

**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 USTA Billie Jean King National Tennis Center (NTC) Strategic Vision. The public hearing on the DEIS was held concurrently with the hearing on the project's Uniform Land Use Review Procedure (ULURP) draft application on April 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 Monday, May 6, 2013. Written comments received on the DEIS are included in **Appendix G**.

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. Tony Avella, State Senator, oral and written testimony presented by Ivan Acosta dated April 24, 2013 (Avella)
2. Helen Marshall, President, Borough of Queens, written recommendation dated April 11, 2013 (Marshall)

**COMMUNITY BOARDS**

3. Queens Community Board 3 Resolution dated March 18, 2013, and oral testimony by Marta LeBreton, Chair, dated April 24, 2013 (CB3)
4. Queens Community Board 4 Resolution dated March 15, 2013 (CB4)
5. Queens Community Board 6 Resolution dated March 15, 2013 (CB6)
6. Queens Community Board 7 Resolution dated March 12, 2013 (CB7)
7. Queens Community Board 8 Resolution dated March 14, 2013 (CB8)

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<sup>1</sup> This chapter is new to the FEIS.

8. Queens Community Board 9 Resolution dated March 14, 2013 (CB9)

**INTERESTED INDIVIDUALS AND ORGANIZATIONS**

9. Katrina Adams, oral testimony dated April 24, 2013 (Adams)
10. Michael L. Bilello, Executive Secretary-Treasurer, United Brotherhood of Carpenters and Joiners of America, written comments dated March 6, 2013 (Bilello)
11. Jim Carlson, oral testimony dated April 24, 2013 (Carlson)
12. Tommy Casino, oral testimony dated April 24, 2013 (Casino)
13. Geoffrey Croft, New York City Parks Advocates, oral testimony dated April 24, 2013 (Croft)
14. Scott Daly, New York Junior Tennis and Learning, oral testimony dated April 24, 2013 (Daly)
15. Jack Friedman, Queens Chamber of Commerce, oral and written testimony dated April 24, 2013 (Friedman)
16. Paul Graziano, written testimony dated April 24, 2013 (Graziano)
17. Ben Haber, Civic Association of Kew Gardens Hills, written testimony dated April 24, 2013 (Haber)
18. Phil Konigsberg, oral testimony dated April 24, 2013 (Konigsberg)
19. Elizabeth Lee, oral and written testimony dated April 24, 2013 (Lee)
20. Holly Leicht, New Yorkers for Parks, oral and written testimony dated April 24, 2013 (Leicht)
21. Michael Littman, oral testimony dated April 24, 2013 (Littman)
22. Vishnu Mahadeo, Richmond Hill Economic Development Council, oral testimony dated April 24, 2013 (Mahadeo)
23. Rob McKay, Queens Economic Development Corporation, oral testimony dated April 24, 2013 (McKay)
24. Ted Newkirk, oral testimony dated April 24, 2013 (Newkirk)
25. Eric Rebhune, oral testimony dated April 24, 2013 (Rebhune)
26. Leandra Requena, oral testimony dated April 24, 2013 (Requena)
27. Maryann Rosa, New York City Central Labor Council, oral testimony dated April 24, 2013 (Rosa)
28. Michael Silverman, oral testimony dated April 24, 2013 (Silverman)
29. Edwin Westley, Jackson Heights Beautification Group, oral testimony dated April 24, 2013 (Westley)

## C. COMMENTS AND RESPONSES

### PROCESS AND PUBLIC PARTICIPATION

**Comment 1:** The EIS is a draft and it is impossible to comment on a document that is still a work in progress. The final document is required in order to provide meaningful comments (Westley).

**Response:** The DEIS was prepared in conformance with the City Environmental Quality Review (CEQR) process, and analyses were prepared in accordance with the methodologies outlined in the *CEQR Technical Manual* and the Final Scope of Work, dated December 27, 2012. As part of the CEQR process, a Draft EIS is prepared to allow public input before the preparation of a Final EIS (FEIS). Following standard practice, the FEIS incorporates responses to public comments and relevant updates to the information and analyses in the DEIS.

**Comment 2:** USTA has not provided information on its proposal online (Croft, Konigsberg).

This project is an attempt to give private developers public land without proper communication, community notification, and input. This belittles the power of our Borough President and local community boards (Lee).

