: There is no mitigation plan for noise impacts during construction. Closed windows and air conditioning is not acceptable. (RICC)

Response: Based on the maximum noise levels predicted to occur at the impacted residential receptor locations on the Island, the existing window/wall attenuation at these buildings would be sufficient to result in acceptable interior noise levels according to CEQR criteria throughout the construction period. At the open space locations that would experience noise level increases resulting from traffic traveling to and from the project site during construction there would be no feasible and practicable mitigation to decrease the noise levels resulting from construction traffic, and those open space areas would consequently experience a significant adverse impact resulting from construction noise.

CHAPTER 23, "UNAVOIDABLE ADVERSE IMPACTS"

Comment 119: Throughout the DEIS there are numerous instances of "unavoidable adverse aspects" which we do not believe are unavoidable. These include, but are not limited to: traffic, air quality, construction process, pollution, and damage to the community from construction transportation. (RICC)

Response: See response to Comment 115.

Comment 120: The "unmitigatable" impacts in locations in Long Island City from trucking (21st Street and Broadway and all along Vernon Boulevard) could be mitigated by implementing barging. Mitigations do not include transporting materials by barge. (RICC)

Response: The EIS analyzes the reasonable worst-case development scenario. For the analysis of construction, the reasonable worst-case development scenario includes the assumption of a truck-based approach to the delivery and removal of construction materials. With the truck-based approach, the EIS identifies the

potential for significant adverse impacts in Long Island City from construction-period traffic. As stated in the response to Comment 102, Cornell is investigating the feasibility of utilizing barging techniques to help limit construction traffic on to the Island. Cornell is considering two barging techniques: (a) a floating harbor barge for bulk materials and (b) a fixed platform for driving trucks directly from barges to the site.

CHAPTER 24, "GROWTH-INDUCING ASPECTS"

Comment 121: Chapter 24 is contradictory. The chapter states that "the new uses are not expected to induce substantial additional growth within any specific neighborhood outside of the project site" but then concludes that "the project is expected to induce significant new growth in the surrounding area." Which is it? How is the "surrounding area" defined? (RICC)

Response: The DEIS contained a typographic error in the last sentence of Chapter 24, "Growth Inducing Aspects of the Proposed Action." The sentence has been corrected to state that "the proposed project is not expected to induce significant new growth in the surrounding area." As stated elsewhere in the chapter, the new uses introduced by the project are not expected to induce substantial additional growth within any specific neighborhood outside of the project site.

Comment 122: This chapter is ambiguous and not particularly rigorous, if the intention is to cite environmental impacts and not just to greenlight the project. (RICC)

Response: As per the *CEQR Technical Manual*, the purpose of the "Growth Inducing Aspects of the Proposed Action" chapter is to summarize the conclusions of other technical assessments, as they pertain to the "secondary" impacts of a project that could trigger further development. The information provided in the chapter is adequate to understand the relationship between the proposed project and growth inducement.

COMMENTS MADE DURING PUBLIC HEARING THAT ARE NOT RELATED TO THE DEIS

Comment 123: As part of the land exchange, RICC urges RIOC to obtain the rights to purchase the leased premises. Non-trivial portions of RIOC-leased properties will be rezoned and used for this project. RIOC should receive adequate compensation for same. (RICC)

Response: Comment noted.

Comment 124: Cornell should contribute to the cost of the necessary expansion of recreational facilities and Island maintenance that will be necessitated by the project (CB8, Stringer, Shinokazi, Mincheff, Bennani, Munfakh, Tandon, RICC). If, due to

Cornell's presence, the Island struggles to support basic services, the Public Purpose Fund, which exists to help create and support the Island's organizations, will be the first budget line to disappear. (RICC) The Cornell proposal should include expansion of Public Purpose Funds to support Island organizations (Rothbart, Grandizio, Katz).

The City needs to consider the potential impact of the expanded campus and adequately supplement RIOC's operating budget to ensure that there is no service shortfall for Island residents (Lyon, Stringer, Mincheff, RICC, Schrum, Tandon, Strong).

Response: Comment noted.

Comment 125: In consideration of the sensitive nature of the Cornell Technion partnership, zoning plans should include a restriction from manufacturing weapons, meaning research for military purposes. (RICC)

Response: Comment noted.

Comment 126: The City Map change application should be changed to designate "East and West Main Street" instead of "East and West Loop Roads" (CB8, RICC). The two connecting loop streets (North and South Loop Roads) could be renamed to something more representative of Roosevelt Island (e.g., FDR Street, South Point Park North). (RICC)

Response: Comment noted.

Comment 127: The RICC group needs to have direct involvement in the development of the final design of the project. Cornell, with our input, must assure that the plans and specifications are complete, leaving the contracting team with minimal room for interpretation. During construction, Cornell should allow periodic site inspections by RICC. RICC wishes to have access to written agreements with contractors and sub-contractors and ability to scrutinize cost controls and change orders, in order to make sure they will be environmentally responsible (Apfelbaum, RICC). To be able to correctly predict construction time and sequencing, a Critical Path Method sequential schedule must be prepared that includes contingencies for unforeseen conditions (Apfelbaum, RICC).

Response: Comment noted.

Comment 128: Cornell should investigate the feasibility of providing reduced rates for hotel space for Island residents (CB8).

Response: Comment noted.

