

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 St. George Waterfront Redevelopment project. The public hearing on the DEIS was held concurrently with the hearing on the project's Uniform Land Use Review Procedure (ULURP) applications on July 24, 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 August 5, 2013. Written comments received on the DEIS are included in **Appendix J**.

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 ENVIRONMENTAL IMPACT STATEMENT**ELECTED OFFICIALS**

1. Staten Island Borough President James Molinaro, recommendation dated July 8, 2013 and oral comments, July 24, 2013 (BP)

COMMUNITY BOARD

2. Staten Island Community Board 1, recommendation dated June 12, 2013 (CB1)

INTERESTED INDIVIDUALS AND ORGANIZATIONS

3. Linda Baran, President, Staten Island Chamber of Commerce, oral comments, July 24, 2013 (Baran)
4. Melanie Franklin Cohn, Executive Director, Staten Island Arts, written testimony, July 24, 2013 (Cohn)
5. Joe Dezio, Staten Island Museum Board Member, written testimony, July 24, 2013 (Dezio)

¹ This chapter is new to the FEIS.

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6. Lynn Kelly, CEO & President, Snug Harbor Cultural Center & Botanical Garden, written testimony, July 24, 2013 (Kelly)
7. Danuta Gorlach and Joan C. Harmon, written comments, June 12, 2013 (Gorlach/Harmon)
8. Peter Gioello, oral comments, July 24, 2013 (Gioello)
9. James Prendemano, Cassandra Properties, oral comments, July 24, 2013 (Prendamano)
10. Jon Salmon, Salmon Real Estate, oral comments, July 24, 2013 (Salmon)
11. Sandy Wolff, Staten Island Economic Development Corporation, oral comments, July 24, 2013 (Wolff)
12. Linda Winkler, written comments, July 24, 2013 (Winkler)

C. COMMENTS AND RESPONSES

PROJECT DESCRIPTION / GENERAL

Comment 1: With the addition of the proposed project, the needs of the Ferry Terminal and its commuters will become permanently secondary to these projects. It is imperative that the current needs of commuters and residents of Staten Island come first. (Gorlach/Harmon)

Response: The needs of commuters and residents of Staten Island are a priority for the proposed project. With the proposed project, parking for Staten Island Ferry commuters would be maintained on both project sites. The shuttle service that is currently provided between the surface parking lot on the North Site and the Staten Island Ferry St. George Terminal would also be maintained in the future with the proposed project. In addition, the application includes plans for interim parking to assure commuter and resident parking will not be reduced during the period of construction.

Comment 2: Instead of these projects, we have an opportunity to create a double/triple level parking garage at the site for commuters and visitors to the park. Union labor could be used to build such a project. The top level of this multi-level facility would become a plaza leading directly to the ferry, and in effect bring Richmond Terrace directly up to the ferry's main level. This facility could generate in excess of \$4.3 million dollars annually. This type of parking facility would also resolve the current congestion and jockeying for parking spaces that exists on Richmond Terrace. (Gorlach/Harmon)

Response: The proposed projects would replace existing surface parking lots with a three-level parking structure with an estimated capacity of 950 cars and 12 buses on the North Site and a three-level parking structure with approximately 1,250 spaces on the South Site. These parking facilities would replace the current

supply of parking and would provide additional spaces to meet the needs of the proposed development.

Comment 3: The North Shore rail line could be built in such a way as to tie in with the ferry plaza and reduce the rigors of commuters who face congested metro and bus service on the Terrace. Additionally, both biking and walking paths could be integrated with the North Shore railway and/or monorail and would create exciting elements for tourists and Islanders alike to explore and enjoy. (Gorlach/Harmon)

Response: As noted in the FEIS, site development would not preclude implementation of the North Shore transit options. The proposed project would enhance site circulation by adding new pedestrian, vehicular, and bicycle paths connecting Richmond Terrace to the waterfront.

