

**Comments on the DGEIS / Amended GPP  
from Individuals**

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of only two residential complexes physically damaged in the attacks of September 11.

Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

ALAN D. ANDERSON  
375 S. END AVE, BLDG 400-  
NY, NY 10280  
12L  
[print name and address]

March 3, 2004

2:50

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

Karina Arabachian  
355 South End Ave # 8F

New York NY 10280

[print name and address]

394

March 3, 2004

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One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

Beatrice Aron

375 South End Ave. #4E

New York NY 10280

[print name and address]

395

379

March 3, 2004

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One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

J. Andy Badami - Moskowitz  
395 South End Ave  
N.Y. N.Y. 10280  
[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
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Very truly yours,

HAROLD BECKER  
375 South End Ave, 10T  
NEW YORK, NY 10280  
[print name and address]

March 3, 2004

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One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

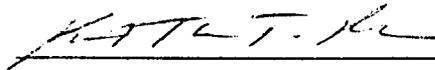
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Very truly yours,



KATHERINE T. BENDU

355 SOUTH END AVE, 7J

[print name and address]

NY NY 10280

Elise Berkower  
355 South End Avenue, #7E  
New York, New York 10280

80

Email: eliseberkower@worldnet.att.net

03

March 7, 2004

Lower Manhattan Development Corporation  
One Liberty Plaza, 20th Floor  
New York, NY 10006  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS

**Re: World Trade Center Draft Generic Environmental Impact Statement**

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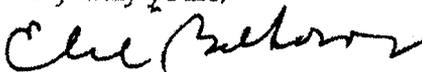
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As a long-time resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street *will be a disaster* for downtown residents and workers during its years of construction, and will provide little, if any, benefit to downtown residents and workers upon its completion. Indeed, the results will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Thank you for your consideration.

Very truly yours,



Elise Berkower

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,



Nora Berner

385 South End Avenue  
[print name and address]

Apt. 6M

New York, NY 10280

400

383

March 3, 2004

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Very truly yours,

ISAAC BLECH

395 South End Ave. Apt 28j

New York NY 10020  
[print name and address]

March 3, 2004

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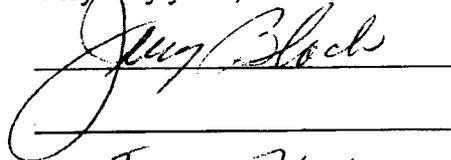
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Very truly yours,



JERRY BLOCK

[print name and address]

375 SO. END AVE.  
NY NY 10240

March 3, 2004

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One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,



375 South GND AVE

NY, N.Y. 10282

[print name and address]

Resident for 12 years

March 3, 2004

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New York, NY 10006

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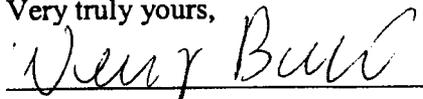
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Very truly yours,



Wendy Bond

345 South End Ave #7K  
NY, NY 10280

[print name and address]

March 3, 2004

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New York, NY 10006

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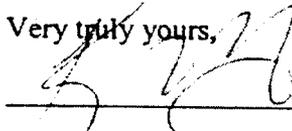
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Very truly yours,

  
\_\_\_\_\_  
Kathryn A. Brady

3-10-04

355 South End Ave, NYC 10280  
[print name and address]

405

386

Amended General Project Plan  
World Trade Center

I truly believe that the tallest building should come back to New York City and now is the time to do it. Never in New York History has a building come down and a smaller building was put up!! It has always been a larger building and still should remain that way. I also feel that it would be truly great to put back the two towers. The observation area in one and the Restaurant in the other was truly a great New York site and should be put back in place. I feel the surrounding buildings could be made taller if needed but the two main towers should go back where they were!! The original World Trade Center had five acres in the middle and this area could differently have a great memorial for all the people who we lost in 2001 and in 1994. I also would love to see a memorial with a smaller layout of the original World Trade Center in a wall replica and have all of these names on it! I also think the NYPD and NYFD should at least have special mention. I feel this could truly bring the greatest back to New York and also prove that this is the land of the free and not the scared. Even at first if it is hard to rent the top of the two towers I am sure this will be overcome maybe in five years after the towers are built. Not that any of us who lived through this event want to hear this but by that time some younger person will have started a company and want his headquarters on top of the towers and not even remember about this tragedy. This issue will not only affect the World Trade Center site but the rest of New York Construction. **REBUILD THE TRADE CENTER!!!!**

At this time I WOULD LIKE TO REQUEST the Draft GEIS when they are available.

Tom Brady  
331 N. Clinton Ave.  
Lindenhurst NY 11757  
Tombrady33@aol.com

406

387

March 3, 2004

Lower Manhattan Development Corporation  
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One Liberty Plaza, 20th Floor  
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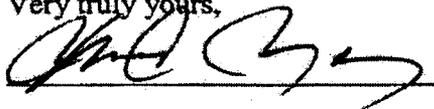
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Very truly yours,



Charles M. Brass  
395 S. End Ave. Apt. 27E  
New York, NY 10280-1033

March 3, 2004

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Very truly yours,

Harvey Brown  
375 South End Ave 21-17  
NY NY 10281  
[print name and address]

408

389

March 3, 2004

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One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of only two residential complexes physically damaged in the attacks of September 11.

Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

KATHLEEN E. BRUZZA  
395 SOUTH END AVE.  
APT 34K N.Y.C. N.Y. 10280  
[print name and address]

**FRIDAY, 16 JAN. 04**  
**601A SURF AVE. (9E)**  
**BROOKLYN, N.Y. 11214**

PA

**L.M.D.C.:**  
**ATT: COMMENTS W.T.C. MEMORIAL (GPP)**  
**ONE LIBERTY PLAZA (20TH FLOOR)**  
**NEW YORK, N.Y. 10006**

- TO WHOM IT MAY CONCERN:**
- 1- ACTING ON YOUR NOTICE OF PUBLIC HEARINGS:  
(TO BE HELD WEDNESDAY, FEBRUARY 18, 2004).**
  - 2- ARTICLE: A SECOND CHANCE FOR "DOUBLE CHECK".  
(I, HEREBY SUBMITT, FOR DISCUSSION, AND,  
HOPEFULLY APPROVAL OF ONE OR BOTH, TO BE  
INCLUDED AS PART OR ALL OF THE MEMORIAL.**



## A Second Chance for 'Double Check'

By Stuart Miller

On Sept. 11, 2001, with everything in ruins, one figure remained in Liberty Park across the street from the World Trade Center. He was slumped over, staring in his case, a businessman who seemed to be in shock and despair. When rescue workers, it was reported, approached him in the chaos to offer assistance, only to discover that he was not a man at all, but a sculpture. The sculpture, created by J. Sewell Johnson Jr. and placed downtown in 1982, was titled "Double Check." It was named for what it depicted: a businessman making final preparations before heading into a nearby office building. Before 9/11, the sculpture was simply part of the downtown landscape. Afterward, it became an icon as newspaper and magazine photos showed it covered in ash and surrounded by flowers, notes and candles

Stuart Miller is co-author of "Blue in the Face: New York" and "The Other Side of New York City."

left there by mourners and rescue workers. "Double Check" was a memorial to all those who perished. It was also a fitting metaphor for the city: though the sculpture had been knocked loose from its moorings, it had endured.

After the attacks, "Double Check" was stored behind a fence in Liberty Park. When plans for its future were not forthcoming, Mr. Johnson, who

**Return a Ground  
Zero sculpture  
to its home.**

owns the sculpture and had lent it to Merrill Lynch for display in Liberty Park, took the work back to his studio. There he bronzed the commemorative objects left on the sculpture, adding them to the figure permanently. And there "Double Check" has stayed — largely forgotten, overlooked in the creation of a large-scale memorial design for the World Trade

Center site.

The time has come to bring "Double Check" back home. Adding the sculpture to the redeveloped Ground Zero would help counter one of the main criticisms of the site's memorial designs, including the winning one: they all seem too remote and impersonal, a passive, abstract take on a visceral experience seared into our memories and hearts. What's more, it would give designers the opportunity to incorporate within the site an important element of the world that existed there before the 9/11.

While it would be awkward to suggest inserting "Double Check" into the layout of the winning design — this redevelopment process has more than its share of forced marriages — a place could surely be found for it on the redeveloped grounds of the World Trade Center or in its former spot in Liberty Park. Mayor Michael R. Bloomberg, Gov. George E. Pataki and other leaders of the downtown reconstruction effort should publicly commit to finding a home for "Double Check."

For years Mr. Johnson's works were dismissed by the art world as being too literal. But it is precisely this quality that makes "Double



The sculpture in question, Sept. 11, 2001.

"Check" so powerful. The sculpture is a representational depiction of a mundane figure that has transcended its origins and achieved symbolic power. Like New York itself, it has weathered the storm — and come away truly stormed but intact.

**N.Y. TIMES 11/16/04**

**LEGAL NOTICE—LOWER MANHATTAN DEVELOPMENT CORPORATION  
NOTICE OF PUBLIC HEARINGS TO BE HELD WEDNESDAY, FEBRUARY 18, 2004**

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**PURSUANT TO SECTION 16 OF THE NEW YORK STATE URBAN DEVELOPMENT  
CORPORATION ACT IN CONNECTION WITH THE PROPOSED  
WORLD TRADE CENTER MEMORIAL AND CULTURAL PROGRAM**

PLEASE TAKE NOTICE that two public hearings open to all persons will be held at the Michael Schimmel Center for the Arts at Pace University, located at Spruce Street between Park Row and Gold Street in the Borough of Manhattan, one from 1 PM to 3 PM and one starting at 6 PM on Wednesday, February 18, 2004, by the Lower Manhattan Development Corporation ("LMDC"), a subsidiary of the Empire State Development Corporation (a political subdivision and public benefit corporation of the State of New York) in cooperation with the United States Department of Housing and Urban Development and The Port Authority of New York and New Jersey pursuant to Section 16 of the New York State Urban Development Corporation Act (Chapter 174, Section 1, Laws of 1968, as amended) and the UDC Act, to consider the Amended General Project Plan (the "Amended GPP") for the proposed World Trade Center Memorial and Cultural Program (the "Project") described below.

The public hearings are for the purpose of informing the public about the Project and for giving all interested persons an opportunity to give testimony or comment on the Amended GPP pursuant to Section 16 of the UDC Act.

The public purposes of the Project include (a) the creation of the permanent memorial commemorating and honoring the thousands of innocent men, women, and children lost in the terrorist attacks on September 11, 2001 and February 26, 2003 (the "Memorial") and (b) the rebuilding of the World Trade Center site (the "WTC Site") and the Adjacent Sites referred to below as a mixed-use center of commerce, public spaces and culture, with the Memorial at its heart.

Any number of LMDC discretionary actions are subject to review pursuant to the UDC Act, including LMDC's approval of the Amended GPP. After the public hearing is held and a thirty-day public comment period is concluded pursuant to applicable laws, a Revised General Project Plan ("Revised GPP") will be completed and LMDC's Directors will be requested to affirm or, if appropriate, modify the Revised GPP and take statutory actions under the UDC Act and any applicable law.

**Project Location.** The Project Site is located in Lower Manhattan on three sites: (a) the WTC Site, bounded by West Vesey Street and Liberty Streets, on the adjacent West Side, blocks south of the WTC Site, now bounded by Liberty, Washington, Albany, and Greenwich Streets, and the other bounded by Liberty West, Cedar and Washington Streets, and (b) the other two streets, Liberty Street between those blocks and the WTC Site, and Washington Street between Cedar and Liberty Streets (collectively, the "Southern Sites") and one below-grade portions of Site 26, bounded by Park and Site 26, bounded by North End Avenue, the Marcy West and Essex Streets, the Southern Sites and Site 26, are referred to collectively as the "Adjacent Sites."

**Project.** The World Trade Center Memorial and Cultural Program, to which construction is expected to begin on or after January 2004, includes the planning, selection, construction and reconstruction of the Memorial and the planning and possible construction of memorial-related improvements and museum and cultural uses at the

Project Site to complement the redevelopment of commercial office space, retail space, conference center and hotel facilities, open space areas, a reconstructed church and certain infrastructure improvements at the Project Site (the "Redevelopment Program"). LMDC and Port Authority have coordinated the planning of these Programs that together constitute a land use improvement and civic project for the redevelopment of the Project Site (the "WTC Memorial and Redevelopment Plan"). The planning process will also include other appropriate public and private entities.

**Availability of the Amended GPP**

The Amended GPP, as approved by LMDC's Board on September 16, 2003 is on file at LMDC, One Liberty Plaza, 20th Floor, New York, New York and is available for inspection by the general public between the hours of 9:30 a.m. and 4:00 p.m., Monday through Friday, public holidays excluded. Copies of the Amended GPP are available without charge to any person requesting such copies at the office of LMDC at the address given above and is also available on LMDC's website, [www.RenewNYC.com](http://www.RenewNYC.com) in the "Planning, Design & Development" section, or by contacting William H. Kelley, Planning Project Manager, Lower Manhattan Development Corporation, One Liberty Plaza, 20th Floor, New York, NY 10006; Telephone: (212) 962-2300; Fax: (212) 962-2431; E-mail: [wtcc@renewnyc.com](mailto:wtcc@renewnyc.com). Pursuant to Section 16(c) of the UDC Act, LMDC also has filed a copy of the Amended GPP and the findings required pursuant to Section 16 of the UDC Act, in the offices of the Clerks of the County and City of New York, and has provided copies thereof to the Mayor of the City of New York, the Borough President of the Borough of Manhattan, the Chair of the City Planning Commission and the Chair of Manhattan Community Board No. 1. Copies of the Amended GPP and findings will be available at the hearing location during the hearing.

**Receipt of Comments**

Comments on the Amended GPP are requested and may be made orally or in writing at the hearings on February 18, 2004. Following the hearings on the Amended GPP, the public comment period on the Amended GPP will remain open for written comments, which must be received by LMDC by 5 PM EDT on March 19, 2004. Comments should be sent to:

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Program GPP—One Liberty Plaza, 20th Floor, New York, NY 10006

Comments on the Amended GPP may also be submitted until 5 PM EDT on March 19, 2004 through LMDC's website [www.renewnyc.com](http://www.renewnyc.com) in the "Development" comments box by choosing the category "Environmental Plan Review." Comments received after the close of business on March 19, 2004 will not be considered.

Dated: January 16, 2004, New York, New York  
LOWER MANHATTAN DEVELOPMENT CORPORATION  
Kevin M. Bergin, President

*Sincerely,*  
*Morris Dornstein*  
**MORRIS DORNSTEIN**  
**SENIOR CITIZEN/AGE 81**  
**1-718-373-2193**

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March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

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As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

Joseph Burstein JOSEPH BURSTEIN  
Jane Burstein JANE BURSTEIN  
355-17 B SOUTH END AVE NY 10280  
[print name and address]

Alexander M. Butziger  
Peter-Beenck-Strasse 51A  
21107 Hamburg  
Germany  
Telephone: ++753-2938  
E-mail: ambutziger@hotmail.com  
or: Alexander\_Butziger@public.uni-hamburg.de

February 18, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan / DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: Comments WTC Memorial and Redevelopment Plan / DGEIS

Comment on Freedom Tower:

I note that the height of the Freedom Tower rooftop observation deck is no longer stated in the new document. You promised an observation deck at 1,776 feet in the Final Scope of the Generic Environmental Impact Statement. Now rumor has it that the upper observation deck is being proposed above Freedom Tower's wind farm latticework at only 1,500 feet. The only worthwhile features of the Libeskind plan were the restaurant and observation deck proposed above the "110th floor level." They would not be the massive floors that should go there. But at least they would restore human presence in the sky - the opportunity for anyone of us to return where elevators go no more. It is crucial that the public will be able to go up as high as in the Twin Towers that were taken from us. That means at least to 1,377 feet, the height of the former Two WTC rooftop observation deck. Not only is this a question of principle, but also of economics - in other words: tourist revenue. If somebody has visited, or planned to visit, the 110th floor observation deck of Two WTC, would he ever make do with Mr. Silverstein's 70th floor observatory? Certainly, on a mundane 70th floor, few visitors and tourists would be drawn to the WTC or to New York. The observation deck should be as high up as possible. A 1,500 foot observatory is preferable over a 1,377 foot observatory. A 1,776 foot observatory is preferable over a 1,500 foot observatory.

Freedom Tower's antenna should by all means be extended to 2,000 feet. The metro area needs a 2,000 foot antenna for HDTV. No attention should be paid to Mr. Libeskind's demand that the Tower must not be taller than his fancied 1,776 feet. It should be noted that Mr. Libeskind's vaunted 1,776 foot spire will not be materially taller than the old 1,728 foot One WTC antenna. Without antennas above 1,776 feet, Freedom Tower might become by some measurement the world's tallest building, but it would not be the world's tallest self-supporting structure. That record is held by Toronto's 1,821 foot CN Tower. With a 2,000 foot antenna, Freedom Tower would be the tallest self-supporting structure in the world, surpassing CN Tower and Jakarta's proposed 1,831 foot Indosat Telkom Tower.

However, there are even taller structures that are not freestanding or self-supporting. They are TV-masts restrained by a maze of inclined steel guy wires, instead of being supported by a massive concrete shaft. The tallest guyed tower - and the tallest structure of any kind - extant is the 2,063 foot TV-mast at Blanchard near Fargo, North Dakota. But the tallest structure ever built by man was a guyed TV-mast of 2,120 feet in Warsaw, Poland, that collapsed in 1991. Wouldn't it be nice for New York to break all those records by making Freedom Tower's antenna a bit taller? Wouldn't it be great to retake the height of man's destroyed masterpiece? Wouldn't it be appropriate for the Capital of the Free World to surpass something built by communists? If an Act of Congress should be required to build taller than 2,000 feet, this site surely deserves it.

The antenna should not be placed asymmetrically atop the building. Putting it on the core at the center of the Tower would save structural steel and funds and it would no longer appear tacked on. Mr. Libeskind's whim, the off-center spire reminding him of the upthrust arm of Lady Liberty, is no excuse for this waste.

Mr. Childs should be allowed to extend the structural top of the Tower's wind farm from 1,500 to 1,776 feet. This would generate more energy, provide for a greater skyline presence, and render it possible to raise the upper observation deck to the world record 1,776 feet you promised.

Freedom Tower needs to be taller than the Twin Towers by all measurements - to highest floor, to roofline, to structural top, and to tip of antenna. The Twin Towers had a 1,368 foot roofline, a 1,377 foot rooftop observation deck atop Two WTC, and a 1,728 foot antenna atop One WTC.

WTC security and safety comment:

Freedom Tower, as far as I know, will have PATH tracks running through its basement. You should look into if a PATH train derailment would be able to knock out columns from under the Tower. You should investigate the possibility of terrorists getting a train of fuel laden tank cars under the Tower, and adopt security measures to forestall it. After all, I heard that terrorists planned to drive fuel laden tanker trucks into the basement of Sears Tower to set them on fire and have the immense heat topple the building. You should pay attention to the best possible fireproofing on the PATH track level of the Tower.

PBS reported that under the new evacuation procedures of Taipei Financial Center and Shanghai World Financial Center people can use smoke resistant elevators to exit the building in less than 20 minutes. At the same time, firefighters can take the elevators to fight the fire. They compared the Asian evacuation procedures with the ones designed by Mr. Childs for 7 WTC. Mr. Childs' plan to use extra wide stairways to evacuate the building could take an hour. Mr. Silverstein said his buildings would be the safest in America. But these safest buildings in America would still fall far short of the new buildings in Asia. The final design of Freedom Tower will have to be better than 7 WTC to be as safe as the Asian towers. The new WTC Towers should be the best skyscrapers in the world in any respect. Implementing above innovations from those Asian towers will be crucial to make the WTC number one in safety.

In order to address future fire threats, the option of building additional or expanding existing fire stations around the WTC should be examined.

Serious storms appear to become a more frequent occurrence. This should be considered in the design wind loads of Freedom Tower and the other new WTC buildings.

General WTC redevelopment comment:

If you choose to replace the Twin Towers with the Libeskind WTC, the other office towers besides Freedom Tower should be super tall (taller than 1,000 feet) too. After all, we did not lose just one "skyline element" (as you like to call it) on September 11, 2001, but two. How can the two lost Towers be replaced by just one building?

Why do not you put the hotel atop one of the office buildings, on floors 71 to 110? If Mr. Silverstein does not wish to build any office space above the 70th floor, that does not mean that no hotel or conference space can go there. Many people would love to stay in a hotel with such incomparable views. You may want to discuss this idea with hotel operators.

Comment on the Restoration Alternative:

Given the mediocrity of all aspects of the Libeskind plan and its buildings, I am glad that you recognize that "The Proposed Action is not, however, the only option considered by or open to LMDC." The only truly worthwhile way of rebuilding is the Restoration Alternative. The new WTC should conform more to that what was taken from us on September 11, 2001, than to Mr. Libeskind's plan. It is obvious that you do not evaluate the Restoration Alternative fairly, but try to denigrate it as best you can, to whitewash the Proposed Action.

Regarding your concern that not enough tenants might be found for the upper floors of 110 story Towers, the New York Post reported that one executive alone indicated a willingness to lease the top

five floors in one of rebuilt 110 story Twin Towers. An asset management firm set up a billboard calling for the Twin Towers to be rebuilt, promising to move in. Former WTC tenant Jonathan Hakala wants to return to his office on the 77th floor of One WTC. He proposes that you should hold a worldwide auction for space above the 85th floor. He is sure that such an auction will be heavily oversubscribed. Mr. Hakala also vowed to rent space in the new WTC only if the new buildings have at least 110 habitable floors. World Trade Center Restoration Movement volunteers regularly run out of supplies of "YES I'd Work on the 110th Floor!" stickers. David Emil, owner of the 107th floor restaurant "Windows on the World," is eager to reopen on the 110th floor of a new WTC Tower. I suggest you poll other prospective tenants on whether they would be willing to rent the high floors before you preclude rebuilding to 110 floors, without any good evidence that not enough tenants could be found.

The Wall Street Journal reported that the unrentable "skyline element" of Freedom Tower will be extremely expensive. Instead of wasting so much money on an unrentable "skyline element," occupied floors 71 to 110 should be funded. In case that that should prove even more expensive than the stack of windmills, you should bear in mind that office floors up there will one day turn a profit, while the windmills will not. In any event, the terrorists' desire to instill a fear of height must not be fulfilled.

There is at least one assertion of yours that staggers imagination. How would 110 story Towers be shorter than a 70 story building? Like Freedom Tower, state-of-the-art Twin Towers would have a higher floor to floor height than the old Twins. They would be materially taller than the old ones. At Mr. Silverstein's desired 13.5 foot floor to floor height, 110 floors translate into a roofline of 1,485 feet. That could easily be extended to equal Freedom Tower's 1,500 foot wind farm top. Rebuilt Twin Towers could have spires above that height, too. Not the occupied floors make Freedom Tower "tall" - it is just the wind farm and the spire. But as a friend of mine likes to put it, you can stack crap into the stratosphere and it still remains crap.

Why would it be a disadvantage that the new Twin Towers will not mimic the Statue of Liberty or Brooklyn Bridge? Get yourself a postcard of the old Twin Towers and have a long, good look! The Twins were beautiful in their own right and do not need to copycat other landmarks.

Who wants view corridors if he can rather look at rebuilt Twins? People will come from all over the world to look at the rebuilt Twin Towers.

Rebuilding the Twins does not encroach on open space - after all, rebuilding the Twins does not mean you need to rebuild the Plaza Buildings. Consolidating the office space into 110 floor Twin Towers would on the contrary leave more land for other uses, like open space. Regarding density, why do not you put the additional 600,000 square feet of space in the new Twin Towers, making them even taller and bigger? Rebuilt Twins should be taller, bigger, better and greater than the old ones.

Like most people I talked to, I utterly fail to understand how a death pit and a locality bearing the atrocious name of "September 11 Place" can be called "attractive, lively, and inviting." Even granting that for the sake of the argument, who said that Mr. Libeskind's spatial arrangement is the only possibility to provide "quality" open space superior to the WTC Plaza? Do you mean to say that you consider yourself incompetent to integrate "quality" open space with new Twin Towers? By the way, who would give up New York's signature buildings for "quality" open space?

The retail mall should indeed be underground. After all, Westfield America pulled out of the mall lease because street level stores are less popular, and thus less profitable than the old WTC underground mall. If people vote with their billfolds against street level retail, and for a new underground mall, this wish should be respected. Obviously, people do not want that street level retail activity. Who would want to force people out into inclement weather by refusing to rebuild Manhattan's only major shopping mall?

While it is well that you examine the option of rebuilding the Twin Towers off their old footprints, it cannot be said often enough that rebuilding them on the footprints is much better. Regarding "meaningful recognition" of the footprints, there is no more meaningful way to recognize the footprints than restoring their old meaning - rebuilding 110 floor office Towers right on them, where they belong! Two death pits are *not* a way to meaningfully recognize the footprints. Only a minority of victims' families wish to keep the footprints completely empty of commercial development. Yet they presume to speak for all victims, for all victims' families and for all people. It must be noted that many victims are survived by multiple mega-memorialists. That is how mega-memorialists get thousands of family member signatures, while they in all likelihood are only a vocal fringe group. It would be worthwhile to

investigate whether the majority of victims' families really wishes the footprints to remain as empty as Osama's boys left them. Terrorists must not be allowed to determine the land use in our cities. Terrorists must not be granted a place on the map. They must not be encouraged to litter our cities with footprint memorials. A possible compromise would be to rebuild the Twin Towers partially offset from their old footprints.

You state that rebuilding the Twins would preclude reopening the streets. Even if the Twins are rebuilt as you describe it, why should the streets not run around the Towers? By the way, under 23.4.11 you state that under the Restoration Alternative, Greenwich and Fulton Streets would be reopened. Anyway, reopening the streets is of no importance, opposed to rebuilding the Twins.

Rebuilding the Twins also does not mean that the Southern Site cannot be used as a park. Neither would it mean that tour bus parking and security checkpoints need to be on-site. None of the alleged security problems with the Restoration Alternative (like checkpoints for trucks) can possibly rival the Proposed Action's security problems. The Proposed Action permits unchecked trucks to drive straight through the WTC.

**Conclusion: Rebuilt Twin Towers could easily be made into something so great that the Libeskind scheme pales in every respect!**

Very truly yours,



A. M. Butziger

Member, World Trade Center Restoration Movement

**Joseph M. Calisi**  
**P.O. Box 1369**  
**Bronx, N.Y. 10475**  
**Office phone: (718) 694-1561**  
**E-mail: jmcalsi@yahoo.com**

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February 18, 2004

Lower Manhattan Development Corporation  
One Liberty Plaza, 20<sup>th</sup> Floor  
New York, NY 10006

Dear Lower Manhattan Development Corporation,

I am submitting to the LMDC, an exciting transportation plan that creates a low-cost, seamless, one-seat ride rail link into Lower Manhattan for commuters and JFK Airport users. By extending the ex-New York Central High Line on the west side of Manhattan with an elevated right-of-way to the Financial District, a great number of people can be transported to this area and realize a tremendous economy of scale and cost savings at the same time.

Under my plan, Metro-North and Long Island Rail Road commuter trains could use the High Line as a means to access the Financial District. This can be accomplished by widening and strengthening the access ramps that go up to the line onto the viaduct outside the LIRR west side yard to accommodate a two-track operation. Should a stadium be built over the adjoining yard tracks, the rail ramps could be built as part of the overall stadium structure with a built-in station. JFK Airport patrons using the Airtrain JFK could also benefit if hybrid rolling stock could be attached to LIRR trains or run as trailers with locomotives at each end that would serve as propulsion and crash protection to those hybrid light rail vehicles.

The following construction options are available.

1. Extending the viaduct south to the former World Trade Center that continues as an extension of the line south of Gansevoort Street (where the original former New York Central line currently ends) and continue south as an elevated or perhaps as a median of a surface arterial route that would be upgraded to an 'FDR-like expressway';
2. A four to six-track elevated terminal could be built near the former World Trade Center complex to accommodate and service commuters traveling from as far away as New Haven, CT; Poughkeepsie, NY (Upstate New York) and Montauk, NY (eastern tip of Long Island)
3. The remaining 2-track area could be used as a walkway or elevated park as others have proposed. However, if this elevated park is not made, it could as a storage yard for commuter trains;

The benefits are:

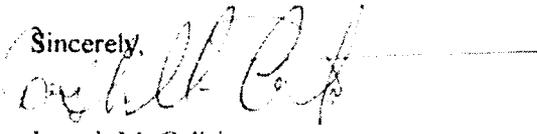
1. In terms of cost, an extension of the viaduct is a cost-effective method of providing transportation to the New York Metropolitan Region compared to tunneling costs.
2. It would help improve access and revitalize the economy of New York City by making it easier to locate new jobs in Lower Manhattan and would also create more jobs when constructing the southern extension.

Trains could access the viaduct through the NY Penn Station area. Long Island Railroad trains could continue through the station from Long Island. Metro-North trains could use the Amtrak line over the Hell Gate Bridge (for Connecticut riders) and through Amtrak's 'West Side line' that runs south of the bridge at Spuyten Duyvil (from Poughkeepsie). It is also possible that if a wye section of track is installed at Spuyten Duyvil, trains from Metro-North's Harlem Line could also gain downtown access after passing through the wye track in 'The Hub' in the Bronx (near MO Tower). Granted, there may have to be some negotiation of trackage rights for this High Line plan, but this right of way is currently unused asset that could be the vital cog to an expanding regional rail network.

Access to this right-of-way could be part of the Penn Station Metro-Hub plan put forth by the Regional Rail Working Group Plan that is back by ESPA (The Empire State Passenger Association) and NJ-ARP (New Jersey Association of Railroad Passengers). Based on discussions with the Regional Rail Working Group, you may already familiar with this plan, so explaining those details will not be repeated here. However, I would need to meet with you so I could explain some of those details as they pertain to my plan. I have attached a series of maps as well as pages from the Auto-Fee New York website to help you conceptualize the plan.

I can be reached at my office during business hours at (718) 694-1561 or via e-mail at: [jmcalisi@yahoo.com](mailto:jmcalisi@yahoo.com).

Sincerely,

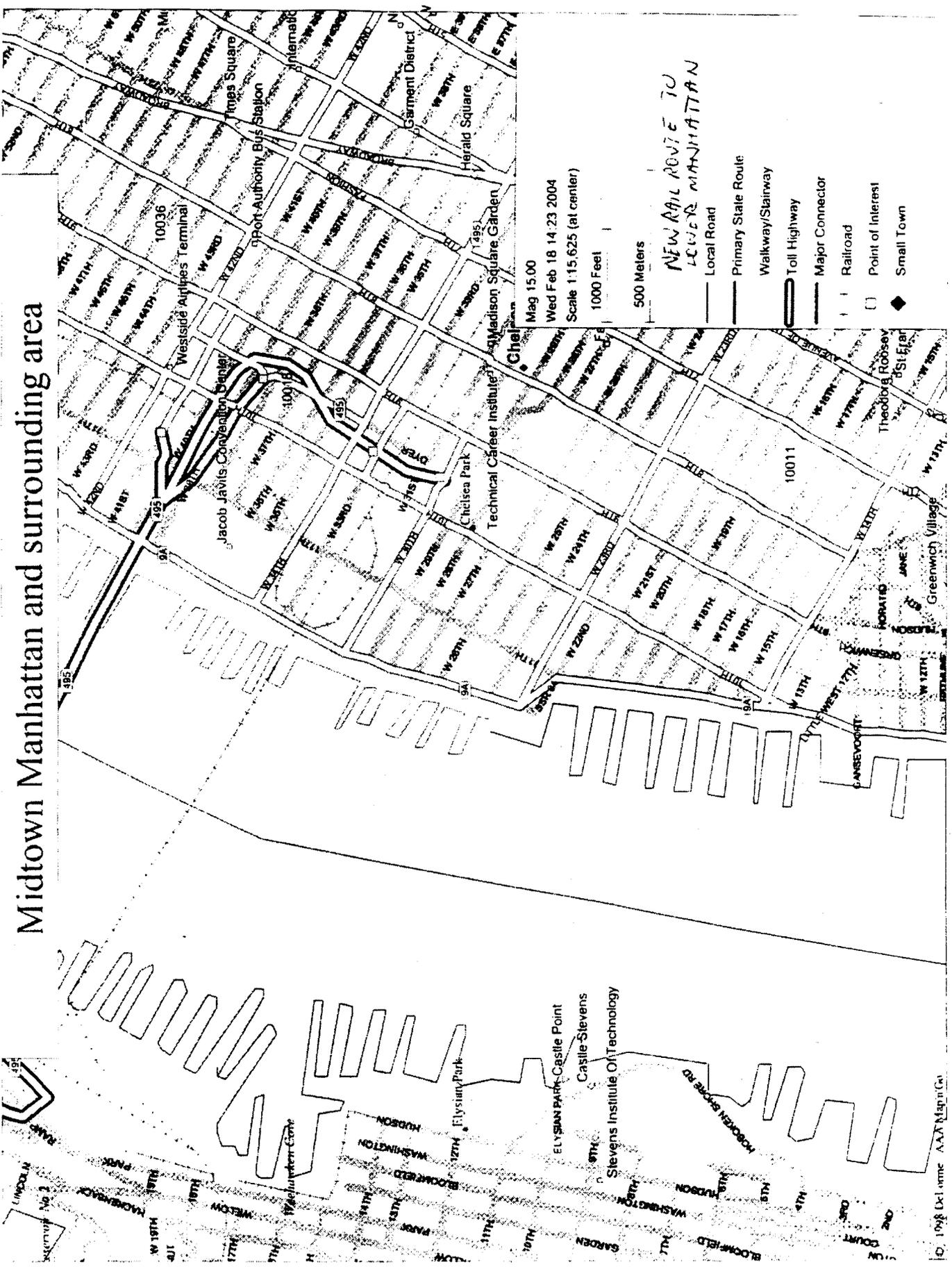


Joseph M. Calisi

# Lower Manhattan and surrounding area

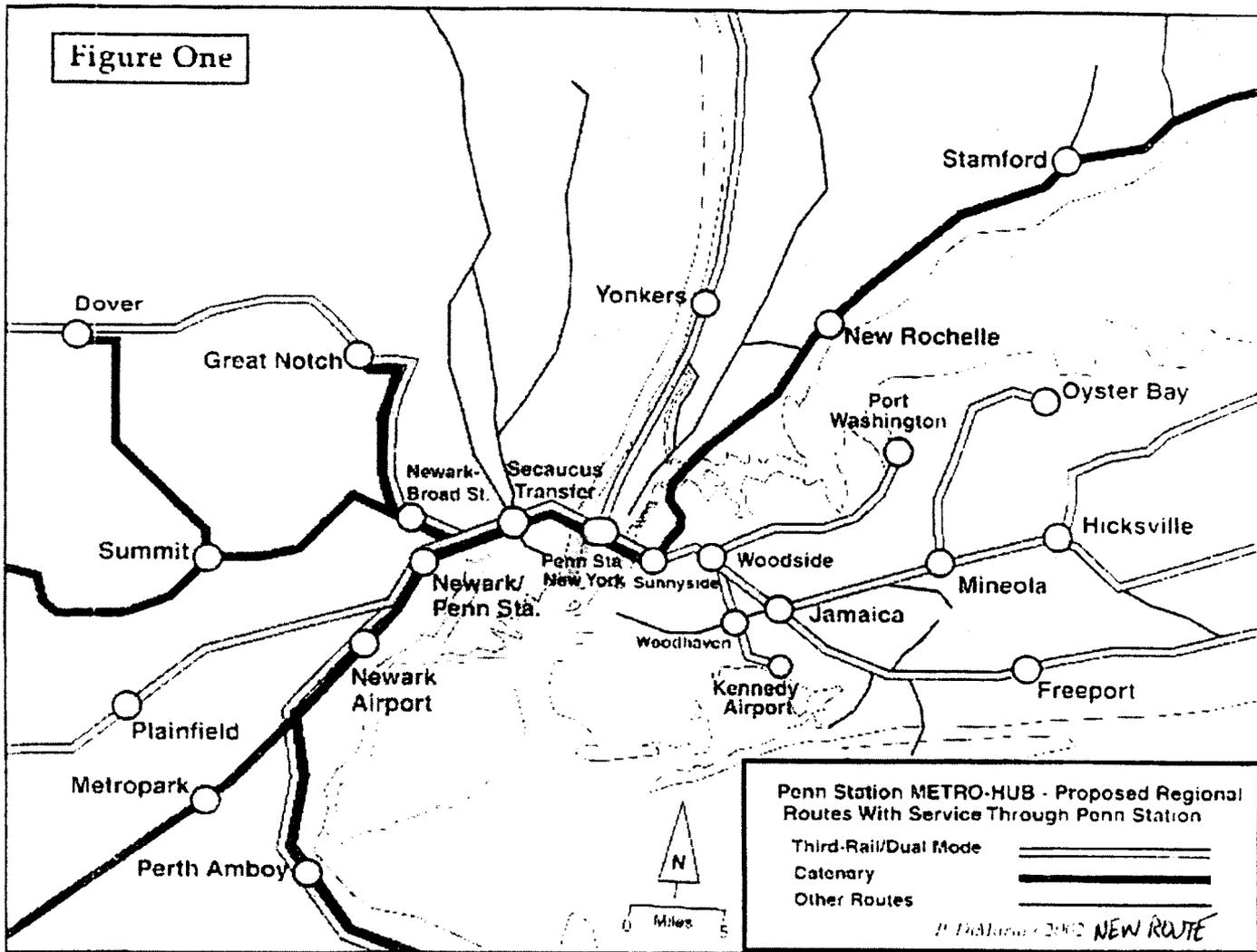


# Midtown Manhattan and surrounding area



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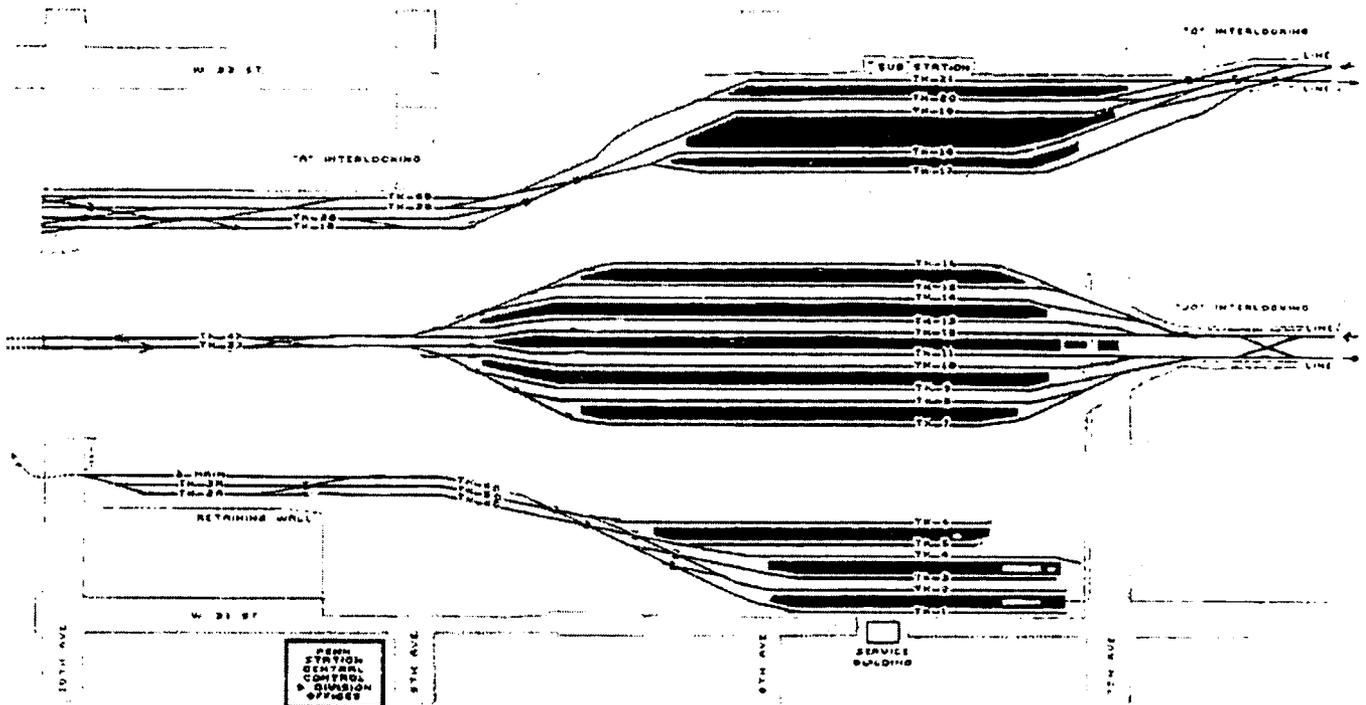
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# Penn Station Metro-Hub

## Figure Two: Proposed Track Layout

This view shows the proposed track layout at Penn Station from overhead, with 33rd Street across the top edge, and 10th Avenue along the left edge. The center group of tracks (platforms are shown in solid black) are for trains running east/west to and from New Jersey and Long Island (and north to the Hell Gate Bridge, for New England). The top group of tracks in the diagram are LIRR's, connecting to the West Side Yard on the edge of Manhattan. The bottom group of tracks are stub-end tracks for Metro-North's Hudson Line and Empire Service.