**Response:** A complete project description, along with the DEIS and other documents, is provided online on DPR's website. A link to the webpage was included in the CEQR notices published for the project. The DEIS was made available for public comment on January 4, 2013. The proposed disposition is subject to public review under the City's Uniform Land Use Review Procedure. The local community boards and the Borough President have been afforded the opportunity to provide input—and have done so—in full accordance with State and City laws and guidelines. Members of the public were invited to testify at the public hearing on the DEIS and to submit written comments at any time between January 4 and May 6, 2013.

**Comment 3:** State legislation is required to alienate park land (Lee).

**Response:** State alienation legislation is required for the proposed project, and will be sought. This approval is noted as a required action in Chapter 1, "Project Description."

### PROJECT DESCRIPTION

**Comment 4:** USTA provides numerous community benefits and programs, which are funded by the US Open. USTA also provides substantial economic benefits to the local community. Therefore, this project is needed to maintain and expand these

## **USTA Billie Jean King National Tennis Center Strategic Vision**

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benefits (Adams, Daley, Friedman, Littman, Mahadeo, McKay, Rebhune, Silverman).

**Response:** Comment noted.

**Comment 5:** Problems associated with aging facilities have plagued the US Open in recent years. New facilities are needed to maintain the competitiveness of the event (Adams).

**Response:** Comment noted.

**Comment 6:** In a city with an annual economy in the hundreds of billions of dollars, the net amount of money that the USTA generates is relatively insignificant (Haber).

**Response:** The economic benefit of the US Open on Queens and New York City is discussed in Chapter 1, "Project Description."

**Comment 7:** USTA's plan should be disapproved because parking garages should not be built on park land (CB3).

**Response:** The proposed parking garages would be built on existing surface parking lots, within the existing NTC lease area. They would not result in a greater land area dedicated to parking, nor would they convert open space areas or vegetated areas to parking. The temporary tennis courts that are currently located on Parking Lot A on a seasonal basis would be relocated to a new permanent location on the roof of the proposed administrative and retail building.

**Comment 8:** USTA should rely more on private security and less on the NYPD (CB3).

**Response:** USTA provides security within the NTC site throughout the US Open and year round. NYPD provides additional security during the event due to counterterrorism concerns. NYPD officers are also responsible for the traffic management program.

**Comment 9:** Lighting improvements should be implemented on the route to the NTC and cameras should be installed to improve safety (CB3, CB4).

**Response:** The NTC site contains adequate cameras and lighting for the safety, security, and comfort of visitors. DPR maintains lighting at the perimeter of the Park in conformity to the lighting standards applicable to the entire City park system. During special events similar to the US Open, when ancillary locations such as drop off areas and pathways are used as part of the event, additional tower lights are brought in. DPR works with NYPD to determine the appropriate placement of tower lights based on NYPD's safety analysis.

**Comment 10:** The replacement Louis Armstrong Stadium must continue to be named after Louis Armstrong, considering his extraordinary stature and deep ties to the community (Marshall).

**Response:** The replacement stadium will continue to be named Louis Armstrong Stadium.

**Comment 11:** The contention that upgrades at the NTC are necessary to compete with other events is ridiculous (Croft).

**Response:** The purpose and need for the project are established in Chapter 1, “Project Description.”

**Comment 12:** USTA should enter into a Community Benefits Agreement (CB3).

**Response:** Comment noted.

**Comment 13:** The cumulative effect of this project, the Willets Point development, and the Major League Soccer (MLS) Stadium will be harmful to the park (Westley, Croft, Requena).

**Response:** Relevant background projects, including the Willets Point development and MLS stadium, are described in the EIS and accounted for where warranted in the impact studies.

**Comment 14:** The environment and nature are very important to us and our children. This is the backyard for our community (Requena)

**Response:** Comment noted. As described in Chapter 7, “Natural Resources,” the bird and wildlife community in the study area is composed of disturbance-tolerant and human-tolerant species, and levels of human disturbance are already high. Therefore, the proposed project would not be expected to displace or otherwise negatively affect wildlife.

Effluent associated with the NTC’s restrooms is, and would continue to be, handled by sanitary sewers, as described in Chapter 9, “Water and Sewer Infrastructure.”