Comment 4: A lower level pick-up and drop-off on both sides of the ferry must be available for commuters to have fast entry and exit to and from the terminal. The existing parking area where the Wheel is proposed should be left as is, to be used for additional parking garages to be developed as our population increases in the future, to meet other future needs, to preserve the view, and to maintain current access. The hotel/mall must have proper drop-off and pick up but our terminal will not. (Gorlach/Harmon)

Response: A detailed parking analysis was conducted as part of the EIS. The proposed project would provide on-site public and accessory parking for up to 2,191 cars, with 950 on the North Site and 1,241 on the South Site (excluding 40 reserved for MTA use). These parking totals include the replacement of the existing parking supply on both sites that are used by the general public such as Staten Island Ferry commuters and Stadium visitors. There are a total of 816 existing parking spaces on the North Site. On the South Site, there are 754 existing spaces (that will increase to 810 spaces in the No-Action condition). In addition, the full project-generated demand would be accommodated on-site during all the peak hours and accounts for ancillary uses that would support the developments.

As described in Chapter 8, "Urban Design and Visual Resources," within the study area, there would be new viewing locations to the harbor and Manhattan with the proposed project, particularly at the new open space on the North Site. The new viewing locations would also serve to replace any views to the waterfront and beyond from Richmond Terrace that could be obstructed by the proposed development.

Access between the waterfront and upland St. George would be enhanced with the proposed project. The proposed site plan for the North Site provides enhanced upland connections to Richmond Terrace and the St. George civic

center. The RROW would be decked over to be level with Richmond Terrace and provide direct access to the North Site open space and to the Wheel Terminal Building. Connectivity between the waterfront and Richmond Terrace would also be provided with a pedestrian pathway that would start near Nicholas Street. A new pedestrian path along the eastern portion of the North Site would provide an enhanced connection between Richmond Terrace and the Bank Street Entrance Plaza. These pedestrian connections would allow greater connectivity between the waterfront and the neighborhood of St. George. In addition, the South Site is designed to maximize pedestrian access onto and through the site. There would be open pedestrian corridors traversing the South Site from Richmond Terrace to Bank Street and the waterfront. The main promenade would provide a visual connection between the lower Ferry Terminal exit and the civic courtyard across Richmond Terrace. A central pedestrian corridor would bring pedestrians across the site traversing in the east-west direction, connecting the Ferry Terminal's upper level and Bus Terminal to the open corridors of the retail development and provide pedestrian routes to the Stadium. There would also be a newly created pedestrian esplanade, the Bank Street Esplanade, which would be separated from the newly created service road by a small retaining wall. This esplanade would serve as the connection between the Ferry Terminal and the project sites.

Comment 5: There have been discussions about ferry schedules. You may need an extra boat. Instead of a boat every half hour, you may need a boat every 15 minutes. And my answer to that is that the riders develop the schedule. If you have enough riders coming over to Staten Island to ride the Wheel or go to the outlet mall, then we have the obligation to help them. (BP)

Response: Comment noted.

Comment 6: It is important to protect the last public parcels of land at this site for future use. If these projects are approved, we will lose forever the possibility of future expansion for ferry operations at a critical time when the Island is growing and future ferry operations will be compromised as a result. Wheels, hotels, and malls can be built elsewhere, but not at the ferry. (Gorlach/Harmon)

Response: As stated in the FEIS, the proposed project serves local planning goals, as described in NYCEDC and DCP's *North Shore 2030* plan, to redevelop the St. George area with new public amenities and commercial space, as well as improve overall mobility throughout the area. Similarly, the proposed project serves the citywide planning goals concerning New York City's waterfront, as described in DCP's *Vision 2020: New York City Comprehensive Waterfront Plan*, to repurpose former industrial space with facilities that promote public access to and enjoyment of the waterfront.

Comment 7: Instead of the proposed project, a monorail, originating at the ferry (such as those that exist at airports) could bring both commuters and visitors to and from the ferry, with stops at the many cultural and recreational resources. If these projects are built, tourists may visit the Wheel, but they will not go further on the Island or spend money here, without transportation systems to take them to other resources on Staten Island. A monorail would enable them to see many of the attractions on Staten Island. (Gorlach/Harmon)

Response: Comment noted. As a general and area-wide transportation improvement, the monorail concept is a not a comment pertaining to the environmental assessment of the proposed project.