Return to: Metro-Hub Proposal  
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**Figure Two: Proposed Track Layout for Metro-Hub**

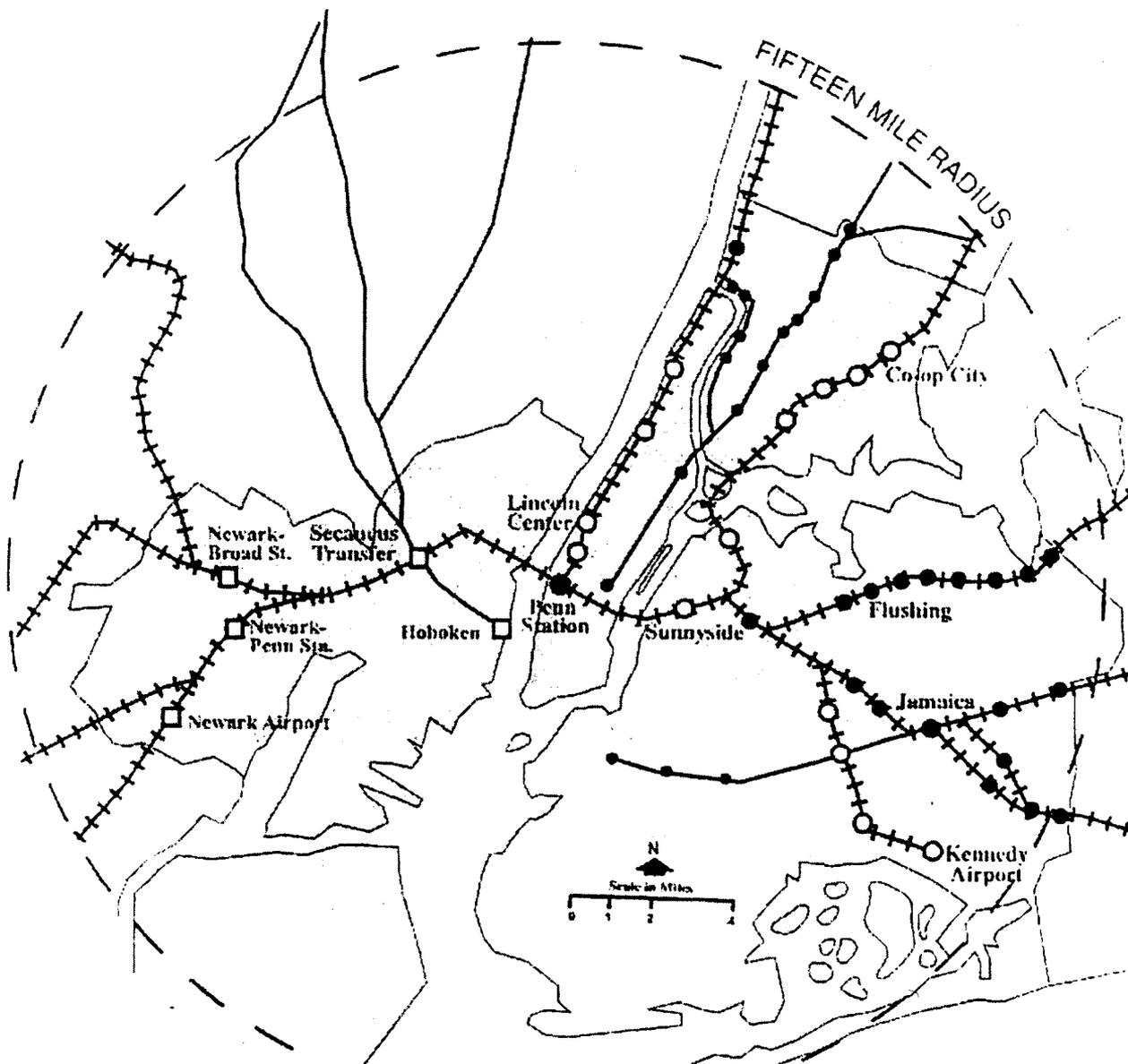
- Tracks 1 thru 6: Stub tracks for West Side Line — Metro-North Hudson Line/Empire Service
- Tracks 7 thru 11: Eastbound, through-running — from N.J. to Long Island/Hell Gate
- Tracks 12 thru 16: Westbound, through-running — from Long Island/Hell Gate to N.J.
- Tracks 17 thru 21: LIRR tracks, connect to West Side Storage Yard (in Manhattan)

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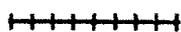
Figure Three

Fifteen Mile Radius From Penn Station  
Urban Fare Zone Shown in Gray



LEGEND

Routes With Direct Access to Penn Station Under Metro-Hub Plan



Other Routes



P. DiMarzio / 2002

NEW ROUTE TO LOWER MANHATTAN

Existing Stations Within New York City



Potential Sites For New Stations Within New York City



New Jersey Stations Within Urban Fare Zone



423

403



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Final Report  
posted:  
October 16, 2003

Last draft posted  
February 6, 2003

## *A Penn Station Metro-Hub*

### A short term action plan for:

- more trains
- faster service
- affordable fares

prepared by

Regional Rail Working Group  
Empire State Passengers Corporation  
Committee for Better Transit  
New Jersey Association of Railroad Passengers

September 15, 2003

### Table of Contents

- Executive Summary
- 1. An Affordable Vision
- 2. Through-running will produce capacity gains of 25 percent or more.
- 3. Frequent peak and off-peak service is essential.
- 4. Dual-mode locomotives enable through service on non-electrified lines.
- 5. Most platforms should be high-level to speed boarding.
- 6. A simplified, affordable and integrated fare system is needed.
- 7. The central fare zone should include New Jersey's congested core.
- 8. Newark and Kennedy Airports should be included in the central fare zone.
- 9. Better use of existing rail cars can increase service quickly and efficiently.
- 10. The bottom line.
- Afterword and Acknowledgements
- Figure One: Proposed Regional Routes through Penn Station
- Figure Two: Penn Station Track Layout
- Figure Three: Urban Fare Zones

424

404

## Executive Summary

Two measures could quickly improve rail travel in the New York-New Jersey-Connecticut metropolitan region.

### 1. Expand capacity at Penn Station by operating it as a "through" terminal:

*Operating Penn Station as a "through terminal" will increase peak hour capacity at this busy terminal by 25 percent or more. This gain occurs because time-consuming conflicts at the approaches to the platforms are avoided by through operation. Regional trains using the Hudson River tunnels, coming from New Jersey would make a stop at Penn Station and then continue directly through the East River tunnels to points in Long Island, the Bronx and Westchester or to Sunnyside yard. Additional trains from Queens and Long Island, using a second set of existing tunnels under the East River, would operate through the northern portion of Penn Station directly to the West Side Yard, also avoiding conflicting moves in the station. A new rail service using the West Side Amtrak line would be added, using the existing stub tracks at the south side of Penn Station.*

### 2. Provide more frequent service and integrated fares:

*Running more frequent service of at least twenty minute headways off-peak and on weekends will attract discretionary riders. "Cross-accepting" city and suburban MetroCards, so that city riders can travel on commuter rail lines within New York City and suburban commuters can use city buses and subways without paying extra fares, will make these regional rail lines more attractive.*

- **Ridership gains and operating efficiency make this plan affordable.**

*These changes, which improve the performance of the region's underutilized commuter rail assets, can be achieved without increasing operating costs if transit agencies introduce measures that improve operating efficiency concurrently. Through running improves equipment utilization allowing the substantial service gains with only modest, if any, additions to the rail car fleet. Combining service enhancements with pricing incentives has the potential to increase overall operating revenues by attracting new riders to the system.*

- **Riders from all three states benefit**

*Residents using non-electrified lines in New Jersey, would gain direct, one-seat ride access to Manhattan. Transit passengers from Eastern Queens, could take speedy LIRR trains, avoiding long, slow bus rides to crowded subways. Transit riders from the East Bronx including Co-op City, could bypass the slower and seriously overcrowded Lexington Subway to reach Manhattan. Non-Manhattan motorists would gain transit options and could avoid congested Trans-Hudson or Bronx-Queens highways crossings.*

- **The bottom line**

*With full support from elected officials, the region's transit agencies can take full advantage of Penn Station's unique design and convert the commuter rail lines into an efficient regional rail system -- to equal or surpass the successful examples in London, Paris and Berlin.*

## 1. An Affordable Vision

This report presents a vision for increasing the utility of the commuter rail lines serving the New York-New Jersey-Connecticut Region by bringing them together at a "Penn Station Metro-Hub." Already the focal point for a number of rail lines, Penn Station can become an even more significant hub if the operational and pricing changes recommended in this plan can be achieved. Since the existing rail infrastructure shown in Figure One: Proposed Regional Routes with Service through Penn Station is largely in

place, the plan can be accomplished within four years or less. While the service and fare integration components of this plan will benefit large numbers of travelers in the region, they will not significantly increase transit agency operating deficits. This is because increases in service can be offset by productivity gains and, when packaged with fare innovations, can result in a substantial increase in ridership and passenger revenues.

## 2. Through-running will produce capacity gains of 25 percent or more.

The elimination of conflicts between inbound and outbound trains at Penn Station by through running has the potential to increase peak hour capacity by 25 percent or more. Trains from New Jersey would operate through the eastbound Hudson River tunnel, making a stop at Penn Station for inbound passengers to alight, and for outbound passengers to board. Trains would then continue to terminals in Long Island, over the Hell Gate Bridge to points in the Bronx, Westchester and Connecticut or to Sunnyside Yard. In a similar manner, westbound trains would be "through-routed", continuing in revenue service to terminals further west or routed to nearby storage yards in New Jersey.

This concept works best for the central part of Penn Station, specifically tracks 7-16, as shown in Figure Two: Penn Station Track Layout. At a minimum, five platform tracks could be made available for each inbound tunnel track. If each platform track could be used every ten minutes, capacity becomes 30 trains per hour, per direction. NJ Transit is completing its installation of modern high capacity signaling on the Hudson River tunnels to handle this level of flow and a similar signal system upgrade would be installed on the East River tunnels.

Enhancement of stairway and escalator capacity to these platforms is also needed. Improvements on platforms serving the LIRR were completed a few years ago, and NJ Transit has recently constructed a new East End Concourse for its portion of the station. An additional access improvement, a short extension of the West End Concourse west of Eighth Avenue to reach tracks 7-14, is relatively easy to accomplish. Further gains in stairway capacity would be desirable for the proposed "through running" central portion of the station.

The five northern-most platform tracks at Penn Station, tracks 17-21, connect to two East River tunnels and to the four tracks leading to the LIRR West Side Yard. This portion of the station would also be operated as a "through station" if all inbound LIRR trains made a stop at Penn Station and then continued west to the storage yard. Outbound trains would originate in the yard. Since a large proportion of peak hour trains would be stored in the yard midday, four of the five platform tracks would be used to accommodate peak direction train movement. If each peak direction platform track could be used once every eight minutes, a 30 train per hour capacity would be achieved for this section of the station. Stairway capacity is adequate to meet this level of train activity. A new platform constructed in the yard would accommodate passengers going to the Javits Center and other new developments planned in the West Midtown area.

The six southern-most platform tracks at Penn Station, tracks 1-6, now used primarily by NJ Transit trains, would function as a stub terminal, with more limited capacity. These tracks are linked to the double-track West Side line used by Amtrak's Empire Service through a single-track tunnel under the West Side Yard. By moving turnouts closer to the tunnel portals, the length of this single track segment could be reduced to about a half-mile. Because of the tight curve in the tunnel, train speed is limited to 15 mph, resulting in a theoretical minimum headway of six minutes in each direction. A more practical operation would be about one train every ten to twenty minutes. This would permit a frequent West Side service for Metro-North as well as an hourly high

speed service to Upstate points. An important variation would be to handle this train flow at a four track stub terminal, releasing tracks 5 and 6 for through train service.

Capacity increases would be gained on both sides of the Hudson River. Increasing morning peak hour train capacity from New Jersey to New York from the 21 trains now scheduled, to a potential of 30 trains per hour would permit more frequent service on existing overcrowded services, and could allow the introduction of new trains from branches that now lack direct service, such as the Raritan Valley Line. Similarly, the potential of 60 trains per hour through the East River tunnels, where 38 per hour are now scheduled, allows new travel markets to be tapped. More frequent service from LIRR stations in Eastern Queens would help shift loads from overcrowded subways. A new Metro-North service across the Hell Gate Bridge would be feasible immediately. A one-seat ride from Kennedy Airport to Penn Station, accommodating passengers from Central Queens and the Rockaways, should also be part of this near-term plan.

Amtrak would also benefit from this capacity enhancement. Capacity gains on Amtrak could also be achieved by modeling its Northeast Corridor high speed service more along the lines of the French TGV or German ICE services. In Europe, much longer, multi-class trains are operated instead of duplicate, shorter high fare and basic trains which use more track space.

These capacity gains can be achieved within a four-year period. Designing and installing new signal systems and ordering new rail equipment can all be accomplished in this time period. An interim through service -- extending some NJ Transit Northeast Corridor Line trains across the Hell Gate Bridge to New Rochelle -- could begin almost immediately. New under river tunnels, though desirable, will take much longer to implement.

### **3. Frequent peak and off-peak service is essential.**

More frequent service is essential if the commuter rail system is to attract discretionary riders for travel to the region's core and is to compete with auto travel for more dispersed markets. For shorter distance trips, and for trips requiring a connecting bus service, current hourly mid-day headways are inadequate. At a minimum, 20 minute intervals, off-peak and on weekends, are critical to gain riders in these travel markets. This frequency is economically feasible if one-person train operation and proof-of-purchase fare collection systems are put into place during off-peak periods. These practices are already standard for new light rail systems, including NJ Transit's Hudson-Bergen LRT line. By tripling service, and cutting crew staffing by two thirds, the existing labor force would be used much more productively, making these service levels affordable. Cooperation with organized labor is essential to make these changes workable.

At certain locations, where two 20 minute headway off-peak services overlap, a rapid transit-like ten minute headway becomes possible. This would occur on the Rahway-New York segment of the Northeast Corridor line and on most LIRR and Metro-North lines in New York City.

While many through-service combinations are possible, those that are driven by equipment considerations may be the most cost-effective. For example, service over the Hell Gate Bridge is best matched with electrified service on NJ Transit's Northeast Corridor or Morristown Lines. Non-electrified lines on either side of the Hudson River would be paired using dual-mode locomotive propelled service. Raritan, Bay Head and Mountain Lakes (or Netcong) services on the west could be through routed with Oyster Bay, Port Jefferson and Patchogue service to the east.

Generally, LIRR branches that are fully electrified would use the northern portion of

Penn Station that continues to the West Side Yard. With eight or nine regional rail branches on either side of the Hudson River converging at Penn Station, the opportunity exists for diverting some motorists who now have no choice but to use congested bridges and tunnels. The dispersed nature of non-Manhattan trips suggests that most of these travelers will have to transfer. This can take place at the Newark, Secaucus and Sunnyside intermodal stations as well as at the Penn Station Metro-Hub. To the extent that a substantial volume of travel might be developed for a single through route, it would be on the Northeast Corridor, linking residential areas in central New Jersey with business centers in Connecticut.

Airport travel is another market that could be developed with good cross-Manhattan links. Newark Airport would be accessible to many LIRR and Metro-North riders through the Penn Station Metro-Hub. A direct Penn Station-Kennedy Airport link also becomes feasible with increased capacity developed in this plan. While a transfer at Jamaica would link the AirTrain system with Penn Station-bound LIRR trains, a one seat ride would produce a more appealing service, particularly for New Jersey and Amtrak passengers. The preferred route, from a passenger and rail operator perspective, would be the re-activation of the LIRR Rockaway Cut-off in Central Queens. While Kennedy Airport platforms limit train length to 240 feet, longer trains could be operated, with doors only opening on cars berthed at the station platforms, as is current practice on many commuter rail lines. These additional cars could handle passengers traveling from other Queens stations served by the cut-off -- Aqueduct, Ozone Park, Woodhaven and South Forest Hills -- reducing travel time to Midtown Manhattan by as much as thirty minutes. The capacity gains resulting from through-running at Penn Station and the restoration of the cut-off in Central Queens opens the way for direct train service from the Rockaway Peninsula, and from Howard Beach, as well.

#### **4. Dual-mode locomotives can permit through service on non-electrified lines.**

Dual-mode locomotives offer a short term solution to quickly gain the benefits of through-running at Penn Station, as well as to attract more riders on non-electrified lines. Extending electrification takes considerable time to design and construct and requires sizable financial resources.

Some key rail lines in suburban New York, New Jersey and Connecticut remain non-electrified. Over forty years ago rail lines serving the northern suburbs pioneered the use of dual-mode locomotives to permit through service to Manhattan's underground rail terminals, avoiding costly and time consuming changes in locomotives. Dual-mode locomotives have on-board diesel engines producing power to drive electric motors propelling trains, similar to conventional locomotives widely used in the U.S. In electrified territory, they draw power from the third rail and perform as straight electric locomotives.

Over the past five years, Metro-North and Amtrak have introduced a new generation of dual-mode locomotives, incorporating many advanced features. The units have proven reliable, particularly in high density peak hour service on Metro-North lines.

Until recently, the LIRR required passengers from non-electrified lines to transfer to reach Penn Station. The railroad is introducing a new fleet of 23 dual-mode locomotives to permit through service. NJ Transit has extended electrification on some lines but still requires passengers to transfer where it has not made this investment.

#### **5. Most platforms should be high-level to speed boarding.**

For a flexible and effective through operation it would make sense to equip most, if not all stations with high level platforms. Passengers prefer floor height platforms because

they speed boarding and reduce tripping hazards. Avoiding the need to have crews to open "traps" on cars to make stairways operational becomes an increasingly important feature when considering substantial increases in off-peak train service.

High-level platforms were an important innovation when first constructed at Penn Station in 1910 and at Grand Central Terminal in 1913, allowing passengers to exit and board trains more rapidly and comfortably than at low level platforms. Stairs were still needed for rail cars since few other stations in the U.S. were equipped with high level platforms.

In the 1960s, MTA decided to replace its ageing fleet of electric multiple unit cars and chose a new high performance car design that could only serve high levels platforms. New platforms were quickly installed at all stations that did not have this feature, on electrified lines. Recently, as part of its plan to replace locomotive-hauled cars on its non-electrified lines, the LIRR put into service a fleet of 134 bi-level cars. Since these cars could only be boarded at high level platforms, all stations on non-electrified lines were converted.

NJ Transit has followed a more incremental approach, generally purchasing cars that can serve both low and high level platforms. Stations are gradually being modified with high level platforms, but some stations, primarily on the Morristown Line, are not expected to be converted due to historic preservation concerns. Clearly, if LIRR bi-levels and dual mode locomotives were operated in through service to non-electrified lines in New Jersey, all remaining low level platforms on these lines would need to be converted.

## 6. A simplified, affordable and integrated fare system is needed.

To be really effective and to attract new riders, a regional rail system requires an integrated fare structure. MTA has seen great success with its MetroCard system that permits bus and subway riders to transfer without a fare penalty. Travelers can now optimize their travel patterns, choosing their preferred route and mode. The transformation of commuter rail into a true regional rail system will require a similar fare integration. Because of high fares and infrequent service, few riders board commuter rail stations in New York City. Little revenue loss would occur if the city's MetroCard were honored at commuter rail stations in the city. With its recent fare increase, MTA authorized a new "City Fare" for its commuter rail lines within New York City. This is a welcome step toward full fare integration.

Integrated fares for suburbanites are also important. While high fares are sustainable for travel to the Manhattan core, commuter rail becomes less competitive with the auto when a transfer to a city bus or subway is required. The inconvenience of a transfer is compounded when riders pay a fare penalty. MTA is beginning to move toward fare integration, offering monthly commuters a 9 percent discount on joint MetroCards, usable on city buses and subways, and converting all commuter rail tickets to MetroCard stock.

MTA, working with NJ Transit, should complete this integration by taking the logical next step -- offering a free transfer between commuter rail lines and the New York City bus/subway system. Since giving rail commuters free transfers to city buses and subways largely benefits suburban commuters, this should be balanced by allowing New York City residents to use their MetroCard to travel on commuter trains within the city. The revenue loss to the city/bus subway system, and the increased operating cost for commuter rail lines to carry more city riders, would be small -- and quite conceivably be largely offset by an increase in ridership -- as was the case to a surprisingly large extent when MTA initiated free transfers between city buses and the subway.

In New York City, the need to disperse residents from Manhattan's overcrowded and unhealthy tenements nearly a century ago led to the flat fare for subway travel within the city. With the introduction of the MetroCard, the city's bus system was finally brought into this common fare boundary. Extending this city fare to include travel on the commuter rail system within the city greatly increases the usefulness of the regional rail system.

## **7. The central fare zone should include New Jersey's congested core.**

New Jersey has much further to go to achieve integrated and affordable fares and service. Its bus and rail systems remain largely duplicative, with only a minimum of coordination. To take full advantage of the transformation of NJ Transit's commuter rail lines into a regional rail system, a major change in the rail fare structure is required. At present, the bulk of the revenues generated by passengers using the commuter rail system come from longer distance commutes of 15 to 50 miles or more in length. Residents of nearby cities like Newark, Elizabeth and Paterson make little use of the commuter rail lines for short distance travel within the densely developed core of New Jersey. Instead, some use local buses which are slow and costly to operate. Most drive, and the result is the state's legendary roadway congestion experienced in the core area.

Extending New York's "city fare" for travel within a common central zone, encompassing both sides of the Hudson River, would produce dramatic increases in transit ridership in the most congested parts of New Jersey. New Jersey local buses serving this common zone would also be equipped with MetroCard fareboxes, permitting a single integrated bus/rail fare. Initially, the central zone in New Jersey might be limited to the City of Newark and Hudson County, as shown in Figure Three: Urban Fare Zones. Eventually, the common central zone on both sides of the Hudson River would be located roughly within a fifteen mile radius of New York's Penn Station.

The revenue loss from the relatively small number of riders using the NJ Transit rail system for travel in the core, or the even smaller number of riders paying two fares for combined bus/rail travel, will be modest. This loss will be more than offset by new revenues generated by increased ridership and by operating cost savings resulting from coordination of bus and rail services.

Completing the fare integration process in New Jersey would be the honoring of commuter rail tickets from stations beyond the central zone for local travel in New Jersey's urban core. The combined advantage of increased regional rail service and the elimination of fare penalties could attract many motorists from crowded highways in the core. Access to regional rail stations located beyond the central zone is generally by auto. Efforts should be made to add specialized bus or van services and to improve walking and bicycle facilities where feasible. At some locations, increased parking may be desirable.

## **8. Newark and Kennedy Airports should be included in the central fare zone.**

Experience at NJ Transit's rail station at Newark Airport indicates that some air travelers are willing to pay a substantial premium over regular rail fares for airport service. However, high fares do deter use, especially for employees who often are given free parking, and for airport visitors who must make a round trip. Minimizing auto use at airports, clearly an important measure to diminish highway congestion and improve air quality, is now even more critical as a means to increase security and reduce the risk of terrorist attacks at airport terminals.

To maximize transit use, regional rail service to airports should be priced at the same level as service to other destinations within the same zone. Both Kennedy and Newark

Airports fall within the fifteen-mile radius central zone and transit service should be priced accordingly.

Furthermore, the Port Authority limits access only to airport users at the Newark Airport train station, preventing potential regional rail users who live or work near the station from reaching it by walking, biking, driving or using local bus service. This action also forecloses the opportunity for much-needed economic development at the airport station in Newark. Either the Port Authority's narrow interpretation of the restrictions on Federal aviation funds should be addressed and changed, or the legislation authorizing these funds should be amended.

## 9. Better use of existing rail cars can increase service quickly and efficiently.

The substantial increase in rail ridership anticipated in this plan will require an increase in service and equipment. The introduction of bi-level cars and dual-mode locomotives permits a rapid increase in train service on the LIRR. By routing lightly-patronized trains that now terminate at Hunters Point or Long Island City directly into Penn Station, duplicate seats on electric and diesel trains can be used more effectively. Retaining and rehabilitating some of the LIRR electric cars, now slated to be scrapped, offers another short term option for equipment gains. These cars could also be converted to locomotive-hauled operation to lengthen dual-mode operated trains. NJ Transit has purchased new single-level and bi-level cars to expand its fleet. The key to service increases is the higher capacities and improved equipment utilization made possible by through-running at Penn Station.

## 10. The bottom line.

With full support from elected officials, the region's transit agencies can take full advantage of Penn Station's unique design and convert the commuter rail lines into an efficient regional rail system -- to equal or surpass the successful examples in London, Paris and Berlin.

## Afterword and Acknowledgements

Representatives of the region's three leading rail transit advocacy organizations -- the Empire State Passengers Association (ESPA), the Committee for Better Transit and the New Jersey Association of Railroad Passengers (NJ-ARP) -- have joined forces, convening a **Regional Rail Working Group** to formulate a plan for advancing strategic regional rail improvements. This effort, begun in February, 2001, involved a series of monthly meetings of representatives of the three organizations. The result is this short term action plan for making much better use of the Tri-State Region's extensive existing rail system.

### Acknowledgments

This report involved the tireless efforts of over a dozen volunteers from the three sponsoring organizations. Meetings were held in space generously offered by Transportation Alternatives and the Alliance for Downtown New York Business Improvement District. Illustrations for the website were created by Paul DiMaria. Website layout/design: Wayne Fields.

### Remembering Steve Dobrow

A key player in establishing the Regional Rail Working Group, and a long-term advocate for improving public transportation in the metropolitan area, was Dr. **Stephen B. Dobrow**. Steve was one of the founders of the Committee for Better Transit and its first President. An electrical engineer and devoted educator at Farleigh Dickinson University, Steve dedicated his entire life to improving the ability of others to travel by bus, train, subway and ferry. He was a knowledgeable advocate, using his skills as an engineer to

make the case for specific improvements based on a solid underpinning of analysis and fact. He was a good communicator, writing thousands of letters and making himself available to provide comments to the press, which made him a force to be reckoned with. Many of the concepts contained in this plan were articulated by Steve through the years. Steve passed away on January 13, 2002. He is greatly missed.

For more information please contact:  
George Haikalis  
Chairman, Regional Rail Working Group  
One Washington Square Village, Apt. 5D, New York, NY 10012  
212-475-3394 -- geohaikalis@juno.com -- www.auto-free.org

*George Haikalis is President of the Institute for Rational Urban Mobility, Inc. (IRUM), and Chairman of Auto-Free New York.*

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March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of only two residential complexes physically damaged in the attacks of September 11.

Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

Karen L. Campbell  
355 S. END AVE 29D  
New York, NY 10280  
[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

FRANZINA D. CARTER

315 SOUTH END AVE, 11th FL.

NEW YORK, NY 10002

[print name and address]

March 3, 2004

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Very truly yours,

Emanuele Casmai

355 South End Avenue #22K

New York - NY 10280

[print name and address]



435

March 3, 2004

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Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
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Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

JACQUELINE CHAIT  
375 SOUTH END AVE #9C  
NY, NY 10050  
[print name and address]

436

JoAnne Chernow  
355 South End Avenue #10M  
New York, NY 10280

RECEIVED 3/10/04

March 7, 2004

Lower Manhattan Development Corporation  
Attn: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza  
20th Floor  
New York, NY 10006

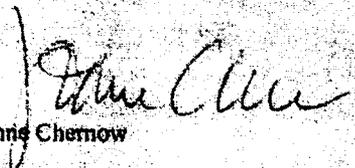
The section of the Draft Generic Environmental Impact Statement that addresses the West Street tunnel seriously underestimates the impact that tunnel construction will have on surrounding residential areas. At a time when the area needs to regain businesses lost after 9/11, this construction will disrupt commercial activity that is mandatory for a healthy economic climate.

The expense and inconvenience of building a half-mile tunnel far outweigh any (incorrectly) perceived advantages of doing so. The construction will take far longer and cost far more than your projections. The money can be better spent on hundreds of other projects that will enhance the neighborhood rather than destroy it.

The end result of the tunnel construction will be a pedestrian nightmare, putting vehicle ramps in the middle of pedestrian crossings, but the construction process will be a thousand times worse, limiting pedestrian and vehicular traffic into and out of Battery Park City for years. We endured years of West Street construction prior to 9/11, and know what a headache this will be for our neighborhood. We have already had two major incidents, in 1993 and in 2001, when traffic was severely restricted on West Street, and northbound traffic leaving Battery Park City was required to make a long detour south and east. Restricting surface lanes will restrict traffic turnings on to West Street, which will funnel Battery Park City traffic into the area east of West Street, where streets are narrow, congested, and through-patterns do not exist. Emergency vehicles entering Battery Park City will have similar problems, being restricted to two lanes where congestion will prevent adequate access. When the increased tour bus traffic of the future is factored in, reducing lanes of traffic either permanently or temporarily makes no sense.

In addition, Battery Park City currently is fighting a significant rat problem that developed after the fall of the towers and during the resulting excavation and reconstruction, and your statement makes no mention of what will be done to alleviate this problem. The city has failed miserably to control the increasing rat population, and digging up West Street is going to add more rats to our neighborhood than anyone can ever imagine.

As a 20-year-long resident of Battery Park City, I insist that the West Street tunnel part of the redevelopment plan be dropped from implementation.

  
JoAnne Chernow

437

414

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

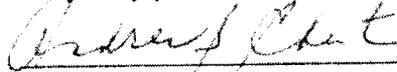
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Very truly yours,



ANDREA P CHESTEL  
395 SOUTH ST AVE #116  
New York, NY 10280  
[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

FELICE S. COHAN

395 S. END AVE #300

NY NY 10280

[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

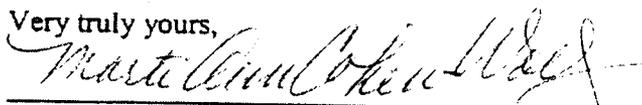
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Very truly yours,



MARTI ANN COHEN-WOLF

355-14B SOUTH END AVE

[print name and address]

NY NY 10280

THIS IS A WASTE OF MONEY

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

*Jennifer Cole, Thonice Cole*  
JENNIFER COLE, THONICE COLE  
375-148 SOUTHWEND NYC, NY  
[print name and address] 10280

WHO IS GOING  
TO PAY FOR  
THIS - WE  
THE TAXPAYERS  
AND RESIDENTS  
OF BATTERY PARK CITY.

WE ARE  
STRONGLY AGAINST THIS PROPOSAL WHICH  
IS OF NO ADVANTAGE & WILL FURTHER DISRUPT  
OUR NEIGHBORHOOD

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

*Beth Coleman*

Beth Coleman

305 South End Ave #F  
[print name and address] NY 10028

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,



Marshal Coleman

365 South End Ave 1F  
[print name and address]

New York, NY 10280

PS we have been through enough. Please don't put us through this!!

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

COLLIAS FAMILY  
345 SOUTH END AVE, APT 3W  
NY NY 10280  
[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
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One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

Audrey Cornisky & ALAN STURM  
375 South END Ave. # 318

NY NY 10280  
[print name and address]

445

422

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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*The post does not  
justify the end  
result!*

Very truly yours,

Denise Cordivano

Denise Cordivano

375 South End Ave #7L  
[print name and address]

NY NY 10280

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

TOBY COSSMAN  
355 South End Ave. Apt. 16A  
New York, NY 10050  
[print name and address]

447

424

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

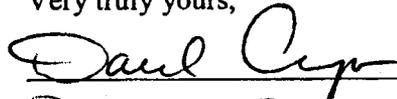
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Very truly yours,

  
DANIEL CUPRIA  
375 South End Ave  
NEW YORK NY 10280  
[print name and address]

448

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

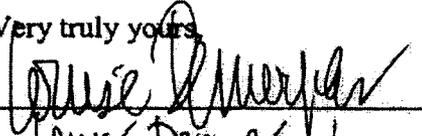
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Very truly yours,

  
\_\_\_\_\_  
LOUISE DEMIRJIAN  
375 South End Ave #24C  
\_\_\_\_\_  
[print name and address]  
NYC 10780

Ammon Dennis  
Gateway Plaza Bldg. 400  
375 South End Ave. #2-D  
New York, NY 10280  
March 8, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20<sup>th</sup> Floor  
New York, NY 10006

Cc: Gateway Plaza Tenants' Association

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, and, contrary to my building's tenants' association, I fully support the short tunnel on West Street outlined in Chapters 13A, 21 and 22 and Appendices E and J of the World Trade Center Draft Generic Environmental Impact Statement (DGEIS).

New York City is congested with automobile traffic, traffic that lowers residents' standard of living, threatens their health and disrupts the physical and emotional continuity of city neighborhoods. Traffic on West Street is no exception. I support West Street's "burial" as a means to reunite Battery Park City with Manhattan, thus favoring pedestrian safety and comfort over the danger and disruption of the automobile. The proposed tunnel would be a resounding statement in favor of humans over cars, raising the quality of life in an already great pedestrian city.

Unfortunately, my building's tenants' association cannot see past the initial inconvenience of the tunnel's construction and the agony of driving a few more blocks to the highway for a weekend in the Hamptons. Let us make Battery Park City more livable for all of New York's residents: build the tunnel. Thank you for your time.

Sincerely,



Ammon Dennis

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

Deborah DiIorio  
375 S. End Ave 9B  
NY NY 10280

[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of only two residential complexes physically damaged in the attacks of September 11.

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Very truly yours,

*Christina Dimichele*

*Christina DiMichele*

*355 South End Ave, Apt 15D*  
[print name and address]

*NY, NY 10280*

452

March 3, 2004

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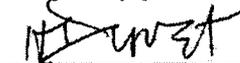
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HILTON DIONET

345 South End Av #6F  
NYC 10280

[print name and address]

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Very truly yours,

EDWARD A. DOBERMAN  
355 SOUTH END AVE., APT. 15K  
NEW YORK, N.Y. 10280  
[print name and address]

454

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Very truly yours,

Cuquita Douglas  
375 50. End Ave #10  
NY NY 10280  
[print name and address]

455

429

 morning my name is Diane Dreyfus I am part of an ad hoc neighborhood group formed to study and make comments on the World Trade Center Environmental Impact Statement. For my part, I examined Land Use. And, because my colleagues will cover the subjects of the failed toxic clean-up and the health risks associated with ten years of construction in a densely populated area, I can confine my remarks to the myriad calculation errors, discrepancies, misrepresentations and wide variances from open space standards that LMDC has settled on. All figures used herein are given in the environmental impact statement released January 22, 2004. In this presentation, I will step through a few of the several types of land uses proposed for the 16 acre site. You will hear about park land, passive open space and active open space but the Memorial –a 4.2 acre space-- is not subject to discussion in this context. It is out of the scope of Open Space Requirements and is mentioned only because LMDC insists on adding the sacred with the mundane to make up the short fall.

In general, Land Use Standards are about “carrying capacity” – they specify the “people load” that different classes of land can support. Although there were standards better suited to the Memorial and Class A Office complexes, the LMDC settled on The CEQR (City Environmental Quality Review) Technical Manual as a guide. The CEQR standard specifies 0.15 acres per thousand people for Workers & Visitors and 0.5 acres per thousand people for Residents. This because visitors and workers are thought to be passing through in a crowd, whereas the residents are seen taking more leisurely strolls with companions.

If LMDC actually complied with CEQR, then Visitor and Worker space would work out to be about six square feet for Workers and Visitors and 20 Square feet for residents. But they don't.

