



CITY PLANNING COMMISSION  
CITY OF NEW YORK

OFFICE OF THE CHAIR

March 8, 2004

Hon. John Whitehead  
Chairman  
Hon. Kevin Rampe  
President  
Lower Manhattan Development Corporation  
1 Liberty Plaza – 20<sup>th</sup> floor  
New York, New York 10006

Dear Chairman Whitehead and President Rampe:

The City Planning Commission (the “Commission”) has reviewed the Lower Manhattan Development Corporation’s (“LMDC”) World Trade Center Memorial and Cultural Program Amended General Project Plan, dated September 16, 2003 ( the “WTC GPP”) at a Special Review Session held on March 1, 2004. The WTC GPP is subject to Commission review pursuant to the provisions of subdivision 3 of section 16 of the New York State Urban Development Corporation Act which provide that a planning board or commission may recommend approval, disapproval or modification of a general project plan, whenever such plan requires the override of local law or regulation for implementation, or in the case of a project where the Empire State Development Corporation or a subsidiary intends to acquire real property by eminent domain.

In the case of the WTC GPP, override of local law or regulation is needed for implementation for at least three reasons related to the proposed acquisition and redevelopment of the “Southern Site”, defined as the two city blocks south of the World Trade Center site, one bounded by Liberty, Washington, Albany and Greenwich Streets, and the other bounded by Liberty, West, Cedar and Washington Streets, as well as a portion of Liberty Street between those parcels and the World Trade Center site. As confirmed by LMDC, the three overrides of local law or regulation currently anticipated by the expansion to the Southern Site are as follows : First, override of the City Map to permit the acquisition of Washington Street between Cedar and Liberty Streets and the incorporation of the area of the street bed into the new, proposed Liberty Park; Second,

override of the City Map to permit the acquisition of portions of Liberty Street between West and the new Greenwich Street, for purposes of above and below-grade infrastructure; Third, override of the Floor Area Ratio and height, setback and coverage provisions of the New York City Zoning Resolution to facilitate development of Tower 5. In addition, implementation of the WTC GPP may involve acquisition of real property by eminent domain.

The Commission believes that adoption of the WTC GPP will be an important milestone in the redevelopment of the World Trade Center site and congratulates both the LMDC and the Port Authority for their outstanding work in creating an open, participatory, and inclusive planning process that has involved countless meetings, discussions, and forums with affected stakeholders. Throughout the process, staff of the Department of City Planning have met and discussed issues with staff of the LMDC and the Port Authority and have fashioned a collaborative, problem-solving approach towards site planning. We look forward to continuing that constructive relationship as the planning process moves into a new phase following adoption of the WTC GPP.

The Commission believes that the WTC GPP establishes a sound framework for future planning and design, consistent with the general principles which have guided planning efforts since adoption of the *Revised Blueprint for the Future of Lower Manhattan* issued on June 5, 2002. In particular, the WTC GPP takes important steps towards reintegrating the former WTC site into the rest of Lower Manhattan; creating a mixed-use neighborhood of commercial, retail, and transportation uses; providing for new cultural institutions in Lower Manhattan; and creating an accessible and attractive open space system for the site. Most importantly, by incorporating Michael Arad and Peter Walker's memorial design concept, "Reflecting Absence", the WTC GPP respects the World Trade Center site as a place of remembrance.

In making recommendations for modification of the WTC GPP, the Commission has identified a small number of changes which it believes are important to ensuring that the goals shared by the LMDC, the Port Authority, and the City for redevelopment of the site are fulfilled. We understand and are pleased that LMDC staff is considering proposing many of the same or similar changes to the LMDC Board of Directors.

The Commission understands that a "General Project Plan" establishes a broad framework for development over time, rather than a detailed set of regulations. The Commission has therefore carefully distinguished between those issues which it believes warrant modification of the WTC GPP, and those for which it encourages the LMDC and the Port Authority to pursue a direction and anticipates further dialogue among planners.