Comment 8: It has yet to be explained how the proposed projects would cause tourists to leave the Wheel and mall to explore Staten Island’s cultural attractions, parks, restaurants, or any other business. (Winkler)

Response: This is not a comment pertaining to the environmental assessment of the proposed project.

Comment 9: The Wheel is a potential terrorist target, in addition to the Ferry. What special security measures will be taken to ensure commuter and community safety and how will these impact traffic patterns? How are quality of life issues measured by having to live near two significant terrorist threats? (Golach/Harmon)

Response: There is no objective basis for concluding that the Wheel is any more a potential terrorist target than any of the many large, iconic structures in New York City or other attractions. However, because the Wheel venue will attract millions of visitors to the site, the developer for the North Site has retained a security consultant to ensure safety at the project site. Security measures have been integrated in the initial design of the project, and would therefore avoid visible and intrusive security features that could affect quality of life for the community.

Comment 10: A non-profit St. George community association among new and existing landowners and businesses should be established that would provide service, advocacy, and information to enhance the quality of life for the St. George community and its visitors, with the understanding that other applicants seeking future waterfront approvals in St. George would also be required to participate and provide funding. A preliminary draft of the intended structure can be included in the ULURP application prior to DCP approval. (BP)

Response: Comment noted. This is not a comment pertaining to the environmental assessment of the proposed project.

Comment 11: Priority resident parking should be provided to Staten Island commuters. This would offer first-come first served parking locations most convenient to the Ferry Terminal during pre-determined rush hours. The number of parking spaces should be consistent with the demand outlined in the EIS. These parking locations and restrictions should be identified and included in the ULURP application prior to DCP approval. (BP)

Response: Both the North and South Site developments will carry forward the existing number of spaces for commuter parking. In general, commuters are the earliest arrivals and would inherently have flexible parking choices as well as access to monthly parking rates and other benefits.

Comment 12: The project site should be evaluated to determine if the number of temporary parking spaces during construction, in proximity to the Ferry, could be increased. Existing City parcels between Bank Street and the North Shore Esplanade could be temporarily converted to additional commuter parking areas accessed from Bank Street and managed by the developers. (BP)

Response: As analyzed in Chapter 20, "Construction," approximately 1,661 parking spaces would be provided to accommodate the combined commuter and construction worker parking demand. During construction, 820 parking spaces would be provided on the North Site at all times. The configuration and operation of the parking facility on the North Site would vary based on construction activities and would be provided by surface parking, stackers, and/or a multi-level parking structure (depending on the construction phase), with a combination of self-park and attendant parking. The shuttle service that currently transports commuters between the North Site and the Ferry Terminal would also be maintained during construction. The parking supply currently provided on the South Site would be relocated to several off-site parking facilities during construction. For off-site parking that is not walking distance to the Ferry Terminal or accessible by the SIR or city bus, shuttle service would be provided between the temporary off-site parking locations and the Ferry Terminal. If the suggested expansion of parking on City parcels between Bank Street and the North Shore Esplanade (generally encompassing the fenced and overgrown area currently reserved for rail right-of-way) is pursued at a later date, further environmental review would be required.

Comment 13: A free Wi-Fi network across the development sites should be established for community access. The network should operate 24/7. (BP)

Response: While not a project element at this time, such a service could be provided at any time in the future based on coordination of the developers, New York City Economic Development Corporation (NYCEDC), and community.

Comment 14: The waterfront esplanade adjacent to Bank Street should be evaluated to determine if restoration and additional improvements can be made to the existing open spaces. (BP)

Response: As described in Chapter 2, “Land Use,” improvements would be provided to replace or bring up to current standards key waterfront esplanade amenities including lampposts, tree plantings, catch basins, bike racks, benches, and areas of storm-related damage to walkways and trees between the 9/11 Memorial and the end of the improved esplanade just north of the North Site.

Comment 15: A looped shuttle service from all temporary off-site parking locations should be provided during construction. Shuttles should be restricted to arterial streets only. A permanent on-site shuttle service between the project site and the Ferry Terminal should be included. (BP)

Response: A shuttle would be provided during construction from the temporary parking facilities to the Ferry Terminal. The shuttle will operate on arterial streets, deviating from them only when required to complete a turnaround loop. The shuttle service that is currently being provided between the surface parking lot on the North Site and the Ferry Terminal would be maintained.