Comment 129: Cornell should work with the community to program outdoor space for children (CB8). Existing playgrounds are currently full. Cornell should provide more playgrounds and some indoor play spaces anywhere on the Island (Bosbach). We need a second Olympic-size pool for the thousands of children who take swimming lessons and the visiting summer camps (McCleary). Urgent need for tennis courts, as they are inadequate for NYJTL (Rothbart, Grandizio) Cornell should consider building a multi-use facility around an ice-skating rink, for the use of Island residents, as Roosevelt Island has no winter activity center (Tandon).

Response: Comment noted.

Comment 130: Cornell should provide free WiFi on the Island (Doyle).

Response: Comment noted.

Comment 131: Cornell should provide consideration to Island organizations and services prior to working with outside organizations, when feasible. Cornell should provide Island residents with opportunities to announce Island news and cultural events to Cornell faculty, students, and staff, through electronic community bulletins boards, postings, and newsletters. Cornell should post employment, contracting, and cultural opportunities via email, WIRE blog, and local bulletin boards (CB8).

Response: Comment noted.

Comment 132: Cornell should make its campus facilities available for use by Island residents (CB8).

Response: Comment noted.

Comment 133: Cornell should provide: assistance to the disabled (CB8). The campus should be fully ADA compliant, including incorporating accessibility features on campus, such as a "looping" system for hearing impaired and disabled access (CB8, Strong). Cornell students should have the opportunity to research ways that technology can enhance the lives of older adults and the disabled, including sponsoring a "tech hackathon" to advance technology education for the disabled (CB8).

Response: Comment noted.

Comment 134: Cornell should provide: assistance to seniors and computers and computer training for the Island's Senior Center (CB8).

Response: Comment noted.

Comment 135: Cornell should create a "shadowing" program for Island middle school students to accompany scientists and observe academic/laboratory process. Cornell should create mentoring programs for the Island's population of post-high school young adults. Cornell should work closely with PS/IS 217 to implement pilot programs focused on tech education for students, and work with other age groups (CB8).

We are looking to support our students with mentoring possibilities and programs that extend the Cornell expertise in science, technology, engineering, and math, to PS/IS 217 (Beckman). Cornell should begin looking at opportunities and programs for PS/IS 217 students immediately instead of waiting until there is an established campus (Beckman)

We have ideas for further collaboration between PS/IS 217 and Cornell, including: updating school technology and applications; implementing more effective data collection and analysis tools; create a cadre of students who can address tech needs of the school; assist with middle school exit projects for grade 8; establish long-term science investigation, to culminate in annual science fair; create science investigation about sustainability, recycling, and lower carbon footprint; co-tech honors science class starting with grade 5 (Beckman).

Cornell must commit to improving our public school (McCain).

Response: Comment noted.

Comment 136: The design of the campus open space should be developed in consultation with the community, elected officials, and relevant stakeholders (Stringer). The Cornell site should be designed to welcome access with a minimum of visual and physical barriers.

Response: Comment noted.

Comment 137: Cornell should study the feasibility of an elevator to the pedestrian walkway of the Queensboro Bridge (CB8, Stringer, Bosbach, RICC). Cornell should study a tram connection to Queens. (RICC)

Response: Comment noted.

Comment 138: Cornell should utilize waste-to-energy technology to supplement Island-wide power (CB8).

Response: Comment noted.

Comment 139: Cornell should provide cohesive energy solutions appropriate for the entire Island. Cornell should explore options for the steam plant, including: as a gas-fired cogeneration plant that would service the Island; or transforming the plant

into the Museum of Technology, Art, and Science (CB8, Lyon, Stringer, Tandon). Cornell's green energy initiatives should expand beyond the campus, and help the entire Island with energy efficient improvements (Lyon). Cornell should share in detail its comprehensive energy plans. Cornell should actively participate in, if not lead, a comprehensive Energy Plan for Roosevelt Island. Cornell could consider/proposed alternatives for the Roosevelt Island steam plant. Cornell could upsize its energy production on Roosevelt Island beyond its own campus needs and share the economic and environmental benefits with the Roosevelt Island community (RICC).

Response: Comment noted.

Comment 140: The Island needs infrastructure repairs, including to the sea walls, as the Island is in a potential flood plain (Berdy, Strong). Cornell should repair the sea wall. (Munfakh) Cornell should be more invested in protecting the entire island from sea level rise, which would mean Cornell participation in the fortification of the Roosevelt Island sea wall. (RICC)

Response: Comment noted.

Comment 141: Cornell should make its best efforts to achieve LEED Platinum certification for the buildings on the site (CB8).

Response: Comment noted.

Comment 142: Cornell should consider use of pre-fabricated buildings, which could be shipped to the Island and can be completed much more quickly (Beltrone).

Response: Comment noted.

Comment 143: Cornell should explore options to increase the use of mass transit and commuting by bike or foot and develop programs to encourage its employees to use mass transit (Stringer, Schrum, Lasker, Helstein).

Response: Comment noted.

Comment 144: RICC requests access to Cornell's digital library, which offers research materials only a university can provide; a "give" that would cost Cornell nothing. (RICC)

Response: Comment noted.

Comment 145: Many residents request materials from Inter-library loan. This vital service may become limited due to budget cuts. (RICC)

Response: Comment noted.

Comment 146: Cornell's landscape plan should include native plants and grasses, ideally with NYS plants, organic, no pesticides. This will address global carbon emissions as well. (RICC)

Response: Comment noted. ✷