The Commission recognizes that certain urban design issues of importance to the City are more appropriately addressed in "Design Guidelines" for the site, in order to accommodate needed flexibility. The current WTC GPP contemplates the use of such Design Guidelines and describes their general contents. See WTC GPP at Pages 7-8. As discussed in greater detail below, there are a limited number of such issues which we believe must be addressed in the Design Guidelines. With respect to these specified

items, as distinguished from the Design Guidelines in general, the City, acting through the Department of City Planning, should have a role in guideline adoption and modification commensurate with that of the LMDC and the Port Authority. ( We express no opinion regarding any other City role with respect to other Design Guidelines and understand that this is a matter for discussion among the parties). We also believe that the WTC GPP must be clear and unequivocal that the Design Guidelines are binding upon redevelopment of the site unless modified pursuant to an agreed-upon process; the Commission believes that the current language of the WTC GPP which provides that the Design Guidelines "... constitute a significant component of the land use plan and controls for the Project Site" ( WTC GPP at Page 8) and "will form part of the land use plan and controls for the Project Site" ( WTC GPP at Page 9) describes this in an appropriate fashion and should be retained.

The Commission's specific recommendation for modification of the WTC GPP with respect to the contents of Design Guidelines and the process for their adoption and modification is set forth in Appendix A to this letter. Individual items proposed for inclusion as required elements of the Design Guidelines are discussed in more detail below.

The discussion of the WTC GPP which follows is divided into four sections, reflecting our concerns for the public realm and open space; the pedestrian experience at the site; traffic and transportation; and infrastructure. A fifth section discusses concerns related to the below-grade concourses and their entrances and exits; while these are not elements of the WTC GPP itself, they are discussed here in recognition of the fact that they will function as integrated elements of the site development.

## **I. Public Realm and Open Space: Reintegrating the Site With Lower Manhattan**

We share the longstanding goal of the LMDC and the PA to reintegrate the World Trade Center Site into the fabric of Lower Manhattan. The current WTC GPP and WTC GPP Site Plan reflect important steps towards fulfilling this objective through the restoration of Greenwich and Fulton Streets across the site and the addition of new open spaces. We believe that additional measures should be taken to more fully integrate the site into its surroundings with regard to streets, sidewalks, pedestrian flow, public open space and urban design. These are discussed below.

### **a. Extend Dey and Cortlandt Streets From Church to Greenwich Streets**

The September 13, 2003 WTC GPP Site Plan ( "2003 Site Plan" ) and February 18, 2004 Revised Site Plan ( "2004 Site Plan" ) are ambiguous with respect to the status of Dey and Cortlandt Streets, between Church and Greenwich Streets. Dey Street is not indicated on the 2003 Site Plan, while the 2004 Site Plan shows Dey Street with dashed lines, suggesting the possibility of its restoration in some form. The 2003 Site Plan appears to show Cortlandt Street between Church and Greenwich as a street or way closed to vehicular traffic and crossed by a two-level pedestrian bridge or platform

linking Towers 3 and 4. The 2004 Site Plan appears to suggest a potential pedestrian corridor.

It is critical to the successful integration of the site with the rest of Lower Manhattan that Dey and Cortlandt Streets be extended as real streets between Church and Greenwich. These streets must be designed to accommodate both vehicular and pedestrian use. The public realm in New York is primarily composed of streets and sidewalks. As such, Dey and Cortlandt provide key opportunities to expand the amount of open space and accessibility into the site. Furthermore, these streets will ensure that the typical block size along Church Street remains the same as the blocks to the north and south. In New York, with few exceptions, larger block sizes (for example, blocks as long as the dimension between Liberty and Dey Streets) are provided only for our most significant public buildings such as Grand Central Station.

Accordingly, we propose the following modifications to the WTC GPP :

- Page 6, first Paragraph under the heading “d. Streets and Public Open Spaces”, a new second sentence is added to read as follows:

“ It also provides for the design and construction of Dey and Cortlandt Streets between Church and Greenwich Streets.”