Additionally, open space is divided into active and passive. Active Space accommodates children running and playing and often includes equipment and ball fields. In this plan, Passive Space is intended to provide an amenity for the workers who might want to relax or take a private moment without going further than 1/4 mile or 10 minute walk from where they work. That 1/4 mile or 10 minute walk is key to Open Space. Space beyond that range is excluded by definition.

On this board you will see two plans provided by LMDC. One is the original World Trade Center showing the Tobin Plaza and open space. The other is the proposed site plan showing new buildings, the memorial and the proposed open space. Let's look at what passes for Open Space... Examining the original World Trade Center Plan you will notice that the side along 9A West Street did not count as open space until after 9/11. But the legend shows us that, now the road shoulder on the other side of 9A is included in the LMDC open space calculations. I bring this up only to indicate the acres of “open space” can include such unsavory parcels. Essentially, this quality of Open Space is as hospitable as the traffic triangle in Harold Square. Yes, there is a tree and a statue to admire and you could have a cup of coffee or meet a friend there. But would you want to?

Now, plug in the numbers for the completed project. Given their projected figures for 2015, 68,000 Visitors and Workers and 33,155 Residents, the LMDC has provided for less than 60% of the CEQR standard for Workers & Visitors and less than 40% of Residents requirements.

With only 5.2 acres of low quality open space to serve that population, LMDC is obliged to include Memorial Space to make up the difference. Adding the Memorial into open space calculations is not only inappropriate and wrong; it acts to obscure how far out of compliance with the CEQR standard the LMDC's proposed plan is.

Interestingly, while reviewing the WTC/EIS for quality of life indicators, I double checked the math on the Open Space figures as set forth on page S-28, Table 2-1 and Table 6-1. The consistent figures are 5.52 acres for open space and 4.2 acres for memorial areas. Simply converting square feet into portions of an acre -Tables 2.1 and 6-1- show the 5.52 acres open space figure converts to 4.85 acres or a 13% overstatement.

However, neither the Actual 4.85 figure nor the exaggerated 5.2 acres restore the net loss of residential amenities -- open space in the pre-911 scenario was 8.13 acres.

My fellow Residents, If you do not hold LMDC to the CEQR Standard and insist on an audit of their glaring errors, you will surely loose quality in your lives plus the local bond rating will decline. I leave you with a quote from Robert Moses -- "Once I put my shovel in the dirt no court can stop me."

Thanks,  
Diane Dreyfus,  
M.S. Arch.  
Urban & Regional Planning  
917-254-9851

ANALYSIS OF OPEN SPACE DISCREPANCIES and VARIANCE from CEQR REQUIREMENTS

WORKERS & VISITORS

Space	Square Feet	Sq Ft./Acres	Acres
Sept 11 Plaza	26045	3260	0.55
Liberty Park N	22870	4350	0.55
Heron Park S	20870	13960	0.48
Man V. Area	12000	43560	0.28
Heron Park N	13980	43560	0.32
W of Light Plaza N	13980	43560	0.32
W of Light Plaza S	44120	43560	1.01
Liberty Park S	58555	43560	1.34

Sq Ft. to ACRE Conversion Formula:  
 $43560 \div \text{Square Feet} = \text{Acres}$

ACTUAL Sub-Total  
 13% Difference

LMDC Sub-Total (ERROR)	211350	43560	4.85	68800	0.07	47%	1.8 Acres per 10
Memorial Park	182870	43560	4.19	68800	0.13	89%	1.6 Acres per 10
LMDC Total (ERROR)	394020	43560	9.05	68800	0.13	89%	1.6 Acres per 10

NOTE: this figure is sometimes 62320 people - 82% of CEQR reqs.  
 & this figure is sometimes 205424 people - 15% of CEQR reqs.  
 NOTE: this figure is sometimes 205424 people - 20% of CEQR reqs.  
 & this figure is sometimes 205424 people - 20% of CEQR reqs.

RESIDENTS

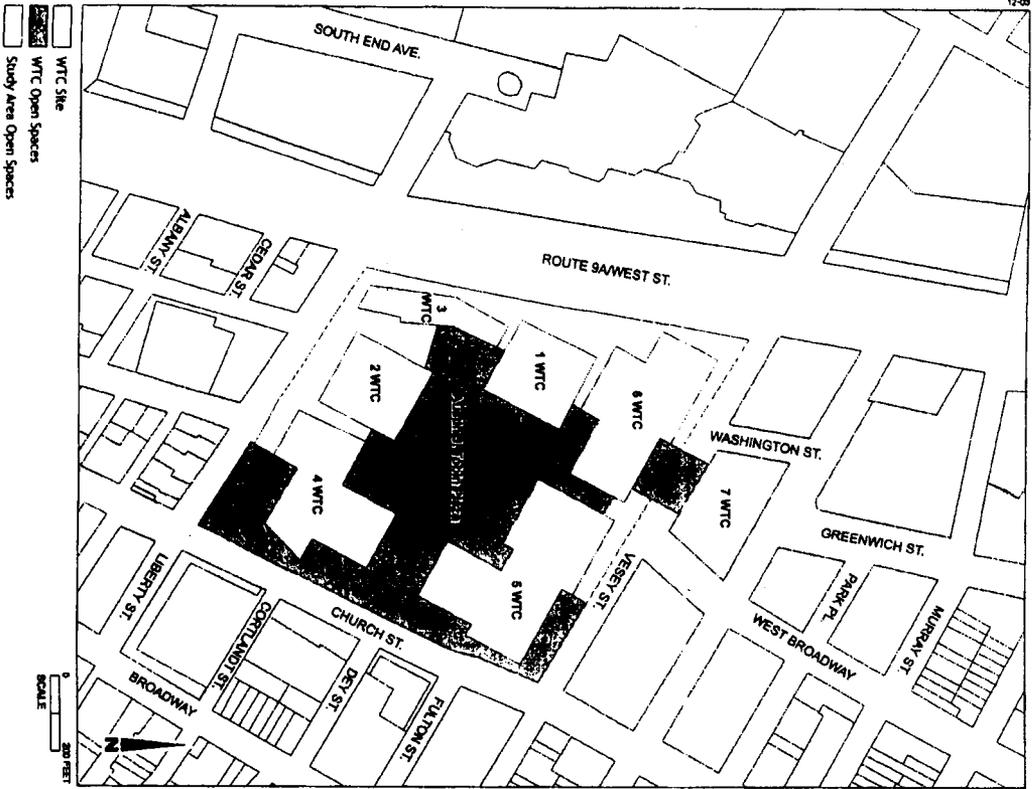
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Actual Sub-Total	211350	43560	4.85	33165	0.15	27%	3 Acres per 10
13% Difference	211350	43560	5.52	33165	0.17	33%	3.5 Acres per 10
LMDC Sub-Total (ERROR)	211350	43560	5.52	33165	0.17	33%	3.5 Acres per 10
Memorial Park	182870	43560	4.19	33165	0.27	66%	5 Acres per 10
LMDC Total (ERROR)	394020	43560	9.05	33165	0.27	66%	5 Acres per 10

458

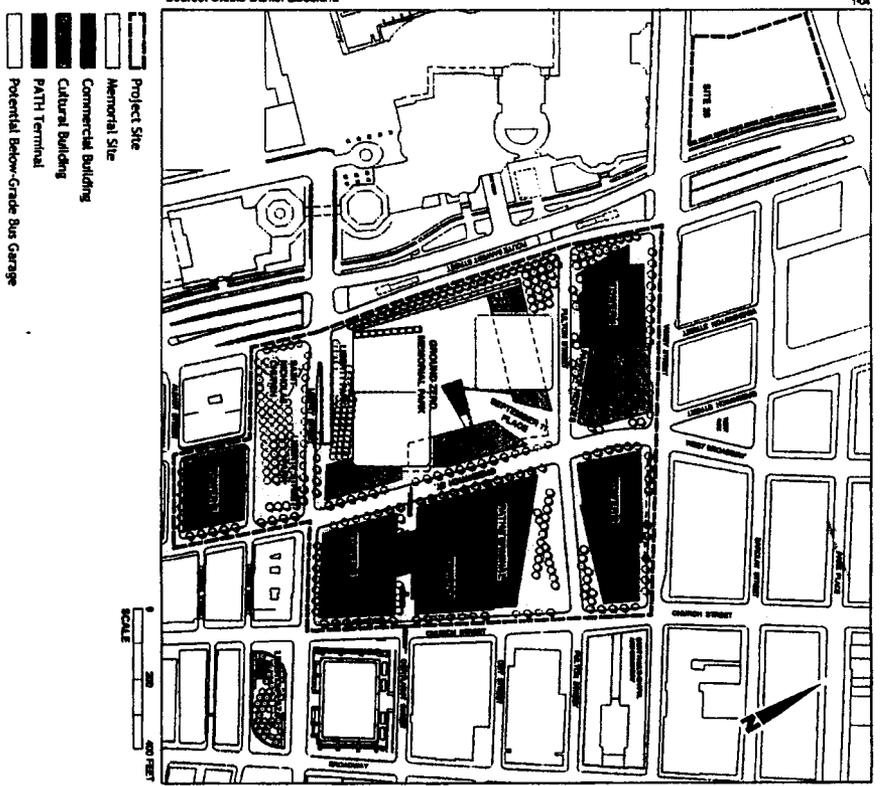
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World Trade Center Memorial and Redevelopment Plan



World Trade Center Open Spaces  
 Pre-September 11  
 Figure 6-5

World Trade Center Memorial and Redevelopment Plan

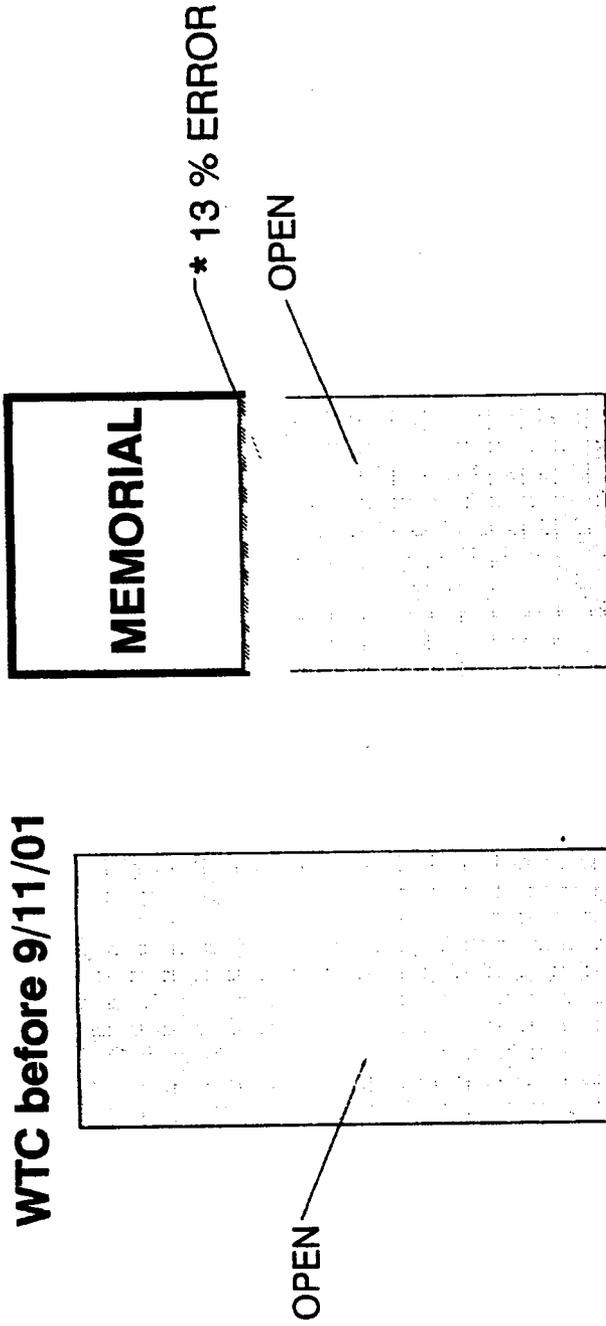


Proposed Site Plan  
 Figure 1-2

459

433

# Comparison of OPEN SPACE



As Projected into 2015.

OPEN SPACE is defined as being within a ten minute walk or 1/4 mile

\* See ANALYSIS of OPEN SPACE DISCREPANCIES and VARIANCE from CEQR REQUIREMENTS

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## **unitech operations**

253 Elizabeth Street | New York, New York 10012 | USA

Phone: 212-226-7027 Cell: 917-254-9851

01MAR04

**ENVIRONMENTAL IMPACTS on NEIGHBORHOOD FACILITIES NOT INVENTORIED  
and NOT MAPPED in WTC-EIS**

Dear Mr. Rampe and Ms. Chang:

Last week we pointed out that LMDC is negligent in excluding schools and libraries from

3/16/2004

4/6/

435

the Environmental Impact Statement. Many of the children on the east side of Broadway use Play Streets for recreation. Recently P.S.130 experienced many weeks of street closings due to traffic. Additionally the grade school students were subjected to such unremitting noise that classes were taught in the hallways and, of course, noxious dust and fumes accrued -- this due to a small 30 unit construction project in the neighborhood. Please, phone principal, Mrs. Wu for details - (212) 226-8072 . Five Play Spaces (\*\*\*\*) were among those omitted in your inventory. All are Play streets.

This week we noticed how incomplete and, frankly, misleading figure 20-2 and 20-3 "Share of Minority Residents in Census Blocks Adjacent to WTC Truck Route" and "Share of Minority Residents in Census Blocks Adjacent to all Truck Routes" are. To wit: routes of the Manhattan Bridge and the Williamsburg Bridges are "cropped out" out of the figures. Whereas, the Williamsburg, Manhattan, Brooklyn and even Queensboro Bridges are shown in figure 9-4 "Manhattan Office Submarkets".

So, since LMDC knows that the Bridges existed in Chapter 9 why would they be eliminated from Truck Route Studies in Chapter 20?

Thank you.

Diane Dreyfus, M.S. Arch.

Urban & regional Planning

Parks and Playgrounds:

Columbus Park

\*\*\*\*Baxter, Mulberry, Bayard Streets

PS 1 Playground - Alfred Smith Houses

\*\*\*\*Madison, Catherine, Oliver Streets

Alfred E. Smith Park

\*\*\*\*Catherine Slip, Madison, South Streets

Sophie Irene Loeb Playground

\*\*\*\*Henry, Market Streets, East Broadway

Battery Park

Battery Place, State and Whitehall Streets

George Soilan Park

Liberty and Marginal Streets, Pier A, Hudson River

City Hall Park

\*\*\*\*Broadway, Park Row, Chambers Street

3/16/2004

462

436

Bowling Green  
Broadway, Whitehall Street

**Post Office:**

Chinatown Station	6 Doyers Street 10013
Knickerbocker Station	128 East Broadway 10002
Bowling Green Station	25 Broadway 10004
Peck Slip Station	1 Peck Slip 10038

**Elementary Schools:**

PS 1 - Alfred E. Smith School (K-8)	8 Henry Street 10038
PS 124 - Yung Wing School (K-8)	40 Division Street 10002
PS 126 - Jacob Riis School (K-8)	80 Catherine Street 10038
PS 130 - Hernando Desoto School (Pre K-5)	143 Baxter Street 10013
PS 150 - Tribeca Learning Center (Pre-K-5)	334 Greenwich Street
PS 234 - Independence School (Pre-K-5)	292 Greenwich Street 10007
PS/IS 89 (Pre-K-5 & 6-8)	201 Warren Street

**Intermediate School:**

IS 131 - Dr. Sun Yat Sen School (6-8)	100 Hester Street 10002
---------------------------------------	-------------------------

**High Schools:**

Murry Bergtraum High School	411 Pearl Street 10038
Satellite Academy High School	51 Chambers Street 10007
High School for Economics and Finance	100 Trinity Place 10006
High School for Leadership and Public Service	90 Trinity Place 10006
Murry Bergtraum High School for Business Careers	411 Pearl Street 10038
Stuyvesant High School	345 Chambers Street 10282
Borough of Manhattan Community College (CUNY)	199 Chambers Street 10007

**Private/Parochial**

**Elementary Schools:**

St. James School (Pre K-8)	37 St. James Place 10038
St. Joseph School (Pre K-8)	1-3 Monroe Street 10002
St. Patrick Old Cathedral School	233 Mott Street 10012
Transfiguration School (Pre K-8)	29 Mott Street 10013
St. John's University - Manhattan Campus	101 Murray Street 10007
College of New Rochelle -	

3/16/2004

463

437

DC 37 Campus	125 Barclay Street 10007
New York Law School	57 Worth Street 10013
New York University School of Business Administration	100 Trinity Place 10006
New York University School of Continuing and Professional Studies	15 Barclay Street, Room 222 10279
Pace University	1 Pace Plaza 10038
New York Career Institute	15 Park Row 10038

**CONTACTS:**

▪ e-mail

<[mailto:diane\\_dreyfus@UTECHO.com](mailto:diane_dreyfus@UTECHO.com)>

▪ Instant Message <<mailto:9172549851@TMOmail.net>>

3/16/2004

464

438

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Very truly yours,

Isaac Eide

395 South END AVE 29G

NYC 10280

[print name and address]

This will greatly disrupt this already  
fragile environment.

465

439

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Very truly yours,

Lois Eide - Lois EIDA  
395 South END AVE 29F  
NYC NY 10280

[print name and address]

Isn't 20 years OF DIGGING UP  
WEST St enough for us to  
endure. We need a break.

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Very truly yours,

AKIKO ENDO  
275 South End Ave. #18B  
NEW YORK, NY. 10280  
[print name and address]

## Commentary on the Draft Generic Environmental Impact Statement for the World Trade Center Site

By Louis Epstein

R.D. 2, Carmel, New York 10512

*Founder & Director, World Trade Center Restoration Movement*

This new document presented for comment in the process of rebuilding the destroyed World Trade Center is another illustration of the profound problems in the way the process has been conducted.

From Draft Scope to Final Scope to Draft GEIS, definitions have been altered back and forth as alterations are made to plans to appease various constituencies and confuse everyone. How are we to react to what is really planned while there is still time to stop it?

That is always a concern... Governor Pataki remains determined to prevent anyone from having a chance to undo his mistakes. The acceleration of this review process has drawn protest from many quarters.

The Draft GEIS does not bear the imprimatur of the Port Authority, though it concerns the construction of Port Authority-owned buildings on Port Authority-owned land... the Port Authority did not bother sending the designated representative to the Draft GEIS hearings. And it has recently been admitted that there is not yet any agreement with the development corporation to allow its plans to proceed. This is a good thing, as the development corporation is not likely to have to deal with the lasting consequences of its actions the way the property owners are. However, political pressure to pave the way for the horribly misconceived Proposed Action to proceed appears inevitable.

At long last a "Pre-September 11 Scenario" and "Restoration Alternative" are explicitly recognized as benchmarks for the GEIS, after a prolonged process in which such strategies for redevelopment have been implacably opposed despite broad public support. However, given the history of official prejudice against redevelopment based on restoration of what was destroyed, it is no surprise that the Draft GEIS seeks to portray these scenarios unfairly, in a bid to justify the unreasonable programmatic requirements that have led to designs such as the Proposed Action.

In rebuilding where renowned icons of America have been destroyed, the presumption must be in favor of rebuilding in the same spirit and image, applying the latest technologies toward restoring what was there stronger than before, and the burden of proof that any new design is better must rest on the new design's proponents;

*in this regard, the DGEIS unconditionally fails to justify the Proposed Action.*

The adverse environmental impacts of the official program requirements are evaded, and the environmental advantages of discarding the Proposed Action in favor of redevelopment based on updated reaffirmation of the design principles that produced the original World Trade Center are likewise obscured behind subjective sophistries.

An environmental impact statement needs to take into account responsible priorities toward superior environmental health, with particular suspicion toward anything that encourages population or traffic growth either at the location in question or as a result of the decisions made regarding what is to be built

468

442

there.

*This DGEIS turns its back on these issues, and virtually glorifies the effects of this nature that would be caused by the Proposed Action.*

The narrow-minded obsession with running streets completely through the site is a dramatic step backward, even apart from the disturbing insensitivity of using the occasion of the murder of thousands to repudiate the urban design principles that gave us the beloved Twin Towers.

To "integrate the site into the surrounding neighborhood" means to destroy the distinct nature of the site, and the official fixation with turning Lower Manhattan into a 24-hour community constitutes destroying the distinctive character of that part of the city in order to make it like countless others.

And contrary to the dubious representations of the City Planning Department, the way forward for Lower Manhattan surely lies in further de-vehicularization, not the creation of more space for future traffic jams and auto accidents. This is an area uniquely suited to being dominated by pedestrian traffic arriving by mass transit.

Chapter 10 begins by praising the neighborhood character created by the old World Trade Center, and then sets about implementing the above policies in order to ensure that that character is never restored, and the action of the terrorists in erasing it perpetuated.

Chapter after chapter tries to justify the Proposed Action, glossing over areas of concern. The last-place finish of the Libeskind plan in the official public poll prior to its selection is nonetheless vindicated.

While the exposure of the slurry wall has been reduced, it remains an objective of the design to perpetuate the terrorist-created exposure of this crumbling structure never intended to be exposed to the elements and designed to always have the weight of the Twin Towers holding it in place.

Pits remain as part of the design on the sites of the former Twin Towers, deep receptacles for the settling of heavier-than-air pollutants from the traffic invited through the site by the inappropriately restored streets and sources of chemically contaminated mist. Cold winters and deep snowfalls will present difficult challenges to these exposed below-grade structures.

The GEIS can not be allowed to soft-pedal the hazards posed by leaving these open wounds as part of the plan. (What of suicide leaps into the sunken pools?)

Only in Chapter 23 is it at last admitted that "The Proposed Action is not, however, the only option considered by or open to LMDC." Yet, in the presence of other options, it does not then, as would be logical for many reasons, abandon the Proposed Action in favor of the greatly superior Restoration Alternative.

Rather it attempts to dismiss the Restoration Alternative in three ill-supported paragraphs of the Executive Summary. The first paragraph describes the alternative. The second shamefully invokes the fears that the terrorists sought to inflict as justification for submitting to their murderous will that we be denied the possibility of again working as high in the skies as before. The third for no reason assumes that environmental mitigating measures would not be a part of future independent development of the southern site.

Yet if one looks at Chapter 23 for the detailed treatment of the Restoration Alternative, subheading after subheading admits that the Restoration Alternative would be no worse than the Proposed Action, even while avoiding the ways the Proposed Action would be worse than the Restoration Alternative.

In trying to come up with reasons to prefer the Proposed Action, the Draft GEIS is driven to refuge in subjective design criticism. It is complained that the Restoration Alternative would need truck checkpoints to be on the site; but only in the Proposed Action can trucks...or truck *bombs*...rumble unchecked through the site, and on either side of every building.

Above-ground retail space, found all over the city, is extolled and the underground retail space a distinguishing feature of the World Trade Center is denigrated. Yet the site has lost its retail operator because the plans called for too much of the retail space to be above ground when shoppers prefer it underground, the more so in bad weather...this was what made the World Trade Center mall among the most profitable in the world.

The Restoration Alternative's skyline impact is denigrated compared to the Freedom Tower, with its roof hundreds of feet lower and dozens fewer office floors. The space not accounted for in the envisioned towers is accused of making the project denser. Yet it would be wholly in the spirit of this Alternative to consolidate these functions into the new Towers to make them even taller, and the density less than the Proposed Action. Open spaces would be increased, where analysis shows that the Proposed Action reduces open space significantly.

The placement of new Twin Towers is said to be constrained by "the public's expressed desire for some meaningful recognition of" the footprints of the old Towers. Before Governor Pataki aggressively intervened to pre-empt public debate, polls showed New Yorkers evenly divided on building on the old footprints, and meaningful recognition does NOT have to be total emptiness.

Only with the placement contrived through this constraint is the shadow effect any worse off the site than that of the Proposed Action. Even placement of the new Twin Towers blocking Greenwich Street's course, since it would not be reopened in this scenario although the DGEIS seems inconsistent on this, would affect the open spaces and pull shadows away from surrounding areas as well as enhancing the towers' security. But every effort is made to paint restoring the Twin Towers as more inconvenient than it is.

The safety technologies seen as advantages of the proposed buildings would of course be scaled up for new Twin Towers with more effectiveness than for smaller buildings. Engineering realities ensure that taller towers are necessarily built stronger and safer than smaller ones.

The new Twin Towers would be engineering marvels embodying the technologies of the new millennium to a degree only made possible by their breathtaking scale, which would also be the only way for them to generate revenue on a sufficient scale to pay for their construction. Neither the original Twin Towers nor the Empire State Building filled up in their first years, but had they been built more cautiously they could never have been as profitable as they were in the long run.

The "Restoration Alternative" must be no empty "straw man" in the final GEIS. It must be fleshed out, regardless of official bias toward the Proposed Action, sufficiently to demonstrate its numerous

advantages. The current effort reads like a rationalization for proceeding with the vastly inferior official design. There can be no assuming that, if the decision is made to proceed with the Restoration Alternative, no environmental mitigation or safety enhancement proposed in other contexts will be adapted.

Until September 11th 2001 the status quo had no established lobby because it did not need to be defended...today a conspiracy of bureaucracy seems determined to leave the status quo of before September 11th 2001 defenseless. This environmental review process must not be perverted into another stage of that conspiracy, but must honestly weigh the drawbacks of failing to set ourselves back onto the course we were on before thousands of valiant lives were unconscionably snuffed out, and iconic structures revered the world over collapsed into ruin.

Blinkered dedication to proceeding further down a wrong turn can not allow the final GEIS to be a biased attempt to sell an eyesore imposed the teeth of public disinterest and dislike, rather than the required fair evaluation of the consequences of the choices before us.

I HEREBY REQUEST A WRITTEN COPY OF THE FINAL GEIS, AS IS MY LEGAL RIGHT UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT.

March 9, 2004

## Commentary on the Amended General Project Plan for the World Trade Center Site

By Louis Epstein  
R.D. 2, Carmel, New York 10512  
*Founder & Director, World Trade Center Restoration Movement*

The official planning process of rebuilding the destroyed World Trade Center has been a saga of uninterrupted incompetence and a constant succession of incorrect decisions.

We are now asked to comment on the "Amended General Project Plan" in March 2004, with reference to a document prepared in September 2003 that looked forward to events that occurred months ago and does not reflect the constant "amendments" that have happened since.

All through the process definitions have been altered back and forth as alterations are made to plans to appease various constituencies and confuse everyone. Whether one reacts to the plans as presented in the document or as they are believed to stand at this time of writing, it remains futile to "amend" a plan that was devised to meet indefensible programmatic requirements that arose out of inappropriate priorities.

*The case for complete abandonment of the current plans in favor of ones much more evocative of what was destroyed in the attacks of September 11th 2001 has never been clearer.*

Public dissatisfaction with the proposals put forward by the official planners has been a constant throughout the process. Unfortunately, so has been official response aimed at deflecting the public concerns in favor of pre-conceived, misconceived official priorities.

In July 2002 the six Beyer Blinder Belle plans were uniformly denounced, the reasons people hated them were turned into official program requirements, and here we are nearly two years later presented with what is basically a warmed-over version of BBB's "Memorial Plaza". We did not get here by a process of taking public concerns into account, but by one of ignoring them.

That's why the Libeskind plan finished last in the official public poll, which was comfortably won by "neither" (of the last two plans considered), and was still selected by the Governor of New York against the advice of most of his own appointees.

***This plan as it stands essentially completes the work of the killers in erasing the World Trade Center from the map, and thus honors the killers at the expense of the victims it pretends to honor.***

Right now there is still an identifiable World Trade Center site, if the proposed plan is built there will not even be that. Even the surrounding neighborhood's character is promised to be altered in a breathtaking triumph of opportunism over honor.

Renowned icons of America were destroyed, thousands of lives extinguished in an act of staggering brutality. What is suggested to rise where they... buildings and people... fell?

Where the Twin Towers themselves stood, officialdom has ignored the near even division of public

opinion and decreed that both "footprints" must remain as completely empty as the terrorists left them, open wounds promising future murderers that when one destroys an American landmark it will stay destroyed. The purposes to which and for which the victims gave their lives are decreed to be banished from those two acres forever, that land henceforward defined as nothing but what the killers sought to make of it.

Apart from that area, the site is ordered to be divided by streets, "integration" into the surrounding area translating into destroying the distinct identity that the site, even as an empty hole, has hitherto managed to retain. And the rebuilding is proposed to take in the Deutsche Bank block to the south, which was not part of the World Trade Center, further altering the definition of the site.

And what are these blocks, surrounding but not joined to the morbid murderers' trophy of a memorial, supposed to be filled with?

Most prominently, we are told, the "Freedom Tower"... a landmark in nothing but the history of pretentiousness. The "world's tallest building", we are told. Actually as a *building*, with walls rising to a roof, it approximates the height of the John Hancock Center, third tallest building in Chicago. Above that is only an ornamental cage full of windmills topped by an observation deck lower than the solid roofs and walls of buildings now rising in Shanghai and Hong Kong, crowned by a spire lower than the structural top of the CN Tower. The actual height of the antenna we have yet to be told, and what we are told now may vanish as quickly as the 1776-foot observation deck promised in the Final Scope of the Generic Environmental Impact Statement.

Compared to this structure each of the Twin Towers had a roof hundreds of feet higher and contained over 60% more office space, and this thin, twisted creation is set to be the largest structure anywhere on the site. In fact, it appears unclear that any others are securely funded.

Between Greenwich and Church Streets (which both ran between Liberty and Fulton Streets for less than a quarter of the city's history, the historical norm has been one of them or the other) we are told that buildings not much taller than others in the area will rise some day, but only in response to market demand.

In the meantime, urban designers encourage us to welcome street-level retail to this site that has lost its retail lease operator because of official insistence on moving retail to street level. We are told that it is a good thing that vehicular traffic will invade what was one of Lower Manhattan's largest open spaces, that becoming yet another of New York's countless "24-hour communities" is something other than destroying the distinctive character of the Financial District to a further extent than the terror attacks thus far managed.

And if we don't like this, we are ignored.

*This is NOT the way to rebuild the World Trade Center.*

*This is NOT the way to honor those who died there.*

*This **surrender** is NOT the way to react to the murderers' desire to "cut America down to size".*

Other cities devastated by war or disaster have not made sure their hearts cut out were never replaced. Not Halifax in 1917, not Hiroshima or countless European cities after 1945.

At this time and in this place, it is absolutely *vital* that we rebuild in a fashion that sends the unambiguous message that the strength of our recovery outweighs the severity of our wounds, and the official plan does exactly the opposite.

We can not disgrace our fallen by continuing with the plans that, for all the empty rhetoric offered by the Governor, unambiguously signal retreat, acquiescence, and timidity. No one will ever work closer than across the street from where they died, these plans say. No one will ever work as high in the sky. Where they died, and the terrorists did not wish them to be, we obey the terrorists and will never return.

If we truly wish to do the right thing for our dead, for our city, for our country, and for the free world, we must send the message that our courage and spirit were *not* among the casualties that horrible day.

We must build towers that rise every bit as tall as the old and beyond by *every* measurement, embodying a "can do" and not a "don't dare" spirit. We must cast aside the fears spinelessly invoked by the Draft GEIS as an excuse for not rebuilding, and build to the skies *regardless* of immediate market demand with the boldness exclusively responsible for the fame of the old Twin Towers, of the Empire State Building before them, and of the Woolworth Building even earlier. Only by being "too big" by market-driven standards did they become exceptional, and only because of that speculative boldness was it ever possible for them to produce as much rental revenue as they did when in time they did fill with tenants.

Let us not forget the Group of 35 report in 2001 that declared that the city needed *sixty* million square feet of new office space by 2020 even before 11 million square feet of Downtown's best space was destroyed and added to the shortage. Let us finance it however we must, but let us not stop short of full replacement of what was lost on the 16 acres, and treat replacement of the Deutsche Bank separately.

It is towers built on a heroic scale, engineering marvels with standards of strength and safety that the laws of physics dictate no lesser structures can attain, that will inspire the world and show that it was indeed the terrorists and not their victims who died in vain. Nothing less can suffice.

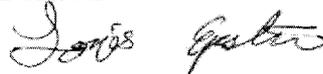
If one needed even more reason to discard the Libeskind plan, surely the strong support for it voiced by Brookfield Properties at the February 18th Draft GEIS hearing should qualify. Why would a competitor owning buildings surrounding the site urge that this plan be proceeded with in haste, if it thought there would be stronger demand for space in the new buildings than in its own? Only if Brookfield were bitterly protesting the unfair competition from the new buildings would the plans be proposing buildings sufficiently inspiring of tenant demand.

In sum, the most important comment one can make about the Amended General Project Plan is that **there is an urgent need to completely discard it.**

We must instead have a plan with *fewer, taller buildings*, in terms of genuine height and not ornamentation on one of them. As with *not* tearing the site apart by running Greenwich Street all the way through it (unanimously opposed by everyone who bothered to post on a comment board on this subject opened by the Project for Public Spaces), this ensures more open space as well as greater structural efficiency.

We must have a plan that reaffirms and reincarnates, not repudiates, what was destroyed. In a war of symbols the destruction of symbols can not be allowed to stand.

The World Trade Center must retain its identity and its Towers rise again undiminished, or history will record that America itself could not do so.



March 12, 2004

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of only two residential complexes physically damaged in the attacks of September 11.

Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

Emanuel Falcone, M.D.  
EMANUEL FALCONE, M.D.  
385 SOUTH END AVENUE  
APT# 5J  
NEW YORK, NEW YORK 10280  
[print name and address]

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March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

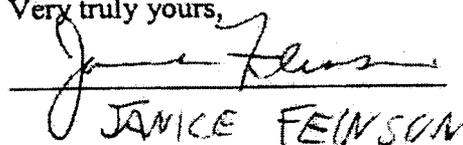
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Very truly yours,

  
\_\_\_\_\_  
JANICE FEINSON

375-12 S. SO-END AVE, N.Y., N.Y. 10284  
[print name and address]

30 E. Elm St. Apt 2A  
Linden, NJ 07036-2974  
March 13, 2004

**LMDC Public Comment on the Draft GEIS**  
1 Liberty Plaza, 20th Floor  
New York, New York 10006

**Commentary on the Draft General Environmental Impact Statement**

I offer this as a member of the civil engineering and building automation community. I operate my own startup company, Project AVATAR. I am a member of the Council on Tall Buildings and Urban Habitat, the Continental Automated Buildings Association, and the Skyscraper Museum. I do not stand to gain financially as a result of any of these comments. In fact, I stand to lose financially, for I have pledged to do any work on new Twin Towers at cost, and I intend to stand by that pledge.

First, while I applaud the interest in the newest generation of green building technology and green building certification (we at CABA are developing a similar certification system for automated/intelligent buildings), please be aware that no amount of energy and resources saved by these technologies would be able to make up for the waste caused by the operation of those two huge waterfalls in the memorial.

Second, on the matter of public space available, I would agree with most of the public that counting streets and sidewalks as open space is fudging the numbers. The only way to secure open space in a project of this density is to build fewer, taller skyscrapers.

Fewer, taller buildings are also far more efficient and safer, as well as potentially far more attractive, than the equivalent space in smaller buildings. The gains made through economy of scale are the most obvious. Fewer materials overall would be needed. Mechanical systems operate at a higher level of utilization. Energy efficiency improves, aided by the fact that larger structures lose less of their heating and cooling to the outside environment. As a contrast, the so-called "Freedom Tower", with its 60 stories of scaffolding on a plebian 70-story building, is not only space inefficient, but a waste of steel.

Safety is greater in taller structures than smaller ones. We who are members of the engineering and construction community have a responsibility to educate the public about the truth, rather than passively catering to their ignorance. The structural redundancy inherent in taller structures is cost-prohibitive in smaller ones. Smaller structures simply cannot generate enough revenue to justify the higher level of design effort. Fireproofing methods are about to take a great leap forward, just like seismic engineering design did in the late 1980's. Give us the confidence and the support we need to advance the state of the art and we guarantee you great results.

Building automation is evolving at extreme speed and will handily remove the complications inherent in managing anything large. Here is a case where available technology has run so far ahead of applications, but now, a new generation of clear visions is showing us what can be possible in this field. Let us prove what we can do.

More, shorter buildings may create shorter shadows, but the light won't fall where it counts. Fewer, taller buildings will allow for more air and light flow. That unforgiving wall of stubby buildings on Church Street will not only isolate and deaden neighborhoods, it would also endanger migrating birds by cutting down the routes through which they can avoid the structures.

This obsession with streets and street-level retail is unseemly. It fixes what isn't broken. I work outside. When it is not winter, I can enjoy being out in the elements, but it is nice to have a choice. I am relatively young and healthy. I have not tried to navigate the crowded sidewalks of Manhattan with a mobility device. Demographics show an increase in the elderly population. More will choose to gravitate to cities, where

public transit, medical facilities, cultural and educational institutions, and amenities for visiting family members abound. They will be even less nostalgic about street level retail when it's raining or the sidewalks are iced. What on Earth is wrong with such people taking a subway to an underground mall? And why are you determined to deprive harried commuters of the opportunity to grab a few items on the way down to their trains? The original WTC mall was one of the most profitable in the world. The success of the Time Warner Center enclosed mall also provides hints that people want choices in their shopping experiences.

You have the opportunity to build a multi-use complex like the Time Warner Center, or the John Hancock Center in Chicago, on an even grander scale, giving the concept the showcase it deserves, but instead you favor more of the same old, same old.

These shortcomings are compounded by underestimates of the impact of more automobile traffic on already choked 19<sup>th</sup> century streets. Downtown does not and will not have the flow of Midtown. Midtown was designed to be more open, with its grid street pattern, yet it is painfully choked. Automobile dependence will be recognized as the "cigarette smoking" of the 21<sup>st</sup> century. We have the responsibility to discourage, not encourage, this nasty habit in the city.

I also feel you are overestimating the long-term impact of the memorial. Historically, nobody has come to New York for memorials. They come to New York for modern marvels, for a taste of the world, and a glimpse of what is possible. There are dozens of memorials and memorial parks throughout the city. Almost unanimously, they have become vandalism targets and roosts for vagrants and dope fiends that deaden, rather than enliven surrounding areas. Contrary to some of the bilge you have heard, this site where innocent people died cannot be compared to Gettysburg or Pearl Harbor. The latter are sites where soldiers died serving their country, a reminder of the sacrifices required for freedom. As for "monuments to tolerance" or similar pap, the truth remains that it was not our intolerance or hate that drove 19 young men, otherwise in the prime of their lives, to spend years learning how to fly planes into buildings. We have made major strides in becoming a more inclusive culture. Most other parts of the world have not. This is more analogous to the Triangle Shirtwaist fire of 1911. They rebuilt the building involved and placed a plaque to the victims. This is the way things should be. Far more people visit the Empire State Building observation deck than Grant's Tomb. You should reconsider your estimates.

