



The City of New York

# **Manhattan Community Board 1**

Catherine McVay Hughes CHAIRPERSON | Noah Pfefferblit DISTRICT MANAGER

**The City of New York Police Department**

**World Trade Center Campus Security Plan**

**Draft Environmental Impact Statement**

**Testimony by**

**Catherine McVay Hughes, Chairperson**

**Manhattan Community Board 1**

**Tuesday, April 23, 2013**

**Specter Hall, 22 Reade Street, New York, NY**

**4:00pm**

Good afternoon. I am Catherine McVay Hughes, Chairperson of Community Board 1. Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) of the New York City Police Department (NYPD) World Trade Center Campus Security Plan.

In light of the attacks that occurred in 1993 and 2001, we certainly understand the need to control vehicular access to and within the WTC Site through the creation of a secure perimeter. CB1 is sensitive to the need for vehicular, pedestrian and building safety and security at the World Trade Center Site and supports a comprehensive security plan for the area surrounding it.

Community Board 1 is dismayed by how little time we were given to review the Draft Environmental Impact Statement. On April 1<sup>st</sup>, we received the final scope of work. Ten days later we received the Draft Environmental Impact Statement. We feel that we were given insufficient time to properly review both the final scope of work and the Draft Environmental Impact Statement.

In March 2012, Community Board 1 testified at the scoping session for the Draft Environmental Impact Statement and urged the NYPD to consider nineteen specific concerns in preparation of the DEIS. We commend the NYPD on the thorough investigation of potential environmental impacts documented in the DEIS. We are particularly pleased that the decision was made to dedicate three lanes to general traffic on Church Street as opposed to the original two as well as the fact that Dey Street will remain a westbound street as opposed to changing it to an eastbound lane, which would have created navigational problems for delivery trucks. However, Community Board 1 still has several major concerns:

1. Potential future storms and flooding – The DEIS is absent of any information regarding the World Trade Center Campus in regards to potential future storms and flooding. The World Trade Center campus overlaps with the current FEMA flood zones and CB1 requests that more research be done regarding how security infrastructure will be affected

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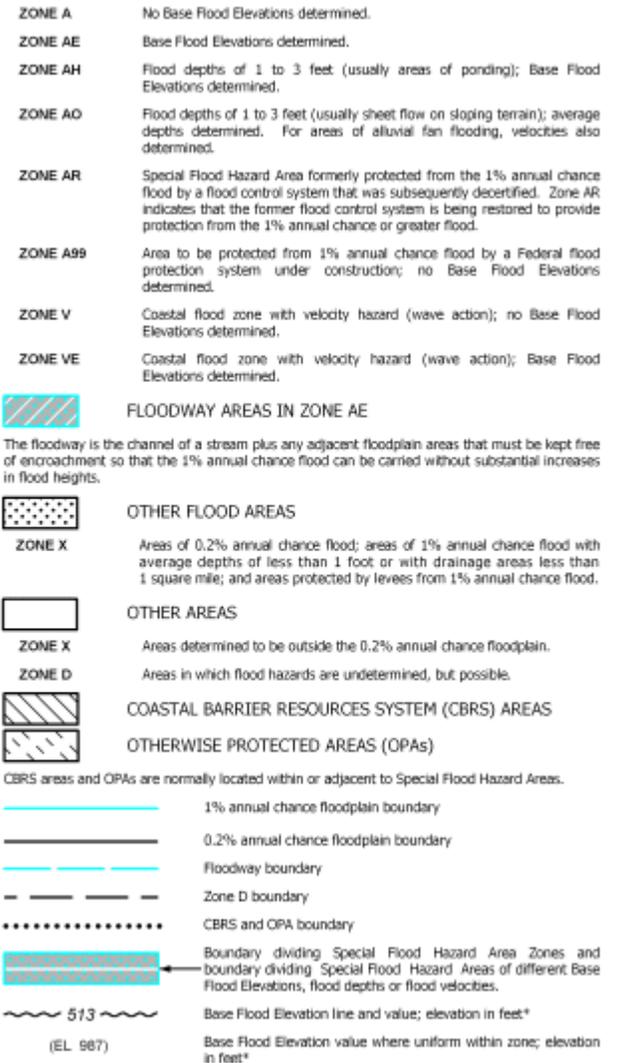
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by potential future storms, flooding and any subsequent power outages and/or loss of cellular or landline phone and data services.