Comment 16: Both operators should provide off-site parking (beyond interim construction) with shuttle service to meet demands for all users during peak utilization. (CB1)

Response: A detailed parking analysis was conducted as part of the EIS. The proposed project would provide on-site public and accessory parking for up to 2,191 cars, with 950 on the North Site and up to 1,241 on the South Site (excluding 40 reserved for MTA use). These parking totals include the replacement of the existing parking supply (1,626 existing parking spaces) on both sites that are used by the general public such as Staten Island Ferry commuters and Stadium visitors. Additionally, the full project-generated demand would be accommodated on-site during all the peak hours and accounts for ancillary uses that would support the developments; therefore, off-site parking would not be warranted beyond the interim construction period.

Comment 17: Parking rates should be at existing market rate or lower and any future increase should be subject to review and approval by Community Board 1. (CB1)

Response: This is not a comment pertaining to the environmental assessment of the proposed project.

Comment 18: All plantings on the South Site should be low to allow view corridors. (CB1)

Response: The developer on the South Site has worked closely with New York City Department of City Planning to establish appropriate design standards for the visual corridor. Plantings have been determined in consultation with DCP.

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Comment 19: BFC has implemented a local economic outreach program in conjunction with us with several points of entry into the local community. Including a green collar training program for local residents, local vendor improvement program, and M/WBE outreach and improvement effort. (Prendamano)

Response: Comment noted.

Comment 20: Priority should be given to members of the New York City Building Trades, Staten Island businesses, organized, unorganized, women and minority workforce for all aspects of construction. There should be a project labor agreement with New York City Building Trades by both developers. (CB1)

Response: Comment noted. Hiring requirements are outside of the scope of CEQR.

Comment 21: 100 percent of the monies collected for rent by both projects by NYCEDC should be used to fund and maintain the following improvements:

1. Smart lights throughout the corridor from Bay Street Landing/Richmond Terrace Corridor and its feeder roads; Victory Boulevard, Jersey Street, Nicholas Street, Bank Street, Hill Street, Wall Street, etc.
2. Widen and reconfigure Richmond Terrace including a bike lane
3. Both Developers widen Bank Street from Richmond Terrace including a bike lane (per FDNY)
4. 24 hour 7-day a week ½ hour ferry service
5. Create and secure a continuous coastal restoration and protection along the north and east shore from Ft. Wadsworth to the Goethals Bridge
6. The North Shore Greenway Trail- Fully funded and completed from Ft. Wadsworth to the Goethals Bridge, to include safe and secure waterfront access, pathways, lighting benches, signage, etc.
7. Fixing the promenade at Bay Street Landing- Remove all pilings from Hurricane Sandy, restoration and protection
8. An HOV lane that would accommodate a north shore rubber wheel trolley along Richmond Terrace to the Bayonne Bridge
9. Improve the St. George Ferry Terminal circulation by having all riders disembark through the north side of the terminal during the hours of 10 am and 4 pm daily so that the separation of tourists from commuters can occur easily with tourists being drawn to the north through the glass doors leading to the St. George Retail Development/Wheel/Promenade and commuters being drawn south toward public transportation options.
10. Improve the St. George Ferry Kiss and Ride St. George Ferry Terminal by removing the fence, security booths, and ferry worker parking and placing a

sidewalk with security bollards and planting within a 15 foot buffer surrounding the ferry maintenance facility and also build a sidewalk connecting the existing sidewalk that is cut off by the current security fence that encompasses a private parking lot and the Ferry Maintenance Facility. That sidewalk should continue through the property and into the former Coast Guard/Triangle Equities Site to connect with the Bay Street Landing Promenade. This sidewalk should have lighting, seating, planting, and security bollards (especially as it passes the Ferry Maintenance Facility) in order to provide a double layer of protection. What was once private parking for the Ferry Maintenance Facility should then be used as public parking space. All security booths should remain within the 15 foot buffer for the Ferry Maintenance Facility. Signage should be installed encouraging visitors to see the public plaza and fishing pier and other attractions that will come with the development of the former Coast Guard/Triangle Equities site.