- Attachment 1, Proposed Project Site Plan, is revised to show Dey and Cortlandt Streets between Church and Greenwich Streets as streets in the same manner as Greenwich and Fulton Streets. The alignments of Dey and Cortlandt streets shall be as set forth in the 2004 Site Plan.

b. Ensure the Provision of Open Space in Front of the Performing Arts Center

The Commission notes that the 2003 and 2004 Site Plans reflect different open space configurations. We understand that this results in part from the proposed addition of usable open space within the Memorial Plaza, and that the net result is to add to the overall amount of open space within the site. The Commission expresses no opinion regarding this reconfiguration overall, but is concerned that the 2004 Site Plan eliminates the open space originally proposed in front of the Performing Arts Center on Fulton Street. Like many cultural buildings in our city, we feel it is essential that the Performing Arts Center have open space in front of it on Fulton Street, as originally proposed, to provide ceremonial space that will give the building appropriate grandeur.

Accordingly, we propose that open space in front of the Performing Arts Center continue to be shown in the final WTC GPP Site Plan , and continue to be described under the heading “ Streets and Public Open Spaces” in the GPP’s description of the Redevelopment Program ( WTC GPP Pages 6-7). We express no opinion whether the name “Park of Heroes” should be retained.

c. Pedestrian Flow through the WTC Site

Given the numbers of pedestrians that will experience the site, we share the goal of making the pedestrian flow through the site as comprehensible as possible for workers, residents, and visitors. We are particularly concerned that public spaces, sidewalks, signage, and entrances to the memorial and other cultural buildings reinforce pedestrian flows along Fulton Street, and to this end we strongly recommend that the observation deck entrance for Tower 1 be prominently placed on Fulton Street across from the Memorial and next to the Performing Arts Center. Similarly, we suggest that tourists should be encouraged not only to visit the World Trade Center site, but also be incentivized by ground floor retail activities, streetscape, and other elements to walk the streets of Lower Manhattan, including the walk down Broadway's "Canyon of Heroes" to the Battery and the Harbor's magnificent destinations.

d. Establish Minimum Sidewalk Dimensions

As stated previously, the open space network provided in much of New York City is composed of its streets and sidewalks. Sidewalks in particular play a key role in shaping the pedestrian experience at-grade and form the armature of the public realm around which buildings and uses are placed. As such, ample sidewalks, both in terms of width and configuration, must be provided on site in order to protect and enhance the pedestrian experience. We note in this regard that the DGEIS assumes that minimum sidewalk widths will be implemented, without specifying dimensions. ( See DGEIS Project Description at Page 1-25).

Accordingly, we propose the following modification to the GPP:

- Page 6, a new second paragraph is added under the heading “d. Streets and Public Open Spaces”, as follows:

“ In order to optimize the pedestrian experience, minimum sidewalk widths will be implemented throughout the WTC Site. For Greenwich and Fulton Streets (with the exception of the north edge of the Memorial Site) , as well as on the west side of Church Street and south side of Vesey Street, sidewalks will have a minimum width of 25 feet. On Dey and Cortlandt Streets, between Church and Greenwich Streets, sidewalks will have a minimum width of 15 feet.”

e. Ensure Appropriate Streetwall and Minimum Setback Requirements in the Design Guidelines

Much like sidewalks and open space, the Commission believes that minimum streetwall and setback requirements for the commercial buildings are vital to the public realm. The height and configuration of streetwalls directly contribute to the quality of the pedestrian experience by affecting the amount of light and air at street level, as well as providing wind breaks to mitigate the wind conditions associated with tall buildings. The

Commission recognizes the need for greater design flexibility for the Performing Arts Center and other cultural buildings.

Our preliminary view is that a streetwall requirement of 85' to 130' feet for commercial buildings would ensure adequate flexibility for the commercial uses on the lower levels of the building while also providing light and air at grade. Likewise, a minimum first setback of 15 feet at the top elevation of the streetwall would provide for marketable commercial tower floorplates above the required streetwalls. The Commission recognizes that the most significant purpose of such controls is to enhance the pedestrian realm, by providing light and air, and protecting pedestrians from wind. Accordingly, such controls should be flexible if it can be demonstrated that an alternative approach meets or exceeds desired performance standards.