A proper reconsideration would serve to highlight further the vast superiority of the Restoration Alternative to the disastrous Proposed Action.

With utmost sincerity,



Cherie L. Fernandez\*  
Chief Developer, Project AVATAR  
<http://www.geocities.com/rayden-tron/AVATARindex.html>

Please send a written copy of the final GEIS.

30 E. Elm St. Apt 2A  
Linden, NJ 07036-2974  
March 16, 2004

LMDC Public Comment on the Amended GPP  
1 Liberty Plaza, 20th Floor  
New York, New York 10006

Commentary on the Amended General Project Plan

I am writing to prevent a second atrocity from being inflicted on Lower Manhattan, and I am not alone. Between friends, family, e-mail pen pals, co-workers, to people I talk to on the trains and buses I ride, hundreds in all, not one thinks the current proposal is worth the paper it's written on.

It is essentially a rehash of the rejected Memorial Triangle design of July 2002. Back then the people complained it looked like Albany. Nearly two years later, it still looks like Albany. Buildings of this stunted scale could be built anywhere. Perhaps this plan would work well in Cleveland. New York City is one of the few places that can safely support exciting, majestic, ultra-tall buildings, so the proposed plan is unworthy of consideration. It is a wasted opportunity, an encouragement of mediocrity where excellence belongs. Mediocrity diminishes this great city. No amount of capital-A Architecture can hide this. Name-brand designing is not what people care about. After all, how many people can name the Empire State Building's architect?

Our number one request in rebuilding was that our skyline be restored. "Restored" does not mean "replaced with an obvious joke", at least not in my Webster's. This 70 story building with 60 stories of scaffolding is the equivalent of a very bad comb-over of weak hearts, small minds, and cowardice. Plus, as far as height titles are concerned, this is reopening a debate in the official arbiter of building height, the Council on Tall Buildings and Urban Habitat, of which I am a member. When the Petronas Towers were completed, the debate began over the relevance of structural top vs. highest occupied roofline. A significant group favored the latter over the former, with the argument that developers would erect buildings with progressively taller yet still insignificant crowns or spires. This displayed little engineering or design effort, would grow to ridiculous proportions, and, honestly considered, is a form of cheating just to get the title. I am of this camp favoring highest occupied roofline as the standard, and by proposing such a ridiculous structure, you have proven our point.

Plus, how can you possibly replace two towers with one? You are showing that we are less than half of what we were before 9/11.

Nobody will be "forced" to occupy the upper floors. Last time I checked my "Commercial Property News", upper floors were still going for a premium compared to lower floors. As the founder of a start-up business, I hope to be able to afford an office on as high a floor as possible. Not only will I be inspired by the awesome views, but I will also have the easiest time weeding through job candidates. Any who would be afraid of coming up to my office for an interview, yet think nothing of the safety of the cab ride they took to reach the building would be unfit to work for me.

I am disappointed by the proposed waste of resources for acquiring and ripping down the repairable Deutsche Bank Building. This structure is a survivor, and you are treating it like you are treating other survivors, deeming only the dead worthy of consideration.

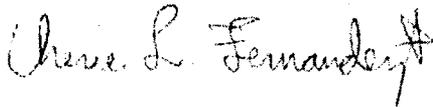
Like hundreds of thousands of others, I do not want to "Reflect Absence" Terrorists celebrate absence, and it is incongruous to commemorate the lives of those who worked in the sky by descending down into a pit

In case you ever decide to show some spine to the emotionally overwrought among the family members and to the anti-development utopians in your hair, I will give you the argument as to why the value dichotomy they've drawn is a false one. This is not a matter of commerce vs. reverence for life. These people utterly lack historical perspective, and are immersed in the very confusion they claim to rail against. Consider first the loose network of charities that provide proper funerals and burials for the bodies of abandoned children. This would not be a priority without the disposable income and free time made possible by our system of commerce. Then consider the Triangle Shirtwaist Factory Fire of 1911. Innocent working people died en masse there, but the building has been repaired. The incident is commemorated with a plaque within the structure. The lack of an elaborate memorial does not mean we have forgotten this incident. Instead, the legacy of the workers' lives is carried on in the unions, the regulations, and agencies like OSHA that protect our safety on the job to this very day.

Comparisons of this site to battlefields pain me. Battlefields imply people choosing to fight, turning points in history. This was a tragedy, a massive crime. Recognizing a tragedy or a crime has been, and should be different than recognizing battlefields or other turning points in history. Dwelling on losses and defeats celebrates those who inflicted them.

The Gardner Plan, which could be considered an improvement on the Restoration Alternative, is a hands-down winner compared to the Proposed Action. This was a completely private effort with a result far better than the horse-and-pony-show of a public process that made a studied effort of ignoring what the people really want. Twin Towers merchandise is still popular. The World Trade Center was one of the few building complexes to have a nickname. The public still has affection for those magnificent buildings. I can only imagine derisive nicknames for the so-called Freedom Tower, which resembles nothing more than a junkie's needle from a distance.

With utmost sincerity,



Cherie L. Fernandez\*  
Chief Developer, Project AVATAR  
<http://www.geocities.com/rayden-tron/AVATARindex.html>

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

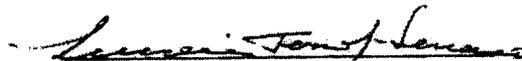
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Very truly yours,



LUCYCA FERNANDEZ-SCREENO

355 SOUTH END AV. APT. 26M  
[print name and address] NEW YORK, NY 10280

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March 3, 2004

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One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

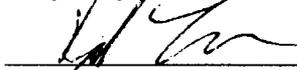
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Very truly yours,



KRISTIN FORBES

355 S. EWA AVE., #8H, NY, NY 10280  
[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

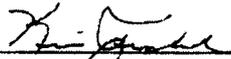
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Very truly yours,



KEIS / CHARLES FREDERICK  
[print name and address]

375 S. END AVE #21P  
NYC, NY 10280

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March 3, 2004

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New York, NY 10006

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Very truly yours,

Chris Freyberg  
395 S. End Ave #31  
NY NY 10280  
[print name and address]



485

434

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Very truly yours,

TOBE GERSON / MORTON GERSON  
365 SOUTH END AV. Apt 4F  
NEW YORK NY 10280  
[print name and address]

March 3, 2004

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Very truly yours,

Joseph Gibney  
355 South End Ave Apt 18C  
NYC, NY 10280  
[print name and address]

Under no circumstances should there be a tunnel.  
A tunnel would be horrible for BPC!

# FaxTools



Phone:

Fax:

## *Message :*

To the L.M.D.C. at 1-212-962-2431 or 2433:

This is re: the DGEIS comments: the enclosed is mine.

Joy E. Goldberg

**From:**

**To:**

L.M.D.C.

**Date:** 3/9/2004

**Page(s):** 3

488

456

114 Crescent Street,  
Apt. N1  
Brooklyn, N.Y. 11208  
March 9, 2004

To the Lower Manhattan Development Corporation:  
Fax# (212) 962-2431 or 2433

This is a comment on the DGEIS report.  
I spoke at your hearing, also, and now I am submitting a *written* comment.

I am also requesting a copy of your final GEIS report, please.

To Whom it may concern:

My name is Joy Goldberg and I live in Brooklyn. I'm a private individual, one person with my family.

A lot of people think it's over and done with, that Governor Pataki and the LMDC have already decided what will be built at the World Trade Center. I know, because I spoke to them. I singlehandedly got c. 3300 signatures on petitions for Twin Towers, a portion of which the LMDC mailed back to me, calling it an "unsolicited proposal."  
Nearly every business on Fulton Street and Lower Broadway signed this same petition. But they asked me: Haven't they already decided?

Polls by USA Today, CNN and New York Magazine before the design competition showed the majority want the Twin Towers rebuilt.  
The LMDC knows FULL WELL that if they put restoring the Twin Towers next to the so-called "Freedom Tower," that the overwhelming vote would be for the Twin Towers.  
But they never gave the people THAT choice, but instead, they rammed negative, visionless, soulless, spiritless, deathlike, and self-seeking designs down the people's throats.  
AND they called rebuilding the Twin Towers an "alternative" plan, and they hid this ALL THE WAY in Chapter 23 of the GEIS report.

Sounds to me like they figure the average joe isn't smart or caring enough to read past the first five pages of that big 2000 page report. Sounds as if they're deliberately trying to FORCE *THEIR* ideas through.

The GEIS report calls two death pits filled with water where the Twin Towers stood, and the erection of one huge, ugly, meaningless building, "attractive, lively and inviting" repeatedly, over and over, but *WE ARE NOT BRAINWASHED!!!*  
*The report negatively says that economic growth would be the same with their plan as with the Twin Towers.*

*People will come forever by the droves to feel the POSITIVE message two new towers will bring, Wall Street will skyrocket, and New York will NEVER have to worry about jobs and homelessness again. They WONT keep coming to look at a death site.*

The report negatively calls two towers off the footprints a density issue, but the towers could be built AROUND the footprints, creating a beautiful, peaceful memorial below, and the restored towers soaring above: THAT is MEANINGFUL. The report negatively claims too many shadows, too little view, but we came to the World Trade Center, to VIEW the Twin Towers and to find delight standing in their majestic shadows.

Too much "open space" is nothing more than a GAP which OSAMA BIN LADEN CREATED, and which evidently the LMDC wants to further.

Hiroshima, San Francisco AND THE PENTAGON ALL were rebuilt. YOUR report is nothing more than political treachery against doing the same for New York. This is an abnormality and is, in fact, inexcusable.

You want to make New York look like Hong Kong and every other major city, because you don't care.

Anyone who opposes what you're doing, is labeled a radical pro-rebuilder, or "sour grapes."

I sincerely hope that THIS isn't really, truly what you think of the MAJORITY of the people!!!

Joy E. Goldberg

March 3, 2004

Lower Manhattan Development Corporation  
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Very truly yours,

Ariel Goodman

375 South End Avenue, Apt #28 L

NY NY 10280

[print name and address]

LMDC COMMUNITY MEETING WITH MEMY REDEVELOPMENT PLAN DEIS  
FROM COLLEGE GARDEN 138 DUANE ST NY NY 10013 212 2851669 cologarden@mindspring.com  
Dear LMDC Sustainability Guidelines 3/13/04 LMDC FAX: 212 962 2431

I work with the Life Cycle Sustainability Guidelines work group of the Civic Alliance.

Our group has effected an inclusive Guidelines scorecard for the Public Participation Process and is now deriving an inclusive Guidelines for Sustainability as a living expandable inclusive underpinning for all Sustainability documents in the DEIS for the WTC and Lower Manhattan rebuild. Public participation is critically important in making value choices or trade-offs in implementing sustainability goals. A Sustainability Scorecard can help make the public participation process more focused and effective. The Public Participation Scorecard should be used as a guide to achieve the most active level of participation in Sustainability that is feasible.

I have followed the rising of your wish to observe Sustainability from an 11th stated point in earlier LMDC documents, through to the present stating that your GEIS Sustainable Design Guidelines call for an ongoing commitment to make the Guidelines into "A 'Living' Document", which is laudable.

Since this is a first attempt at scoping out such a Living Document which can create a working Surplus-making and Surplus-cycling Sustainability, and this was borne of the vacuum that was made at the WTC, we need you, the LMDC leading the rebuild at this time to know that Sustainability-educated and Permaculture visionary people are arrayed around you, taking part in this unprecedented Public Participation process in order to get our Place, our City, our lower Manhattan, our WTC site covered by the umbrella of Sustainable systems to be designed and constructed and maintained in of themselves to provide much of their own generation, maintenance and accountability; and we need you to be able to transfer your beneficial guidance to any other agencies that will lead this rebuild in the future.

1. In order to do anything "Sustainably", External costs and Life Cycle costs must be accounted out in each step of the process. If any one system impacts on our health which wards costs off to another sector, this is not Sustainable, it is not true Sustainability. We must be seeking the highest forms of Sustainability, very much including Permaculture thinking, Permaculture systems designs, which can lessen many off-put impacts of wasted wastes, moving, separating, carting, cleaning up, handling and disposal not least their costs. We must explicitly recognize that displacement of environmental and social dysfunction to other communities is not an acceptable way to achieve project sustainability goals.

Life cycle costs and benefits (including environmental and health impacts) must be explicitly considered. Equity impacts should be evaluated both at the local level and beyond. How does the full program strengthen or weaken

the social fabric of our shared community? When taken as a whole, are the benefits and the costs equitably distributed?

The traffic impact of goods and persons attracted by development must be fully recognized as a project cost, and mitigated. The appropriate standard is improving accessibility: reducing travel time for workers and other users of the area, and reducing time lost due to congestion for vehicles and pedestrians.

2. Sustainability is not static. Public and private planners, builders, systems engineers, and maintenance professionals must continually improve systems and practices by adopting and designing better systems and practices as they become available and are proven elsewhere.

3. Without comprehensive cumulative effects listed in each of your Sustainable Guidelines, there is no real Sustainability. You list systems and practices in isolation and segmentation. They must each be shown how they interact for greatest operability and effect. Sustainability cannot be limited to one subset of systems, as in green building design, but must be applied to the overall community, including all proposed public and private projects and activity going beyond increased commercial and retail activity to all increases in residential, cultural and tourist activity.

4. True Sustainability is in its infancy. Sustainability practices will become a baseline. Sustainable Guidelines require initial continuous upgrading and adjustment if monitoring is to become self-operative. It is not enough to use modern design. The designed skin of architecture is the fashion statement. All systems should be interconnected with the elements of climate, wind, weather, and available natural renewable resources, to bring these inside with design function that matches a Permacultural inner operative body beneath the skin. Make Skyfilters not Skyscrapers. Make oxygen grow inside as well as outside.

I suggest a Permacultural Art force created with the aid of our many contemporary cultural institutions, to work with each architectural firm that will be employed in the rebuild. This means pairing Permaculture experts with Artists to devise along with the architects and engineers the inner ecological workings of constructed sites and buildings and their interrelationships.

All Systems and practices should have monitoring of key environmental indicators built into place in every step of Sustainable systems and practices, to determine if desired outcomes are being achieved, if systems are working as expected, and adjustments are reaching desired levels of ecological, societal and inter-operative sustainability. This way these indicators are visible to all, much as the time and date. Indicators can be designed similarly

by artists, Permaculture experts, in tune with instrument makers, creating a new type of green manufacturing.

Perhaps making the measure of retail and commerce in all new spaces at the WTC measure up to the Surplus Sustainability Bottom line, would enable less resistance to the higher square footage envisioned by the LMDC to be built. If all systems interrelating inside and out with your proposed increase in building were to withstand the Surplus Sustainability Guidelines, including cumulative effects plus all salient points suggested in this document; and, if above ground sustainable retail were allowed to get established before that built underground (with oxygen increase provisions) then all parties might get what they wish. Don't forget we have a "neighborhood" to enhance and preserve.

The WTC project has an important showcase role as an early-adopter and anchor market for innovations. The cost of playing this role should be explicitly recognized, and funds from agencies such as NYSERDA and USEPA should be solicited to support this function.

The standard environmental and resource-conservation criteria should be measured quantitatively (in tons emitted or consumed). These include emissions of air pollutants; water use and impact on water quality; noise; waste generation; and energy consumption. A data collection and analysis organization should be specified as an integral part of project development and management. The body must have the responsibility, authority, and regular source of funding to collect and analyze all necessary data.

Beyond these standard criteria, Greenhouse gas impact can serve as a framework for evaluating a wide range of environmental and resource impacts. Global climate change must be recognized as a prime sustainability issue in this century. A commitment to leadership in reducing greenhouse gas (GHG) emissions is a particularly important yardstick of performance.

At a minimum, the project area should be GHG neutral; GHG emissions can be used as a metric for fossil fuel energy use for buildings, transportation, industrial and commercial activities, and infrastructure. This should be tracked by total emissions and by emissions rate for each type of activity.

Measures to reduce emissions outside the project area can be a major form of mitigation of adverse project impacts on other communities.

5. Similarly, transportation design must be matched by true transportation hard connection advances and improvements including nature-patterned renewable energy heat, cool, air and light exchanges that keep commuters and visitors to our City comfortable, healthy, moving and being delivered most expedient access to more interwoven destinations, including airport access. The hard connection underground between the PATH and the Lexington Subway which has been deemed a low cost alternative by

transportation experts would fulfill the above, redeeming the expense of fashionable architectural skin of hubs built. Representative Nadler and other political representative of the people agree.

6. Please see that you have omitted any **mechanism** that can create built-in accountability. You must include in each Sustainable Guideline the **mechanism** for insuring fiscal and environmental source and maintenance responsibility and accountability. This placing of enforcement **mechanisms** can be stated upfront as an objective goal for your entire Sustainable Guidelines, which would create a self-replicating underpinning, a self-generation of Surplus-making Sustainability. The **mechanism** then can be easily built into the system and its resultant scorecard can exist as a barometer shows the weather or a thermometer shows the temperature. The higher the stated goal, the higher the stated outcome will lessen the policing and regulation of individual Sustainability elements newly inclusively detailed in your DEIS.

7. Every way you interweave your systems from input through to output to minimize waste will minimize cost. Surplus-making Sustainability is already proven to be profitable by many large industries. There is ultimately less need for regulations, expensive inspection and its costly paper trails when surplus-making sustainability is already built into projects.

8. Permaculture patterned from nature itself, goes beyond Sustainable Development-as-usual to fine tune Surplus-cycling within the systems designed, so that less inputs are needed and greater beneficial outputs are created, while cost cycles become inter-relatedly built into regenerating and maintaining the systems. Permaculture systems design for accountability. Permaculture systems design for catastrophe.

9. How Permaculture works to help you:

Permaculture is the entry to the Infinite Bottom Line that keeps upgrading itself by the very nature of its design to generate safe and healthful needs for future generations. Use Permaculture designers to create the needed **mechanisms** built in for accountability.

In Permaculture we must know and deploy properly which Resources increase by modest use; which are unaffected by use; which disappear or degrade if not used; which are reduced by use; which are those that pollute or destroy other resources if used. Managing this is true Resource Management:

Most resources lie in the category of resources that need to be managed to maintain them. They are those which decrease if used. We call them finite resources.

Resources are something you can feed into a system and increase its productivity, or its yield, or the number of useful storages. But if you continue

beyond that point of productivity, then the system itself collapses. And that comes down to any integrated system only accepting that amount of energy that it can productively use. So you can over-heat anything, over-load anything, over-siphon anything, over-drain anything, over-manure anything, over-plow anything. Whether we are talking about money or renewable materials, you can put too much of it in. What then happens first is that you start to get less and less increase in yield and then more and more increase in a lethal factor. You cannot continue to pour in more of the same thing and get a continued increase in yield. We might reach the stage where we pollute the system simply with diversity. We strive therefore for maximal beneficial connections between all elements.

We prevent energy leaving before the basic needs of the whole system are satisfied, so growth, reproduction & maintenance live on in living components.

We Manufacturer to recycle or replant the materials of manufacture (law of return).

10. All industries should be required to design for, and then take back separatable waste, or, buy-back no longer usable materials and packaging.

Sheet mulch educational programs using cardboard and newspaper waste layered with sawdust from construction sites under drip lines of rained on roofs or trees, should be pilot projects for city creation of earth which is eroding and disappearing everywhere at an alarming rate. Sheet mulch can be created on old dead-end concrete patches and roofs to bring back Earth for gardens and more oxygen, less asthma.

All city food waste should be returned to soils or supply farms. Compost programs must tie in with restaurant regulations to eliminate food garbage.

11. Goods delivery systems built with Permaculture principles will give wholistic relief to air quality, street management, and neighborhood interconnectivity.

12. Designing for Permacultural Sustainability will create a whole new wholesome oriented work force, with many new more healthy jobs near the places people live in, while transforming much of the City's maintenance force and its costs of waste-handling and carting to dumpsites. The City will be cleaner and richer!

13. "City Repair" of Portland OR-type street calming circles and kiosks can lead the example to upgrading our dangerous streets and add neighborhood sociability. Tabletop gardens can make social pilot neighborhood programs for the elderly-challenged. George Haikalis (IRUM) has long researched good street calming design, redesigned trolleys and pedestrain cross access of the

city at critical crossing places, including his Liberty Loop, Vision 42, and then extended cross access across Chambers Street and 8th Street.

14. Vision of an underlying effective permeating Surplus Sustainability infiltration into the WTC and lower Manhattan, eventually leading through our entire City and beyond will make the answering in detail to each DEIS clause and listed item obsolete. When you write into your Sustainability Guidelines Document what is proposed here, you will not need so many small regulating clauses added, the document will be self-fulfilling.

15. To begin, my colleagues working on the Sustainability Life Cycle Scorecard Group of the Civic Alliance as well as the Civic Alliance itself and the plural green sustainability organizations long working in their own specialized zones have very good suggestions for getting from Here to There.

Additional Permaculture background material:

A. 97% of water is locked up at all times and only 3% goes into any cycling at all. We are reducing that very rapidly. Use Rain water more effectively.

The first point at which we can generally make an intervention is water (since we cannot control the climate, or determine the broadscale landscape.) On this basis, the first thing to do when designing is to consider how we can guide and use water to best effect, and how we can get it to perform as many functions as possible before it leaves the site. P.A. Yeoman was an Australian who developed the Keyline System, and this has been used widely to good effect, and has transformed many previously degraded landscapes. It is a key strategy used within broadscale Permaculture design. Our waterfront edges need to be strictly Permaculturally overseen to this effect.

B. Industrial water can be supplied from roofs. New York City is simply short of tanks, while being a potentially large tank. There are different sorts of tanks. One is the kind you put under the downspout from the roof of your building. Tanks of another sort are the cheap tanks - earth tanks. From these we get enough water for many of our uses - fresh water, which we presently let go into the sea. We have several ways of water storage. We can store it in the soils; we can store it in surface earth tanks, and we can store it in sealed catchments. For an agricultural situation, we will use the soils. For domestic situations, we will use earth tanks where we can. They are very much cheaper. For every 5,000 gallons we can store in concrete tanks, we can store 250,000 in Earth tanks at the same cost.

C. Conversion of high-level investment capital will flow to these low energy systems. There is a large set of strategies to assemble as an "Earth banks" service. The end result we aim for, is to produce a system that is ecologically sound & economically profitable.

D. PERMACULTURE is a design science that weaves together our individual human needs with the microclimates, plants, animals, micro-organisms, water & soil management, thus allowing us as individuals to take responsibility for our life-styles & design our way out of unsustainable cultural patterns while meeting the realities of the future. Some of its principles are:

- \* Relative location.
- \* Each element performs many functions.
- \* Each important function is supported by many elements.
- \* Efficient energy planning: niche, zone, sector and slope.
- \* Using biological resources.
- \* Cycling of energy, nutrients, resources.
- \* Small-scale intensive systems; including plant stacking and time stacking.
- \* Accelerating succession and evolution.
- \* Diversity; including guilds. Make the least change for the greatest possible effect.
- \* Edge effects. Small space three dimensional abundance. Use the height. Use gravity feed downward.
- \* Attitudinal principles: everything works reciprocally, and Permaculture is information and imagination-intensive.

Cities are perfect places to build Permaculture systems which teach all living beings to design for themselves a maximum satisfaction of their needs to employ even in a minimum area of built space with a high density & quality of biological information. Surplus-creating Sustainability is the future. Let us in this WTC rebuild lead the way and maintain our world status of being the greatest city in this future.

I am looking Forward to our all working together to create a Model Sustainable Site, Sustainable City.

Sincerely,



Coco Gordon a.k.a SuperSkyWoman  
Artist, publisher, hand papermaker, Permaculture designer, and 20 year resident of Tribeca

138 Duane Street, NY NY 10013  
(212) 285-1609 (914) 238-6549  
[cocogord@mindspring.com](mailto:cocogord@mindspring.com)

March 3, 2004

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Very truly yours,

CAROLE A. GOTTLIEB  
395 South END AVE. (2L)  
New York, N.Y. 10280  
[print name and address]

-----Original Message-----

From: proh grabe [mailto:tony\_bpc@yahoo.com]  
Sent: Tuesday, February 03, 2004 11:41 AM  
To: saveweststreet@aol.com; WTCENVIRONMENTAL  
Cc: 911\_healthalerts@yahoogroups.com  
Subject: This Should Be in EIS....ResidentsJust AsSick

Dear Mr. Kelley:

The following transcript's facts should be included extensively in the WTC rebuild EIS. The information is relevant to the physical, economic and environmental conditions of the downtown area.

Also the EIS must include the fact that a remediation to hazmat the downtown areas WAS NEVER PERFORMED, even though it is clearly a Brownfield site (massive diesel spills) and a Superfund site (toxins from bulding materials).

And that remediation was performed at other toxic sites, but somehow not here.

Thank you.

Sincerely,

Proh+Tony GRABE

Downtown Residents and Workers.

-----  
Subject: New York Academy of Medicine 9/11 update  
Researchers Describe Impact of Sept. 11 on City  
Residents at Academy Conference Impact on  
firefighters, children, borough residents chronicled  
by researchers and national health leaders gathered  
atthe Academy  
Some of the 440 people who attended the Academy's  
conference regarding Sept. 11 research  
NEW YORK CITY, Sept. 12 – New Yorkers are gradually  
healing from the terrorist attacks that traumatized  
the city one year ago, but some Manhattan and outer

2/13/2004

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461

borough residents remain gripped by a troubling mix of mental stress, substance abuse and respiratory problems, distinguished researchers said this week during a daylong conference at The New York Academy of Medicine.

"We awakened to the fact that we're not invulnerable to international terrorism," Dr. Jeremiah A.

Barondess, president of the Academy, told a 440-person audience in his opening remarks. "In the clinical and public health communities, we've responded with a spate of research efforts."

City, state and national health leaders and scientists presented their research findings on Sept. 9 in Hosack Hall at one of the most significant conferences the Academy ever convened. Few were left unscathed by the terrorist acts that took more than 3,000 lives in New York, at the Pentagon and in Pennsylvania, said Dr. Thomas Frieden, commissioner of the New York City Department of Health and Mental Hygiene. Children, adults, firefighters, drug users, people who watched the Twin Towers crumble in person, those who saw it unfold on television: most New Yorkers suffered some degree of emotional or physical impact.

"Virtually everybody was affected by the World Trade Center attacks and indeed, most everybody felt some level of stress," said Frieden, who was among 28 speakers at the event, all who've been immersed in disaster-related health research and recovery efforts.

"The bottom line is, do people feel safe, and are they able to function after the attack?" As the city marks the one-year anniversary of the attacks, it is improving preparedness for dealing with bioterrorism by installing a new "Syndromic Surveillance" system in citywide emergency rooms to detect clusters of symptoms that warn of suspicious outbreaks or foul play. (The Academy is co-hosting a Sept. 23-24 conference about this new system).

Nobel Laureate Joshua Lederberg speaking at the conference.

Mental health on the rebound New Yorkers' mental health has collectively improved

since last Sept. 11 but has still not returned to normal, explained David Vlahov, Ph.D., director of the Academy's Center for Urban Epidemiologic Studies. Academy surveys conducted in the first half of 2002 show that New Yorkers were sleeping better, were less jumpy, and felt less fearful of a shortened future by the time June arrived. Insomnia dropped to 15 percent by June, down from 25 percent in February. Far fewer people were suffering from post-traumatic stress disorder (PTSD). Still, the news on mental health was

2/13/2004

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462

not all good, especially in the outer boroughs, researchers reported. Staten Islanders and residents of the Bronx suffered from more extensive PTSD symptoms than did Manhattanites (22 percent, 21.7 percent and 16 percent, respectively). "The data suggests that New York City is recovering, but outreach to all boroughs remains an important need," Vlahov said.

Patients with PTSD symptoms must not be treated using a one-size-fits-all approach, cautioned Dr. Carol North, Professor of Psychiatry at the Washington University School of Medicine in St. Louis. Patients with symptoms like nightmares, jumpiness, and intrusive thoughts can benefit by talking about their Sept. 11 experiences in counseling, North said. But such discussions may worsen the pain for people struggling with avoidance or numbing symptoms, said North, a 15-year specialist in mental health effects of disasters. "There are different treatments for different populations," she said.

New York residents who've called the state's crisis counseling hotline have overwhelmingly reported feelings of "sadness and tearfulness," said Chip Felton, Associate Commissioner with the state Office of Mental Health. Forty-six percent of callers to Project Liberty have reported these symptoms, Felton said. While a significant number of New Yorkers have recovered from the mental trauma, Felton said "there still is a core group of individuals who are heavily impacted by this event whose functioning is impaired." Substance use remains higher

Some New York residents have been turning to drugs to cope with the lingering pain and anguish, researchers reported at the conference. While little or no change was detected in the use of hard-core drugs like heroin, cocaine and crack after Sept. 11, alcohol use as well as cigarette- and marijuana-smoking did increase, and those increases persisted at least through June, said Dr. Sandro Galea, a medical epidemiologist in the Academy's Center for Urban Epidemiologic Studies. Six to nine months after Sept. 11, an estimated 1.5 million New York City residents (25 percent of adults) were still drinking and smoking more than they had prior to the attacks, Academy research shows. Cigarette use was still about 8.3 percent higher than normal, alcohol use remained 19 percent higher, and marijuana use was elevated by 5.1 percent.

"Use of substances remain as high, almost, six to nine months after the event" as they did 1-2 months after the event, said Galea, calling the findings

2/13/2004

502

463

“surprising,” especially since PTSD and depression had begun to subside by that time. Research exploring the relationship between stress and substance use will be a funding priority for the National Institute on Drug Abuse in the coming fiscal year, Associate Director Timothy Condon, Ph.D., told the crowd.

Left to right, Dr. James Hughes of the CDC, former New York City Health Commissioner Dr. Neal Cohen, and Dr. Marci Layton, Assistant Commissioner at the city Health Department.

Children feel the stress; newborns appear unscathed As was widely anticipated, some of society’s most vulnerable members – children -- were also severely impacted. Thousands of children were plagued by fears and anxieties after living through the unprecedented horror of Sept. 11. Christina Hoven, Ph.D., a professor at the Columbia Mailman School of Public Health, surveyed 8,266 fourth- through 12-graders in the New York City public schools to determine the prevalence of mental disorders relating from Sept. 11. What she found was striking: 15 percent of kids reported a fear of public places, 12 percent of the children reported separation anxiety, 11 percent reported PTSD symptoms, and nine percent said they had experienced panic.

Black and Hispanic children, children whose parents were involved in the Sept. 11 rescue efforts and children whose parents had PTSD were most likely to exhibit behavioral problems after the terrorist attacks and to be sent to counseling, according to Jennifer Stuber, Ph.D., a research associate in the Academy’s Division of Health and Science Policy. Stuber was lead author of a January-February survey of 2,001 New York City adults. Children from single-parent homes were more likely to receive counseling, the survey showed.

Youths who attended school in the Twin Towers’ shadows were not the only ones likely to feel psychological pain resulting from Sept. 11. Research presented by Dr. Betty Pfefferbaum showed that children suffer mental distress even if they are not physically near to the disaster site. Pfefferbaum, chair of the Department of Psychiatry and Behavioral Science at the University of Oklahoma, studied Oklahoma City middle school students seven weeks after the bombing of a federal office building that killed 168 people. Two years later, she surveyed sixth graders residing 100 miles from the 1995 bombing site. “Television exposure was as important as physical exposure or interpersonal exposure (knowing someone in the blast) in predicting post-traumatic stress,” Pfefferbaum said.

2/13/2004

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464

Perhaps the day's most encouraging news was shared by Trudy Berkowitz, Ph.D., a professor at the Mount Sinai School of Medicine. Her preliminary data shows that the World Trade Center collapse did not negatively impact the health of babies carried by pregnant downtown residents last September. The study so far involved 173 women, most from lower Manhattan. Researchers examined the babies, and looked at mothers' blood, urine and breast milk samples.

Respiratory problems linger A concern that continues to frighten many New Yorkers is the long-term impact of the World Trade Center collapse on respiratory health. Just how damaging was the thick cloud of smoke and pulverized debris that blanketed streets, offices, apartments and people downtown? Several ongoing studies aim to provide a comprehensive answer, researchers explained. The World Trade Center Respiratory Health Study, a collaborative effort of New York University and the state Health Department, will assess new and worsened asthma cases that occurred after Sept. 11 among downtown residents. Health of those living within a mile of the World Trade Center site will be compared to that of residents living more than five miles away, in Upper Manhattan and Queens. The city Health Department and the Centers for Disease Control and Prevention this fall will begin enrolling 200,000 New Yorkers in a 20-year study to determine Sept. 11's long-term impact on their health. "We cannot rule out with absolute certainty, any long-term health effects," said Jessica Leighton, Ph.D., Assistant Commissioner at the city Health Department. The department detected a vast amount of fiberglass in the dust sampled from 59 apartments in 30 buildings south of Canal Street last November and December.

Outdoor air samples that were collected between Sept. 14 and Dec. 31 by a New York University School of Medicine team also showed high levels of fiberglass particles, as well as gypsum board particles. Professor Lung Chi Chen and colleagues set up air sampling stations at several points downtown and compared them to samples collected at Sterling Forest State Park, about 40 miles north of the city. "We wanted to see what the particles were made of," Chen said. Most of the World Trade Center dust particles were too large to penetrate past the throat into the lungs, he said, but are probably to blame for what's known as the "World Trade Center Cough." Chronic breathing problems have sidelined 363 firefighters and emergency medical workers with respiratory disabilities, according to new CDC reports. "These

2/13/2004

504

465

particles are very irritating," Chen said.

In the most emotional presentation of the day, Dr. Kerry Kelly, Chief Medical Officer for the New York City Fire Department, recalled that every one of the department's 11,000+ firefighters was called to duty on Sept. 11. The department suffered a devastating loss of 341 firefighters and two paramedics from more than 60 firehouses, she said somberly, as pictures of firemen flashed on the screen behind her. "Over 70 of our members lost a brother, a father or a son," Kelly said. Fires at the disaster site burned well into December and firefighters breathed the smoke clouds every day. The deleterious health impact was staggering: 1,768 firemen suffered respiratory stress after Sept. 11, five times as many as before the terrorist attacks. Coughing, wheezing and eye irritation were common complaints, with more than 90 percent of the FDNY workforce developing a cough after the towers collapsed.

Breathing is not the only impairment firefighters are grappling with. A full 250 department employees remain out on leave for PTSD, Kelly said, and 90 others are out with orthopedic injuries. Smoking has increased so much that the department is beginning a smoking cessation program. There is also grave concern about the disaster's long-term effect on firefighters' emotional health. "We'll be sending surveys to firehouses shortly to see how they're doing as a group and as individuals," Kelly said.

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2/13/2004

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March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

*Vicki Grooms*

VICKI GROOMS

375 South End Ave. 17D, NY, NY 10288

[print name and address]

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Very truly yours,



Harold A. Grossman

395 South End Ave #21E  
NY NY 10250

[print name and address]

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Very truly yours,

*J. Christina Gumbel & Ms. Joan Lambert*

*355 South End Ave Apt 22A*

*NYC, NY 10080*

[print name and address]

March 3, 2004

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Very truly yours,

*Catherine Guinee*

*Catherine Guinee*

*395-22 E So. End Ave NYC*

[print name and address]

*10280*

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Very truly yours,

CHRISTIAN BUTIERRE

355 S. END AVE NO 1K

NEW YORK, N. Y. 10280

[print name and address]

Testimony February 18, 2004

Good Afternoon. My name is Holly Haff and I am here today as a member of the World Trade Center Survivor's Network. The Survivor's Network is made up of some of the 1000's of workers who courageously evacuated--whose desks were their 2<sup>nd</sup> homes, some for 25 years. We are workers from adjacent buildings who looked out on the towers every day. We are nearby residents, like my family, two blocks to the north of Building 7

While attention has focused over the past two and a half years on replacing the iconic value of the trade towers, the infrastructure, and memorializing our lost loved ones, there has been a void of attention to those who survived. The proposed plans do not provide for survivors.

The WTC was a village to us. We lost our friends, work colleagues, and way of life on 9-11. We shared meals in the concourse, coffee in the elevators, and hellos through the revolving doors. We walked through these buildings as gateways to our offices, to shop, to our subways and ferries and even on Sundays to church. We bought our vegetables at its farmers market, our theater tickets on the mezzanine at TKTS. For my son's 10<sup>th</sup> birthday, we walked two blocks to go to the Observation Deck to celebrate his entry into double digit numbers. We lived our lives in the towers and around it, and today have difficulty with the tourists and flashing cameras at the site that was so intimately a part of our lives.

The Survivors Network implores the Governor, the Port Authority, LMDC, and the Mayor that the plans at Ground Zero provide a special place for survivors. In the structuring of the Memorial Foundation, we seek to have members of the Survivor's Network included in the decision-making to help formulate the exhibits, the quiet space, the events, to ensure that the survivor's tale is told. We seek to ensure that survivors and their families can visit the site with appropriate facilities to accommodate our needs for contemplation, reverence, and reflection.

We want the richness of the culture and life of the World Trade Center told and respected. It had energy, energy of a talented work force, excitement of the financial and government worlds, glamour of the Windows on the World and the Observation Deck, and the beauty and softness of a surrounding residential community.

Let's pay tribute to the World Trade Center by telling the stories of not only who died; but those who live on to retell the life of towers. We want to cherish our roots in Lower Manhattan by honoring the life and times, the culture and the people, who made the World Trade Center a vibrant part of life. The Survivor's Network stands ready to be accountable in making this happen.

March 3, 2004

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New York, NY 10006

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Very truly yours,

AUDREY HARKINS  
395 SOUTH END AVE 4K  
NY 10280  
[print name and address]

March 3, 2004

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George M. Harvey  
George M. Harvey

Appt 375 South ENCLAVE  
29th NYC NY 10280  
[print name and address]

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LE HOANG  
395 S. END #4A, 10280  
Jefferies  
[print name and address]

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Edgar & Mary Anne Holley  
375 South End Ave  
New York, NY 10020  
[print name and address]

16 Stuyvesant Oval, Apt. 9E  
New York, New York 10009  
212.533.3162  
barbaranewyork@hotmail.com

March 15, 2004

Kevin M Rampe, President  
Lower Manhattan Development Corporation  
1 Liberty Plaza, 20<sup>th</sup> Floor  
New York, New York 10007

Dear Mr. Rampe,

Enclosed are my brief comments which I would like to be considered in the Environmental Impact Study for the site of the former World Trade Center.

