

Comments on DGEIS for WTC Site:
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This Draft EIS appears to be rushed, inaccurate, and predictive of an outcome that according to NEPA should not have been decided at this stage.

Although the Draft EIS was not approved by the Board of LMDC on January 20th and made available to the public January 22nd, HUD put a notice signed January 16th in the Federal Register. This is in contravention of NEPA rules, and seems rushed.

In the Catskills an EIS is being prepared, and due to public pressure the time for comment is being extended an additional two months. I formally request that the public comment period for this draft EIS be extended from the current minimum of 45 days by an additional 2 months e.g. until May 15th.

The Draft EIS says that 13,000 public comments were received through "Plans in Progress"; there were also seven community workshops. The FEIS must include proof of affirmative solicitation of these people for comment on the Draft EIS as required by NEPA, and affidavits as to what notices were put into which newspapers, and when.

Although the proposed action includes cultural and retail buildings and claims to be planning a 24/7 community, I can find no reference to traffic or pedestrians that relate to activities in these buildings. The Final EIS must recalculate all numbers for traffic and pedestrians to reflect this group.

The Final EIS should also include the Fitterman Hall and Deutsche Bank demolitions. It should include a thorough study of conditions without the four additional towers when Mr. Silverstein's insurance payment is \$3.55 million instead of 7. The Final EIS should study the effect of a loss of rental tenants when the LMDC grants run out in 5/05 and the tenants have seen the effect of construction on quality of life.

The Port Authority of New York and New Jersey must commit in the Final EIS to follow best practices during design and construction. They should also agree to follow the recommendations of the NYC department of buildings WTC building code now before the city council.

The Port Authority seems to be planning new towers with no roof egress. They and anyone else in charge of building on the site should include fire engineers, fire marshals and a National Institute of Technology representative in their design team.

The Final EIS should include a memorandum of understanding specifically agreeing to make the site subject to NYC building codes.

The Final EIS should include a detailed plan for air and sound monitoring around the periphery of the site during construction, with the hourly readings posted on a publicly accessible and publicly announced web site.

In Europe it has been discovered that people living closer than 600 yards – or in some cases a mile from wind turbines have had their health adversely effected by low frequency noise.

The Final EIS should address how this problem will be mitigated. In Denmark the government has responded to public demand and stopped erecting onshore turbines because of the noise hazard.

The Final EIS should explain why the Draft EIS makes the determination that there are sufficient fire and police personnel available to cope with the 62,530 plus additional people they expect. In appendix B the fire department say they have not seen the WTC plans, and the police department say that they have 24 fewer staff than on 9/11.

The most worrying thing about this rushed EIS is that there appears to be no penalty for being wrong.

If you have made comments on the Draft EIS, you are entitled to a copy of the Final EIS under NEPA rules – no mention of it only being available electronically, or having to pay for the privilege. I would like to go on record as stating that I want a free hard copy on the day the Final EIS is made available to the public, and I want to be affirmatively informed when that date is, and where I can pick up my copy.