While the Commission believes that the streetwall and setback requirements described above are generally appropriate and would contribute to a successful urban design for the WTC Site, we also recognize that precise heights and dimensions are more appropriate for Design Guidelines capable of adjustment without need to modify the GPP itself. The WTC GPP should therefore be modified to require such streetwall and setback requirements as an element of the Design Guidelines. See Appendix A.

f. Provide for Minimum Separations Between the Performing Arts Center and Tower 1

We believe that, in order to be architecturally successful as a major new cultural facility, the Performing Arts Center must be physically separated from Tower 1. Like the fantastic and inspiring new PATH terminal, public and cultural buildings must be separated from commercial ones. This is vital for the Performing Arts Center to establish its separate civic identity, and is in keeping with other major cultural and public buildings throughout New York City.

Accordingly, we propose that the WTC GPP be modified as follows:

- Page 5, paragraph under heading “ ii.Cultural Buildings and Programming”, the sixth sentence is modified as follows:

“ The site at the northwest corner of Fulton and Greenwich Streets is being considered for a performing arts center of potentially 800 to 2,200 seats; in order to enhance the architectural prominence of this center and promote its identity as a major new cultural institution, the performing arts center shall be separated from Tower 1 by approximately 30 feet.

- Attachment 1, Proposed Site Plan, is revised to show an approximate 30 foot separation between the performing arts center and Tower 1 discussed above.

g. Ensure Appropriate Slopes and Grades

The Commission recognizes the difficulties faced by planners in integrating important sub-grade infrastructure into the site plan. However, it is vital that sub-grade infrastructure not create an above-ground environment in which steep sidewalk grades and elevations impede pedestrian movement and obstruct accessibility into and across the site. Further, under the current design, the rise and descent of streets along their length creates the potential to obstruct view corridors along the street and impede pedestrian access. The potential for severe grade conflicts under the current design is highlighted by sectional studies of the configuration of Liberty Street and West Street. As currently conceived, the sidewalk on the north side of Liberty Street will be essentially a concrete channel formed by the edge of the truck ramp on the south and the raised Memorial plinth on the north. Similarly the sidewalk condition on West street will be constrained by the raised Memorial edge which rises up to 12 feet above the sidewalk.

In general, the Commission believes that site grading and sidewalk elevations should follow the natural contours of Lower Manhattan, sloping in a consistent manner downward from Church Street to West Street, similar to the grades that existed on the site prior to the development of the original World Trade Center. Likewise, the effect of grade changes, where they do occur, should be softened through use of stairs, ramps or benches. In general, blank retaining walls adjacent to public sidewalks should be avoided.

The Commission recognizes, however, that precise grade and elevation requirements are more appropriate for Design Guidelines capable of adjustment without need to modify the WTC GPP itself. The WTC GPP should therefore be modified to require maximum slope, elevation and other grade controls for streets and sidewalks as an element of the Design Guidelines, in order to provide appropriate streetscape transition between level changes and protection of view corridors, as well as to avoid pedestrian conflicts. See Appendix A.

h. Promote Use of Security Devices that Minimize Conflict with Urban Design and the Pedestrian Experience

The Commission recognizes that security devices are likely to be installed in streets and sidewalks within the WTC Site. The Department of City Planning's recent experience working collaboratively with the LMDC on the Financial District Streetscape Improvements Project highlights that security measures and design concerns need not be in conflict, and that a thoughtful security plan design can in fact enhance the pedestrian experience. That study has proven that innovative thinking can result in the substitution of stock security devices such as fixed bollards, jersey barriers, and delta barriers with amenities that provide equal or greater levels of security such as benches, retractable bollards, fountains, and the like.