Thank you for your consideration.

Sincerely,



Barbara Marion Horn,  
New Yorker

Mar 15 2004 16:58 P.01

Fax: 2125757669

HOSPITAL AUDIENCES

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Commentary for the World Trade Center Memorial and  
Redevelopment Plan: Environmental Impact Study

Submitted by Barbara Marion Horn  
barbaranewyork@hotmail.com

March 15, 2004

**We Can't Have It Both Ways:  
Let The Fire Department In**

How can we ask the Fire Department of New York to take responsibility for the safety, rescue and recovery of people and property at the World Trade Center site without giving them full authority over the fire and safety codes ruling its rebuilding?

Whether I am working on the top floor of the Freedom Tower or meditating in the depths of the Reflecting Absence Memorial, I want the assurance of knowing that the public servants trained to come to my aid, if summoned, are entering facilities they had a hand in shaping and feel confident about.

The owners of this site, the Port Authority of New Jersey and New York, must let the FDNY in on the decision making process. If the FDNY is expected to safeguard the well-being of person and place at these 16 acres, then they must be the lead agency in all aspects of design and construction impacting fire and safety for these future buildings.

We can't have it both ways.

Following are comments on the Draft Scope of the WTC Memorial and Redevelopment plan. It should be noted that this entire process is flawed, because the "Proposed Action" does not reflect the desires of a majority of New Yorkers. At numerous LMDC public comment sessions, more speakers called for rebuilding the Twin Towers than supported the Libeskind plan. Despite this, no "restoration alternative" was presented to the public during any of these comment sessions. During 2002, six "Preliminary Design Concepts" were unveiled to universal disdain, and nine subsequent designs were announced later in the year. During this process, the "Restoration Alternative" was ignored by the policy makers despite repeated requests from the public that it be considered. The exercise of rebuilding the WTC site should not be viewed as some abstract exercise in urban planning. Rather, it is a necessary response to an act of mass murder and urban vandalism on an unprecedented scale. As such, the analysis using the "Current Conditions Scenario" is inappropriate. Because the destruction of the WTC was an unprovoked attack and not a planned redevelopment, the only appropriate method of analysis is the "Pre-9/11 Scenario". Furthermore, not replacing what the murderers destroyed is validating this horrible atrocity for generations to come. The appearance and function of Manhattan must not be dictated by criminals. Furthermore, the Libeskind plan is significantly flawed in ways too numerous to list here. Two examples: restoring Fulton and Greenwich Streets through the WTC site will have adverse environmental impacts because it will encourage more vehicles to enter lower Manhattan. The area is already too congested; adding more roads will simply encourage more

people to drive downtown. Also, the so-called "Wedge of Light" is a farce because it has been demonstrated that the area in question will actually be covered in shadow during the morning of 9/11. All references to the Wedge of Light should be deleted from the analysis. Another flaw is that the "Restoration Alternative" does not allow for rebuilding the Twin Towers closer to Church Street, leaving the "footprints" of the former towers vacant for the memorial. Since the political decision was made not to build on the footprints, the "Restoration Alternative", as written, is infeasible despite its popularity. A modified "Restoration Alternative", with the towers built away from the "footprints", more accurately reflects the desires of many New Yorkers who expressed a desire to see the Twin Towers rebuilt while acknowledging the necessity of providing a memorial to the victims of terrorism. Towers proposed under the "Restoration Alternative" must incorporate all modern safety and environmental systems, rather than the mid-1960s standards of the old buildings. The Libeskind plan's buildings are unattractive, and too short to accommodate the 10 million square feet of office space that must be built at the site. Not restoring all of the lost office space will result in adverse environmental impacts throughout the region, as jobs are forced to move to the suburbs due to insufficient space in the city. This will increase suburban sprawl. Therefore, it is imperative that the Libeskind plan be discarded without further consideration, and a modified "Restoration Alternative" be adopted in its place.

Bill Hough  
238 East 30<sup>th</sup> Street #2F  
New York, NY 10016

*395 South End Avenue  
apartment 19L  
New York, New York 10280*

March 12, 2004

Lower Manhattan Development Corporation  
Attn: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20<sup>th</sup> Floor  
New York, NY 10006

**RE: World Trade Center Draft Generic Environmental Impact Statement (DGEIS)**

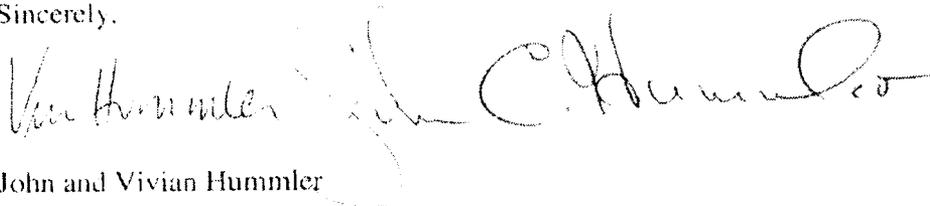
Dear Ladies / Gentlemen:

We are residents of Gateway Plaza Building 600 in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of two residential complexes physically damaged in the attacks of September 11<sup>th</sup>.

Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life unbearable for a period of years for both residents and workers downtown, particularly those in Battery Park City. The DGEIS also makes clear that the end result of this multi-year construction will have little, if any, benefit to workers and residents downtown.

As a resident of Lower Manhattan, I urge the LDMC to study and learn the lesson that the DGEIS teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit and will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Sincerely,



John and Vivian Hummler

521

480

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

CAROL JARECKI  
375 SOUTH END AVE, SF  
NEW YORK NY 10280  
[print name and address]

522

481

Good afternoon. My name is Dr. Robert Jarvik and I submitted an entry to the Memorial Competition.

Many of you know me as an artificial heart inventor. In my work, I have become an expert on miniature axial flow pumps, the same type of pumps needed for the proposed memorial waterfalls, only much larger.

Huge axial flow pumps used for flood control can do the job, but who appreciates how immense these waterfalls would be?

Added together, the eight waterfall walls of both "footprints" are over 1,600 feet long and far exceed the length of Niagara's American Falls, which is about 1,000 feet long.

With the memorial falls, a curtain of water only ½ inch thick would require a flow of 15,000 gallons per second, equal to 20% of American Falls.

Like Niagara, the waterfalls would throw up a cloud of mist that would spread with the wind. Chemicals added to the pools to prevent the growth of slime would shower visitors, even beyond the site.

Five million tons of water a day would roar over the memorial falls, almost 2 billion tons a year!

The energy required to pump this much water would exceed 10 megawatts, - twice the energy the Empire state building consumes; and would cost over six million dollars per year.

This design should never be built.

How many of you realize that the LMDC did not have the legal authority to build **any memorial** at the World Trade Center site when it conducted the competition?

LMDC is a political subdivision of the State of New York.

The World Trade Center site is owned by the Port Authority, and is **not** subject to the jurisdiction of the city or the state of New York. Absent a legitimate contract with the Port Authority, the LMDC has no control over the World Trade Center site.

The Amended General Project Plan evidences the absence of a contract with the Port Authority granting the LMDC the legal right to conduct the "Memorial Program", as of September 16, 2003.

Paragraph 1 of the Amended General Project Plan states:

"LMDC and Port Authority will plan these Programs together pursuant to a Memorandum of Understanding to be entered into between them."

Note the future tense "to be entered".

There was no contract!

The LMDC had no legal right to design and construct a memorial at the World Trade Center site, and misled the public to believe that it did.

The LMDC promoted the Memorial Competition process to the world as a model of our democracy and as a "transparent" public process. But this wasn't a democratic process at all, and in fact the LMDC was attempting to usurp the process of representative government through which the Port Authority exercised legal control of the World Trade Center site.

The LMDC was deceptive and betrayed the public trust.

The representatives of so many rightful special interest groups, firemen and police, families and private citizens alike, should refuse to deal with the LMDC, and should take their concerns directly to the Port Authority and to the United States Congress.

To restore the integrity of the memorial process, the LMDC must be excluded from further participation. – Thank you.

Robert Jarvik, MD.  
President,  
Jarvik Heart, Inc.  
333 West 52<sup>nd</sup> Street  
New York, New York 10019  
(212) 397-3911 ext.11  
[rjarvik@jarvikheart.com](mailto:rjarvik@jarvikheart.com)

February 18, 2004 statement to the LMDC concerning the World Trade Center Memorial and Cultural Program Amended General Project Plan, September 16, 2003  
Michael Schimmel Center for the Arts at Pace University, Spruce Street, Manhattan.

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

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Very truly yours,

TRUPTI JHAVERI

325 SOUTH END AVE, #30-U

NEW YORK, NY 10280.

[print name and address]

525

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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*I am also extremely  
concerned about air quality  
and noise during construction.*

Very truly yours,

*Buff Kavelman (Ms.)*  
375 South End Avenue #4k  
New York, NY 10280-1018  
[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

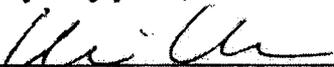
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Very truly yours,



Kazuo Kawai

395 South End Ave., #16J  
[print name and address]

New York, NY 10280-1030

527

484

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

  
\_\_\_\_\_  
Tamar Keil  
375 South End Ave, # 3B  
\_\_\_\_\_  
New York, NY 10280  
[print name and address]

528

March 11, 2004

Lower Manhattan Development Corporation  
One Liberty Plaza, 20<sup>th</sup> Floor  
New York NY 10006

Dear Sirs:

I am a resident of the Gateway Plaza in Battery Park City. This letter is written to express my deep concern regarding the tunnel option for rebuilding West Street.

The project will be a disaster during its years of construction. Currently I use Albany Street as my crossing point... The Liberty bridge is often too crowded, and the stairs impossible when returning with packages! The Vesey street bridge is one I have never attempted... it just looks so miserably industrial that I prefer to walk across at street grade. I must admit I may not do so when winter returns as the area under the arches of the Verizon building becomes darker and more treacherous with each new piece of metal added to that horrible bridge.

I have become familiar with the impact study DGEIS. I believe that study confirms my fears that the tunnel option will make life miserable for residents and workers, particularly those of us in Battery Park City, during the years of construction. Additionally the tunnel option will have little, if any, benefit for us.

The residents of Battery Park City have been through enough. The tragic event happened in our backyard, our lives were wildly disrupted, now the emptiness in the sky is a daily reminder, it haunts us and assaults our senses. I implore you to reconsider this project, to consider us! Frankly we are the victims of the tragedy too and we live with its aftermath daily.

Sincerely,



Veronica Kelly  
375 South End Avenue, 16A  
New York NY 10280  
[Vk1240@aol.com](mailto:Vk1240@aol.com)

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

Esther Kornblau

ESTHER KORNBLAU

375-6 E SOUTH END AVE

[print name and address]

NEW YORK, N.Y. 10280

March 3, 2004

Lower Manhattan Development Corporation  
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One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

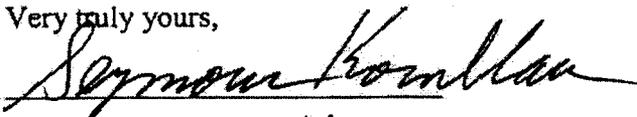
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Very truly yours,



SEYMOUR KORNBLAU  
375-60 SOUTH END AVE

[print name and address]

NEW YORK, N.Y. 10280

March 3, 2004

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One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

Angela Krevey  
375 South End Ave Apt 6R  
NY NY 10280  
[print name and address]

Angela Krevey

March 3, 2004

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Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

John Kreuey  
375 South End Ave #65  
NY NY 10280  
[print name and address]

*J. Kreuey*

March 3, 2004

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Very truly yours,

DEBORAH KRICKSCUN  
375 SOUTH END AVE 18J  
NY NY 10280  
[print name and address]

534

486

March 3, 2004

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New York, NY 10006

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Very truly yours,

Ellen Krulise

03-07-04

Ellen KRULISE

Gateway Pl. 400 / #357  
[print name and address]

535

489

March 3, 2004

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One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

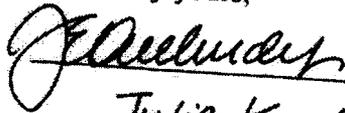
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Very truly yours,



Julie Kuehndorf

365 South End Ave, 5A

[print name and address]

New York, NY 10280

In sum, NO TUNNEL!

536

490

March 3, 2004

Lower Manhattan Development Corporation  
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One Liberty Plaza, 20th Floor  
New York, NY 10006

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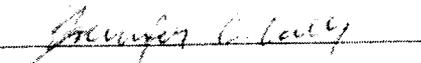
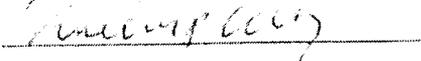
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Very truly yours,

  
\_\_\_\_\_  


\_\_\_\_\_  
[print name and address]

Jennifer A. Pith Calor  
375 South End Ave #96  
New York NY 10008

537

491

March 3, 2004

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One Liberty Plaza, 20th Floor  
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Very truly yours,

*Christina Guiberto & Mr. John Lambert*

*355 South End Ave Apt 22A*

*NYC, NY 10080*

[print name and address]

538

492

March 3, 2004

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Very truly yours,



– Arthur Land  
355 S. End Ave. Apt. 6J  
New York, NY 10280-1007

[ ]

March 3, 2004

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Very truly yours,

Peter A. Larsen

375 South End Ave. #10B

New York NY 10286

[print name and address]

March 3, 2004

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Very truly yours,



ALISA R. LEBENSOHN

355 South End Ave #35c

NY NY 10280

[print name and address]

*Please  
dont  
approve this!  
we have  
enough  
problems*

541

March 3, 2004

03/03/04 11:21

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One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,



Linda M Lemiesz

355 South End 10 D  
[print name and address]

542



**February 9, 2004**

**Lower Manhattan Development Corporation  
Attn: Comments WTC Memorial and  
Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006**

***Re: Environmental Plan Review***

**Gentlepersons:**

**As a registered professional engineer in both New York State and the State of Texas, and having experience in building of large structures beside teaching and research, I am writing to comment on the proposed short-bypass plan for West Street/Highway 9A.**

**Very briefly, the plan calls for four lanes of traffic in each of the northbound and southbound direction in the vicinity of the former WTC. In each direction, two lanes will be placed below ground in tunnels and two-lanes at-grade. In crossing West Street as envisaged for this plan is that pedestrians at the north and south ends of the tunnels will cross two two-lane of "slow traffic" paths and two two-lane of "fast traffic" paths.**

**While waiting for crossing, the pedestrian would be subjected to the fumes coming out of the tunnels in addition to those at ground level. Also, exciting traffic tends to speed up and thereby pouring out above normal amount of exhaust gases. Under raining and snowing weather, these points alone would pose physical danger of all sorts.**

**One of the repeated official reasons for the short-bypass plan was pedestrian safety and convenience when compared to the at-grade plan.**

*Permanent Address: 250 South End Avenue, Suite 3E, New York, NY 10280 Email: lingf1@asme.org*

Based on the aforementioned alone, it is not clear how a margin of better pedestrian safety would be achieved. Moreover, I see the tunnel plan would be a monumental task, accompanied by many environmental risks. Are these the price to pay for pedestrian safety and convenience? Be it as it may, consider just a few items:

- A temporary slurry wall has to be to be constructed and removed after a permanent slurry wall is built, and this wall is to be connected with the existing WTC bath tub's west wall
- The slurry walls have to go down to bed rock level
- Moving sanitary interceptor sewer which I had read is over five feet in diameter
- Pressure grouting at the PATH tunnels which means disturbing a 100 year old cast-iron system

Over the minimum period of 2005-2008, residents and folks who work around the West Street or Route 9A project would be subjected to several known environmental risks. Please remember more than half of these folks had endured a severe round of environmental risks before, i.e. post September 11!

I urge LMDC to adopt the at-grade plan. The city around the former WTC is living entity including a shared thoroughfare of West Street and Highway 9A. Moreover, the new WTC is not a cemetery, but a living entity with a profound memorial element.

Thanking you for your attention, I am

Sincerely,

  
**Frederick F. Ling, PE**  
**Earnest F. Gloyna Regents Chair Emeritus in Engineering &  
Distinguished William Howard Hart Professor Emeritus,  
Rensselaer Polytechnic Institute**

March 3, 2004

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Very truly yours,

Joanne Lipton  
395 S. End Ave 7J  
NY, NY 10280  
[print name and address]

545

496

Statement by John Lumea  
LMDC Hearing on Draft Generic Environmental Impact Statement  
re its Proposed Action at the World Trade Center site  
Pace University, 18 February 2004

My name is John Lumea.

On 6 February 2004, the Lower Manhattan Development Corporation determined that under Section 106 of the National Historic Preservation Act, the World Trade Center site is eligible to be placed on the National Register of Historic Places because "the WTC site retains *integrity* of location, setting, feeling, and association."

Put that very statement in the imperative – the WTC site *must* retain integrity of location, setting, feeling, and association – and you have a good idea what most people want for the site. Building a truthful response to the enormity of 9/11 obliges us to preserve the site's historic sense of place – not as measured by the arbitrary sanctification of slurry walls, but by endowing the site with a visual and visceral sense

of the physical wholeness of those acres as they now present themselves.

Lining the perimeter of the site with monstrously bulky towers, making it impossible to grasp at a glance from the street the sheer greatness of the site, is not the way to go about this. On the contrary, greatness will come to the site only by designing it as one civic urban gesture.

For nearly 2½ years, you, the LMDC, have precluded such an architectural response to 9/11 by running Greenwich and Fulton Streets through the site, creating planning quadrants – “the memorial” in one quadrant, everything else in the rest – then requiring that these be designed on separate tracks.

Last week’s news that below-grade infrastructure would likely force the planned memorial footprints to be smaller than the historic ones showed where this approach leads.

Still, you have insisted that restoring the street grid is the key to a so-called human scale development.

The fact is, the current plan would create the highest urban densities and some of the worst light and air conditions in Manhattan – in one case, according to the architect Eli Attia, twice the maximum provision of the New York City Zoning Resolution and 2½ times the former World Trade Center. Outrageous.

Defining the entire site as one parcel, as the draft GEIS does, yields better numbers and enables the LMDC to dodge these ill effects.

But each of the five proposed buildings will be privately developed on its own parcel. And the collaborative bulks of these buildings is what will determine how the site feels on the ground.

Likewise, defining public open space to include streets and sidewalks, as the draft GEIS does, boosts the numbers, but it does not alter the facts: The fragmentary spaces currently shown on the World Trade Center site would function as little more than glorified sidewalks.

Given how painfully the site would have suffered under the so-called Libeskind plan, it is reassuring that the LMDC has now recorded its intention, above all else, to preserve the site's integrity of location, setting, feeling, and association.

Now we can get to the urgent business of finding a design that does that, and the vast majority of us who never supported the plan credited to Libeskind can rest assured that the World Trade Center's future is in good hands.

Thank you.

March 3, 2004

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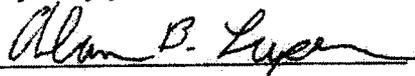
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Very truly yours,



ALAN LUPER

355 SOUTH END AVE, N.Y., N.Y.  
[print name and address]

BALANCING THE ENVIRONMENTAL IMPACT OF DEVELOPMENT WITH THE  
HISTORICAL IMPERATIVE TO PRESERVE GROUND ZERO.

FEBRUARY 18, 2004

P3200 Photojournalism / Gregory P. Mango ©2004

**Background:** The master plan, Memory Foundations, by architect Daniel Libeskind, was developed in concert with the L.M.D.C. to create what has become known as the memorial mission statement and program elements. These guidelines formed the basis of the memorial competition & were culled from a variety of ideas presented by thousands of people at numerous town hall meetings over the last several years. These guidelines have been highly praised by many as being visionary in scope and also very democratic precisely because so many people had input, including hundreds of family members of those who were victims on that infamous and horrific day.

**Supporting document #1**, from the **Executive Summary, page S-9**: Regarding selection of Daniel Libeskind's Memory Foundations: "The selection team noted that the Memory Foundations design reconciled the need to preserve the setting...with the need to rebuild." This statement confirms the fact that any proposed action must not only respect but in fact should **ENHANCE** the design elements present in Mr. Libeskind's plan.

When the memorial competition started, designers were given specific parameters. The most important of these was the following statement found on the **Site Definition page**: "**It is fundamental to Studio Daniel Libeskind's design that the slurry wall remains prominent and highly visible.**" (see supporting document #2)

**Supporting document #3** is a **Letter from Frank Gehry**, renowned architect, who highlights the qualities of the 30 foot deep recessed memorial plane and exposed slurry wall as designed by Studio Daniel Libeskind.

**Supporting document #4** is a statement taken from Leon Wieseltier, literary editor of The New Republic. He suggested that the site itself has so much power that a flag and a void (meaning the 30 foot recessed memorial with exposed slurry wall) would suffice.

**Supporting document #5**, taken from the **Executive Summary, page S-13**: also relates to the memorial area, 30 feet below grade, as designed by Daniel Libeskind: The Memorial would, "provide a level of psychological (and physical--my words) separation from the busy streets around it."

The question then remains as to how we ended up with a memorial that fills in the 30 foot deep recessed memorial and buries the slurry wall. In other words, **the crux of the issue centers around a conflict between the master plan as designed by Daniel Libeskind and a chosen memorial that disregards the master plan entirely.** I will now present evidence as to what happened.

**STATEMENT:** The jury made a decision, **BEFORE** looking at any of the boards, to eliminate any proposals that actually used the 30 foot deep recessed memorial plane as designed by Mr. Libeskind.

**Why the jury erred:**

2

**Supporting document #6:** Taken from The New York Times, 1/19/04, is a quote from juror Julie Menin. "Most of us thought that an at-grade solution was preferable." They correctly determined that the flow of pedestrian traffic was just as important as the memorial itself, but they assumed that an "at-grade" solution would better address this issue. This decision was made **BEFORE** looking at any of the boards.

**Supporting document #7:** Taken from The New York Times, 1/8/04: "The proposals that survived the first winnowing called for ample space at sidewalk level..." This makes no sense because there was no sidewalk. By setting this **false precedent** before looking at the boards, the jury effectively disabled their own ability to judge how well a competitor wedded his design to the Libeskind design, which **was the basis for the competition**. Those designs were eliminated right away. How did the jury know **In Advance** that a winning design wasn't to be found 30 feet below grade? The jury's task was not to find an "**At-grade**" solution. Their task was to find a design that **complimented** the Libeskind design and kept the slurry wall exposed. The process should be additive, not destructive. I would further argue that the thought process that gave us "Reflecting Absence" is antithetical to what the memorial is supposed to represent.

**Supporting Document #8:** Taken from the Memorial Mission Statement: "...inspire and end to hatred, ignorance and intolerance." Mr. Arad blatantly **ignored** the fundamental directives of the Memorial guidelines and disregarded the voices of thousands of people. Does this behavior exemplify tolerance for other ideas, which is the basis of our constitution? I think not.

**In addition, architectural remains from the destroyed towers and surrounding artifacts have not been used, further watering down the potential for a powerful memorial and diluting the historical authenticity of the site.**

By example, I use my trip to the concentration camp in Dachau, Germany, to illustrate a point. At the site, I was able to walk inside and view a green tiled shower room with round, oversized shower heads, where people were gassed. I walked past brick ovens which contained stretchers that were fitted with wheels on tracks that were used to cremate bodies. The German authorities left these items in place to tell a story. They made the right choice to leave these palpable items in the exact spots where they were used. They didn't remove these items and expect people to guess what the places looked like. This is one way of creating a powerful memorial and this technique must be used at Ground Zero.

**No manmade architectural structure can replicate the power and the symbolism of the remaining box beam columns, as well as other artifacts like the Koenig sphere and the tower #1 antenna.**

**Supporting document #9:** A Daily News photo and text from December 7, 2003, shows a picture of the remaining box beam columns standing at the Northeast corner of the South Tower. The caption reads: "The Proper and Fitting 9/11 Memorial." I think it is safe to say that editorials in at least two of the three major newspapers in New York City are a fair and accurate representation of what the public wants.

In closing, I must emphasize that all those town hall meetings will have been a waste of time if the Libeskind plan is thrown out. We will be failing future generations if they can't see the slurry wall, the remains of the box beam columns, the Koenig sphere, and the Tower #1 antenna. (among other items) There is an historical imperative that must direct our actions so that citizens from all over the world have a visual bookmark of the destruction wrought on that day, so that all who visit will never forget and perhaps, they will be inspired to never let it happen again by putting an end to hatred, ignorance and intolerance.



- *Unresolvable Issues:* Are there components that are unresolvable?
- *Resolvable Issues:* How significant are the issues that can be resolved?
- *Cost:* What is the estimated cost of publicly funded elements of the plan?

Although all of the designs had positive elements, LMDC and the Port Authority determined that two of the design concepts best satisfied the selection criteria—Studio Daniel Libeskind's Memory Foundations and the THINK team's World Cultural Center.

The Memory Foundations plan, submitted by Studio Daniel Libeskind, would preserve and reveal the slurry walls of the bathtub of the WTC Site as a symbol and physical embodiment of the resilience of withstanding the attacks of September 11. North of the bathtub, the tallest building in the world would rise 1,776 feet in the air, and four other commercial towers would encircle the Memorial setting in a descending spiral. New cultural facilities and a performing arts center would be sited directly around the Memorial. At street level, Memory Foundations would create a lively public realm by restoring Greenwich and Fulton Streets with a continuous street wall and at-grade retail shops and restaurants. In the east, Wedge of Light Plaza would create a plaza along Fulton Street from the St. Paul's churchyard to the entrance to September 11th Place. The Fulton Street corridor would be extended west of the museum and create another major new open space.

The World Cultural Center design submitted by the THINK team (Ban, Schwartz, Smith, Vinoly) centered around two open-lattice towers built around the footprints of the former towers. A memorial would be located at the top of the latticework, with other cultural uses including a museum and performing arts center below. A series of pedestrian bridges would cross through the site, intersect at the heart of the two towers, and extend across Route 9A to BPC. Commercial development would take place in office towers surrounding the memorial site. Fulton and Greenwich Streets would be extended for pedestrian and vehicular traffic.

Public sentiment concurred with the selection of these two designs. Ninety-two percent of the public comments received by LMDC gave Memorial Foundations a positive rating. Popular elements of the design included the approach to restoring the skyline, and the use of the slurry wall and bathtub area for the memorial. There was favorable response to the open space and parks, particularly Wedge of Light Plaza. Ninety percent of the comments received were also favorable toward the THINK World Cultural Center. Many responded favorably to the approach to restoring the skyline and the inclusion of cultural and civic facilities. There was positive interest in the memorial context and setting, though some concern about its feasibility.

Based on further refinements and evaluation by the LMDC, the Port Authority, and other government officials, Governor Pataki and Mayor Bloomberg announced on February 27, 2003, that Studio Daniel Libeskind's Memorial Foundations had been selected as the basis for the redevelopment plan.

[REDACTED]

In the spring and summer of 2003 LMDC, together with the Port Authority, entered into agreements with Studio Daniel Libeskind providing for the refinement of the Memory Foundations design concept; to serve as the consultant architect for overall redevelopment of the WTC Site; and to develop design guidelines for future commercial development at the WTC Site in coordination with the Port Authority, LMDC, and the Net Lessees. LMDC also engaged Studio Daniel Libeskind to assist in site planning of the Memorial and the cultural components.

554

503



Overview History Memorial Site Mission Program Schedule Rules How to Enter Jury Contents



- » Site Definition
- Access and Circulation
- Climate
- Competition Boundaries
- Statement
- Memorial Site Drawings

**SITE DEFINITION**

This competition seeks to elicit the most creative and exceptional designs for the memorial at the World Trade Center site. The memorial site is part of the larger site plan for the future rebuilding of the World Trade Center site. (See Illustration #5 in Downloads.) Of the approximately 16 acres designated for reconstruction, the memorial and cultural complex occupies an area of 6.5 acres that includes the 4.7-acre memorial site, a museum and other cultural buildings. The memorial and cultural complex is bounded by the West Street 8-lane highway to the west, an extension of Fulton Street to the north, a restored Greenwich Street to the east, and a new, east-west-oriented Liberty Street Park to the south. The cultural buildings form a protective shield and a buffer zone for the memorial site along Fulton Street and Greenwich Street.

- The memorial site itself is an area of approximately 4.7 acres that is recessed 30 feet below street level. The site includes the two approximately 200 by 200 feet areas known as "footprints," where the original World Trade Center Towers were located.
- There is a glazed wall defining the northern edge of the north tower footprint. This glazed wall provides natural light for the adjacent, below grade pedestrian concourse.
- On the southern side of the site there is a new concrete wall forming the edge of the memorial site at Liberty Street.
- At the western perimeter of the memorial site is an area adjacent to the slurry wall going all the way down to bedrock, approximately 70 feet below street level. It extends approximately 260 feet south from the northwest corner of the site and has a width of approximately 24 feet. It provides an opportunity for visitors to experience the full depth of the site and allows views of the slurry wall's full height.
- The museum and cultural buildings flanking the site, including the façades and all architectural elements, are not included as part of the competition.

GLASS  
→ TILES  
IN  
THE  
STREET  
INSTEAD

The western edge of the site, below grade, is defined by the exposed slurry wall, the only surviving structure from the original World Trade Center.

The slurry wall will be stabilized by steel structures and protected by a climatized glazed plane.

The north wing of the cultural building complex spans over the North Tower footprint and provides a visual frame from Fulton Street. The eastern wing cantilevers over the southern footprint and, together with a waterfall, provides a definition of the South Tower footprint. (See Illustrations #6 and #7 in Downloads.) Areas under these building portions are part of the memorial site and are shown as dashed lines on the site plan and on the sections. Between the two wings and at their center is September 11 Place plaza, overlooking the memorial site and giving central access to the memorial and the museum. The museum is housed in a

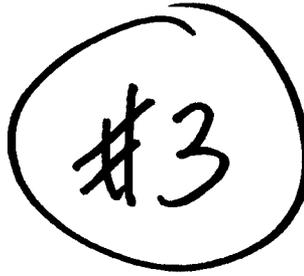
ER SITE MEMORIAL COMPETITION :: MEMORIAL SITE ::... Page 2 of 2

suspended building floating over September 11 Place plaza.  
Included in these guidelines are drawings and images illustrating the site plan designed by Studio Daniel Libeskind for your reference and use, along with other information about the site and its environment.

555

506

GEHRY PARTNERS, LLP



Frank Gehry  
Jim Glymph  
Randy Jefferson

Terry Bell  
Edwin Chan  
Craig Webb  
George Metzger  
Marc Salette

December 15, 2003

Gregory Mango  
P3200 Photojournalism  
210 17<sup>th</sup> Street  
Studio #3  
Brooklyn, New York 11215

Dear Gregory,

Frank Gehry has asked me to contact you on his behalf.

Frank was pleased to have the chance to review your proposal for a memorial at the World Trade Center site. Frank found your proposal to be very interesting, he was especially interested in the qualities conveyed by the two images *North Footprint - View Looking North - Reflecting Pool Area* and *Drawing #22*, both of which we've marked.

Frank has asked me to extend his thanks, and his best wishes for continued success with your work.

Yours Sincerely,

GEHRY PARTNERS, LLP

A handwritten signature in black ink, appearing to read "K J-A I".

Keith Mendenhall

12541 Beatrice Street, Los Angeles, California 90066  
TELEPHONE: 310-482-3000 FAX: 310-482-3006

556

307

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17 DEEP, KEUESSED MEMORIAL PLANE.  
DANIEL LIBESKIND IMAGE: VIEW OF 30 FOOT ~~ANTENNA~~, GREAT SLURRY WALL AND GREAT  
PROCESSIONAL RAMP AS SEEN FROM STREET LEVEL ABOVE SEPTEMBER 11TH PLACE.  
NOTE: TOWER 1 ANTENNA REMAINS & "THE SPHERE" SCULPTURE HAVE BEEN ADDED.



DRAWING #22

NOTE: THIS IMAGE HIGHLIGHTED BY ARCHITECT FRANK GEHRY

504

Unbearable Lightness of Memory  
By MAUREEN DOWD

Published: November 30, 2003

E-mail: liberties@nytimes.com

They are pretty.

Pretty and soothing.

Soothing and smooth.

Smooth and light.

Light and watery.

The eight designs for a memorial at ground zero, gleaming with hanging candles and translucent tubes and reflecting pools and the smiling faces of those killed on 9/11, aim to transcend. And they succeed.

They transcend terror. They have the banality of no evil. They represent the triumph of atmosphere over atrocity, mood over meaning. The designs are more concerned with the play of light on water than the play of darkness on life.

They have taken the heaviest event in modern American history and made the lightest memorials.

As I walked around the Winter Garden of the World Financial Center, looking at the finalists in the competition held by the Lower Manhattan Development Corporation, it was hard to feel any connection to the grotesque evil that had crashed into innocence right outside these windows two years ago, the evil that still radiates from that huge pit and makes you mutter imprecations against Osama bin Laden.

2

"The designs are horribly, horribly bland," mourned Eric Gibson in The Wall Street Journal.

The ugliness of Al Qaeda's vicious blow to America is obscured by these prettified designs, which look oddly like spas or fancy malls or aromatherapy centers. It's easy to visualize toned women with yoga mats strolling through these New Age pavilions filled with waterfalls and floating trees and sunken gardens and suspended votives. Mass murder dulled by architectural Musak.

The designs are reflections of our psychobabble culture, exuding that horrible and impossible concept, closure. Our grief and anger have been sentimentalized and stripped of a larger historical and moral purpose.





#5

to the World Financial Center in BPC on the west and the subway system on Church Street, and would provide connections to street-level retail and pedestrian activities.

Beneath the concourse levels would be two service levels above the bedrock. The upper service level would be adjacent to the PATH mezzanine, while the lower level would be adjacent to the PATH tracks and platforms. There would also be loading facilities (docks, stalls, and bins) for trucks on the mezzanine level beneath the new office towers. Parking for buses would be provided below grade at the Southern Site or at Site 26, or at the WTC Site itself. Attendant parking for 1,200 to 1,400 cars belonging to building tenants would also be provided below grade. No parking is contemplated in the area of the site below the Memorial.

As part of the infrastructure for the proposed project an existing Hudson River pump station below grade in BPC would be reactivated.

### SITE DESIGN

Design guidelines are being prepared by Studio Daniel Libeskind, LMDC, and the Port Authority to translate the vision of Memory Foundations into a set of principles and standards that will guide the design of the open spaces and commercial projects. These guidelines establish a broad but well-defined framework, enabling designers to be creative in the design for each component while at the same time defining the essential elements that will ensure that each part of the development contributes to the overall vision. The preliminary guidelines are highlighted below.

**EXPERIENCE**

The Memorial would delineate the footprints of the Twin Towers in remembrance of the individuals who lost their lives on September 11, 2001, and those who died in the earlier attack on February 26, 1993. The master plan envisions the ground level areas around the Memorial serving as a visual and thematic introduction to the Memorial. Movement to and from the Memorial would be as important as the experience itself.

the Memorial could be accessed from other sides, the main route would be from September 11 Place.

### TOWERS

The five towers would be organized in a three-dimensional spiral, culminating in Freedom Tower. Their orientation would emphasize the centrality of the Memorial space. When viewed from a distance, the composition of towers would recall the dynamism of the Statue of Liberty, creating an association between what would become the two most prominent landmarks along the Hudson River. The towers would also incrementally increase in size, beginning with Tower 5 as the lowest and Tower 1 as the tallest. Consistency of the towers' modern design would be achieved by using a modern palette of compatible materials. Each tower would be subject to height and bulk limits and, depending on the outcome of ongoing design guideline discussions, may be designed with setbacks to maximize daylight to buildings and streets, improve views from the upper stories, and mitigate the wind effects at ground level.

### SAFETY AND SECURITY

Although pedestrian traffic would dominate the ground level of the site, safe and efficient vehicle access and mobility is important for goods movement, emergency vehicles, buses, taxis and for-hire vehicles.

560

511



### Setting the Rules

As submissions arrived at a warehouse on West 36th Street, the jury met with many groups and with the governor, the mayor and former Mayor Rudolph W. Giuliani. "All of them promised to affirm our autonomy and authority," Dr. Gregorian said.

For their part, jurors signed confidentiality statements restricting their public comments. But their silence during the process also reflected their respect for one another. "You did not leave a meeting and read about it the next day," Ms. Harris said.



Choosing the memorial was as much an urban planning exercise as an artistic commission. "It was the memorial site competition," said Susan K. Freedman, a juror and president of the Public Art Fund. "How many artists are given four and a half acres?"

Although there were two consultant firms to guide the process, it did not take long for the jurors to make their own rules, including a quorum of 100 percent for deliberations. "If somebody had to leave to get on an airplane, the meeting ended — period," said Ms. Harris. The jury also decided that the magic number for consensus would be 10 votes. And it wrangled with its stewards.

"There was constant friction with this group of jurors who hate authority," one official said. "They're a difficult group, but great jurors."

State officials were not the only ones to feel the jury's heat. Members debated among themselves — sometimes to the point of raised voices and stamping feet — how the memorial would feel to those who visited it. Jurors with a historical bent fought with those more concerned with the memorial's emotional and tactile impact.

Many jurors credited Ms. Contini, a former first vice president for sponsorships and events marketing at Merrill Lynch, for smoothing disagreements among them.

"I wanted to be sure that each juror always had the opportunity to have a voice," Ms. Contini said.

### Narrowing the Field

With 5,201 entries to consider, the original strategy was for the submissions to be divided among three groups of jurors. The jury decided, though, that every juror would look at every board, including some 400 that had been disqualified on technicalities.

They did so in a 20,000-square-foot office on the 30th floor of the Equitable Building at 120 Broadway. When they gazed out the window, exhausted from viewing submissions, jurors saw ground zero.

A private investigation firm run by Bo Dietl, a former New York police detective, examined each submission for explosive devices or contamination by anthrax. The 30- by 40-inch entries were placed on hundreds of easels in rooms protected by a double-key system. Jurors' notebooks never left the office.