2. Air Quality at and surrounding the World Trade Center Campus – We request that more research be done on the air quality at and surrounding the World Trade Center Campus. While the DEIS explores the effects of certain air quality components, key factors are left unexplored. For instance, “an analysis of potential local impacts on NO<sub>2</sub> concentrations was not warranted” due to the fact that the Proposed Action would not involve the addition of any new stationary emission sources, although there will be mobile emission sources due to vehicular traffic such as up to 450 car service vehicles daily on Greenwich Street. Other sources such as the New York City Air Quality Survey report that Lower Manhattan has one of the highest concentrations of NO<sub>2</sub> in New York City. The American Lung Association State of the Air 2012 report gave our area a “D” for ozone and a “C” for particulate air pollution for 24-hour. The Lower Manhattan Construction Command Center currently has air monitoring stations at four locations; we request that the use of these stations be extended during the implementation phase.
3. Greenmarket currently located on the east side of West Broadway between Barclay Street and Park Place – The DEIS states that the Greenmarket will relocate to “a more prominent location” when the World Trade Center Site begins to reopen. We request further information about where the Greenmarket will be relocated to and whether or not this wonderful community resource will remain in the Financial District.
4. Construction vehicle access at the World Trade Center Campus during the completion of the Master Plan – Construction is expected to continue at Towers 3 and 2, the WTC Performing Arts Center, and Tower 5, CB1 requests more information regarding where construction vehicles will enter and exit the site and how construction traffic will be managed in a way that does not disrupt the flow of vehicular and pedestrian traffic.