The Commission believes that the WTC GPP should be modified to include design standards for security devices installed in streets, sidewalks or other open spaces as an element of the Design Guidelines, in order to ensure, to the maximum extent possible

consistent with security needs, that such devices are integrated with streetscape elements and do not impede pedestrian flow. See Appendix A.

## **II. Commercial and Cultural Program: Creating a Pedestrian Environment**

The Commission believes that the creation of an active pedestrian environment in the WTC Site depends on more than building wide sidewalks and that maximizing ground retail floor uses in the commercial buildings is essential to a vital street life.

The WTC GPP contains a brief description of the retail program, stating that “[t]he new retail program at the WTC Site will provide for up to 1 million square feet of retail, some of which would be located in the hotel and office buildings.” (WTC GPP at Page 6). We believe that several provisions, discussed below, should be added to the WTC GPP to facilitate a successful above-grade retail environment.

In addition, the Commission believes that the proposed sequencing of redevelopment described in the DGEIS, under which the retail bases of all commercial buildings would be constructed prior to the tower structures themselves, is a logical and feasible approach to creating a successful pedestrian environment early in the process. The Commission encourages the LMDC and the Port Authority to pursue this goal.

Hotel and conference center use is also described in the WTC GPP as an element of the Redevelopment Program. We strongly concur in the view that hotel space is needed to serve existing and expected new businesses and residents, as well as visitors to the new cultural and Memorial uses, and that conference facilities are desirable because of the site’s central location and excellent access to the regional transportation network. We therefore recommend that hotel and conference center use remain part of the WTC GPP project description, without amendment. We believe that the location of the hotel and conference center space should remain flexible.

The Commission’s specific recommendations are as follows:

a. **Ensure a Significant Proportion of Retail Space At or Above Grade**

The Commission recognizes that the WTC GPP anticipates retail uses on two below-grade concourse levels, and concurs with the view that below-grade retail uses would enliven the east-west pedestrian connection linking the permanent PATH Terminal to the World Financial Center and the subway system at Church Street. At the same time, the Commission believes that most of the 1 million square feet of retail anticipated by the WTC GPP and DGEIS must be located at or above grade in order to ensure a vital street life.

Accordingly, the Commission recommends that the WTC GPP be modified as follows:

- Page 6, paragraph under heading “b. Retail”, the second sentence is modified as follows:

“ The new retail program at the WTC Site will provide for up to 1 million square feet of retail, [some] most of which would be located at or above grade in the hotel and office buildings.”

- b. Prescribe minimum retail frontage and transparency requirements for ground floor retail

The Commission believes that, in order for ground floor retail to activate the streets, it must form a continuous presence around building perimeters on key streets and that storefronts must be open and visually accessible from the street. Our experience with Midtown Zoning on streets such as Madison Avenue shows that a minimum retail frontage requirement of 80% and a requirement that at least 50 to 75% of each storefront be of a transparent material can achieve this objective. The Commission recognizes, however, that minimum retail frontage and transparency percentages are an appropriate subject for Design Guidelines, rather than the WTC GPP itself and therefore proposes that the WTC GPP be modified to include them among the required elements of the Design Guidelines. See Appendix A.

- c. Maximize Retail Square Footage on the Ground Floor Level

The Commission believes that , in addition to a requirement for minimum percentage of retail frontage, the Design Guidelines should include other provisions to maximize the amount of ground floor retail space relative to ground floor lobby and other uses. Such measures could include, for example, a minimum ground floor retail coverage requirement of 75%. They should also include provisions to encourage third-floor elevated lobbies that would be reached by escalator in Towers 2, 3 and 4. The use of elevated lobbies would not only allow additional square footage to be dedicated to ground floor retail, but would also allow for security and other lobby functions to be placed on upper, less commercially valuable levels that can also act as private amenity levels for tenants. No less significant is the need for office lobby entrances to be sited in mid-block rather than corner locations, in order to free up corners for more valuable retail uses.

The Commission therefore believes that the WTC GPP should be amended to include provisions to maximize the amount of ground floor retail as an element of the Design Guidelines. See Appendix A.

