

Statement on DGEIS for LMDC, February 18, 2004

Good morning my name is Diane Dreyfus I am part of an ad hoc neighborhood group convened 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 lose 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,
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