11. Deck over the remaining parking lot and train tracks adjacent to the bus ramps to create more public access and space

12. Provide a kiosk for Department of Cultural Affairs to encourage use of and access to Staten Island Cultural and recreational institutions. (CB1)

Response: Comment noted. With the exception of the proposed widening of Bank Street by six feet (with bicycle lane) which is part of the proposed action, the long term implementation of area-wide transportation and physical improvements noted in the comment are beyond the scope of this environmental assessment.

Comment 22: A study should analyze changing Front Street and Bay Street to one way streets. (BP)

Response: Comment noted. This is an area-wide transportation improvement that is not part of the proposed project and is beyond the scope of this environmental assessment.

Comment 23: It is important for the City to look at some of the gaps in those areas to make sure that we have a continuous esplanade. (Baran)

Response: This is not a comment pertaining to the environmental assessment of the proposed project.

Comment 24: There should be something looked at in terms of the North Shore right-of-way to compliment this project because in order for this project to be a success, the City needs to step up to the plate and play its part to make sure that everything works on Staten Island so that we don't have traffic problems. (Baran)

Response: As noted in the DEIS, the proposed St. George Waterfront Redevelopment project preserves the rail right-of-way connecting the Ferry Terminal with the

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North Shore line. The DEIS also acknowledges that planning for a transit option is being undertaken by the New York City Transit (NYCT). As established in the 2012 MTA North Shore Alternatives Analysis, the currently identified preferred transit scenario is a Bus Rapid Transit system. The proposed development would be compatible with such a transit scenario.

COMMENTS IN SUPPORT OF THE PROPOSED PROJECT

Comment 25: The redevelopment will bring added connectivity—offering new pedestrian paths between the waterfront, Ferry Terminal, and Richmond Terrace. (Cohn)

Response: Comment noted.

Comment 26: The proposed project would activate the North Shore of Staten Island, bring jobs to local residents, and draw tourists from all over the world. (Cohn)

Response: Comment noted.

Comment 27: My experience on Staten Island is generally that Staten Island never seems to miss an opportunity to miss an opportunity. Representing business on Staten Island, we want this, we need this, and we deserve this. (Salmon)

Response: Comment noted.

Comment 28: We have an opportunity to create a world class venue on our island, something that we can be proud of. (Prendamano)

Response: Comment noted.

Comment 29: The only opportunity we have for shopping on Staten Island is the Staten Island Mall. The St. George Retail Development will not only benefit tourists, but it will benefit our community as another destination shopping center and place for people to enjoy the waterfront. (Baran)

Response: Comment noted.

Comment 30: This is the largest financial development that ever came to Staten Island in one time. Over half a billion dollars is being invested in two ventures. These projects will change the face of St. George. (BP)

Response: Comment noted.

Comment 31: With the New York Wheel, many thousands of tourists will disembark the ferry and venture onto Staten Island. The New York Wheel will play a vital role in

changing the perception that Staten Island is just a station stop before the ferry returns to Manhattan. (Dezio)

Response: Comment noted.

Comment 32: The New York Wheel and Empire Outlets will draw tourists to the North Shore and keep them in Staten Island for several hours. Both developers of the New York Wheel and Empire Outlets have shown early interest of working with the cultural community on Staten Island. These projects will lead to increased visibility to the artists and cultural organizations on Staten Island. (Cohn)

Response: Comment noted.

Comment 33: The New York Wheel/Empire Outlets is the most important and iconic project for Staten Island's economic and tourist destinations. The economic impact of the project to the whole borough will be unprecedented. The north shore will not only see a rise in property values, it will finally see the renaissance we've been talking about for years. Existing local businesses will benefit from the new foot traffic generated by the proposed projects. (Wolff)

Response: Comment noted.

Comment 34: The proposed project will create jobs for our community. The proposed project will get people off of the ferry and they will be able to visit the cultural attractions and restaurants. The proposed project will bring a lot of activity to Staten Island. (Baran)

Response: Comment noted.

Comment 35: I'm honored and excited about the project. I am an electrical contractor for the South Site. I am looking to hire people from the neighborhood. (Gioello)

Response: Comment noted.

