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Environment Heads the List of Trade Center Concerns

By DAVID W. DUNLAP

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t is hard to imagine a 2,000-page document missing anything. But critical comments on the draft environmental impact statement for the World Trade Center rebuilding project generally fault it more for what it does not say than for what it does.

The comments, which were due Monday but kept trickling in yesterday to the Lower Manhattan Development Corporation, urged officials to assess more carefully and comprehensively the cumulative effects of several big projects - the office towers and memorial, the PATH terminal, the Fulton Street Transit Center and the reconstruction of West Street-Route 9A - that have been separated for public review.

They also asked for a more detailed examination of what may be at least a decade's worth of diminished air quality, increased noise and aggravated traffic.

"The failure to consider the cumulative impact on air quality of all related Lower Manhattan construction projects may constitute a segmentation of the project and expose the project to litigation," said a comment from the Civic Alliance to Rebuild Downtown New York, a group of 27 planning, environmental, civic, neighborhood and other groups.

Verizon raised a related concern. That company has an enormous stake in the future of the trade center site because of its central office and switching center at SCOTLAND COMES TO NY
And there's no telling who might show up.

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140 West Street, one block to the north, which was heavily damaged on Sept. 11, 2001.

"While Verizon is supportive of the redevelopment of Lower Manhattan, the most troubling aspect of the proposed construction is the lack of coordination among the respective New York State and New York City agencies," the company said in its comments. "The absence of synchronization with respect to the proposed projects will undoubtedly have severe impacts on Verizon and the residents and businesses of Lower Manhattan."

In its comments, the federal Environmental Protection Agency gave the draft document a rating of EC-2, meaning both that the agency has "environmental concerns" and that the document does not yet contain enough information for a full assessment.

Among other points, the agency asked for further analysis of nitrogen oxide and ozone levels, more

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information on the potential impact of pollutants in storm-water runoff and a discussion of the effect on air quality of buses idling on Greenwich Street.

The city's Environmental Protection Department submitted 12 suggestions and questions, asking where the water in the memorial pools would come from. "If the city is the water source, is there a plan in place to deal with drought emergencies?" wrote Darryl H. Cabbagestalk, the agency's director of project management for New York City projects.

Rather than respond point by point, Kevin M. Rampe, the president of the development corporation, said yesterday: "We've really exhibited all along a willingness to expose our drafts and have a conversation and take in comments and incorporate them in meaningful ways. And we look forward to doing that here." The final document is expected to be submitted next month for a vote by the corporation board.

Noting that there were already plans to establish coordination among the construction projects by various agencies, Mr. Rampe said, "It's critical that we all take into account the cumulative impacts and take steps to mitigate those impacts."

Physically, the bulk of the comments came from Gateway Plaza in Battery Park City, opposing the possible construction of a tunnel under West Street, even though it is not technically part of the development corporation's impact statement. Some 120 tenants signed their names to form letters describing the tunnel project as a "multiyear construction purgatory" that "will be a disaster for downtown residents and workers."

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