561

512

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January 8, 2004

## How Winning 9/11 Memorial Acquired Its 2nd Designer

By DAVID W. DUNLAP and GLENN COLLINS

**W**hen a proposal called Reflecting Absence was submitted last year to the World Trade Center memorial site competition, there was one name on it: that of Michael Arad, a young architect for the New York City Housing Authority.

When Reflecting Absence was announced on Tuesday as the winner of the six-month competition, there was another name: Peter Walker of Berkeley, Calif., who has 45 years of experience in the teaching and practice of landscape architecture.

Though Mr. Arad attracted the jurors' attention with the concept of great pool-filled voids where the twin towers stood, it was Mr. Walker's greening of the surrounding plaza that sealed their choice. The two now share the design credit and the contract, even though Mr. Walker joined only last month.

Having survived a winnowing from 5,201 entries to 8 finalists to 3 significantly redesigned favorites, Reflecting Absence wound up as the choice of most, though not all, of the jurors in a 12-hour meeting on Monday at Gracie Mansion.

The success of Reflecting Absence — and the ultimate failure of Garden of Lights and Passages of Light: Memorial Cloud designs — was attributed to many factors by six people closely connected to the process, who spoke to reporters on the condition that their names and their affiliations not be divulged.

For its part, the Lower Manhattan Development Corporation declined yesterday to offer any comment on the memorial deliberations. Jurors are forbidden by their contract with the corporation to speak with journalists until the process is completed when the final design is made public next week.

Public attention has focused on the possibly persuasive role played by one juror, Maya Lin, who designed the Vietnam Veterans Memorial in Washington. She sketched out a proposal for the memorial in The New York Times Magazine of Sept. 8, 2002, that bears a superficial resemblance to Reflecting Absence.

But those who were interviewed said that though Ms. Lin's recent advocacy of Reflecting Absence was forceful and entirely consistent with her minimalist design sensibility, no one person could have commandeered the jury.

Instead, they said, Ms. Lin, though committed to the Arad design, was self-effacing and gave in on many points she had favored. At least four other jurors made the case for the Arad design aside from Ms. Lin, they said.

All 13 jurors had strong ideas and opinions, and they were given ample opportunity to express them and did so, they said. But they also described deliberations that were largely collegial, even

though sharp differences persisted through Monday, as Passages of Light remained a contender until the end. (Garden of Lights, they generally agreed, had suffered so much from changes that it was no longer as highly regarded, especially after its creators' presentation to the jury on Monday.)

What mattered most to jurors about Reflecting Absence — the degree depended somewhat on who was speaking — was the way in which its design spoke more clearly than other entries to what happened on Sept. 11, 2001: the pancaking collapse of the twin towers into their own foundations.

By expressing the towers as voids 30 feet deep and almost an acre in extent exactly where the 110-story buildings stood, jurors believed, the design would convey the magnitude of the event not only to a generation that will never forget that day but to future generations that will have to learn.

The sheer size of the voids would also allow visitors to experience something of the physical dimension of the trade center towers. Jurors were not unaware, even as they met in secret, of the publicly expressed hunger for a memorial design specific both to the site and the event.

They were also concerned that Mr. Arad's original concept called for a plaza around the voids that was too barren and lifeless. They made it clear that a landscape architect of high caliber would have to be involved in the project, though they did not specify Mr. Walker.

The development corporation was said to have furnished a list of choices to Mr. Arad that included Mr. Walker.

Vartan Gregorian, the chairman of the memorial jury, summarized the result of their collaboration in a brief public statement issued on Tuesday.

"While these voids still remain empty and inconsolable, the surrounding plaza's design has evolved to include teeming groves of trees, traditional affirmations of life and rebirth," he said. "The result is a memorial that expresses both the incalculable loss of life and its regeneration."

The jurors' concern about landscaping began long before the recent refinements. They conceived their task as finding a design for a memorial site — not just a memorial — meaning that it had to fit into the surrounding streets and sidewalks and into the larger context of Lower Manhattan.

That was reflected in the eight finalists announced in November. All turned their back, in one way or another, on the idea that the entire memorial area could be depressed 30 feet below street level, which was embodied in Daniel Libeskind's overall trade center design concept.

Instead, from the very beginning, the jury publicly invited architects to challenge the site design plan. They said they deliberately issued a direct invitation to break its boundaries.

WHAT!

Some jurors also felt that in its boldness, Reflecting Absence stood a better chance of serving as a counterpoint to the 1,776-foot Freedom Tower, across Fulton Street, whose scale was made quite apparent when the jurors saw a model on Monday night.

Jurors set a threshold of 10 votes for acceptance. Reflecting Absence came close in the first polling on

563

514

Monday morning, but Passages of Light had supporters who appreciated it as a spectacular work of architecture. To its advocates, the canopy formed by undulating translucent tubes suggested a cathedral; to its detractors, it suggested a cave.

Garden of Lights, in which the site was to be covered by prairies and apple orchards, suffered from concerns over its underground "altar" rooms and the limited access that would be provided across the grounds.

The final vote between Reflecting Absence and Passages of Light was not unanimously in favor of the concept by Mr. Arad and Mr. Walker, though those interviewed would not specify what it was.

Besides Dr. Gregorian and Ms. Lin, the jurors are Paula Grant Berry, Susan K. Freedman, Deputy Mayor Patricia E. Harris, Michael McKeon, Julie Menin, Enrique Norten, Martin Puryear, Nancy Rosen, Lowery Stokes Sims, Michael Van Valkenburgh and James E. Young.

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**THE MEMORIAL MISSION STATEMENT**

Introduction *Remember and honor the thousands of innocent men, women, and children murdered by terrorists in the horrific attacks of February 26, 1993 and September 11, 2001.*

• Mission Statement

Program Guiding Principles *Respect this place made sacred through tragic loss.*

Program Elements *Recognize the endurance of those who survived, the courage of those who risked their lives to save others, and the compassion of all who supported us in our darkest hours.*

Additional Program Considerations

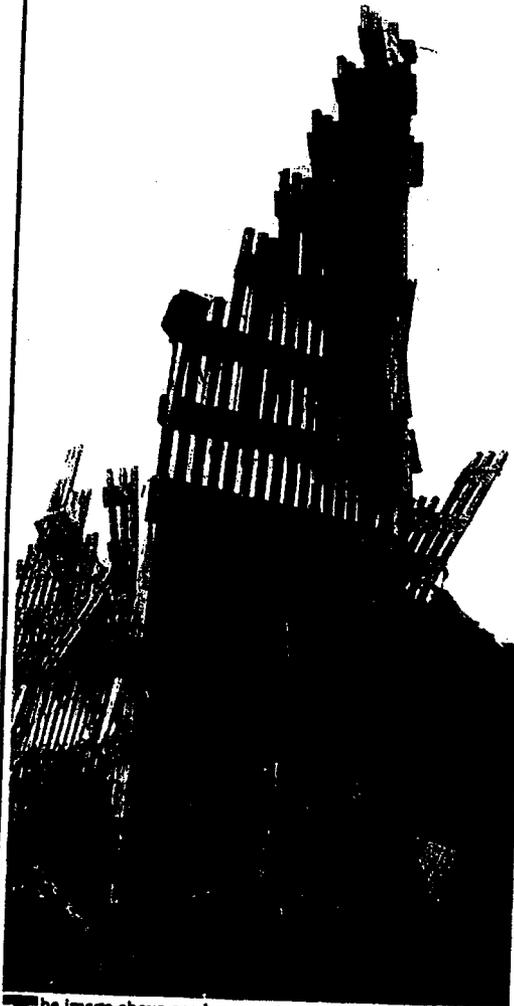
*May the lives remembered, the deeds recognized, and the spirit reawakened be eternal beacons, which reaffirm respect for life, strengthen our resolve to preserve freedom and justice.*



Questions    Disclaimer    Acknowledgments



# The fitting and proper 9/11 memorial



#9

**T**he image above needs no explanation. In the days after the attack on the World Trade Center, it was seared into America's consciousness, a symbol of the horror, outrage, courage and grief that swept the nation. To look at it is to remember, and to remember is to grapple with the scope of a bloody turning point in history.

Such is the function of a memorial. The artists and architects who designed the 9/11 remembrances being considered for the Trade Center site have yet to match the power vested in this seven-story remnant of the south tower. Their plans, while sensitive, creative and even beautiful, have failed to inspire. So they're re-working them.

As they do, they should turn their eyes to a Kennedy Airport hangar. There, the surviving portion of the World Trade Center facade rests in about 40 pieces, waiting to be reassembled and returned to Ground Zero to claim its rightful place in the national soul.

Sunday, December 7, 2003 DAILY NEWS

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Editorial Page Editor

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of only two residential complexes physically damaged in the attacks of September 11.

Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

*Gerald H. Marcus*

GERALD H. MARCUS

375 SOUTH END AVE - APT 26E  
[print name and address]

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Very truly yours,

MARILYN R. MASARYK

355 South End Ave - 12J

NY, NY 10280-1009

[print name and address]

3/6/04

- Too costly
- Too disruptive
- Works fine now

568

March 3, 2004

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In addition,  
My parents and I  
have been down here  
for more than 12 years.  
This area has been  
under construction  
and repair for most of  
that time. This has not  
been easy to live with and  
we'll feel more  
distressed if anything more  
is worked on other than  
necessary. DO NOT DO THIS TO US!

Very truly yours,

NIKKI MAZER

355 South End Ave #26G

NYC NY 10280

[print name and address]

March 3, 2004

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Very truly yours,

J. McCann

355 South End Ave.

NY, NY 10280

[print name and address]

the TUNNEL IDEA IS CRIMINAL WASTE!

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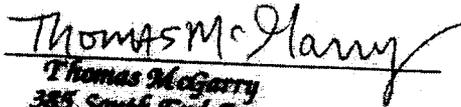
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As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,



Thomas McGarry  
385 South End Ave.  
Suite 4-31  
New York City, NY 10000

[print name and address]

**Testimony of  
Catherine McVay Hughes  
On  
Lower Manhattan Development Corporation (LMDC)  
Draft Generic Environmental Impact Statement  
for  
World Trade Center Memorial and Redevelopment Plan  
February 18, 2004  
Michael Schimmel Center for the Arts at Pace University**

Good afternoon. My name is Catherine McVay Hughes, a fifteen year Financial District resident. Our family of four owns an apartment one block east overlooking the World Trade Center site (WTC). I am here to urge you to minimize air pollution as much as possible (including dust and machinery exhaust) during the ten to fifteen years of construction at and around the WTC site.

**Calculate Cumulative Impact**

Your Generic Draft Environmental Impact Statement (GDEIS) needs to adequately address the **accumulative impact beyond the immediate WTC site** since more was severely damaged on September 11, 2001 and more than that remains to be damaged two and half years later. These large projects listed below must be included in the cumulative construction period analysis since they "represent a change from conditions existing prior to September 11, 2001" (page 2-6):

- **130 Liberty Street (Deutsche Bank) "de-construction" and site "re-construct"** of contaminated and exposed building which covers two city blocks
- **30 West Broadway (Borough of Manhattan Community College's Fiterman Hall) "de-construction" and site "re-construct"** of contaminated and exposed building which covers one city block
- **South Ferry Subway Station**
- **7 World Trade Center** (construction in progress)
- **90 West Street** renovation and conversion to residential building (construction in progress)
- **Infrastructure Repair** which consists of digging up many streets to access cables, pipes, and wires

All these projects combined with your construction phasing has and will have an enormous impact on air quality from the exposed contaminated Deutsche Bank & Fiterman buildings to the truck traffic to construction machinery. These projects will include traffic **beyond the estimated 176,000 truckloads** calculated from the various tables listed in Appendix J.

**Air Quality**

The Environmental Protection Agency (EPA) has designated Manhattan as **Moderate Non-Attainment for PM10**. In addition, all counties in New York City as well as

Suffolk and Nassau counties have been designated **Severe Non-Attainment for ozone** (Section 14.3.2, page 14-9).

If LMDC is actually serious about taking upon itself a higher standard for environmental performance in an effort to reduce practical environmental impacts,<sup>1</sup> then LMDC should take the following steps to reduce air quality impacts on the surrounding World Trade Center community that lives and works in the immediate vicinity of the WTC site.

- **Incorporate the A-191 law into all contracts related to the World Trade Center Redevelopment and enforce it.** This law will require city construction contracts to call for ultra-low sulfur diesel (ULSD at 15 ppm) and best available pollution control technology on heavy diesel construction machinery above 50 horsepower. Timely quarterly reports should be made available on-line for the public.
  - **Extend law to include contracts with the Metropolitan Transportation Authority (MTA) and the Port Authority of New York & New Jersey (PA)** at and near the immediate vicinity of the WTC Redevelopment site.
  - **Extend law to include contracts with the utilities including Con Edison and Verizon.** Both companies continue to do maintenance related to the WTC disaster in and around the immediate WTC site.
  - **Modify Appendix A, SEQ-5: Construction Environment Action** which does not comply with existing law since it refers to only non-road construction equipment of 60 hp or greater to include diesel retrofit technology
  - **Change “practicable” and “commitment” to mean “required.”** (Chapter 22: Mitigation Measures, page 22-17)
- **Reduce Vehicular Emissions by extending the A-191 law to include moving vehicles immediately.** For example, demolition trucks (used at the Fulton Street Transportation Station and Deutsche Bank) and concrete trucks (including 7 World Trade Center) should be using ULSD and be retrofitted. Although trucks and buses will be required to use ULSD fuel by 2007 under a rule issue by the U.S. Environmental Protection Agency (EPA)<sup>2</sup>, why not implement this earlier? If this can not be implemented, then provide a portable local exhaust ventilation system where a tail pipe is hooked up to a hose that captures the exhaust by filtering the vehicle emissions through a HEPA similar to a Fire Engine at the Fire House.
- **Enforce the New York City’s three consecutive minute idling law for trucks and buses with diesel engines** (see CB#1 resolution) **and manage construction scheduling to avoid idling.** Add this under Action of UEQ-8, Appendix A, page 9. This should include all moving vehicles such as concrete trucks or hauling

<sup>1</sup> “With the above uncertainty in mind, and in order to minimize impacts from the massive simultaneous reconstruction efforts in Lower Manhattan, LMDC, in coordination with all agencies involved in the reconstruction, has taken upon itself a higher standard for environmental performance in an effort to reduce to the extent practical environmental impacts during both the construction and the operational phases of the Proposed Action, with special attention given to air quality.” (page 14-5)

<sup>2</sup> New York State Department of Environmental Conservation News Release, “State Announces Air Quality Controls for Lower Manhattan: Initiatives To Reduce Emissions From Construction Equipment During Rebuilding,” September 27, 2002.

trucks used on the WTC Redevelopment projects and tour busses, limo services and cars. Idling of tourist buses and limos visiting the site and car service cars for local businesses pollutes the air.

- **Provide funding or install HEPA filters at fresh air intakes in nearby residential and commercial buildings.** Implement LMDC's suggestion of "reducing the exposure of people to PM by installation of HEPA Filters at fresh air inlets in hotels and office buildings, and the purchase of air conditioning units with HEPA filters for residences with operable windows, in the immediate vicinity of the project site." (Chapter 22: Mitigation Measures, page 22-17)
- **Develop an Air Monitoring Program along the perimeter of the entire World Trade Center Redevelopment Site to track cumulative impact of the numerous construction projects on the adjacent residential and commercial areas.** This should include 130 Liberty & 30 West Broadway and the Fulton Street Station. The air monitoring should include testing for particulate matter (ultrafine, PM 2.5 and PM 10), diesel particulates, asbestos, metals, mercury, quartz, organics, PCBs, and dioxins. There also should be surface testing of surrounding communities to assess surface dust contamination as a result of redevelopment activities. The information should be available on-line and should include a 24-hour rapid response to limit potential exposures.
- **Improve the public transportation infrastructure.** This can be done by creating a world-class airport access system linking Lower Manhattan to Long Island and all three of the area's major airports, and build the Second Avenue Subway. It is very important to minimize vehicular congestion.
- **Require that all MTA and tourist buses use low sulfur fuel and be designed or retrofitted to use current low emission technologies.**
- **Incorporate the impact of the trucks bringing the slurry to the site and the dust generated from mixing the slurry that is used in the slurry walls.** This dusty component is completely missing from the calculations.

### Sustainable Design Guidelines

After the recent extensive electricity blackout that left Downtown Manhattan, as well as much of the Northeast, in the dark for over 24 hours, it's clear that our energy grid and supply is antiquated and a national security issue. Therefore, construction at and surrounding the WTC site should exceed the **Battery Park City Authority Green Guidelines** (<http://www.batteryparkcity.org/guidelines.htm>) which:

- **Increases energy efficiency by 20% over current New York State Energy Code<sup>3</sup> measured in terms of dollar (BPCA, Section 1.1, page 9).** LMDC states that WTC projects will only achieve a minimum of 20% decrease in energy cost above ASHRAE 90.1/1999 (according to

<sup>3</sup> The EECNYS addresses the design of energy-efficient building envelopes and the installation of energy efficient mechanical, lighting and power systems through requirement emphasizing performance. This comprehensive code establishes minimum regulations for energy-efficient buildings using prescriptive and performance-related provisions. It makes possible the use of new materials and innovative techniques that conserve energy. (<http://www.dos.state.ny.us/code/energycode/Code.htm>)

Appendix A: EEQ-3 Optimize Energy Performance Action, page 15). Therefore, current WTC Redevelopment doesn't exceed BPCA's guidelines. Also, the WTC Redevelopment 20% calculation should exclude the wind turbines which "would be explored to determine if power generation could be achieved through harnessing wind power at this location" (page 12-26), just in case this new technology does not work.

- **Requires use of ultra low sulfur diesel fuel for all construction vehicles** with a carrying capacity in excess of 5 tons and for all portable generators. (Section 3.9, p. 31)

### Hazardous Substances

- **Monitor the soil as excavation continues.** There is no mention of further testing of soil as the project moves forward. However, the document states, "contaminated material encountered during excavation activity would be handled, transported, and disposed of according to all applicable federal, state, and local rules and regulations, and in accordance with the Health and Safety and Soil Management Plans." (Chapter 11: Hazardous Materials, page 11-14).
- **Install metal grates at exits to clean tires of vehicles leaving WTC site,** such as Vesey & Church Street and Liberty & West Street.
- **Minimize dust by spraying water around the WTC site and area when the ground is dry and dirty vehicles should be cleaned before leaving the site.** The Health and Safety Plan, states that "Dust generated by construction activities or from excavations would be suppressed by spraying water during dry weather, by cleaning vehicles and other equipment prior to leaving site..." **Special provisions should be made during the winter months when the water would freeze.** In addition, I have yet to see any vehicles and other equipment cleaned prior to leaving the site or a washing station set-up (Chapter 11: Hazardous Materials, page 11-14).
- There is no mention of further testing of existing structures containing elevated asbestos and metals concentrations as the project moves forward. However, the document states, "surfaces of existing structure containing elevated asbestos and metals concentrations would be subjected to pre-construction cleaning." (Chapter 11: Hazardous Materials, page 11-13).

### Other

- **New location needs to be determined for Greenmarket** that reopened in June 2003 at Liberty Plaza which has been subsequently closed due to plaza renovation (page 1-36).

Thank you for the opportunity to express my family's environmental health concerns about the redevelopment of the WTC site before you today. I urge you to seriously consider implementing these measures. I look forward to working with you on rebuilding our neighborhood and to make this ten to fifteen year rebuilding process as livable as possible.

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

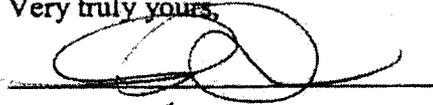
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Very truly yours,



Angelina Mercado

355 South End Ave #24H, NY NY 10282  
[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

*Sonia E. Miller*  
Sonia E. Miller

355 South End Avenue, Apt. 20P

New York, NY 10280

[print name and address]

577

March 3, 2004

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Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

Elliott Milling  
395 - South End Ave.  
New York, NY 10280  
[print name and address]

March 3, 2004

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Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

Mary Moneey  
395 South End Ave  
New York, NY 10280  
[print name and address]

March 12, 2004

TO: Lower Manhattan Development Corporation

FROM: Residents of 125 Cedar St. (AKA Beard Building, AKA 120 Liberty Street)

RE: World Trade Center Memorial and Redevelopment Plan Draft Generic Environmental Impact Statement

As one of the closest residential buildings to the WTC, we have lived through the destruction of the towers, dislocation from our homes, the clearing of the site, major infrastructure work beneath our streets and, now, the emptying of toxic debris from the Deutsche Bank building.

When the redevelopment process begins in earnest, the impact on our quality of life will be even greater than it has been. We the residents of 125 Cedar Street have immediate concerns about the impact of collective deconstruction and construction at all sites now included in the WTC rebuilding zone. Some of our concerns are listed below.

- The impact on us as sitting residents be considered at all times.
- An entity be established to coordinate activities of all projects in the expanded WTC redevelopment site to make the process more efficient, cleaner and quieter
- Construction schedules be shared with the community every few days, so that we can know in advance what to expect.
- Immediate steps be taken to minimize the impact of deconstruction of Deutsche Bank on our community including
  - provide noise mitigation by installation of soundproof windows in our homes (as proposed in Chapter 22 of the GEIS), at no cost to residents
  - provide assurances that buildings as large as DB have been successfully and safely deconstructed while residents, workers and businesses have remained in place, and as close to the building as we are to DB
  - Monitor air and dust for environmental hazards, with monitoring stations placed near where people live and work. Tell us what you are monitoring for, tell us the threshold safety levels for each substance, and tell us what your contingency plans are if those levels are exceeded.
  - Be accountable if the deconstruction of Deutsche Bank or reconstruction on the expanded redevelopment site results in an unhealthy or unsafe situation or makes it impossible for us to remain in our homes.
- All vehicles, from tourist buses to off-street construction machinery, should obey laws that limit idling.
- All vehicles and construction machinery on site should obey the low-sulfur fuel laws.
- Steps should be taken to muffle engine noise of vehicles and construction machinery.

- Throughout the redevelopment process air quality and noise levels should be continuously monitored and results reported to the public quickly and often. If conditions become hazardous, LMDC will be responsible for remediating.

Regarding the long term environmental impact of the redevelopment we ask that LMDC

- Consider the impact on our south of Liberty Street residential neighborhood in planning the location of the WTC truck and bus garage and vehicular access to that garage. With plans to further develop our neighborhood as a residential district, and considering both the concentration of buildings, density of population and the narrowness of the streets, we believe that the south of Liberty St. alternative being considered for this garage is not feasible.
- Revisit pedestrian and vehicular traffic patterns and estimates as included in the GEIS. We believe, based on our experiences as longtime residents (more than 20 years for most of us), that the estimates are far too conservative.
- Revisit the site plan for the proposed building on the southeast corner of the redeveloped WTC. Our adjacent residential block of low rise buildings is a buffer between the 21<sup>st</sup> century redevelopment and historic New York. It is important for planners to consider this historic role as well as protect us from undue impact from shadows, etc.
- A wind turbine has never been built inside a densely populated city or on top of a building. We ask that further study be made of the plan for wind turbines in the Freedom Tower, especially the potential impact of noise and the effectiveness of plans for maintenance, including blade cleaning.

We congratulate the LMDC on its leadership in planning for the simultaneous development of so many projects on so large a site, and for encouraging green building practices. We thank the LMDC for giving high priority to the concerns of the residents that live immediately adjacent to the site, especially during the construction process. This site belongs to the world, but it is also our home.

Warm regards,

Kathleen Moore  
Patricia L. Moore  
Residents of 125 Cedar Street

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

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Very truly yours,

*Michelle L. Morey*

MICHELLE L. MOREY  
375 SO. END AVENUE, #19B  
NEW YORK, NY 10280  
[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

*Harvey Moskowitz*

HARVEY MOSKOWITZ

395 SO. END AVE NY

[print name and address]

NY 10280

583

531

-----Original Message-----

**From:** Ms. Moss [mailto:infowoman3001@yahoo.com]

**Sent:** Wednesday, February 25, 2004 2:22 PM

**To:** WTCENVIRONMENTAL

**Subject:** Environmental/Plan Review

The West Street Tunnel Project is a very harmful waste. The resident communities near the WTC have been harmed enough. Well-placed pedestrian walkways will accomplish what the neighborhoods and traffic flow need far better than beyond-belief expensive tunnels. Wake up, and do your jobs by supporting the needs of the surviving community members.

Evyn Moss

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3/16/2004

584

532

March 3, 2004

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One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

  
B. MUEHLBACH  
355 SOUTH END AVE, 14F

NY, NY 10280  
[print name and address]

March 3, 2004

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Very truly yours,

William D. [Signature]

300 South End Ave # 405

NY NY 10006

[print name and address]

March 3, 2004

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Ladies and Gentlemen:

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Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

LESLIE NICHOLS  
375 WEST STREET - 4TH FLOOR  
NEW YORK, NY 10014  
[print name and address]

587

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6107 217<sup>th</sup> Street  
Bayside, N.Y. 11364  
March 7, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

To Whom It May Concern:

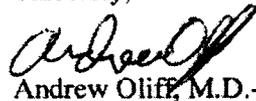
What follows is my comment on the Amended General Project Plan.

The extension of streets into the World Trade Center site is a mistake that will become evident once construction is completed. As I mentioned in my comment on the DGEIS, an open Greenwich Street will provide a perfect opportunity for trucks and cars to bypass West Street and Broadway on their way to and from the Holland and Brooklyn-Battery Tunnels. Fulton Street will just become a noisy, congested mess like Chambers Street. Consider the security implications: a few well-placed truck bombs on these streets will more than suffice to collapse all the office towers on site. Furthermore, you put visitors to the site in extreme danger of being killed by vehicular traffic, or suffering the effects of the noise and air pollution as they visit the WTC. Is this the "lively street life" you want? More traffic mayhem?

Furthermore, you continue to propose a dense mess of low-rise office towers to replace the commercial office space, hotel and conference center. Why not put all of that into two tall skyscrapers like what was taken from us? This would solve the density and open space issue.

It is imperative, for the future of this city, that you reconsider the restoration alternative, and rebuild the WTC site accordingly. For too long you have shut the silent majority of the people who desire the restoration alternative out of the process. If you take a poll of the restoration alternative vs. the Libeskind plan, maybe you will wake up. I suggest you take a good look at what the people truly want instead of parroting the Big Lie that "Libeskind was the people's choice."

Sincerely,



Andrew Oliff, M.D.-Ph.D.

6107 217<sup>th</sup> Street  
Bayside, NY 11364  
March 7, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

To Whom It May Concern:

What follows is my comment on the Draft Generic Environmental Impact Statement (DGEIS), which partly incorporates my 3-minute presentation at the DGEIS comment hearing at Pace University on February 18, 2004.

After over two years of writing letters, talking to many people, and sacrificing inordinate amounts of time attending hearings, viewing Winter Garden exhibitions, and getting involved in ImagineNY and Listening to the City events, I have come to the realization that The Leave Manhattan Destroyed Committee doesn't give a damn what the ordinary people of this city want for the WTC site. Only special interest political and urban renewal agendas have been considered. You are but puppets of Pataki, who has corrupted the rebuilding process and has turned all these forums and events into shams where you pay lip service to listening to the city, when in reality, you only care about listening to Pataki!

The Twin Towers were targeted for their symbolism, their representation of our commercial enterprise, which we as Americans should be proud of, not ashamed of. They were an important part of Lower Manhattan, which has been and always should be the financial capital of the world. The World Trade Center before 9/11/01 was an active, diverse community with 45,000 to 50,000 workers and numerous tourists most every day. The people of this city, this country and the world want the twin towers of the WTC restored to their former glory! This is the reason why Foster's site plan was the winner, by a clear plurality (20% of those polled on your own official poll). It gave us Twin Towers we could be proud of. But instead, you rigged this process to shove Libeskind's mess down our throats.

Joseph Goebbels, Hitler's Minister of Propaganda, said, "if you tell a lie big enough and keep repeating it, people will eventually come to believe it." Since February 26, 2003, when Pataki overruled the LMDC's choice of THINK's World Culture Center and selected Libeskind, the rebuilding of the World Trade Center has become a Big Lie perpetrated by Pataki. In his speech the next day at the Winter Garden ceremony for the winning site plan, it was sickening to hear Pataki extol the virtues of this "open and democratic" rebuilding process that resulted in the selection of Libeskind as the winner." How long are you going to repeat the Big Lie that Libeskind was the people's choice when the TRUTH is reflected by your own polls! In your initial poll, which had over

32,000 respondents, the "winner" by 64% was "I don't like either of these plans!" Did you ever even stop to consider what those two-thirds of New Yorkers wanted? No, you found it more expedient to blatantly ignore the will of the people and impose Pataki's agenda on this sacred site. Rebuilding the World Trade Center was supposed to be about what the PEOPLE wanted, NOT about advancing Pataki's political career or giving him something to brag about at this summer's Republican National convention!

Like Pataki, the Libeskind plan also incorporates Big Lies designed to be swallowed by the unquestioning masses. It has been proven that his Wedge of Light Plaza will not work as described, and even someone with high school physics or who has visited the NY Planetarium could have told you that! And although it is being sold to the public as "the tallest building in the world," the "Freedom Tower" fails to boldly restore the skyline in any way imaginable. From its beginnings in the Libeskind plan as a hypodermic needle pointlessly filled with various flora, to its current conception in collaboration with David Childs of Skidmore Owings Merrill, where cables, windmills, whirligigs, cages and a spire are used to reach 1,776 feet, it remains only a 70-story building. No human presence is allowed above a height of 1,100 feet, and the observation deck and restaurant are on the 63<sup>rd</sup> floor, which is an insulting betrayal to the people of this city who were once able to look out over the city from over 1,300 feet.

For those who can see beyond the Big Lie of the Freedom Tower, it is nothing more than a Surrender Tower that capitulates to the terrorists in preventing us from reclaiming the skies at the height where we were once able to ascend. The rebuilding effort thus far has produced a site plan few New Yorkers are proud of, a skyscraper that exudes fear and cowardice with its upper third uninhabitable, and a bland, abstract memorial that is little more than a new-age theme park disconnected from the reality of 9/11. And the control of Ground Zero has been given to two self-aggrandizing architects with no experience to speak of for such a project, who could not have attained their position without the influence of Pataki. This is in clear violation of city and state ethics codes. As Governor Rowland of Connecticut and Governor Davis of California found out the hard way, one cannot play a corrupt game and a corrupt agenda against the public interest for long. Pataki's machinations at the WTC site and his corruption of the rebuilding process by way of the LMDC will come back to haunt all of you!

You have given into the worst impulses of urban renewal, by seeking against popular will to bury West Street, and by restoring every street from Radio Row days through the World Trade Center site. In doing so, you will turn it from a respite from the noise and congestion of Lower Manhattan to a traffic shortcut for cars and trucks bypassing Broadway and West Street. This must be the first time in city history that development groups favored streets filled with noise pollution and exhaust over a pedestrian-only area protected from traffic that once characterized the original World Trade Center plaza. Keep the streets out of the WTC site, and leave West Street alone! Do you not realize how bad an idea it is to open up the streets of the WTC to traffic? EVERY traffic study done has concluded that adding streets only ADDS to traffic congestion. If the WTC site is such an important site resonating with historical significance, for what reason do you want to turn it into an ordinary street grid? We

already have much of Canal Street, Broadway, and Downtown Brooklyn choked up with cars, heavy trucks and traffic noise pollution. The environmental impact of streets on the WTC site cannot be ignored! An open Greenwich Street will provide a perfect opportunity for trucks and cars to bypass West Street and Broadway on their way to and from the Holland and Brooklyn-Battery Tunnels. Fulton Street will just become a noisy, congested mess like Chambers Street. Your shortsighted urban renewal opportunism is a disaster waiting to happen. Also, for all the fear you exude over people working above 63 stories due to terrorism, do you ever stop to think how you are opening the WTC site up to destruction by truck bombs when you open up those streets? A few well-placed truck bombs on your re-imposed Radio Row street grid will more than suffice to collapse all the office towers on site. Furthermore, you put visitors to the site in extreme danger of being killed by vehicular traffic, or suffering the effects of the noise and air pollution as they visit the WTC. Is this the "lively street life" you want? More traffic mayhem?

What is your bias against an underground shopping concourse? The concourse-level shopping center that was one of Westfield America's most successful malls and a favorite of workers, residents and tourists to the area, was derided as a suburban shopping mall that should have no place in the city. The LMDC scuttled Westfield America's desire to rebuild their shopping center by forcing most of the stores onto the streets to improve "street life," forcing this company to finally sell its lease. Many people enjoyed that concourse level retail, and your organization had to destroy it!

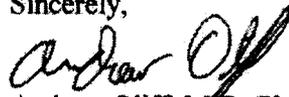
You can, and MUST revisit the restoration alternative. You do make perfectly clear that "THE PROPOSED ACTION IS NOT, HOWEVER, THE ONLY OPTION CONSIDERED BY OR OPEN TO THE LMDC." According to your own draft GEIS, the restoration alternative does not have significant negative environmental impact with respect to shadows (23.4.5), community facilities (23.4.6), socioeconomic impact (23.4.7), "neighborhood character" (23.4.8), hazardous materials (23.4.9), infrastructure (23.4.10), air quality (23.4.13), noise (23.4.14), the coastal zone (23.4.15), the floodplain (23.4.16), natural resources (23.4.17), electromagnetic fields (23.4.18), and construction impact (23.4.19)! Yet the current site plan would be quite detrimental to the environment! Low-frequency sound waves generated by the windmills will become a source of complaint to the neighborhood, air quality will be poor due to pollution from the re-developed streets, noise pollution will increase for that same reason, and pedestrians will suffer. Furthermore, the reopened streets will destroy historic resources by paving up much of the site with asphalt for vehicular access, and effectively deleting it from pedestrian-friendly open space, while security will be lessened given the amount of unchecked vehicles that would be moving through the site. The urban density that comes with the Libeskind site plan would be among the worst in America with several low-rise skyscrapers towering over sidewalks with relatively small footprint areas. This could be avoided with all the office space placed in two strong, tall towers.

Give us back truly monumental twin skyscrapers as tall or taller than before and safer and stronger than ever, which allow people to ascend to their apices, and in so doing reclaim the skies over Lower Manhattan. An imaginative restoration plan can do just that and meet the needs of a fitting memorial without encroaching on the footprints. It would

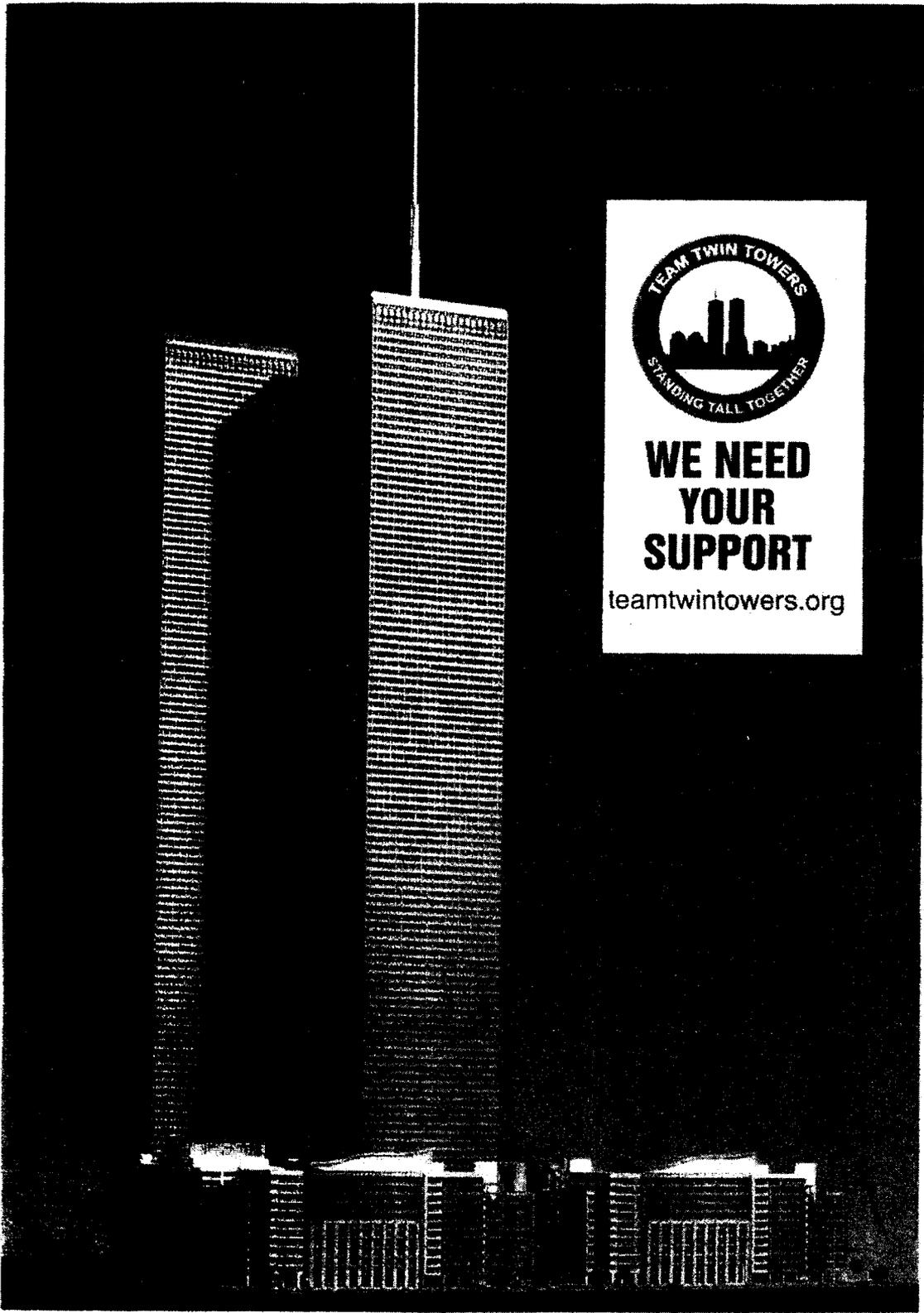
maximize the open space, historic resources urban design, and visual resources, while having significantly less environmental impact on the surrounding area than the Libeskind plan. Such a restoration plan does exist, if only you would consider the "Plan of the People" introduced by Team Twin Towers. A poster and executive summary of this plan is enclosed. I can already hear your groans, as if you have no desire to restore what we lost. But stop and consider: Pataki will be out of office soon, and the people of this city will be stuck with a hated site plan, and future generations, the rest of America, and indeed the rest of the world will curse you for your arrogance in not listening to what the ordinary people's aspirations for that site, to put back what was taken from us in an act of war.