USTA encourages patrons to use public transportation to attend the US Open, and has been successful in increasing the share of patrons who use public transportation to get to and from the event from approximately 32 percent in 2006 to approximately 56 percent in 2012. As described in Chapter 10, “Transportation,” the project site is located in close proximity to the Mets-Willets Point subway station (No. 7 line) operated by the MTA New York City Transit (NYCT). Because USTA patron travel is in the off-peak direction, additional trains are run during special event conditions, and due to the infrequency of the event, the proposed project would not adversely affect No. 7 line service.

The cooling tower that would be built to help meet the US Open’s energy needs during peak demand periods would utilize generators in temporary use for the US Open, with advanced controls to minimize pollutant emissions. USTA is exploring the feasibility of natural gas fuel for the generators, and would utilize ultra-low sulfur diesel if natural gas is not available. As noted in Chapter 11, “Air Quality,” the generators would only be utilized during the US Open and an analysis of the emissions expected to result from these generators found that the air quality impacts on the surrounding area would be below EPA’s National Ambient Air Quality Standards (NAAQS) and the standards in the *City Environmental Quality Review Technical Manual*, which are intended to protect the public health.

Chapter 12, “Greenhouse Gas Emissions,” describes other environmental initiatives undertaken by USTA.

#### *PARK IMPROVEMENT PROJECTS*

**Comment 15:** The southern end of Flushing Meadows Corona Park should be improved for more exposure to the natural waterway. The model airplane and kite flying fields should be renewed, and the reintroduction of canoeing and kayaking at Willow Lake should be considered (CB4).

**Response:** Comment noted.

**Comment 16:** A multipurpose recreational center should be built on the southwest corner of Meadow Lake (CB4).

**Response:** Comment noted.

**Comment 17:** The Flushing Meadows Corona Park trolley should be re-implemented (CB4).

**Response:** Comment noted.

#### **OPEN SPACE**

**Comment 18:** USTA should give back at least 0.68 acres of alienated land within Flushing Meadows Corona Park in order to replace the park land that is now being alienated (CB3, CB4, CB8, Leicht, Marshall, Westley).

Replacement park land must be a meaningful and contiguous piece of park land for the affected community (Avella).

**Response:** At the outset of the environmental review process, the City proposed that improvements to the Park would result in a more meaningful degree of public benefit than an in-kind replacement of alienated park land. However, in response to comments during the public review process, USTA now proposes to

surrender a portion of the USTA's currently alienated and leased land that is more than double the 0.68 acres of park land that USTA seeks to lease. As described in Chapter 1, "Project Description," the replacement park land totals 1.56 acres, comprising 0.75 acres of passive landscaped areas and 0.81 acres of space for active recreation containing 5 tennis courts.

**Comment 19:** We are opposed to any alliance or conservancy in Flushing Meadows Corona Park that would take private money and encourage development on park land. Parks should be public and paid for through taxes (Croft).

**Response:** Comment noted.

**Comment 20:** Public park land is precious and should not be surrendered for private development under any circumstances (Croft, Graziano, Haber, Lee, Westley).

**Response:** Comment noted. The NTC is one of the world's largest public recreational tennis facilities and is open to the public from 6 am to midnight for than 11 months a year when the US Open is not in session. Over 100,000 kids, seniors and other adults participate in programs at the NTC each year; and the USTA makes available thousands of hours of free and discounted court time. The vast majority of patrons at the NTC access courts at fees well below the listed rates. The USTA sponsors numerous programs and camps whose participants get deeply discounted or free court time. The USTA also provides equipment and training in local schools and funds court refurbishment in other local parks. Local schools and leagues use the NTC as their home court. These programs are especially valuable given the dearth of publicly accessible recreational opportunities in some nearby neighborhoods and the growing problem of childhood obesity. The health, welfare and recreational public purpose of the NTC are well established in the legislative provisions authorizing the NTC lease.

**Comment 21:** More cement and steel is a further environmental insult to the integrity of Flushing Meadows Corona Park. The number of large non-traditional structures in the park may exceed the total number of such structures in all other City parks (Haber).