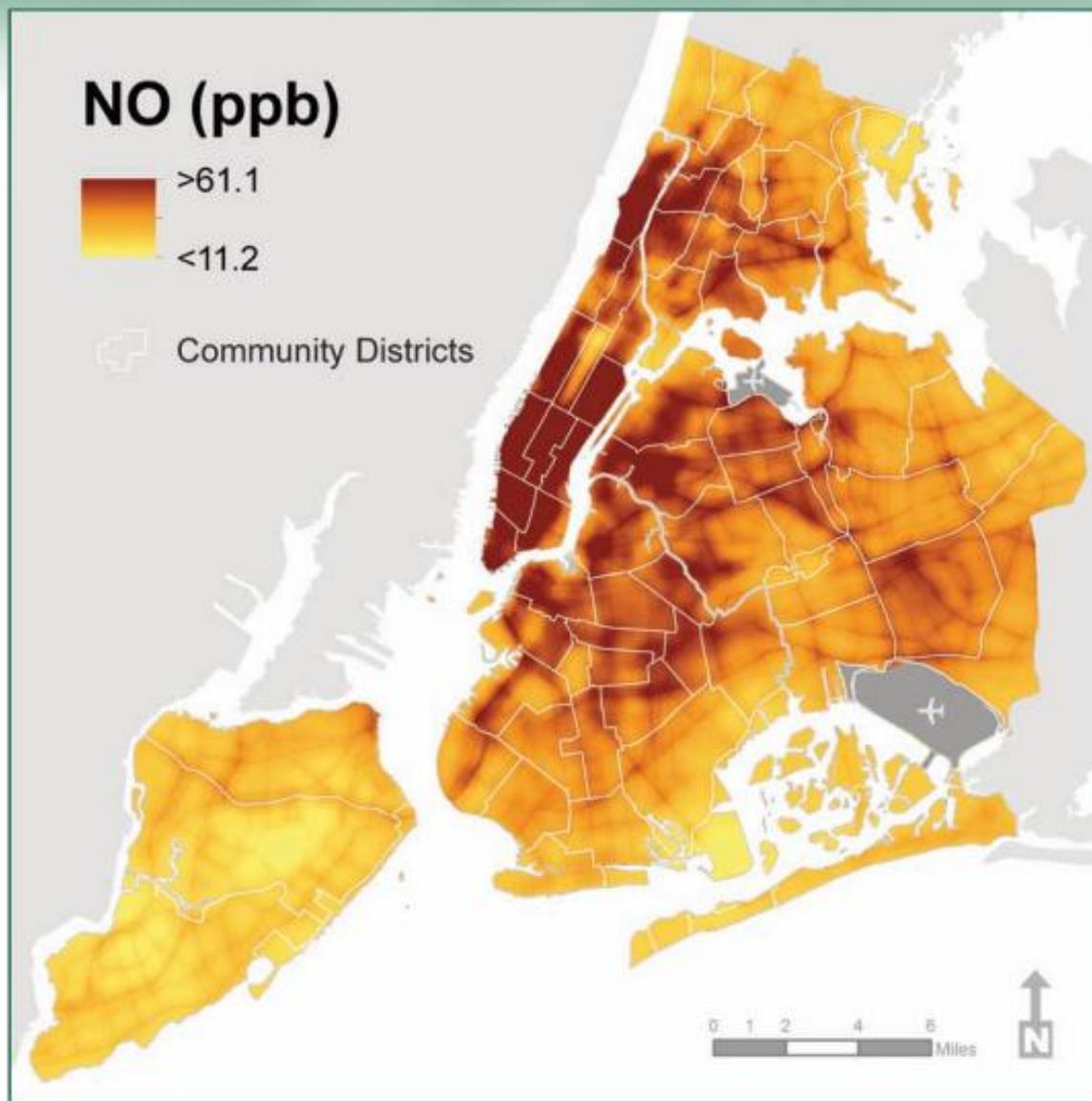
We thank you for your consideration of these points and we urge you to explore these topics more thoroughly. I will be followed by Diana Switaj who will outline our specific concerns regarding buses at the WTC Campus, access for residents, business and cyclists within the WTC campus and potential negative impacts on pedestrians due to security infrastructure.

Thank you for the opportunity to comment today.