Please note, the officials are legally required to provide a copy of the final generic environmental impact statement to anyone who comments on the draft. As I have commented on the draft GEIS, I am asking that the final copy, in printed (hard copy) form be mailed to me at the above address when it is available.

Sincerely,



Andrew Oliff, M.D.-Ph.D.

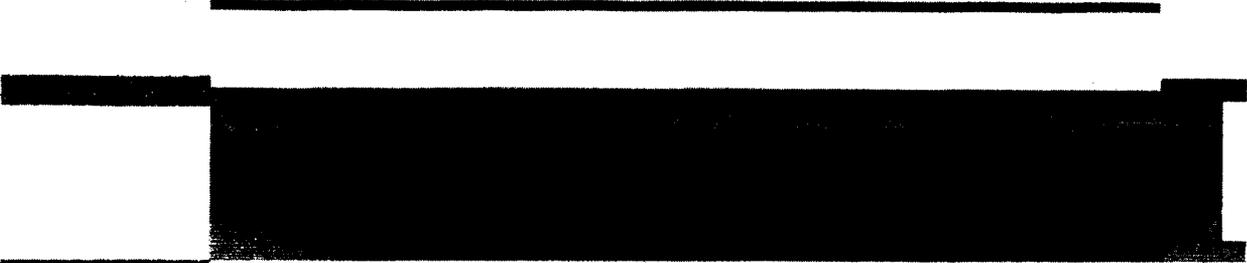


**WE NEED  
YOUR  
SUPPORT**

[teamtwin towers.org](http://teamtwin towers.org)

593

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# Standing Tall Together



- LOCATION
- ABOUT THE TEAM
- MEMBERSHIP
- FAQ
- NEWS
- WHY REBUILD
- REBUILDING
- COMPENSARY
- PETITION
- LINES
- FUNDS
- ADVERTISE

## The Plan of the People Executive Summary

The "Plan of the People" was conceived to address the rebirth of the WTC site in a manner that properly honors those we lost, while serving the needs of the living. The site plan is a conceptual model of how the WTC site could look. It is subject to change as a result of public feedback, official acceptance, and/or unforeseen engineering considerations. In its current configuration, the plan features:

- Rebuilt Twin Towers shifted 300 feet east of their original footprints;
- Footprint-based outdoor memorial complex featuring the lower five stories of the original Twin Tower facades or a replication thereof;
- Five 12-story buildings containing:
  - A 9/11 Memorial Museum in the southwest corner including a Hall of Heroes;
  - A glass tower of meditation on the northeast side of the Memorial Museum;
  - An office/street-level retail building in the northwest corner;
  - Transportation terminal in the northeast corner;
  - Opera house abutting Tower 2 (South Tower);
- Restoration of 600,000 square feet of hotel space;
- Restoration of the underground shopping mall and addition of street-level retail;
- Restoration of Fulton St. to partial vehicular traffic and restoration of Greenwich St. one block to Fulton St.
- Improved pedestrian access through the outdoor and indoor complexes;
- In its final configuration, a Floor Area Ratio of 15 or less.
- Ability to phase office space to the market in sixths, halves, thirds, quarters, or non-phased.



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through the <sup>specious,</sup> ~~path~~ "open process" verbiage!  
Let's cut to the chase here. ~~The LADC has failed its mission - you~~ ~~you don't give a damn about the people~~ ~~what the people~~

New York + America wait for the WTC site. The ~~loss of the destroyed~~  
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corrupt ~~and~~ sidestair in which only special interest ~~agendas~~  
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How ~~can you~~ <sup>can you</sup> continue the Big Lie ~~with~~ that Libeskind was  
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Did you ever stop to think what those  $\frac{2}{3}$  of the people wanted?

We the people wanted our Twin Towers Back! This is why your restoration alternative must supplant the ~~design~~ proposed (or should I say, imposed) ~~plan~~ action. The Twin Towers were targeted for their symbolism, their representation of our commercial enterprise, which we as Americans should be proud of not ashamed of! They were an important part of Lower Manhattan, which has been and always should be the Financial Capital of the world.

Instead you give us an ~~abstract~~ architectural mess, sliced up by every street from Radio Row days, comprising an abstract memorial disconnected from the reality of 9/11 and although it is being sold to the public as "the tallest building in the world" the "Freedom Tower" fails to ~~boldly~~ restore the skyline in any way imaginable. From its beginnings in the Libeskind plan as a hypodermic needle pointlessly filled with various flora, to its correct conception in collaboration with David Childs where cables, windmills, ~~and~~ cages, whirligigs and a spire are used to reach 1776 feet, it remains a 70-story building!

No human presence is allowed above a height of ~~1000~~ 1100 feet, and the observation deck is on the 63<sup>rd</sup> floor, which is an insulting betrayal to the people of this city ~~from over 1100 feet~~ who were once able to look over the city from over 1,300 feet!

For those who can see beyond the Big Lie of the Freedom Tower, it is nothing more than a surrender Tower that capitulates to the terrorists in preventing us from reclaiming the skies at the height where we were once able to ascend.

~~Then~~ ~~to~~ ~~West St.~~, for it ~~has~~ ~~been~~ ~~decided~~ ~~it~~ ~~is~~ ~~never~~ ~~was~~ ~~needed~~  
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Do not ~~let~~ ~~our~~ ~~future~~ ~~be~~ ~~held~~ ~~in~~ ~~our~~ ~~hands~~ ~~by~~ ~~a~~ ~~surrender~~ ~~Tower~~ ~~beholden~~ ~~to~~ ~~political~~ ~~&~~ ~~architectural~~ ~~self~~ ~~aggrandizement~~. Give us back our Twin Towers, as tall or taller, that we can be proud of!

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of only two residential complexes physically damaged in the attacks of September 11.

Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

*Elena Olivo*

Elena Olivo

Gateway Plaza

[print name and address]

South End Ave  
NEW YORK, NY 10280

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Do not ~~let~~ give bequeath to ~~our~~ our future a surrender Tower beholden to political & architectural self aggrandizement. Give us back our Twin Towers, as tall or taller, that we can be proud of!

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Very truly yours,

Michael & Michael ParKente  
355 South End Ave. #3L  
New York, NY  
[print name and address]

602

**Testimony  
LMDC DGEIS Hearing  
Pace University, New York City  
Wednesday, February 18, 2004**

Good afternoon. My name is Glenn Pasanen. I am a political scientist, a public finance columnist for the Gothamgazette.com, and a resident of Battery Park City. I am here to object strongly to the flawed nature of this Draft Generic EIS and, particularly, its failure to include a thorough analysis of the fiscal and environmental costs of the proposed bypass tunnel on Route 9A.

The proposed bypass Route 9A tunnel is a fiscal and environmental disaster. Neither Battery Park City nor the World Trade Center development plan needs a \$1 to \$2 billion (or more) tunnel plan that further tears up our neighborhood and takes money from more reasonable, environmentally sound transportation alternatives.

The failure to include a comprehensive analysis of the Route 9A question and alternative uses of its financing looks like an attempt on the part of Governor George Pataki and the LMDC to fragment the process and obfuscate the real goal of building a tunnel.

The EIS says that Route 9A questions will be addressed in a separate EIS. Why is that? In fact, this EIS does in several places allude to the bypass tunnel (and the major sewer line that would need to be moved) – and in many ways makes a good case that there is no need for such a tunnel.

For instance, the EIS says that congestion in the year 2009 at Route 9A and Vesey Street, Route 9A and Liberty Street, and at the entrance to the Brooklyn Battery Tunnel would (quote) “not be appreciably different from [the congestion with] the at-grade alternative” (Chapter 13A-29).

In a neighborhood already besieged by a monstrous disaster and years of re-construction, why would any reasonable person want to dig up a Route 9A that only a few years ago was re-built quite reasonably and attractively? We've dug up and moved enough earth in this neighborhood.

Furthermore, the EIS also suggests we are being set up. The mitigation chapter (Chapter 22, page 13) in effect warns us that the State Department of Transportation's forthcoming separate EIS on the tunnel option will paint a much happier picture of traffic congestion with a tunnel. This is because the DOT EIS will be based on a different model, showing much less traffic in the area.

In the face of a segmented plan, incomplete information, and inadequate analysis of the Route 9A questions, I urge the Governor and LMDC to acknowledge the inadequacies of this EIS and reject any idea of building a boondoggle tunnel.

Thank you.

Glenn Pasanen  
377 Rector Place  
New York, NY 10280

March 3, 2004

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Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

ANDREW <sup>3</sup> NICOLE PHOENIX  
375 SOUTH END AVE. APT. 18-K  
NY NY 10280  
[print name and address]

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554

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

Karen A. Paul Picciardi  
375 South End Ave., 4G  
NY, NY 10280  
[print name and address]

606

335

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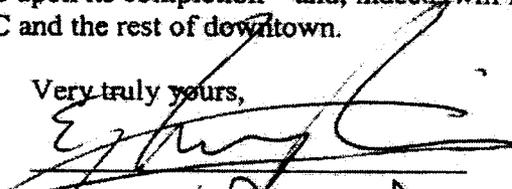
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Very truly yours,

  
Eddy Pierre Pierre  
395 South End Ave  
[print name and address]  
Apt 15C  
NY NY 10280

607

356

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Very truly yours,

JACKIE PLEAS  
355 South End Ave Apr 17,  
NY NY 10280  
[print name and address]

608

557

March 3, 2004

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New York, NY 10006

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Very truly yours,

TODD RADER   
395 S. END AVE. #31 H  
N.Y. N.Y. 10280  
[print name and address]

03/11/04

I recently sent out my comments on the DGEIS document, but I did not specify on what documents I am commenting on. The document is dated 03/08/04. By not specifying on what document I'm commenting on, I know that's enough to justify the discard of my letter. Please ignore and dispose of that letter. I forgot to specify what document I'm commenting on. Here is my letter on the DGEIS document. I'm also sorry for any inconveniencies I might have created, it was not *the* document I intended to send and didn't specify what I was commenting on. Again, I'm sorry for the error and here are my comments on the DGEIS document.

Pedro Ramos  
363 Highland Avenue #1  
Clifton, NJ 07011  
(973)472-1978

03/11/04

***Comments  
on the WTC Memorial and  
Redevelopment Plan/DGEIS***

***Comments on the DGEIS document***

03/11/04

Comments on WTC Memorial and Redevelopment Plan / DGEIS

Comments on the DGEIS document

This is in regard of the DGEIS document. I am pleased to know that you recognize that in Chapter 23 you say that "The Proposed Action is not, however, the only option considered by or open to LMDC." The absolutely best way to rebuild the WTC site, is the original WTC plan or the "Restoration Alternative". I'll give many reasons why the Libeskind/Child plan is simply environmentally wrong for the WTC site. You the LMDC, must not ignore the real hazards of the "Proposed Action" even though there is a very visible bias towards the Libeskind plan.

The overcrowding of streets

You intend to construct too many buildings, and to put too many streets into a small area. This will create many dangers, and will not help at all the WTC site. Since cars will pass through the WTC site, this means there will be more dangerous car fumes around the area. As if NYC needed more polluted, congested streets. This will also cause hazards like car accidents, some potentially fatal, especially during the winter months. I also notice that unchecked trucks will be allowed to pass. What if one of these trucks has bomb? By opening more streets, you are only creating more opportunities for the terrorists to use car bombs. The noise pollution will be extreme, all the cars honking and the engine of trucks, this will surely make the WTC site miserable. All of the car fumes, since car-fumes are heavier than air, will settle around the streets. Since too many buildings are put one street, some of the buildings facade will never be touched by the sun, thus guaranteeing the worst air and light conditions in all of Manhattan. The re-opened streets will also create headaches for pedestrians, what was once an easy thing to do, like crossing the WTC site, will now be risky. There is always the potential that a pedestrian might get run-over. With so many buildings in such a small space, the sidewalks will be very narrow. This will create nightmares for pedestrians, the pushing and shoving will be incredible. Can you imagine what it will look like at 5 pm, when all the tenants from Freedom Tower coming out at the same time, with such a narrow sidewalk! The street will be extremely congested, there would be no space for thousands of people to walk. This was never a problem with the original WTC. When taxi and buses drop-off people, they will have no where to stop, so each time they would have to drop-off someone, they will stop and block the street. Try that during rush-hour! In simple terms, there is not enough space for so many buildings, and so many streets. The super-block made the area feel much different than others, it was special in its own way. There was only one WTC site, and the super-block was part of the WTC. It was one-of-a-kind, it was unique. By opening streets, you take that

character that existed there for 28 years, and make it plain and boring like the surrounding areas. How is that supposed to "integrate the site into the surrounding neighborhood"? Integrating does not mean you have to make it monotonous like the surrounding areas!

### Street level shopping nightmare

As if it wasn't enough with polluted, traffic congested, crowded streets, you still intend on putting street level shops? That's ridiculous, there will be absolutely no space for people to shop, and most will be discouraged. Who will come to shop when the air is dirty, it's too noisy from all the cars, and there is no space to walk? Certainly I wouldn't. Also during inclement weather, no one will come when it's freezing cold or raining heavily, or when the humidity in July is unbearable. The underground mall is the only way to go. An underground mall will be cleaner, safer, and no one will worry about snow, rain or heat.

### The memorial is a toxic waste

The memorial you have chosen is a wasteland for toxic fumes. Since car fumes are heavier-than-air pollutants, the fumes will settle in the pit memorial. The water from the pools will be infested from fumes, thus the air-conditions in the memorial will be horrendous. Also it has been said that the memorial generators will burn more energy than the Empire State Building, why would anyone burn valuable electricity on waterfalls, when that same energy can be saved. We all learned how valuable energy is during the August black-out. Also how would you clean out the areas after a blizzard? There is no possible way to shovel 3 feet of snow. How would the waterfalls work when it's -10 below zero weather? The waterfall feature is useless in winter, since water freezes at 32 degrees, that's the average temperature for winter. Big, unattractive fences, would have to be built in order to protect people from falling over the Pit and waterfalls. People at risk are children, accidental fall, or even suicides. The fences would detract from value and appeal of the memorial. The waterfalls will also create a mist clouds that will be a nuisance for drivers and pedestrians. A street memorial will be preferred.

### The Slurry Wall danger

Even though the exposure of the slurry wall has been reduced, it still presents an enormous danger. The slurry wall was never intended to be exposed to heat, cold, snow, or rain. Also, the slurry wall was built to hold the Twin Towers weight. A good push from the Hudson River, or stress from inclement weather, might make the slurry wall crumble. If this happens, the World Financial Center will collapse, since it will have no weight support from the WTC site. Not to mention that toxic dust might escape from the slurry wall. By leaving the slurry wall exposed, even partially, presents a massive danger.

### The skyline will never be repaired

How do you, the LMDC, actually believe it can restore the once great NYC skyline, with a pathetic excuse for a building? To begin with, on September 11, we lost two "skyline elements", as you have called them. You are only planning on one tall skyscraper, although it is supposed to only measure 70 stories. I don't know how you intend to replace the majestic Twin Towers, twin as in two buildings, with one needle-like building. The spire on the Freedom Tower is very thin, and won't be visible from various spots in, even as close as New Jersey, Brooklyn, and Mid-Town. Also Mr. Childs has said he wants a spire that will "fade", fade as in disappearing? The spire antennae of the Empire State Building and the Chrysler Building are completely lost from the previously mentioned spots, the sun's intense glare makes the spires of most buildings nearly invisible. Also the darkness of the night makes the spires disappear. This is very sad as this means the skyline will never be repaired. The 70 story-building will barely pierce the skyline. Think of this, replacing two 110 story buildings with one 70 story building, well isn't that cowardice. I was taught America was home of the free and the brave. The Twin Towers were clearly visible from far away places, it was visible from nearly 20 miles away! The Freedom Tower's cage work won't be visible from 7 miles away. Is there a need for more comparison? I think not, plain and simple the Freedom Tower won't fix the hole the terrorists left in our beloved skyline.

### There is no need to copy other landmarks

Mr. Libeskind has said that he got his inspiration for the Freedom Tower from the Statue of Liberty. The Freedom Tower is supposed to mimic the Statue, but why? Why should we copy the Lady Liberty, she is there for all of us to see. There is no need to have a giant headless, legless version of the Statue. The Twin Towers were beautiful in their own way, take a look at any poster or postcard! The WTC was built around the Twin Towers, they go well together. New York was known world-wide for the Twin Towers, they were in movies and pictures for 28 years. Just tell me, is there really a need to have two Statues of Liberty? Like the Port Authority brochures said in the 80's "New York begins at the World Trade Center." WTC as in Twin Towers.

### Wedge of Light farce

Why do you keep lying to the citizens of New York? Mr. Libeskind has said that every September 11<sup>th</sup>, there will be some type of light effect on a plaza. This is a lie! Eli Attia, architect of the Millennium Hilton Hotel across the street of the WTC site, has said and proved that the Hilton Hotel will create shadows over the plaza. Mr. Libeskind "light effect" will never come true. Also Santiago Calatrava's transit hub will create shadows over the plaza. Anyway, who guarantees a sunny morning every September 11<sup>th</sup>, no one controls the weather. I would appreciate if you made the Wedge of Light farce public, as many New Yorkers are still not aware of this.

*The wind farm is a complete idiocy*

When I heard the news the Mr. Childs intends to put a "wind farm" on the top the Freedom Tower, I didn't whether to laugh or cry. It still doesn't fit in my head, how is NYC supposed enter the new millennium using technology invented in Europe about 300 years ago? This will make the Freedom Tower look very clumsy, also it will subjects of controversy over usefulness for years to come. To mention that a lot of funds will be wasted on the wind farm, especially during wind storms and other dangerous weather occurrences, since it looks like it will be very fragile. A powerful wind-storm might knock it down. Asian cities are building taller skyscrapers, they are not using wind farms for power. Birds wont be able to tell the cage work, and will slam into the bars. A deep freeze, or ice and snow, might weaken the cage thus making it collapse. Think of this, what is the point of saving electricity on the Freedom Tower when the waterfall memorial is going to burn more electricity than the Empire State Building? It boggles the mind!

*The "Worlds Tallest Building" farce*

The building itself will only have 70 stories, pathetic since its supposed replace two 110 story buildings, then why do you call this "The Worlds Tallest Building?". It's a farce, if I put a 2,100 ft spire full of cage work and wind mills, on top of my two story house, will that count as the "Worlds Tallest Building?" It wont classify as the "Worlds Tallest Building". Building mean structures that measure from ground level to highest habitable space, thus the cage work wont count as a "building." The cage is basically useless, it's just that, a cage.

*The LMDC has never held a poll for the "Restoration Alternative"*

Since the destruction of the Towers in 2001, you the LMDC, have never conducted any poll nor has never given the chance to vote on whether we want the Twin Towers back or not. This should have been the first choice. It's not to late, please, give the Twin Towers a second chance. Make an open poll and let New Yorkers make the final call. Its up to New Yorkers to reject the Twin Towers, not you the LMDC. Make it a true democratic competition between the "Restoration Alternative" and the "Proposed Action".

*The advantages of the Restoration Alternative*

The Twin Towers were beloved by many around the world. There is a whole generation of people, including me, who knew nothing else but the Towers. I was

born in the early 80's. Poll after poll prove NYC wants them rebuilt. Here are the advantages of rebuilding the Twin Towers.

- 1.- The Towers, if rebuilt, don't have to be built exactly over the footprints. They can be built anywhere in the 16 acre site. The pit memorial can still be built.
- 2.- Rebuilding the Twin Towers doesn't necessarily mean the Greenwich Street can't be opened, if the Towers are moved to the east, you can accommodate streets.
- 3.- The Twin Towers were NYC crown jewel, they were recognized world-wide. As famous as the Egyptian Pyramids, the Eiffel Tower, and the Great Wall Of China. It would only be fair that at least you seriously consider the "Restoration Alternative". An NYC with no Twin Towers is similar to Paris with no Eiffel Tower or London with no Big Ben Tower, it makes no sense.
- 4.- The tourists flocked to the WTC for 28 years. More postcards of the WTC were sent around the world than any other building in the world. Tourists would love the new Twin Towers, this will greatly influence the local economy. It's no secret, the WTC made 15% of all NY state economy, more successful than any other skyscraper in the country! Also the beauty of the WTC was the simple fact that there were two 110 story buildings, not just one.
- 5.- The familiar skyline that millions around the world knew would be made complete only if the towers are rebuilt. Two ramrod straight, one acre thick, skyscrapers that dwarfed all other surrounding, that's the skyline that was seen in pictures, movies and posters for 28 years. The only true to restore the skyline to the September 10<sup>th</sup> glory, would be with new Twin Towers. The Twin Towers were huge and visible, it was visible for nearly 20 miles away!
- 6.- You say the no one would work on the 110<sup>th</sup> floor, that's not true. Many people still work on the top floors of the Empire State Building, the Sears Tower, and the Petronas Towers in Malaysia. Can you explain to me why do people work there, but no one else would work at the WTC towers? Of course its false, many including me, would love to work on the 110<sup>th</sup> floor of the new Twin Towers. Here are some examples, Jonathan Hakala worked on the 74<sup>th</sup> floor of 1WTC, he has promised to return to work only if the towers are rebuilt. Another example is Artie Vignapiano, he worked on the 74<sup>th</sup> floor of 1WTC as a Port Authority landscaper, he is also willing to work in the new WTC only if it means new Twin Towers. Of course this is just a small example. Many have suggested that a worldwide auction for space above the 85th floor would fill the high floors of the new Twin Towers.
- 7.- Rebuilding the Twin Towers doesn't mean that open space is in danger. In fact, taller buildings means less building footprint. This means that it leaves more open space. Also the rebuilding the towers doesn't mean you have to rebuild the old WTC plaza buildings. Consolidating the office space into 110 floor Twin Towers would on

the contrary leave more land for other uses, like open space for plazas and so forth.

8.- Rebuilding the Twin Towers would be "spit in the eyes of terrorists". Many news services like CNN and MSNBC have reported that when US special services capture terrorists, it's common to find at least one picture or videos of the Twin Towers burning. Recently, many posters were found in Iraq with drawings of planes hitting the Twin Towers saying the phrase "Victory" and "God is Great". Terrorists are now using this attack as their crowning jewel, and surely be used as propaganda to recruit new terrorists. Rebuilding the Twin Towers would make the terrorists future attacks futile. Not rebuilding them would make them feel invincible.

9.- Think of this, if the Twin Towers are not rebuilt, this will be the first time in US history that a major landmark is destroyed by opposing forces that wont be rebuilt!

10.- You, the LMDC, have accepted that the "Restoration Alternative" would be no worse than the Proposed Action, environmentally speaking. We already know all of the environmental hazards of the Twin Towers, that saves a lot of time in rebuilding! If rebuilt with today's technology, the Towers would be the most secure buildings in the world!

Lets not make terrorists happy, but New Yorkers happy.

The Final GEIS must not diminish the environmental hazards of the Proposed action. Also the "Proposed Action" must not have a biased endorsement, it must be fair. The "Restoration Alternative" must also be judged fairly and not be treated as a bad example or an inconvenient plan. It must be treated as a reasonable and feasible plan for the WTC site.

In conclusion, rebuilding the Twin Towers can effortlessly be made into something so grand that the Libeskind plan will pale in every size, shape and form!

My Contact info

Pedro Ramos  
363 Highland Avenue #1  
Clifton, NJ 07011-3316  
(973) 472-1978 or (201)780-2572  
agustinramos@mybluelight.com

I understand that it is my legal right under the National Environmental Policy Act, to receive a written copy of the final GEIS document, I wish to receive a copy when it is available.

Please LMDC, seriously consider the "Restoration Alternative" choice!

03/08/04

***Comments***  
***on the WTC memorial and***  
***Redevelopment Plan/***  
***DGEIS document***

03/08/04

**Comments on WTC Memorial and Redevelopment Plan /**  
**DGEIS**

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**A.- The skyline will never be repaired**

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### C.-The overcrowding of streets

You intend to build too many buildings, and to put too many streets into a small area. This will create many dangers, and will not help at all the WTC site. Since cars will pass through the WTC site, this means there will be more dangerous car fumes around the area. As is NYC needed more polluted, congested streets. This will also cause hazards like car accidents, some potentially fatal, especially during the winter months. I also notice that unchecked trucks will be allowed to pass. What if one of these trucks has a bomb? The noise pollution will be extreme, all the cars honking and the engine of trucks, this will surely make the WTC site miserable. All of the car fumes, since car-fumes are heavier than air, will settle around the streets. Since too many buildings are put on one street, some of the buildings facade will never be touched by the sun, thus guaranteeing the worst air, and light conditions in all of Manhattan. The re-opened streets will also create headaches for pedestrians, what was once an easy thing to do, like crossing the WTC site, will now be risky. There is always the potential that a pedestrian might get run-over. With so many buildings in such a small space, the sidewalks will be very narrow. This will create nightmares for pedestrians, the pushing and shoving will be incredible. Can you imagine what it will look like at 5 pm, when all the tenants from Freedom Tower coming out at the same time, with such a narrow sidewalk! The street will be extremely congested, there would be no space for thousands of people to walk. This was never a problem with the original WTC. When taxi and buses drop-off people, they will have no where to stop, so each time they would have to drop-off someone, they will stop and block the street. Try that during rush-hour! In simple terms, there is not enough space for so many buildings, and so many streets.

### D. There is no need to copy other landmarks

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### E. Street level shopping nightmare

As if it wasn't enough with polluted, traffic congested, crowded streets, you still intend on putting street level shops? That's ridiculous, there will be absolutely no space for people to shop, and most will be discouraged. Who will come to shop when the air is dirty, it's too noisy from all the cars, and there is no space to walk? Certainly I wouldn't. Also during inclement weather, no one will come when its

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Why do you keep lying to the citizens of New York? Mr. Libeskind has said that every September 11<sup>th</sup>, there will be some type of light effect on a plaza. This a lie! Eli Attia, architect of the Millennium Hilton Hotel across the street of the WTC site, has said and proved that the Hilton Hotel will create shadows over the plaza. Mr. Libeskind "light effect" will never come true. Also Santiago Calatrava's transit hub will create shadows over the plaza. Anyway, who guarantees a sunny morning every September 11<sup>th</sup>, no one controls the weather. I would appreciate if you made the Wedge of Light farce public, as many New Yorkers are still not aware of this.

#### H.-The memorial is a toxic waste

The memorial you have chosen is a wasteland for toxic fumes. Since car fumes are heavier-than-air pollutants, the fumes will settle in the pit memorial. The water from the pools will be infested from fumes, thus the air-conditions in the memorial will be horrendous. Also it has been said that the memorial will burn more energy than the Empire State Building, why would anyone burn valuable electricity on waterfalls, when that same energy can be saved, We all learned how valuable energy is during the August black-out. The waterfalls will also create a mist clouds that will be a nuisance for drivers and pedestrians. A street memorial will be preferred.

### The advantages of the Restoration Alternative

The Twin Towers were beloved by many around the world. There is a whole generation of people, including me, who knew nothing else but the Towers. I was born in the early 80's. Poll after poll prove NYC wants them rebuilt. Here are the advantages of rebuilding the Twin Towers.

A.- The Towers, if rebuilt, don't have to be built exactly over the footprints. They can be built anywhere in the 16 acre site. The pit memorial can still be built.

B.- Rebuilding the Twin Towers doesn't necessarily mean the Greenwich Street can't be opened, if the Towers are moved to the east, you can accommodate streets.

C.- The Twin Towers were NYC crown jewel, they were recognized world-wide. As famous as the Egyptian Pyramids, the Eiffel Tower, and the Great Wall Of China. It would only be fair that at least you seriously consider the "Restoration Alternative". An NYC with no Twin Towers is similar to Paris with no Eiffel Tower or London with no Big Ben Tower, it makes no sense.

**D.- The tourists flocked to the WTC for 28 years. More postcards of the WTC were sent around the world than any other building in the world. Tourists would love the new Twin Towers, this will greatly influence the local economy. It's no secret, the WTC made 15% of all NY state economy, more successful than any other skyscraper in the country! Also the beauty of the WTC was the simple fact that there were two 110 story buildings, not just one.**

**E.- The familiar skyline that millions around the world knew would be made complete only if the towers are rebuilt. Two ramrod straight, one acre thick, skyscrapers that dwarfed all other surrounding, that's the skyline that was seen in pictures, movies and posters for 28 years. The only true to restore the skyline to the September 10<sup>th</sup> glory, would be with new Twin Towers.**

**F.- You say the no one would work on the 110<sup>th</sup> floor, that's not true. Many people still work on the top floors of the Empire State Building, the Sears Tower, and the Petronas Towers in Malaysia. Can you explain to me why do people work there, but no one else would work at the WTC towers? Of course its false, many including me, would love to work on the 110<sup>th</sup> floor of the new Twin Towers. Here are some examples, Jonathan Hakala worked on the 74<sup>th</sup> floor of 1WTC, he has promised to return to work only if the towers are rebuilt. Another example is Artie Vignapiano, he worked on the 74<sup>th</sup> floor of 1WTC as a Port Authority landscaper, he is also willing to work in the new WTC only if it means new Twin Towers. Of course this is just a small example. Many have suggested that a worldwide auction for space above the 85th floor would fill the high floors of the new Twin Towers.**

**G.- Rebuilding the Twin Towers doesn't mean that open space is in danger. In fact, taller buildings means less building footprint. This means that it leaves more open space. Also the rebuilding the towers doesn't mean you have to rebuild the old WTC plaza buildings. Consolidating the office space into 110 floor Twin Towers would on the contrary leave more land for other uses, like open space for plazas and so forth.**

**H.- Rebuilding the Twin Towers would be "spit in the eyes of terrorists". Many news services like CNN and MSNBC have reported that when US special services capture terrorists, it's common to find at least one picture or videos of the Twin Towers burning. Recently, many posters were found in Iraq with drawings of planes hitting the Twin Towers saying the phrase "Victory" and "God is Great". Terrorists are now using this attack as their crowning jewel, and surely be used as propaganda to recruit new terrorists. Rebuilding the Twin Towers would make the terrorists future attacks futile. Not rebuilding them would make them feel invincible.**

**I.- Think of this, if the Twin Towers are not rebuilt, this will be the first time in US history that a major landmark is destroyed by opposing forces that wont be rebuilt! Lets not make terrorists happy, but New Yorkers happy.**

**In conclusion, rebuilding the Twin Towers can effortlessly be made into something so grand that the Libeskind plan will pale in every size, shape and form!**

**Since the destruction of the Towers in 2001, you the LMDC, has never given any poll nor has never given the chance to vote on whether we want the Twin Towers back or not. It's not to late, please, give the Twin Towers a second chance. Make an open poll and let New Yorkers make the final call.**

**My Contact info**

**Pedro Ramos  
363 Highland Avenue #1  
Clifton, NJ 07011-3316  
(973) 472-1978 or (201)780-2572  
agustinramos@mybluelight.com**

**I understand that it is my legal right to receive a copy of the final GEIS document, I wish to receive a copy when it is available.**

**Please LMDC, seriously consider the "Restoration Alternative". Put it into a democratic vote against the "Proposed Action". Let New Yorkers make the final choice!**

03/15/04

***Comments on  
WTC Memorial and Redevelopment plan/  
Amended General Project Plan***

***Amended General Project Plan Comments***

**Pedro Ramos  
363 Highland Avenue #1  
Clifton, NJ 07011  
(973) 472 1978**

*Comments on WTC Memorial and Redevelopment plan/  
Amended General Project Plan*

*Amended General Project Plan comments*

This letter is in regard of the comments on the Amended General Project Plan. I have read the document and I have found many flaws in the current project plan. The current plan is simply not worthy of replacing the Twin Towers.

The Amended GPP document has many errors, but by far the most shameful, shocking, and appalling mistake I found is, the Amended GPP does not call for the rebuilding of two 110+ heroic scale skyscrapers. The current Amended GPP allows for inappropriate and irresponsible rebuilding. It literally allows, for what was once "The Center of the World" as the Port Authority once called it, to be turned into a monotonous, common park full of short crowded buildings. A park that can be found in any place of the world, San Francisco, Boston or Miami, but how many two 110 story towers are there in there in the world? Not even the Petronas Towers can count, they only measure 88 floors. It is very obvious that the Libeskind plan looks like the Beyer Bindell Bell plan of 2002, which was rejected by the public. Many said that the BBB plan "looked like Albany". The current plan certainly isn't breathtaking as were the Twin Towers, that's why the Libeskind plan was last on all public polls. Another flaw, you firmly believe that shorter, duller buildings will be more profitable than tall scale skyscrapers, but that is false. It's true, shorter buildings fill up faster with tenants, but suffer greatly in the long run. In the long term, in 50 years, those boring, stout skyscrapers will simply disappear in the landscape of Manhattan. The diminutive buildings won't attract tourists or new potential for businesses. Soon they will be forgotten like the short-rises in mid-town, while the tall skyscrapers like the Empire State or Chrysler Building are never forgotten. The Empire and Chrysler are nearly 100 years old, yet the tourists never tire of these buildings. The same would have happened with the Twin Towers. So in conclusion, small dull buildings will be forgotten fast, this includes the Freedom Tower, which will only measure 70 stores. Even though the observation deck will be at a tall height, the building won't create the confidence that Americans want. By reducing two 110 story towers to a pathetic 70 story building, which needs a "cage" to make up for height, will make most people feel empty. In a form, Bin Laden and Al-Qaeda truly will have the last laugh. The Amended GPP should state that at least in some form two 110+story towers have to be rebuilt, maybe not carbon copies, but they have to be rebuilt. In fact they should be rebuilt taller and stronger using today's newest technology. This will be a true step forward for NYC. Also, since people never tire of tall skyscrapers, the memorial should be built at the highest floor of the new Twin Towers. This way, the memorial will never be forgotten. By far, the rebuilding of the Twin Towers should be the most important requirement in the Amended GPP. Not rebuilding the Twins will be the best way to bow down to terrorism.

Another disturbing item I read is that the Amended GPP states that not all the office space that was destroyed or damaged, on 9/11, has to be rebuilt. How can that be called "rebuilding"? It's surprising to know that even if the Southern Site is added, it still won't have the same office space that was there with the previous WTC plan. It still makes me think whether with the "Proposed Action" is NYC taking a step forward or a step backwards? By not rebuilding all of the office space, it's taking a significant step backwards. Forcing street level retail is a mistake, the underground mall was the most profitable mall in Manhattan because it has many advantages compared to street level shopping. With the underground mall, shoppers don't have to worry about weather, crowded streets, and street noise. Running Greenwich street through the site will hurt more than help. The plaza and super-block were the "personality" of the Financial District, but by running streets, this "personality" is destroyed. The WTC site will be turned into a boring and dull community, like the countless that already exist. Also street noise and pollution from car fumes won't help at all.

Rebuilding the Towers would be the best way to defy terrorism and to inspire confidence in all Americans. To build a "cage" to make up for lost height is simply pathetic and shows that America fears Bin Laden and Al-Qaeda. Rebuilding the Twin Towers will discourage future terrorists, as they will feel that any attempt on any landmark will be futile. No matter how many times it's destroyed, Americans will rebuild. Already terrorists are using images of 9/11 to recruit potential bombers, they feel proud the towers fell. How would they feel when they see it rise again? They will feel very disappointed.

The biggest proof that the Libeskind plan is a mistake comes from its competitors. Brookfield Properties wants the Libeskind plan built with quickness. Why would the owner of surrounding buildings, where competition might hurt Brookfield's profits for office space, want the Libeskind plan built fast? The answer is simple, Brookfield knows that the Libeskind plan is a failure, that it presents no danger to its business. They know that it is doomed to fail and future tenants will prefer their property over the WTC buildings. Why replace the most profitable buildings in Manhattan, the Twin Towers, with a plan that will fail in the future. Businesses don't like competition, and Brookfield knows that the Libeskind plan presents no risk at all to their business. Proof enough that shows the Libeskind plan is simply a failure.

The Amended GPP document obviously states that there is a common public view that the memorial should be the focus of the plan and that everything must revolve around the memorial. Nothing could be farther from the truth. There are those who say that the footprints should not be preserved, some say that the whole 16-acres should be a park, and finally those who say a memorial should be inside the new Twin Towers. There is no single common view, but Governor Pataki single-handedly crushed all other views, in a dictator fashion, and called that nothing be built on the footprints of the Towers. Even though the Towers footprints might be

off-limits for now, the Twin Towers can still be rebuilt on the other extreme of the site, a mere 300 feet to the east. No matter how big or beautiful a memorial might be, it will only be a "tourist hotspot" as long as the tragedy is still fresh in our minds. I guarantee that there won't be the same number of visitors in 2009 than in 2019. It's the common pattern with all memorials like Grant's Tomb, the Titanic memorial, and the General Slocum memorial. Some of the mentioned memorials are not even familiar with some New Yorkers. All memorials sooner or later are forgotten. I'm not an insensitive person, I do agree that a memorial should be built, but it should not be the focus of the site. Even today, more people are concerned about jobs and the new skyscrapers on the site, than on the memorial. The most anticipated of the skyscrapers is whether the Twin Towers will make a heroic return.

I read a part that truly frightens me, its called "condemning", or the forceful confiscating of properties the authorities cannot buy. I never thought that NYC authorities will be doing this in today's age. These are tactics used by communist China or Cuba, not in America, especially modern day New York. It's not right or honest to steal property for a plan, the "Proposed Action", that failed on all public polls. If an owner doesn't want to sell his property, respect their wishes. Would you like it if someone came and kicked you out of your house to build something the public opposes? Think about it!

Any plan that resembles the "Restoration Alternative" will be the only plan worthy of being built. The icons that terrorists hated, must be rebuilt, if only to defy them. There are many advantages of rebuilding the Twin Towers, simply to many to list. Just look at the profit records since its birth in the 70's, or the pleasant experiences that people had with them, and how they defined the Lower Manhattan skyline for 28 years. It's proof that the Twin Towers were a complete success, more of a success than anyone expected. The most important comment I can make on the Amended GPP, is that it would be wiser to write a new one, one that includes the rebuilding of New York's twin icons, the Twin Towers. That will be a true, responsible, and heroic way to , renew, rebuild, and remember.

#### Contact Information

Pedro Ramos  
363 Highland Avenue #1  
Clifton, NJ 07011  
(973) 472-1978

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of only two residential complexes physically damaged in the attacks of September 11.

Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

Paul Schneider

355 SOLEND AVE

NY NY 10280

[print name and address]

March 3, 2004

Lower Manhattan Development Corporation  
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One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

SEYMOUR J. SCHREIBMAN

395 SOUTH END AVENUE

NEW YORK, N.Y. 10280

[print name and address]

*Seymour J. Schreibman*

March 3, 2004

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Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

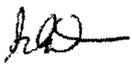
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Very truly yours,

KATHARINE SCHUCHMAN *Katharine*   
20C, 395 South End Avenue  
NY, NY 10280  
[print name and address]

630

578

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

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Very truly yours,

RICHARD & VIVIANA SCHUEMACHER

355 SO. END AVE #16J

NY, NY 10280

[print name and address]

631

I am pleased I have had the opportunity to participate in the Section 106 hearings. I think it has been important for a neighborhood representative to be included, because we certainly were in the minority at the meetings. It would seem from the meetings that most of the population would agree with the preservationists and the few family members that were present. I do not think this committee was an honest reflection of the opinions of the community at large.

Most of the families have moved on, dealt with their grief and want life to progress. I do not mean to sound callous, but this is a much larger issue than a few families who want to prolong their grief period. This is an issue of survival of Lower Manhattan. No one held up the rebuilding of the Pentagon, it was not even considered. Why is it being considered here??? As a woman said at the last meeting, the preservationists keep saying that creating a historic preservation site is just pro forma, those really involved know better. It takes months of wrangling, meetings, etc. paper work to even place a bench on Ellis Island.....

A few sites will be preserved, as per the LMDC's plans, and the local population feels this is sufficient. We want the site to be respectful, but we need to REBUILD. Actually, it is a crime that the bus parking will not even be allowed to be on the site. This, I think, we will recognize as a major mistake in years to come. To sit at the meeting last week, and hear people asking for the underground parking areas to be preserved was unbelievable.

I hope that reason will prevail!

I also appreciate the opportunity to visit the hanger where the artifacts are stored, but as a trained curator, I think it was a mistake to let us think we have a say in the items chosen for the museum. You need to hire a world class curator to put together the museum. Families, etc. do not need to be involved in this process. You have mistakenly opened a Pandora's box. All of the items will be preserved, and can be rotated in to exhibit, but please do not let the public think they can be involved in this selection. The museum will be a botch job.

Thank you, for myself and the larger community, for the opportunity to be heard.

Sincerely,

Helene Z. Seeman  
BPCUnited  
212 945-4979

3/16/2004

632

579

Bernhardt R. Seifert  
288 Hollow Road  
Staatsburg, New York 12580

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and  
Redevelopment Program GPP  
One Liberty Plaza 20<sup>th</sup> Floor  
New York, NY 10006

Regarding the Tragic Event 9-11 the Memorial of the WTC  
Depiction of the horrific event.

Honorable Directors:

My appreciation and thanks to everyone for all the good work to date  
And especially to the Judges who had to choose a memorial

My comment to the directors is that there is nothing that depicts the  
Horrific event on 9-11-01. The United States was VIOLATED in an act  
Of aggression that should never be forgotten. I believe a structure that  
Can be seen from afar, such as illustrated in the attached. Depictions should be  
Considered by the Directors of the LMDC.

I also believe that the intrusion of such a structure on the site will  
Entice the architects chosen by Mr. Silversteen to extreme creativity  
And new heights of expression for the surrounding buildings. I have  
Been reviewing the memorial submissions on the web of which one is my  
Own. I find that there is a unique commonness among many of the submissions.  
Which if properly studied and reviewed will present a unique pattern of direction.

Thank you,

Bernhardt Seifert

A handwritten signature in cursive script, appearing to read "Bernhardt Seifert", with a long horizontal flourish extending to the right.

Bernhardt R Seifert  
288 Hollow Road  
Staatsburg, New York 12580

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and  
Redevelopment Program GPP  
One Liberty Plaza 20<sup>th</sup> Floor  
New York NY, 10006

Regarding the Tragic event 9-11 the Memorial of the WTC  
Dispection of the horrific event.

To Whom It May Concern:

At this time I think it is appropriate to comment my thoughts and feelings  
And attached depiction for a structure to always remember the event of 9-11.

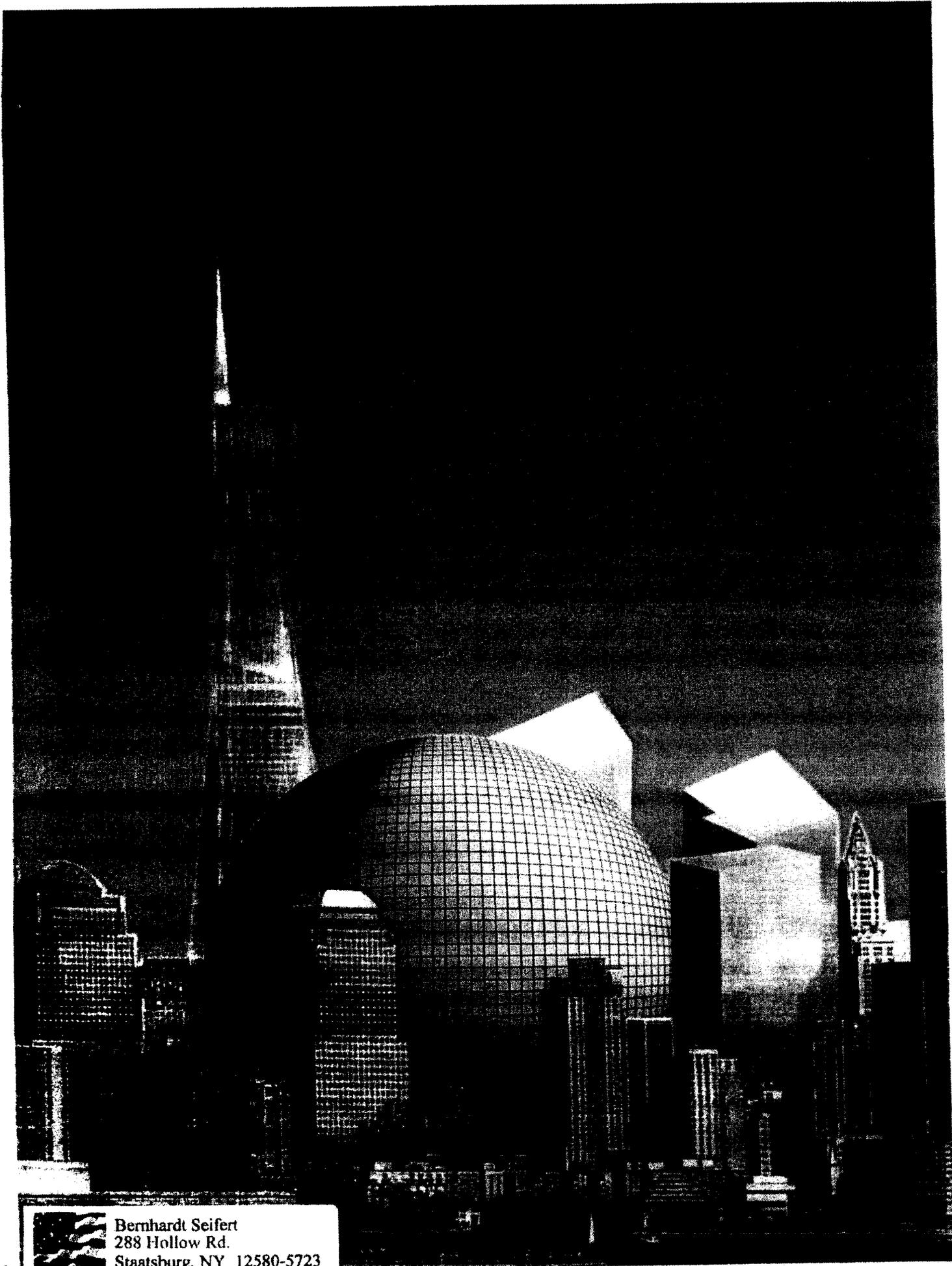
Having been one of the submitters in the WTC Memorial competition I have  
Accumulated many comments to offer. However, the main one is that there is  
No reminder of the callousness of the event.

Therefore, my proposal of this humungous sphere, which will be seen from all  
Angles and many blocks away. Structurally sound and encompassing the entire  
Site and the chosen memorial protecting it from the elements of nature, acid rain,  
Dirt, soot, leaves freezing. All of which, translate into very expensive maintenance  
Costs.

Benefits of the sphere would be millions of cubic feet of space for Museums,  
Theaters, restaurants and other necessary spaces to re-coop the cost of the tragic  
Event.

A new symbol of renewal advancement and tribute to President Bush's visions  
To put Human being on Mars.

Building it out of space-age materials under the guidance of Nasa, and backed  
By the Federal Government funds. It will be a message to the world as a symbol  
Of world peace and prosperity.



Bernhardt Seifert  
288 Hollow Rd.  
Staatsburg, NY 12580-5723

635

582

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

Ladies and Gentlemen:

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Very truly yours,

*Egyptian Sellers*  
355 South End Ave, 23D  
N.Y. N.Y. 10780  
[print name and address]

March 3, 2004

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Very truly yours,

ARLINE SHAPIRO

355 SOUTH END AVE - 15 F

NEW YORK, N.Y. - 10280

[print name and address]

637

March 3, 2004

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New York, NY 10006

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Very truly yours,

Carol S. Liberman #344  
375 S. End Ave

My name is Jean Silliman and I'm a resident of BPC.

Here I stand at another hearing, yet again, to underscore my position to the LMDC regarding the major artery of 9A-West St. The Save West Street Coalition has been lobbying for more than two years for a more beautiful, sensible, safe and humane West St. Plan.

Our <sup>local</sup> elected politicians are against the tunnel. Community Board 1 is against the tunnel. BPC residents are against the tunnel. The consensus being that the end does not justify the means. There are creative ways to link both sides of West St. with at-grade solutions. In the EIS draft, there were 4 lines out of approximately 2000 pages dismissing an at-grade alternative as involving considerably less construction activity than the bypass alternative and the chapter conservatively assumed that the bypass project would be selected and constructed concurrently with the Proposed Action. What an assumption!

The tunnel calls for such drastic measures!

The spending of over 700 million dollars on a four block project ?

The building of a new slurry wall to hold back the Hudson from overflowing into BPC?.

The relocating of utilities including a sanitary interceptor sewer?

The years and years of snarled traffic, long shadows and a decade's worth of noise while Route 9A is under construction the NY Times reported the LMDC admitting to?

The added construction and rebuilding efforts occurring over the same periods and in close proximity to the other ongoing WTC projects with horrific cumulative effects?

Unightly tunnel ramps that are hazardous for pedestrians to cross?

Disruption of residential neighborhoods and local businesses for years to come?

And when the construction is finally over, what is there to look forward to?

A short tunnel with unsightly, dangerous ramps, slower moving local traffic, increased exhaust fumes, backed up traffic from the Brooklyn Battery Tunnel, a skinny median park with traffic on both sides and no money for anything else. Hardly something to smile and endure for. The Environmental Impact Study is aptly named-Impact as in collision comes to mind!

From: n. smitty [mailto:smitteny@yahoo.com]  
Sent: Monday, March 15, 2004 12:20 PM  
To: WTCENVIRONMENTAL  
Subject: No To Tunnel

Hello:

Please do not build the tunnel near the WTC into BPC. This is unnecessary and a waste of money. BPC residents have been through this catastrophe and the route 9A rebuild which was unbelievably dirty and noisy 24/7, and can not stand any more. People will just move out if you proceed without major considerations of the residents' interests and well being. So far you have not addressed this issue.

This 20 year long rebuild is taking place illegally because no hazmat abatement is planned to occur first, as is required by many Federal laws. I think a lawsuit, already in process, is going to stop or slow this debacle, and I hope so.

I doo want a good WTC rebuild, but not at the expense of the city residents and businesses just to please tourists who are being 'used' to make the city a lot of money.

A total hazmat remediation of the entire downtown must occur first.

Many are moving out after the LMDC money is up because it looks like the government is just lying to us again and again, and plans to just cover-up the toxins here, which will make us all continue to be sick.

Thank you. N.Smitten NYC Resident/Worker

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Do you Yahoo!?

Yahoo! Mail - More reliable, more storage, less spam <http://mail.yahoo.com>

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

Georgia Sparks 3/8/04

Georgia Sparks  
[print name and address]

641

385

March 3, 2004

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New York, NY 10006

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Very truly yours,

ALBERT + RENEE SPIELMAN  
375 (SOUTH) AVE., APT. 8F  
N.Y., N.Y., 10280  
[print name and address]

March 3, 2004

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Very truly yours,

AUDREA STARR  
375 So. END AVE #8D  
NEW YORK N.Y. 10280  
[print name and address]

March 3, 2004

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Very truly yours,

Audrey Cornisky & ALAN STURM  
375 South END AVE. # 315  
NY NY 10280  
[print name and address]

644

588

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Very truly yours,

BARNET & JUDITH SULTZER  
375-8M SOUTHERN AVE.  
NEW YORK, NY 10280  
[print name and address]

645

589

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Very truly yours,

KAZU SUZUKI  
375 S. END AVE. #7R  
NEW YORK, NY. 10280  
[print name and address]

646

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Very truly yours,

*Margery Szczepanski*  
*Margery Szczepanski*  
355 SOUTH END AVE #30B  
[print name and address]  
N.Y. N.Y. 10280

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Very truly yours,

*Nona J. Tashman*

NONA J. TASHMAN

395 SOUTH END AVE Apt 31K  
[print name and address] N/ NY 10280

TUNNELS - (NO MATTER HOW  
ARE DARK SHAFT)  
ENCLOSED  
PLACES RIPE FOR TERRORIST  
HISCHIEF AND MURDER, ONLY

WHEN THERE IS ABSOLUTELY  
NO OTHER OPTION, SHOULD TUNNELS BE CONSIDERED !!  
LET'S NOT "DO" ANOTHER DISASTER I.E. THE MILITARY OVERPASS.

648

391

March 3, 2004

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Very truly yours,

*Lorraine Terracina*

355 South End Ave, #115

New York NY 10280

[print name and address]

LORRAINE TERRACINA

March 3, 2004

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Very truly yours,

Susan Topol - Susan Topol  
395 South End Ave - 25K  
New York, NY 10280  
[print name and address]

March 3, 2004

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Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

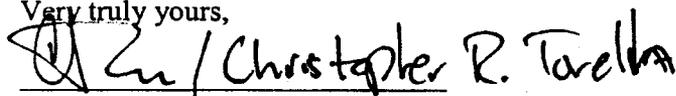
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Very truly yours,

 Christopher R. Torella

Christopher R. Torella  
355 South End Ave. 11G  
New York, NY  
10280

FAX

TO: William Kelly  
LMDC  
212-962-2431

FROM: Bernard Tuchman

SUBJECT: Comments on the Draft GEIS for the WTC Redevelopment Plan, under the heading "Building a Supporting Structure for Sustainability Principles".

PAGES: 8 pages, including this cover page.

---

**My background is as follows.**

I work with the Life Cycle Sustainability Guidelines work group of the Civic Alliance. I was Senior Policy Analyst at New York City Department of Environmental Protection, at which I worked for 33 years until my retirement in October, 2002. Since then I have worked as an environmental policy analyst with the Urban Environmental Law Center, and serve on the Steering Committee of the Environmental Sciences Section of the New York Academy of Sciences.

Bernard Tuchman  
Urban Environmental Law Center  
240 West End Ave. #8-D  
New York, NY 10023  
212-874-4199  
bdtjpw@rcn.com

## 1 Building a Supporting Structure for Sustainability Principles

### Building a Supporting Structure for Sustainability Principles at the WTC Redevelopment Area

Sustainable development is an ongoing and evolving movement towards meeting our present economic, environmental, and social needs without compromising the ability of future generations to meet their own needs. Future generations will judge our success in rebuilding and renewal based on how well we grasp this goal.

The GEIS Sustainable Design Guidelines call for an ongoing commitment to make the Guidelines into "A 'Living' Document" which evolves with new knowledge. Much of that new knowledge will reflect changes in technology. But vital information about what is needed to promote sustainability, which should be incorporated into the Guidelines over time, can only be gained by maintaining close contact with those who are affected by the project. That is because project planners need to understand the dynamics of the relationship between the WTC project and the living and changing community within which it operates.

Thus, a continuous and open process of evaluation and assessment will be necessary in order to keep the World Trade Center redevelopment project at the forefront of the practice of sustainable development. The LMDC (and any successor body) must inform, and gain insight from, all those interested in participating in a process which covers every stage of this complex project's life cycle.

#### Criteria of Performance

The LMDC must provide clear yardsticks of performance, so that the public can judge how well the work in the WTC redevelopment project matches its high expectations.

The standard environmental and resource-conservation criteria should be measured quantitatively (in tons emitted or consumed). These include emissions of air pollutants; water use and impact on water quality; noise; waste generation; and energy consumption. A data collection and analysis organization should be specified as an integral part of project development and management. The body must have the responsibility, authority, and regular source of funding to collect and analyze all necessary data.

Greenhouse gas impact can serve as a framework for evaluating a wide range of environmental and resource impacts. Global climate change must be recognized as a prime sustainability issue in this century. A commitment to leadership in reducing greenhouse gas (GHG) emissions is a particularly important yardstick of performance.

---

### 3 Building a Supporting Structure for Sustainability Principles

#### **Air Monitoring**

A public information policy of continuous inclusion can start with ambient air monitoring posted on the Internet – recording both real-time and past readings. While it is important that this be established during the construction phase, it must be ongoing to determine if traffic mitigation measures (or other air pollution mitigation measures) need to be strengthened.

Monitoring and reporting on diesel exhaust is particularly important. A recent major study concludes:

Evidence suggests that fresh traffic exhaust is hazardous, independent of background concentrations.

See "Breathless in Los Angeles: The Exhausting Search for Clean Air" in American Journal of Public Health | September 2003, Vol. 93, No. 9, [http://courses.washington.edu/envh311/Readings/Optional\\_04.pdf](http://courses.washington.edu/envh311/Readings/Optional_04.pdf)

The World Trade Center was the site of New York State's only ozone monitor in Manhattan. After it was destroyed nothing was done to replace it. The combined impact of high ozone and fine particulates is associated with acute respiratory illness. Ozone monitoring should be resumed for Lower Manhattan, and fine particulate levels should be monitored where public contact with traffic emissions is greatest, and along those corridors most likely to be affected by re-development in the area.

#### **Sustainability Requires a Continuing Role for the Public**

Any commitment now made for sustainable development must be understood to be the basis for an ongoing effort that provides the public with the information it needs in order to keep the development process honest to the original vision.

The greatest obstacle to achieving long-term sustainability goals is the natural tendency of developers and project managers to adopt business-as-usual approaches which focus on limited short-term economic objectives. These primal economic goals always have strong and committed advocates. It is unrealistic to think that long-term principles can survive short-term pressures if there is no mechanism to keep developers and operators accountable to an interested public, who are affected by the totality of project outcomes.

Governmental authorities responsible for overseeing this large-scale undertaking must create an open structure that would foster a continuing high level of public participation.

## 2 Building a Supporting Structure for Sustainability Principles

Greenhouse gases and other emissions must be accounted for, both in absolute terms (such as total emissions in the area), and in relative terms (such as emissions rate per square foot of floorspace, or per person trip, or per ton of goods transported to the area). At a minimum, the project area should be GHG neutral, even if this means buying or supporting emissions reductions elsewhere. Measures to reduce emissions outside the project area can be a major form of mitigation of adverse project impacts on other communities.

There are other attributes whose impacts should be evaluated, even though they may only be assessed by qualitative indicators.

### **Bringing Externalities into the Accounting**

There must be an established process for examining issues which go beyond standards for individual buildings or projects. The LMDC must evaluate both positive and negative impacts which extend beyond the project itself. They should be brought into the accounting equation insofar as information can be obtained.

*It must be explicitly recognized that displacement of environmental and social dysfunction to other communities is not an acceptable way to achieve project sustainability goals.*

*The traffic impact of goods and persons attracted by development must be fully recognized as a project cost, and mitigated. The appropriate standard is improving accessibility: reducing travel time for workers and other users of the area, and reducing time lost due to congestion for vehicles and pedestrians.*

On the positive side, the LMDC must consider whether proposed projects can provide a base of support (on the demand and/or supply side) to make it economically viable to invest in systems which benefit the larger community, such as infrastructure development and land use changes which increase the share of trips made by mass transit, or which improve the utilization of Con Edison's steam distribution system.

The WTC project has an important showcase role as an early-adopter and anchor market for innovations. The cost of playing this role should be explicitly recognized, and funds from agencies such as NYSERDA and USEPA should be solicited to support this function.

#### 4 Building a Supporting Structure for Sustainability Principles

##### **Specific Comments on GEIS Appendix A: Commercial Sustainable Design Guidelines World Trade Center Development Projects**

Extracts from Appendix A are followed by comments *in italics*.

p. 1

In order to create an integrated project design and capture the maximum performance potentials of such preferred tenant fit-outs, each major office and retail segment will design and build an "exemplar" or model of a typical high performance tenant fit out. The performance attributes (energy savings, daylight, air quality, etc.) of the space will be fully quantified and described and advocated as the landlord "preferred" standard.

Tenants will be encouraged to apply to federal, state, municipal and utility Incentive programs for assistance in offsetting initial investment costs. For reasons of marketability and flexibility, it is important to note that the final tenant fit-out decision lies with the individual tenant and, therefore, may be completed in the current best practice of conventional tenant fit-outs within the framework of the tenant guidelines.

*>> A further incentive to tenants (which would not be a cost to the project developer) is to establish a tenant selection process in which the developer considers factors beyond the lease price in choosing building occupants. A tenant's application should spell out its contribution to the value of the overall project, including whether it is committed to adopting high performance standards for sustainability in its equipment and operations.*

p. 2

Because the development of the World Trade Center will extend over a significant period of time, and the related sustainable/environmental technologies and methods are in the process of rapid change, there will be a periodic review of the guideline provisions, with expected updates occurring in response to emerging, practice, standards and technologies (any previously approved site development with previously ordered materials will not be affected by a subsequent upgrade.)

p. 3

Consistent with the Commercial Design Guidelines process, the implementation of these Guidelines will be accomplished by an Implementation Authority (to be designated). The attached "Implementation Matrix" provides clarification of the process and an overview by general building type that has been related back to the relevant guidelines.

5 Building a Supporting Structure for Sustainability Principles

p. 22

The Implementation Authority or Design Review Authority that ultimately utilizes these Guidelines will need to make the final determination as to which of the guidelines are applicable to any given project.

*>> The Guidelines have recognized a continuing role for an Implementation Authority. The quest for enhanced sustainability should be a living and vital process. Towards this end, it is important that a Final document spells out the scope and structure of the Implementation Authority (including a funding commitment from the Port Authority and New York State); and mandates an open process to inform the public and foster maximum public participation.*

p. 5

#### **AIR QUALITY MANAGEMENT**

##### **Site Air Quality**

Work to improve site outdoor and neighborhood air quality. Support and expand pedestrian accessibility and increase bicycle access. Reduce site generated vehicular emissions.

##### **IAQ Performance and Monitoring**

Optimize the indoor environment for the comfort, well-being and enhanced productivity of the buildings' occupants by establishing minimum indoor air quality (IAQ) performance and standards. Provide indoor air quality monitoring so that a standard of quality in the overall indoor environment and resulting well-being of the occupants is maintained.

##### **100% Outside Air**

Provide capability for 100% outside air where practicable and balanced with energy conservation to support the comfort and well-being of building occupants.

*>> Much of this is a general "do the best you can" statement of areas of intent. Criteria by which to judge whether the developer is doing the best that can be done need to be explicated, and made part of the selection criteria.*

p. 6

#### **Comprehensive Energy Management Plan**

Conserve and optimize energy use and minimize air emissions, associated with energy use, through the implementation of a Site/Building Energy Management Plan.

Provide for ongoing verification of optimal operation and energy utilization of building energy systems by providing a computerized, fully-integrated Building Management System (BMS). Provide for full building commissioning with ongoing verification, maintenance and energy systems management.

6 Building a Supporting Structure for Sustainability Principles

*>> The Guidelines should specify who will pay for ongoing verification, maintenance and energy systems management. What are the consequences of failure to comply with a commitment once the project is fully commissioned? Any penalty should be crafted to be an effective incentive for compliance – neither too minor to affect the operator's performance, nor so drastic that it is never applied.*

p.6

**Opportunities for Energy Conservation and Efficiency**

Review large and small scale opportunities for energy conservation and enhanced reliability and capacity. Include exploration of the feasibility and potential benefits and reliability of co-generation, river water cooling and recovery of resources.

*>> The developer is likely to limit consideration to determining whether the alternative which is to be considered is the least costly option. If it is not, then the developer should be required to quantify the incremental cost and attempt to identify funding sources to cover those costs.*

*In selecting developers for project elements, the Implementation Authority should give preference, to the extent appropriate, for proposals that include measures in which the developer agrees to bear the burden of incremental costs in order to attain energy conservation and other environmental and sustainability goals.*

*The Implementation Authority should also have within its assigned mission the goal of assisting developers in securing subsidies for environmental benefits which are not mandated and are not directly cost-effective.*

p. 14

**EEQ-1: Comprehensive Energy Management Plan**

Intent: To conserve and optimize building energy use and minimize air emissions, including greenhouse gases, associated with energy consumption at the site.

*>> The intent is to minimize air emissions including greenhouse gases associated with energy consumption. But there are no actions which measure performance in terms of air emissions and GHG emissions. At a minimum, this must be done in order to integrate WTC projects with the State's GHG and Energy plans.*

p 17

**Material Proximity**

**Intent:** To reduce environmental degradation resulting from transportation impacts by increasing the demand for building materials and products that are extracted and/or manufactured in close proximity to the building site.

**Action:** Utilize local/regional materials in conjunction with the Materials Management Plan. Use a minimum of 20% of all building materials (based on cost) that are manufactured within a 500 mile radius of the site. Manufactured in this context means the location where 'final assembly' takes place.

*>> This is a rule which needs further justification. Perhaps the cost basis should be in terms of value added by local operations. This would tend to provide maximum job benefits from the rule. If environmental benefits were the chief concern a factor other than cost should be considered, such as total greenhouse gas emissions associated with purchased inputs.*



---

**From:** Jennifer Brown [jbrown@renewnyc.com]  
**Sent:** Tuesday, February 03, 2004 2:55 PM  
**To:** Jessica Scaperotti; Irene Chang; William Kelley  
**Subject:** another one from website

http://www.renewnyc.com/plan\_des\_dev/environme  
NULL NULL NULL NULL NULL NULL NULL NULL does NOT DOWNLOAD here. NEED TEXT ONLY OR HT  
works and is a terrible program. Public needs access

**PLEASE NOTE MY NEW EMAIL ADDRESS: JBROWN@RENEWNYC.COM**

**Jennifer Brown**  
**Assistant Vice President**  
**Government Relations and Community Affairs**  
**Lower Manhattan Development Corporation (LMDC)**  
**212-587-9738 direct line**  
**212-406-8858 fax**  
**www.renewnyc.com**

2/13/2004

661

602

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

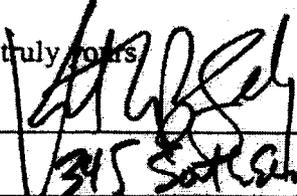
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Very truly yours,

  
\_\_\_\_\_  
315 South St. #JK  
NY NY 10280

[print name and address]

Unknown  
Unnamed Resident  
(Name Illegible)

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

Resident Unnamed  
345 South End Ave  
10280  
[print name and address]

This is a disgraceful  
waste of taxpayer \$

and your actions clearly  
illustrate that the LMDC leadership (NOT)  
are pawns of the Governor. Disgust  
is a weak description of your callous disregard for publ

663

604

March 3, 2004

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Very truly yours,

Nancy Van Goethem and

Lawrence Joseph

355 South End Ave NYC 10280

[print name and address]

ps.  
We have had  
enough misery  
in our neighborhood –  
we don't want more of it.

March 3, 2004

Lower Manhattan Development Corporation  
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One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

Aiko Wada *A. Wada*

355 South End Ave #104

New York, NY 10280

[print name and address]

665

605

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

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Very truly yours,

*Frances Wallach*

FRANCES WALLACH

315 S. END AVE, NYC 10280  
[print name and address]

March 3, 2004

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One Liberty Plaza, 20th Floor  
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Very truly yours,

RANDI WEISBATH *Randi Weisbath*  
3-75 S. END AVE  
NY NY 10280  
[print name and address]

March 3, 2004

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Very truly yours,

Mary White

335 South FM Ave #43

NY NY 10080

[print name and address]

*the tunnel  
since 1992 has  
been built  
turn up numerous  
times - before it made  
sense*

668

608

March 3, 2004

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Very truly yours,

Walter Winkler

Walter Winkler

375 S. End Ave Apt. 6M New York NY 10028  
[print name and address]

The Street...  
of money & in my view...  
no...  
L.E. World Trade Center

March 3, 2004

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Very truly yours,

KARLENE WIESE  
335 SOUTH END APT 3N  
NYC 10280  
[print name and address]

March 3, 2004

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One Liberty Plaza, 20th Floor  
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Very truly yours,

Ruth-William Meyers

395 So End Ave 10E

NY 10280

[print name and address]

Seth Wilpan  
375 South End Avenue, #14C  
New York, NY 10280-1022

March 13, 2004

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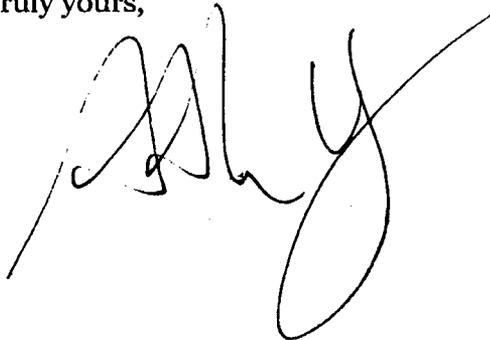
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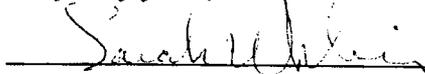
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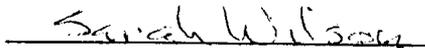
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355 So. End Ave 11/2  
[print name and address]

NYC 10250

March 3, 2004

Lower Manhattan Development Corporation  
Attention: Comments WTC Memorial and Redevelopment Plan/DGEIS  
One Liberty Plaza, 20th Floor  
New York, NY 10006

Re: World Trade Center Draft Generic Environmental Impact Statement

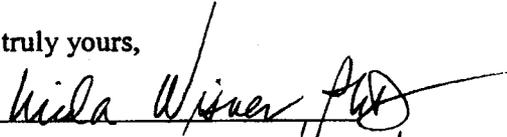
Ladies and Gentlemen:

I am a resident of Gateway Plaza in Battery Park City, the residential complex in Battery Park City closest to the World Trade Center site and one of only two residential complexes physically damaged in the attacks of September 11.

Chapters 13A, 21 and 22, and Appendices E and J of the Draft Generic Environmental Impact Statement (DGEIS) address, among other things, the issue of traffic along West Street, and the impacts of the WTC redevelopment under scenarios that include (a) a short tunnel on West Street and (b) keeping West Street at grade. The DGEIS makes abundantly clear that the tunnel option will make life miserable for both residents and workers downtown, particularly those in Battery Park City for periods of years. The DGEIS also makes clear that the end result of this multi-year construction purgatory will have little, if any, benefit to workers and residents downtown. According to the DGEIS, building a tunnel will still require 2 to 3 lanes of traffic in either direction at grade. In addition, the entrance and exit ramps for the tunnel lanes will decrease connectivity at points that BPC workers and residents frequently use to cross West Street – at Albany Street and at Murray Street. Moreover, the DGEIS appears to underestimate the amount of traffic that the WTC redevelopment will generate locally.

As a resident of Lower Manhattan, I urge the LMDC to study and learn the lesson that the DGEIS clearly teaches: the tunnel option for rebuilding West Street will be a disaster for downtown residents and workers during its years of construction, and will have little, if any, benefit to downtown residents and workers upon its completion – and, indeed, will likely thwart the connectivity that we seek between BPC and the rest of downtown.

Very truly yours,

  
LINDA (DIPASQUALE) WISNER  
375 SOUTH END AVE 27 H  
[print name and address] NY, NY 10280

March 3, 2004

What are you folks thinking?  
What can this money do for schools, seniors

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Very truly yours,

Michael D. Wolf  
355-198 So. End Ave  
NY NY 10280

[print name and address]

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Very truly yours,



PAULINE WOLF

395 So. 2nd Ave Apt 10 28C

[print name and address]

apt 28M

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**From:** Mariwolk@aol.com [mailto:Mariwolk@aol.com]  
**Sent:** Sunday, February 15, 2004 10:35 AM  
**To:** WTCENVIRONMENTAL  
**Subject:** re: West Street Tunnel Comments

Dear Sir:

I cannot attend the session due to work commitments. However, I do have comments. I live in Battery Park and disturbed that this construction will be one more disruption in my life. Although it may be a necessary project, I am upset that the LMDC has taxed my grant for the two year commitment I signed to stay here. What about this new construction? Shouldn't there be some kind of compensation to those of us who would like to stay but are again compromised by living in this area?

I would like my comments brought on the record at the meeting. If you need to contact me, please call me at 212-608-0350. I have been a resident since 1985 at 200 Rector Place.

Sincerely,  
Marianne E. Wolkstein

3/17/2004

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## LOOKS WORSE THAN ALBANY

By Joe Wright

At the Javits Center public hearing on rebuilding the World Trade Center, a series of plans were submitted and were resoundingly rejected. One comment, with which many of the some 5,000 people in attendance agreed, was that the plans "Look like Albany," the implication being that they were incredibly bland. This was Crap 1.

Then the LMDC presented the famous 9 plans. Because the<sup>Y</sup> disallowed rebuilding the twin towers as an alternative, call them Crap 2. ^

On Friday, December 19, 2003, the first building of the Final Plan was presented with great hoopla by the powers-that-be to the public at large. My immediate response was: "Looks worse than Albany." Call the final plan Crap 3.

At least in Albany, they have real buildings occupied by real people, not stunted little 60 or 70 story buildings pretending to be the tallest in the world.

From Daniel Libeskind and David Childs, we have form over function, ornament over design, symbol over substance.

And. . . IT IS NOT A 1776 FOOT BUILDING!

It's a 70 story building topped off with a void, windmills and that goofy Libeskind spire. We don't need any reference to the Statue of Liberty. She stands on her own as the sole symbol of liberty. Why would anyone dare to diminish her stature by sticking a needle on top of a building? And who in the future would even make the connection?

Windmills? Give me a break! I've had enough of this crap about unoccupiable, uneconomical tall buildings. If these hooples, Pataki, Bloomberg, Silverstein, Childs, Libeskind and the LMDC can't build in the spirit of New York City, get out of the way and open the field to the inspired, the ambitious, the heroic. Let's put a real New York builder in charge. (Where is "the Donald?")

The announcement of the "final" design was just another shameful day in the history of the failure to rebuild the WTC.

Did you observe, that all of the buildings spiraling upwards toward the 1776 tower will, by the nature of an upward spiral, have to be even shorter? What is this, design by and for the dwarfs of stature as well as intellect? Of course this spiraling upward is yet another dumb idea from the Libeskind "blaster plan."

More than any other, Libeskind's plan grants the terrorists what they wanted: to demoralize and humiliate America by destroying her symbols. The terrorists cut us down to size. The Libeskind plan and all of its supporters appear content with us remaining in that state. The Leave Manhattan Destroyed Corporation certainly isn't going to help.

What we have is not Freedom Tower, but Surrender Tower as so accurately designated by my colleague Andrew Oliff.

The powers-that-be don't have the courage, the insight, the foresight or the ambition to do anything but the mediocre. We are, after all, dealing with politicians and their appointees who always hew to the pragmatic, and the "dead" middle with emphasis on "dead." They love to rush to the front of a charging crowd, claiming to be its leader.

They pander to all interests in a hopeless attempt to please them all. The windmills are a sop to the environmentalists. The latticework is a sop to the artsy-fartsy crowd. Allowing Greenwich Street to slash through the property, destroying the whole plaza concept is a sop to the vaunted urban planners who always hated the WTC.

But they dare not challenge the merchants of grief! To the self-appointed lobbyists for the victims, there is total capitulation. They want a deathpit and so they get a deathpit. The Libeskind plan was imposed because it offered the greatest space for memorializing death and the least space for celebrating life. Interestingly, some victim family members have courageously spoken out in favor of rebuilding the twin towers. But their voices are silenced and ignored.

Had the twin towers of the World Trade Center never been built, the Libeskind-Childs "building" might have been praised for its inventiveness, spectacular design and for being the tallest structure in the world. But since the twin towers were built, replacing them with anything of less stature, of less grandness, with less functionality as office and commercial space can only be regarded as an utter disgrace. An insult to all Americans. An even grosser insult to New Yorkers who deserve better and even grander buildings on the site.

So, we have Crap design 1, Crap design 2 and Crap design 3. To paraphrase Johnny Paycheck, "Take this crap and shovel it!"

And I haven't yet said a word about the memorial! Needless to say, the plans are atrocious. The idea of turning the site into a cemetery is grossly repugnant. I don't want the WTC site to become Tombstone City. Neither do residents in the area.

The most magnificent way to honor those murdered by terrorists on 9/11 is to rebuild what was destroyed. We can't bring back the dead, but we can rebuild

what was important in their lives, what they worked for and where they worked, visited and enjoyed themselves and where others risked their lives to save those who were horribly entombed by the fires started by the terrorists.

My memorial would consist of elements of the destroyed towers placed on a new plaza between two new twin towers, built as tall or taller and exactly on the footprints of the original towers. Pieces of the steel beams, of the unique facade, the damaged Fritz Koenig Sphere (not repaired) and a proportionally sized monument on which names of the murdered would be inscribed.

As to an explanation of the meaning of the memorial, it would simply be that "On 9/11/01 these people were murdered by fanatical religious terrorists who hate America for everything that makes it and us great. We are not defeated and we submit these grand new twin towers as proof."

Joe Wright  
212-244-5488 x134  
4joewright@att.net

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Very truly yours,

Maria Zamparelli,  
395 South End Ave. (3C)  
NY NY 10280  
[print name and address]