**Response:** Comment noted. The impact of the project on open space, natural resources and urban design is discussed in Chapters 3, 6, and 7 of the EIS. As described in Chapter 6, "Urban Design and Visual Resources," the incremental increases in height and bulk in the NTC attributable to the proposed project would be modest relative to the existing facilities, and would not be inconsistent with the surrounding park land context. Trees and other landscaping would be provided along the site's perimeter, including adjacent to Parking Garage B and the Passerelle Building, which would serve to moderate the visual presence of the new site elements from most locations. The proposed project would not alter the

visual character of the surrounding area, except to make certain sections of the NTC site more prominent in directly adjacent views. Therefore, the proposed project would be consistent with the existing urban design characteristics of the study area and would not result in any significant adverse impact related to urban design and visual resources.

**Comment 22:** USTA should help establish a new conservancy for Flushing Meadows Corona Park, make an initial contribution of \$20 million, and make an annual contribution of at least \$500,000, or 2.5 percent of annual revenue. An advisory board should also be established with one member from each of the surrounding community boards (CB3).

USTA should contribute \$15 million to a trust fund for Flushing Meadows Corona Park, with an additional \$500,000 per year maintenance fund, to be overseen by an advisory board composed of local community board members (CB4).

USTA should donate funds for the annual maintenance, security, and upkeep of Flushing Meadows Corona Park and establish by an advisory board with representatives of local community boards (CB6).

USTA should establish a \$15 million capital endowment for Flushing Meadows Corona Park, plus an annual expense fund of \$300,000. Oversight for all funding should include a member of each affected community board (CB7).

USTA should donate \$15 million into an escrow fund for a new conservancy for Flushing Meadows Corona Park, and contribute \$1 million annually for park upkeep, which will increase with inflation (CB8).

USTA needs to invest in Flushing Meadows Corona Park, including upfront costs and ongoing maintenance, and participate on the board of a new not-for-profit organization dedicated to improving the park (Leicht).

USTA should donate \$15 million to a Flushing Meadows Corona Park benefit fund that would supplement, and not supplant, City funding for maintenance and operation of the park (Marshall).

**Response:** DPR and USTA are open to working with a not-for-profit partner for Flushing Meadows Corona Park. Further assessment and discussion would need to occur to determine the feasibility of the proposed conservancy/alliance and its functions, as well as the best vehicle through which to financially support Flushing Meadows Corona Park. Any conservancy, however, need not be accomplished to satisfy the requirements of CEQR.

**Comment 23:** The NTC is a “gated community” that is not truly publicly accessible. The NTC should be accessible to the public year round (CB3, Westley).



**Response:** The NTC is accessible to the public for more than 11 months of year when the US Open is not in session. Over 100,000 people participate at events at the NTC outside of the US Open period every year, including over 70 New York City schools. The NTC is gated, due to the need to ensure the safety of visitors and users (many of whom are young children), and to control entry during the US Open. However, using the public entrance, the public is welcome to visit the facility grounds without restriction from 6:00 am to midnight, 7 days per week, 11 months of the year. In response to comments made during the review process, permanent signage indicating the availability of access has been affixed at the East and South Gates of the NTC.

**Comment 24:** USTA contends that the NTC is publicly accessible but use of courts costs up to \$66 per hour, which is not affordable to the local community (Avella, Leicht, Westley).

**Response:** While the top rate is \$66 for “walk-in” indoor play during peak periods, the average rate paid is substantially lower, and there are discounts for students, seniors, and DPR permit holders. Tennis patrons with DPR tennis permits enjoy hourly court rates as low as \$11 with a 50 percent discount at the NTC’s outdoor courts. In addition, USTA donates thousands of hours of time each year to community organizations for free or at substantially reduced rates.

**Comment 25:** Members of the local community, who are predominantly low-income immigrants, have had their permits to play soccer in Flushing Meadows Corona Park taken away due to the US Open (Croft).

**Response:** The proposed project would have no effect on soccer permits. Erroneous news reports during a recent US Open tournament stated that local soccer teams were denied permission to use soccer fields in the Park during the US Open. They were not. USTA has never asked DPR to deny permitting of soccer fields during the US Open. DPR was able to address the erroneous rumors in a timely manner, so the soccer games could be played as scheduled. DPR does not intend to pull or cancel any soccer permits as part of coordinating and facilitating the US Open. In addition, the NTC provides substantial benefits for members of the local community (who are, as the commentor notes, disproportionately low-income and immigrants) including: providing jobs, generating economic activity, providing a world class public recreational facility 11 months of the year, and donating court time for community programs.