- d. Signage Controls

While retail uses add to the vitality of street life, retail signage can sometimes detract from the visual quality of the pedestrian environment. The Commission believes that the Design Guidelines must include signage controls for retail signage to address such issues as size, height, projection and illumination. Particular attention should be given to retail

signage on the Greenwich Street frontage facing the Memorial Plaza in order to ensure appropriate respect for and sensitivity to the Memorial use.

The Commission therefore proposes that the WTC GPP be modified to include such signage controls as a required element of the Design Guidelines. See Appendix A .

### **III. Traffic and Transportation: Lower Manhattan Street Management**

The restoration of streets to the WTC Site provides a critical opportunity to reintegrate the WTC site with the rest of the Lower Manhattan street network. While we understand that security needs may dictate closures or other use restrictions, the streets themselves should be designed and built to accommodate vehicular and pedestrian traffic and must match the existing street network in terms of vehicle capacity and directionality in order to permit a true reintegration.

The Commission notes in particular the importance of reintroducing Liberty Street as a two-way street through the site, assuming a relocation of the truck ramp is determined to be feasible. See IV.a.below.

#### **a. Establish Street Directions and Lane Capacity**

Consistent with the above, the Commission believes that the directions of streets within the Project Site and their lane capacities should be established in the WTC GPP, it being recognized that directions and lane capacity may change over time.

Accordingly, we propose the following modification to the WTC GPP:

- Page 6, under the heading “d. Streets and Public Open Spaces”, a new second paragraph is added to read as follows:

“ Streets through the site shall be designed and built to meet or exceed NYCDOT standards and shall have the following directions and lane capacity , except as may be agreed to by NYCDOT:

<u>Street</u>	<u>Direction</u>	<u>Lane Number</u>
<u>Church</u>	<u>Northbound</u>	<u>5</u>
<u>Greenwich</u>	<u>Southbound</u>	<u>4 or 5</u>
<u>Vesey</u>	<u>Eastbound</u>	<u>5</u>
<u>Fulton</u>	<u>Westbound</u>	<u>3</u>
<u>Dey</u>	<u>Eastbound</u>	<u>3</u>
<u>Cortlandt</u>	<u>Westbound</u>	<u>3</u>
<u>Liberty</u>	<u>Two-way</u>	<u>4 or 5*</u>

\* In the event truck ramp is located elsewhere on the Project Site. Direction and lane capacity to be determined in the event the truck ramp is not relocated.

The Commission notes that the above information may also appropriately be set forth in graphic form as an attachment to the WTC GPP, should the LMDC prefer this approach.

b. Avoid the Use of Bridges Across Streets as a Method for Pedestrian Movement

The Commission believes that streets should be open to the sky and that the use of platforms across streets to provide continuous retail or above-grade pedestrian concourses is detrimental to the public realm. In this regard, the Commission is deeply concerned that the 2003 Site shows a platform connecting Towers 3 and 4. While the 2004 Site Plan does not clearly indicate this feature, we understand that it remains a potential element of the site plan.

Use of “sky-bridges” or other similar platform devices is a discredited approach to urban design that is incompatible with the New York City environment. Such devices significantly diminish light and air, obstruct view corridors, and reduce street level activity. The Commission understands that the Port Authority currently wishes to retain the ability to build such platforms over streets, and will not support a limitation on their use at this time. The Commission encourages the Port Authority to reconsider this position, and to affirm that the goals of opening streets through the site and avoiding the outmoded “superblock” configuration that guided the former World Trade Center site plan will not be compromised through use of these devices.

#### **IV. Infrastructure: Managing User Needs**

The Commission recognizes the importance of the proposed sub-grade infrastructure as a means to accommodate the parking, delivery and other needs generated by development above-grade, and appreciates the difficulties faced by planners in reconciling conflicting demands. At the same time, it must be recognized that the siting of sub-grade vehicular access points can have a significant impact on the quality of the above-grade environment. In particular, ramps to the sub-grade must be carefully sited so as not to impede pedestrian flow, create pedestrian-vehicle conflict, or obstruct view corridors. The Commission’s specific concerns with regard to the locations of the Liberty Street and Vesey Street ramps are discussed in more detail below.