Source: Federal Emergency Management Agency

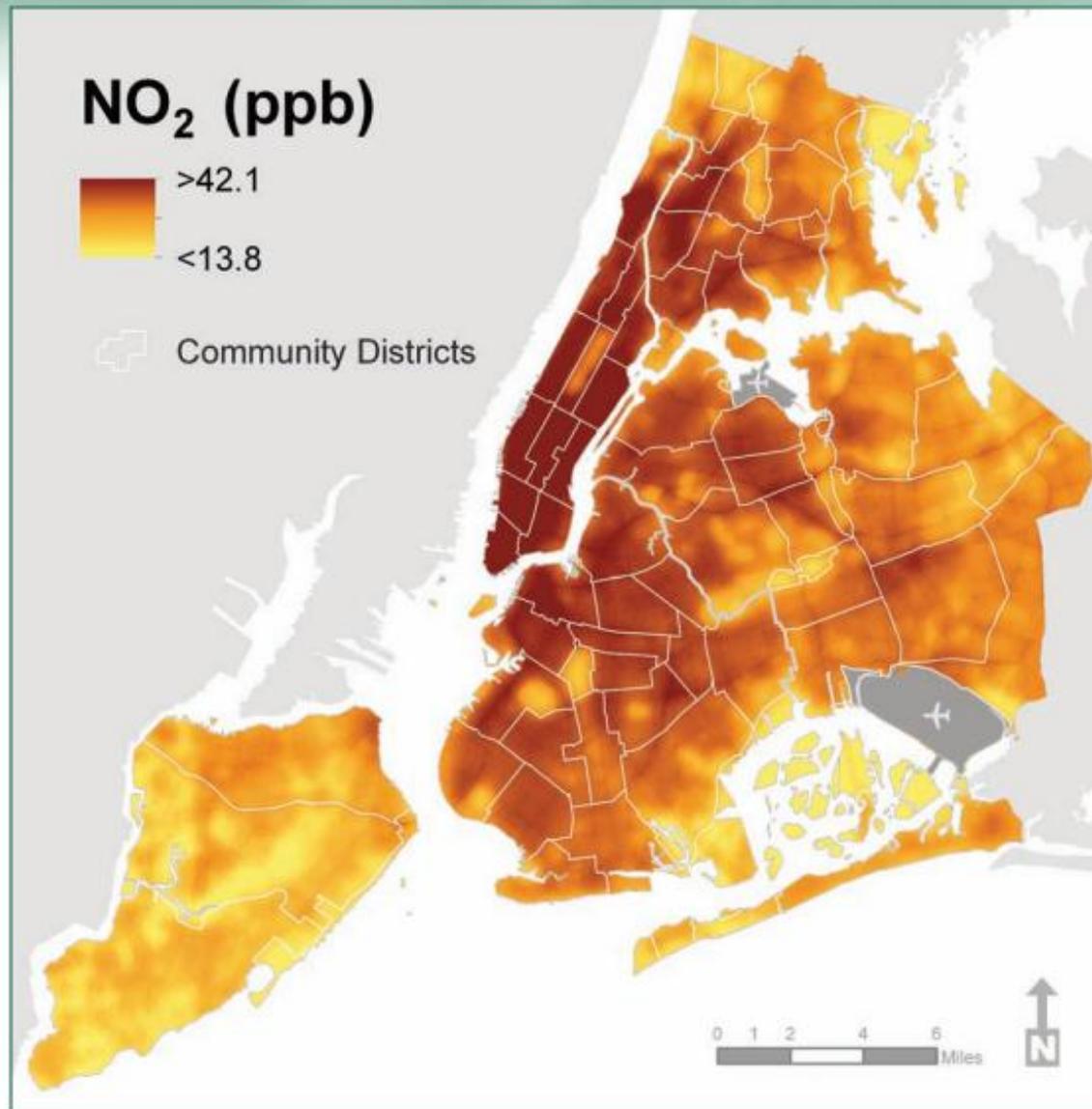
Figure 8. Map of estimated two year average nitric oxide (NO) concentrations, December 2008-December 2010



Nitrogen Oxides (NO<sub>x</sub>) are gases produced by fuel combustion. They include nitric oxide (NO), which is rapidly converted to nitrogen dioxide (NO<sub>2</sub>) after emission from vehicles and other sources. Exposures have been associated with lung irritation, emergency department visits and hospital admissions for respiratory conditions. Nitrogen oxides also contribute to the formation of ozone.