**Comment 26:** USTA should cease parking vehicles on lawns during the US Open (Leicht).

**Response:** Public parking on grass areas in Flushing Meadows Corona Park is the last resort on days when there is a conflict between the US Open and a NY Mets home game, and after the parking supply on paved lots has been fully utilized.

With the exception of these conflict days, there are more than enough parking spaces available in the Citi Field lots for US Open patrons.

There are two small grass areas that are used for staff parking during the tournament. For general overflow parking, when Citi Field parking is not available, another paved lot is available further south in the Park. Only after that paved lot is filled are patrons directed to grass lots. After the tournament, grass parking lots are re-seeded and restored by the entity that manages the lot (some grass lots are managed by the USTA, but others are managed by DPR or the Citi Field parking lot operator). USTA will continue to strongly encourage use of public transportation to reduce the number of private cars parking in the Park.

**Comment 27:** USTA should partner with DPR to ensure the cleanliness and maintenance of the perimeter of the NTC. (CB3)

**Response:** Comment noted. USTA is responsible for maintenance along the perimeter of the site, which is stipulated in NTC's lease with DPR. USTA has a maintenance schedule for both inside and outside the NTC campus and works with DPR on an annual basis to ensure the appearance of the perimeter is satisfactory.

## **HISTORIC RESOURCES**

**Comment 28:** I have asked the Landmarks Preservation Commission (LPC) to consider preserving Flushing Meadows Corona Park due to its historical significance. USTA's application should not be considered until LPC has made a determination (Avella).

**Response:** As noted in the DEIS, Louis Armstrong Stadium and Grandstand Stadium, which were originally constructed for the 1964-1965 World's Fair, were both extensively remodeled and expanded for NTC use in 1978. The stadiums were further altered as part of the 1993 NTC project that was completed in 1997. As such, neither retains significant historic or architectural integrity.

The proposed project would also affect areas at the NTC's perimeter and result in the relocation of a connector roadway. However, the existing connector roadway and the other affected landscaped and paved areas are not significant elements of Flushing Meadows Corona Park's original Beaux Arts plan. Therefore, Flushing Meadow Corona Park's original plan elements would not be significantly adversely affected by the proposed project.

## **URBAN DESIGN AND VISUAL RESOURCES**

**Comment 29:** The facades of the parking garages should be aesthetically pleasing and conform to the appearance of the park (CB7).

The design of the proposed parking garages should conform to DPR design (CB6).

**Response:** Trees and other landscaping would be provided adjacent to the proposed parking garages, and the garages and surrounding landscaping will be designed to be compatible with their context in the park. The design plans for the proposed parking garages will need to be approved by both DPR and the Public Design Commission (PDC).

## NATURAL RESOURCES

**Comment 30:** USTA should replace trees that will be damaged or moved due to the proposed project. The current proposal does not include a plan for the replacement of trees. Trees should be replaced within Flushing Meadows Corona Park (CB3, CB6, CB7, Marshall).

Trees not replaced within the park should be replaced within the affected community boards (CB7).

**Response:** USTA is dedicated to minimizing the number of trees that would be impacted by the proposed project. Approximately 349 trees would be affected, two of which are dead. USTA is working with DPR's Forestry Division to minimize the number of trees that would be removed and not replanted and has currently identified approximately 45 of the 347 living trees that would be replanted in place or transplanted. The other approximately 302 affected trees are being evaluated. Under a worst case scenario those approximately 302 trees would be removed and not replanted. However, some of these trees are expected to be determined by DPR to be suitable for transplant. Trees that could not be transplanted would be replaced pursuant to City regulations.

**Comment 31:** Landscaping improvements that are implemented during the US Open should be maintained throughout the year (CB3).

**Response:** Comment noted.

## HAZARDOUS MATERIALS

**Comment 32:** The proposed project should include a plan to remediate soil and study the long term effects of cars parking on the grass (CB3).

**Response:** Public parking on grass areas in Flushing Meadows Corona Park is the last resort on days when there is a conflict between the US Open and a NY Mets home game, and after the parking supply on paved lots has been fully utilized. Following the tournament, each year, any damaged areas are (and would continue to be) reseeded. This parking would not be expected to be associated with significant contamination as the potential impacts would not be

concentrated in any one area and have not been, and are not expected to be, of a quantity beyond the ability of natural biodegradation processes to break down.