The Commission notes that while the proposed sub-grade infrastructure includes parking for trucks, buses, and tenants, no provision is made for public parking for visitors. The Commission recognizes that this limitation arises from the multiple needs generated by site users, but believes it can be partially addressed by such measures as making tenant parking areas accessible to patrons of the Performing Arts Center in the

evenings or to shoppers on weekends. The Commission encourages the LMDC and the Port Authority to explore such options.

The Commission's specific recommendations with regard to sub-grade infrastructure facilities are as follows:

a. Relocate the Liberty Street Ramp

The location of the truck ramp on Liberty Street could seriously impede pedestrian movement to and from the Memorial and the waterfront, and has the potential to compromise the integrity of the Memorial Site as a location for contemplation and reflection. The location of the ramp between the Memorial and Liberty Park South is also unfortunate given the public nature of those uses, particularly given the "concrete channel" aspect described previously. In addition, the ramp precludes two-way traffic on Liberty Street, which we believe to be an important element of traffic flow across the site, as described above.

The Commission recognizes that the LMDC and Port Authority share the goal of moving the truck ramp to another location within the Project Site, and have been actively working to study alternatives. We understand that, in addition to studying alternative locations for a truck ramp entrance to a centralized loading facility, the LMDC and Port Authority are exploring the option of decentralized or semi-centralized loading facilities. The Commission acknowledges that these alternatives may have cost implications and pose engineering challenges, but believes that they should be pursued fully in the long-term interest of ensuring a successful redevelopment of the site. The Commission expects that the City will be presented with the results of all engineering and cost analysis, and have an opportunity to meet and confer with the LMDC and Port Authority on this subject.

Accordingly, we propose the following modification to the WTC GPP:

- Page 7, first paragraph under heading "f. Infrastructure and Utilities" is modified to add a new third sentence as follows:

" Consistent with this objective, the Liberty Street truck ramp shall be relocated if a feasible alternative location within the Project Site is identified by the LMDC and the Port Authority, and the environmental effects of such alternative location are no greater than those associated with the Liberty Street location."

b. Move the Vesey Street Ramp East of the Washington Street View Corridor

The current location of the vehicular entrance and exit ramp on Vesey Street, as shown on both the 2003 Site Plan and 2004 Site Plan, obstructs the Washington Street view corridor and pedestrian access into the site that would be facilitated through adoption of the Commission's recommendation to provide a minimum 30 foot separation

between the Performing Arts Center and Tower 1. See I.f. above. The ramp should be relocated at least 30 feet east of the Washington Street Corridor.

Accordingly, we propose the following modification to the WTC GPP:

- Attachment 1, Proposed Site Plan, is revised to show the Vesey Street vehicular ramp at a location no less than 30 feet east of the Washington Street view corridor.
- c. Ensure Inclusion of an On-Site Bus Parking Facility in the Project Description

The Commission believes that, in order to accommodate the large number of expected visitors to the site, a bus parking facility must be included in the plan. This facility should be located within the Project Site, rather than on Site 26 in Battery Park City.

The Commission notes in this regard that the GPP states that visitor services and amenities on the site “may” include a bus parking facility ( WTC GPP at Page 7) , while the DGEIS Project Description includes a bus parking facility on-site or on Site 26. ( DGEIS at Page 1-20.)

Accordingly, we propose the following modification to the WTC GPP:

- Page 7, second paragraph under the heading “f. Infrastructure and Utilities, the second sentence is revised as follows:

“ This [may] shall include a bus parking facility.”