Source: New York City Community Air Survey

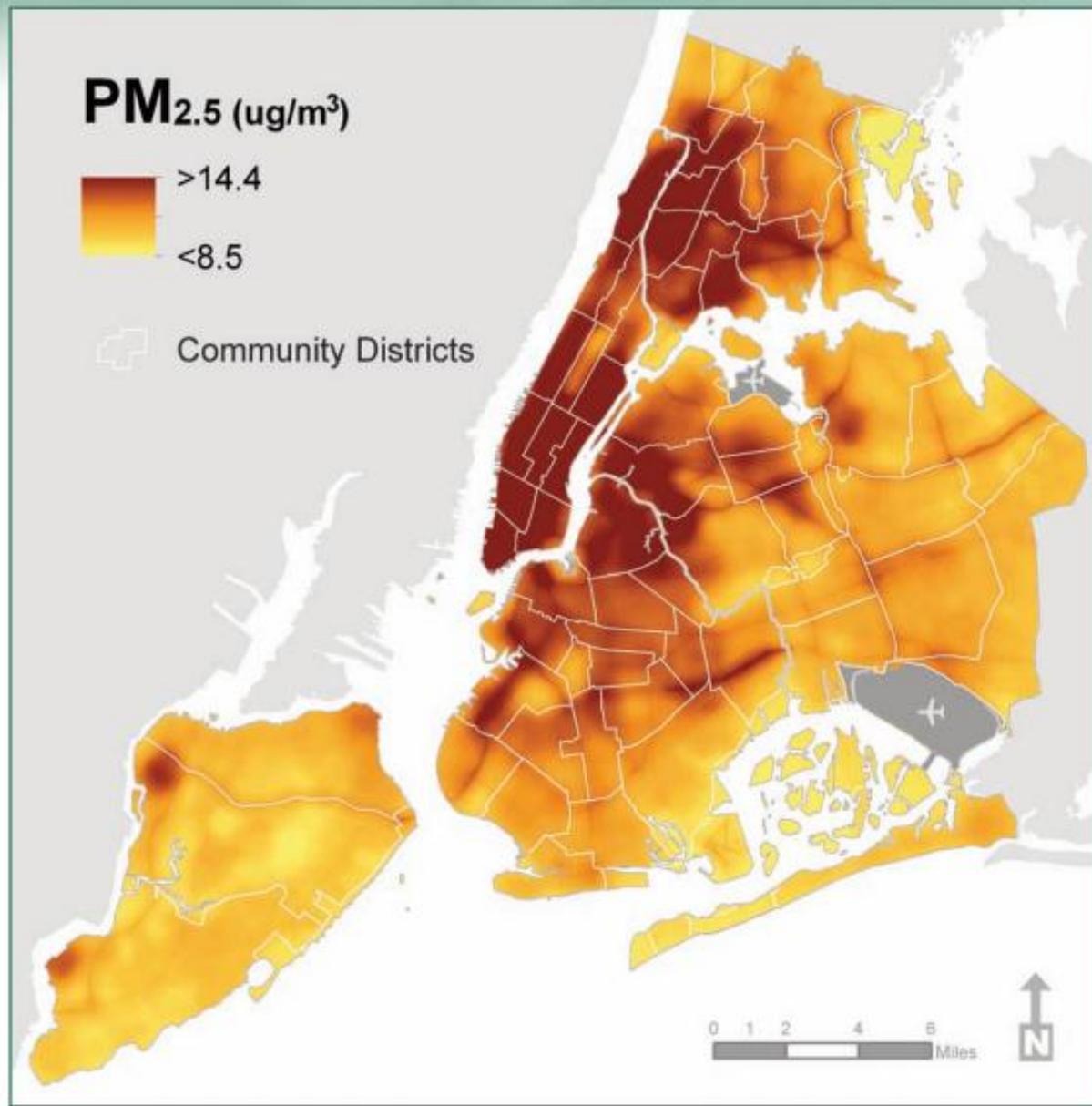
Figure 5. Map of estimated two year average nitrogen dioxide (NO<sub>2</sub>) concentrations, December 2008–December 2010



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Source: New York City Community Air Survey

Figure 2. Map of estimated two year average  $PM_{2.5}$  concentrations, December 2008-December 2010



Fine Particles ( $PM_{2.5}$ ) are small, airborne particles with a diameter of 2.5 micrometers or less.  $PM_{2.5}$  that can penetrate deep into the lungs, causing inflammation of the airways, exacerbating lung and heart disease, increasing hospital admissions and contributing to premature mortality. Sources of  $PM_{2.5}$  include all types of combustion sources; the elemental composition of  $PM_{2.5}$  can vary by source and determine  $PM_{2.5}$  health effects.

Source: New York City Community Air Survey

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**Ozone**



**Particle Pollution 24-hour**



**Particle Pollution Annual**



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