Comment 36: Empire Outlets offers so much more than a shopping venue. It is a chance to offer an elite waterfront experience, coupled with products desired by and locally unavailable to our residents, as well as encouraging and promoting tourism on the island, something we have been attempting to do for generations. In addition to the shops themselves, the food and beverage deck and hotel will provide additional options sorely needed in the marketplace. It will be a source of long term employment, as well as more dollars in revenue to the City. (Prendamano)

Response: Comment noted.

Comment 37: The New York Wheel and St. George Retail Development is long overdue for Staten Island and is the shot in the arm we need—for public/private investment, job generation, waterfront access and the future sustainability of our community. (Kelly)

Response: Comment noted.

CHAPTER 8, “URBAN DESIGN AND VISUAL RESOURCES”

Comment 38: The proposed project would obliterate views the Hudson Harbor and Manhattan from Richmond Terrace. (Gorlach/Harmon, Winkler)

Response: As described in Chapter 8, "Urban Design and Visual Resources," within the study area, the proposed development would be most notable in views along Richmond Terrace—given the roadway’s wide width and adjacency to the project sites. Rather than a wide thoroughfare with a lack of development on the waterfront side, the new structures along the waterfront side of the street would now frame these views. Since portions of the project sites would be raised level with Richmond Terrace, new viewing locations to the harbor and Manhattan could be created, particularly at the new open space on the North Site. These new viewing locations would also serve to replace any views to the waterfront and beyond from Richmond Terrace that could be obstructed by the proposed development. In addition, the design of the development on the South Site—long, narrow structures separated by walkways—is intended to maintain visual corridors through that portion of the South Site. Furthermore, the proposed development would not be anticipated to alter views to the harbor and Manhattan from Richmond Terrace north of Nicholas Street, or between Hamilton Avenue and Wall Street, where views to the water and beyond would continue to be dominated by the ballpark.

Comment 39: I am concerned about light pollution at night. (Winkler)

Response: As described in Chapter 8, "Urban Design and Visual Resources," the lighting strategy of the Observation Wheel would be highly directional, to shield the upland neighborhoods from direct lighting and to avoid sky glow, and would be designed and programmed to minimize environmental effects. All decorative lighting on the Observation Wheel would be greatly reduced or entirely suspended during periods of heavy fog or rain. There would be no lighting of the structure on the land-side, and the wheel structure would be largely dark in views from the study area upland of Richmond Terrace. The lighting strategy for the South Site also would be mindful of adjacent waterfront and residential areas.

CHAPTER 14, “TRANSPORTATION”

Comment 40: The proposed project will put Staten Island on the map in a positive way. However, traffic on most major thoroughfares is at an all-time high. It is not acceptable that the community settle for a Level of Service D or better at many of our local intersections. The City should take a hard look at mitigating the intersections with LOS D or below and invest monetarily in traffic solutions. (Kelly)

Response: The Transportation chapter of the EIS includes detailed analyses of the project’s potential traffic, parking, pedestrian, transit, and safety impacts which were analyzed in accordance with the *City Environmental Quality Review (CEQR) Technical Manual* guidelines and have been reviewed by New York City Department of Transportation (NYCDOT). Mitigation measures are recommended at locations where the project is projected to result in significant adverse impacts per CEQR criteria. Subject to review and approval by the relevant agencies, including NYCDOT, each of the significant adverse impacts identified in the EIS could be fully mitigated with the exception of the impact at the Richmond Terrace and Staten Island Ferry Viaduct (cars) and Staten Island Ferry Viaduct (buses) intersections. NYCDOT is currently investigating additional improvements at these locations to improve traffic flow.

Comment 41: The proposed project would have insufficient parking with no possibility of increasing future capacity. Ancillary services required to support these projects (e.g. elevators, laundry/linen services, garbage removal, staircases, storage areas, maintenance areas and construction elements (columns) will take up parking spaces, seriously limiting availability for commuters. (Gorlach/Harmon)

Response: A detailed parking analysis was conducted as part of the EIS. The proposed project would provide on-site public and accessory parking for up to 2,191 cars, with 950 on the North Site and up to 1,241 on the South Site (excluding 40 reserved for MTA use). These parking totals include the replacement of the existing parking supply on both sites that are used by the general public such as Staten Island Ferry commuters and Stadium visitors. The full project-generated demand would be accommodated on-site during all the peak hours and accounts for ancillary uses that would support the developments.