## **V. Below-Grade Concourses and Related Above-Ground Infrastructure**

The Commission recognizes that the below-grade retail concourses and associated infrastructure will be reviewed under a process separate from the WTC GPP. Nonetheless, this infrastructure is strongly related to site planning under the WTC GPP (e.g., with respect to retail spaces and pedestrian flows through the site) and deserves mention here. The Commission believes that the below-grade East-West Concourse connecting the World Financial Center, the PATH terminal, and the new Fulton Transit Center is a valuable transportation asset. However, the proposed North-South Concourse running between Church and Greenwich Streets is highly problematic, since it will have the effect of keeping pedestrians off the street and within an underground environment. Consequently, the Commission recommends that this North-South Concourse and its related entrances and exits be eliminated from future planning for the site , in order to encourage pedestrians to flow onto City streets from the magnificent new PATH terminal. This will also serve to maximize pedestrian flow along the retail storefronts at grade.

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The Commission looks forward to adoption of the WTC GPP by the LMDC Board of Directors, together with the modifications proposed in this letter. Recognizing that the WTC GPP is an instrument binding on the LMDC only, the Commission also urges the Port Authority to enter into a Memorandum of Understanding or other agreement at the earliest possible date by which it will commit itself to redevelop the site in accordance with the terms of the WTC GPP governing the Redevelopment Plan.

Accordingly, please be advised that the Commission, by unanimous consent of all members present (11) during the consideration of this item at the March 8, 2004 Review Session, recommends approval of the World Trade Center Memorial and Cultural Program Amended General Project Plan, together with the modifications set forth herein.

Sincerely,

Amanda Burden, AICP

Chair

C: J. Seymour  
D. Doctoroff  
R. Barth  
D. Karnovsky  
V. Chakrabarti

## APPENDIX A

Section 8 of the WTC GPP is modified as follows:

Deletions in brackets; additions underlined

### **8. Design Guidelines**

The redevelopment of the Project Site will be carried out in phases over an anticipated period of approximately 12 years. In order to assure that the open spaces, buildings and other features of the Project designed and built throughout the entire development period reintegrate the site with the rest of Lower Manhattan, exemplify excellence in design, fit into the vision for the site, and are compatible with the intent of the WTC Memorial and Redevelopment Plan, a set of design guidelines will be adopted by LMDC and the Port Authority with input from involved and interested parties, including the Department of City Planning and the Port Authority's net lessees, to guide future development for the Memorial Program and the Redevelopment Program.

The City of New York, acting through the Department of City Planning, shall participate in the adoption and modification of certain such design guidelines to the same extent and in the same manner as the LMDC and the Port Authority. The design guidelines adopted and modified with such participation of the Department of City Planning are as set forth in Exhibit 1 hereto.

The [guidelines] design guidelines will outline general building envelopes for each identified development parcel, including height, bulk, massing, floor plates, setbacks, and lobby locations. They will define (1) retail boundaries, volumes and plan concepts; (2) street/open space edges and connections, as well as service access points; and (3) sustainability, security and life safety, and material/aesthetic issues for building facades and retail storefronts. The guidelines [are intended] process is intended to be flexible enough to accommodate future modifications as changing conditions may require and will include [ a process] mechanisms to do so as needed.

The design guidelines will constitute a significant component of the land use plan and controls for the Project Site.

## EXHIBIT 1

(1) for commercial buildings other than Tower 1: (a) a minimum and maximum streetwall requirement; (b) a minimum first setback or similar requirement; (c) a minimum percentage retail frontage requirement on Greenwich, Church and Fulton Street frontages ; (d) provisions designed to maximize the amount of ground floor retail space relative to lobby and other uses; and (e) a minimum percentage ground floor transparency requirement on Greenwich, Church and Fulton Street frontages ;

(2) size, height, projection and illumination controls for exterior retail signage, including special controls for Greenwich Street frontages facing the Memorial site;

(3) design standards and configurations for security devices installed in streets, sidewalks or other open spaces to ensure, to the maximum extent possible consistent with security needs, that such devices are integrated with streetscape elements and do not impede pedestrian flow; and

(4) maximum slope , elevation and other grade controls for streets and sidewalks, in order to provide an appropriate streetscape transition between level changes and protection of view corridors.

The above shall be clearly and separately identified in the design guidelines document and its table of contents.