A Phase I Environmental Site Assessment (ESA) was conducted in June 2012. The Phase I ESA identified conditions characteristic of the overall park, which include: historical on-site marshland potentially associated with methane emissions; filling of the project site and nearby land with a mixture of ash, refuse, street sweepings, and soil and rock removed during subway construction in Brooklyn; and a historical on-site underground storage tank (UST). A Subsurface (Phase II) Investigation Work Plan has been prepared and submitted to the New York City Department of Environmental Protection (NYCDEP) for review and approval. Following the Phase II investigation, a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP), to be implemented during project construction, will be prepared and submitted to NYCDEP for review and approval.

## **TRANSPORTATION**

**Comment 33:** USTA should develop a comprehensive parking plan with input from the surrounding community boards (CB3).

**Response:** Planning for US Open parking and traffic is coordinated on an annual basis between NYPD, DPR and USTA. Going forward, it is USTA's intention to communicate with local community boards regarding maintenance of the plan.

**Comment 34:** USTA should commission a new traffic study that would include Roosevelt Avenue, 108th Street, Northern Boulevard, Astoria Boulevard, Ditmars Boulevard, 34th Avenue, and 37th Avenue (CB3).

**Response:** As part of the EIS, trip projections were developed for the additional traffic and assigned the traffic to the roadway network via departure points of the US Open. In coordination with NYCDOT, the EIS studied the overall traffic network and conducted an analysis of those locations demonstrating the greatest potential for impacts. Only those locations with the potential for significant adverse impacts under the guidelines of the *CEQR Technical Manual* are studied in the EIS. The proposed project is not expected to result in significant adverse traffic impacts on the roadway corridors noted in the comment.

**Comment 35:** The traffic study should include an analysis of Sky View Park (on College Point Boulevard) and the World's Fair Marina (CB7).

**Response:** DOT is currently undertaking an analysis of Sky View Park independent of the USTA project. Any future project at the World's Fair Marina would undergo similar traffic analyses, if warranted. The traffic analysis in the DEIS

incorporated known background development projects in the vicinity of the NTC.

## GREENHOUSE GAS EMISSIONS

**Comment 36:** Green spaces should not be developed. Due to climate change, development in Flushing Meadows Corona Park is not appropriate (Requena).

**Response:** The proposed project has been designed to minimize development on previously undeveloped areas. The proposed project's design includes many features aimed at reducing energy consumption and GHG emissions, such as energy efficient building design and landscaping improvements. Therefore, as described in EIS Chapter 12, "Greenhouse Gas Emissions," the proposed project would be consistent with the City's GHG reduction goal.

## ALTERNATIVES

**Comment 37:** The NTC has already expanded, including doubling its size in the 1990s. It does not need to expand again and should undertake this project within its current lease boundary. The DEIS states that the project could be accommodated within its current footprint (Avella, Croft, Westley).

The expansion is only needed to create a more luxurious experience for USTA patrons (Croft).

**Response:** As described in Chapter 17, "Alternatives," USTA extensively studied alternative site plans with the goal of meeting the principal goals of the project, including the need to replace aging facilities and infrastructure and to improve safety and circulation at the site, without expanding beyond the footprint approved in 1993. However, this was not possible, given the constraints of the site and the constraints of the facilities, such as the shape of the lease parcels, the subsurface condition of the land, and the size and orientation of the courts required for tournament play. USTA minimized the need for expansion by shifting seating, landscaping and other more flexible elements of the program, and by designing walkways that will be safe and comfortable, but not overly spacious or grand.

As noted in the DEIS, absent the proposed expansion of the project site, the project's goals and objectives would not be met. The NTC would continue to be constrained by an inefficient site plan, including critical pedestrian congestion at certain areas. There would not be an increase in economic benefits to Queens, New York City, and the region. The competitive position of the NTC would decline in relative terms due to improvements at competing and peer facilities.

**MITIGATION**

**Comment 38:** USTA should commit to ongoing evaluation and mitigation of all concerns related to the project (CB7).

**Response:** Comment noted. \*