Comment 42: The proposed project would create obstacles near the Ferry for pedestrian versus congested traffic at three unmitigated intersections near the ferry terminal. (Gorlach/Harmon)

Response: The EIS projects unmitigatable traffic impacts at two intersections near the ferry terminal. However, pedestrian access to the Ferry Terminal would be improved in the No-Action and With-Action conditions. A new crosswalk between the two unmitigatable intersections with a protected pedestrian/bicycle-only signal

phase will be included as part of NYCDOT's St. George Bay Street Improvement project at the St. George Ferry Terminal. Additionally, the proposed project will provide a new signalized crosswalk across Richmond Terrace at Schuyler Street and would improve pedestrian access to the Ferry Terminal by providing access through the South Site. These improvements were incorporated into the vehicular and pedestrian traffic and safety assessments conducted as part of the EIS, and no significant adverse impacts to vehicular or pedestrian safety were projected.

Comment 43: Huge trucks servicing the supply needs of the hotel, wheel, and mall will lead to congestion on Richmond Terrace, slowing down municipal bus service and foot traffic into the terminal. (Gorlach/Harmon)

Response: The applicants have agreed to restrict the majority of deliveries to the proposed project to off-peak hours and to use smaller single-unit trucks. The EIS includes quantified analyses of the project's potential impacts with respect to traffic and pedestrian conditions, including traffic flow, pedestrian safety, and public transportation. The analysis incorporates any truck volumes generated by the proposed project during the peak hours studied.

Comment 44: I am concerned about increased traffic to the immediate area, as well as delays radiating out from this public transportation hub, where the Staten Island Ferry is located, the origin and final destination of both the Staten Island Rapid Transit and many bus routes for the entire island. (Winkler)

Response: The Transportation Chapter of the EIS includes detailed analyses of the project's potential traffic, parking, pedestrian, transit, and safety impacts. The analyses were performed in accordance with the *CEQR Technical Manual* guidelines and have been reviewed by New York City Department of Transportation (NYCDOT). Mitigation measures were recommended at locations where the project is projected to result in significant adverse impacts. Subject to review and approval by the relevant agencies, including NYCDOT, each of the significant adverse impacts identified in the EIS could be fully mitigated with the exception of the impact at the Richmond Terrace and Staten Island Ferry Viaduct (cars) and Staten Island Ferry Viaduct (buses) intersections. NYCDOT is currently investigating additional improvements at these locations to improve traffic flow.

Comment 45: I am concerned about an expected increase in ferry ridership, and no mitigation planned at this time. (Winkler)

Response: Potential mitigation measures to partially or fully mitigate the significant adverse impact to the Staten Island Ferry are included in Chapter 22, "Mitigation Measures" of the EIS. The City will continue to monitor the Staten Island Ferry operations to determine if future service changes or capital

improvements are necessary. Additionally, NYCEDC is exploring the potential to provide supplemental waterborne transit to the project sites, which could decrease the projected ridership on the Staten Island Ferry.

Comment 46: I am concerned about an exponential increase in tractor trailer truck traffic, as well as tour buses and the accompanying air and noise pollution, on streets that are one way in each direction leading into and out of the area. (Winkler)

Response: The majority of deliveries would be made during off-peak hours and by smaller single-unit trucks. Tour buses would travel primarily on Richmond Terrace and would not use local one-way streets.

CHAPTER 17, “NOISE”

Comment 47: I am concerned about noise pollution from the New York Wheel, which is touted to be running daily until at least 11 pm in the summer, with no buffer between it and the area’s residences. (Winkler)

Response: The existing ambient noise levels for the area’s residences are 57-58 dBA during the nighttime period (7:00-11:00 pm) based upon the measured values. Noise generated from the Wheel would be about 40 dBA at the closest residence on Richmond Terrace (about 390 feet away from the Wheel). As a result, with the proposed Wheel, changes in ambient noise levels would be imperceptible, and the proposed project would not result in significant adverse noise impacts at the area’s residences. *