

**December 16, 2003**

Goods Delivery and Waste Removal at the WTC Site

RESOLVED by the Voting Member Organizations of the Civic Alliance to Rebuild Downtown New York:

Whereas the Civic Alliance has consistently advocated that the Lower Manhattan Development Corporation and the Port Authority should develop alternatives to the traditional truck-based goods delivery and waste removal systems to serve the WTC site, and;

Whereas the Port Authority has produced a report, dated August 2003, entitled *Goods Delivery and Waste Management Options for the WTC Site* (Staff Report), and;

Whereas the Port Authority staff transmitted the Staff Report to senior management with draft staff recommendations (Staff Recommendations) dated September 15, 2003, and;

Whereas the Civic Alliance has reviewed the Staff Report and the Staff Recommendations and finds them to be inadequate because:

- The Staff Report asserts that goods delivery will generate 1,000 daily trips but does not give the basis for the estimate and does not provide any information on the volume, weight or type of goods delivered. While it describes five categories of deliveries, the Staff Report provides no estimate of the number of each type of delivery.
- The Staff Report does not discuss or quantify the benefits of an off-site sorting and consolidation center. We believe an off-site center would reduce the security risks for the entire WTC site and reduce the acres of underground area required for roads, parking and docking areas.
- The Staff Report catalogs the significant obstacles to the use of the PATH tracks to move goods and waste to and from an off-site sorting and consolidation center, but evaluates the impacts using the worst assumptions, never quantifying positive impacts, ignoring potential mitigating actions and presenting the track use in the worst possible light. We believe the evaluation should first define a conceptual plan for using the PATH tracks based on the optimal scenario designed to produce the least amount of negative impacts and should evaluate both the positive and negative impacts in a realistic way. (See attached list of examples where the report assumes the worst case and asserts negative impacts that may be

mitigated.)

- The Staff Report indicates that the off-site sorting and consolidation center at Heathrow Airport reduced truck traffic by 75%, yet this option is dismissed in the Staff Recommendations as “not feasible at this time because of the additional costs, time, risk of damage, and liability associated with handoff it would entail.” The report contains no information to support this summary dismissal. And,

Whereas the decisions concerning the goods delivery and waste removal system for the WTC is likely to impact environmental justice populations and the Staff Report does not evaluate the environmental justice impacts.

Therefore be it resolved that the Port Authority and the Lower Manhattan Development Corporation conduct further evaluation of the options for goods delivery and waste removal from the WTC site before reaching any conclusions about the design of the area under the WTC site. And,

Be it further resolved that funding be provided by the Port Authority and the Lower Manhattan Development Corporation for outside engineering evaluations with a scope of work developed jointly by the Port Authority and the Lower Manhattan Development Corporation in consultation with participating environmental, environmental justice, civic organizations and NYC Department of Transportation. At a minimum the additional evaluation should address the work outlined in the attached Goods Delivery and Waste Removal Evaluation – Phase 2. And,

Be it further resolved that the analysis include an evaluation of the environmental justice impact of the decision.

## Appendix A

### Goods Delivery and Waste Removal Evaluation – Phase 2

The existing conceptual design for the goods delivery system for the WTC site is 100% dependent on truck-delivery, provides individual docking at each building at the site and an extensive underground system of roads from a large security area to the individual docks, and assumes unregulated and uncoordinated delivery to each building. This complete dependency on trucks for goods delivery and waste removal has a number of environmental, social, economic and security costs. In light of this fact, the Port Authority should develop the best possible proposals for using rail, water, consolidating strategies or other ways to reduce this truck dependency. The following is an outline of an additional evaluation of alternatives for the goods delivery system serving the new development at the WTC site:

- I. Consider the alternatives for the delivery of goods to the site:
  - A. By PATH track – Provide a conceptual design for the optimal use of the PATH system and measure the costs and benefits:
    1. Number of freight trains required to deliver 90% of goods and remove all waste
    2. Conceptual design and approximate cost for specialized cars that could use the PATH tracks and tunnels and are designed for goods delivery and waste removal.
    3. Conceptual design and approximate cost and impacts of creating a center on the west side of the Hudson for sorting and consolidating goods, and a center at the WTC site for receiving goods. Each center would have access to the PATH tracks.
    4. Number of passengers disrupted if tracks are limited to use for freight once per day, twice per day, three times per day (schedule for minimum disruption).
    5. Determine the feasibility of attaching freight cars to the end of passenger trains
    6. By Truck – Consider a system based on truck delivery to the site, but reduce the number of truck trips required:
    7. Conceptual design for, and costs and impacts of, establishing a satellite goods sorting and consolidation center with truck delivery to the WTC site.
    8. Conceptual design for, and impacts of, truck delivery to the WTC site with strict regulation and coordination.
    9. Uncoordinated truck delivery to the site (current conceptual design) – What are the impacts on the local community and other communities affected by the traffic.
- II. Consider the alternatives for distribution of goods at the site:
  - A. Conceptual design for, and cost and impacts of, a central docking with automated delivery to individual buildings at the WTC site.

- B. Decentralized docking at each building at the site (current conceptual design).

In considering each alternative, the evaluation should consider the security implications, the space requirements under the WTC site and alternative uses for saved space.

## Appendix B

Examples of where the report assumes the worst case and asserts negative impacts that may be mitigated.

“Mixed PATH and freight service would have to operate at the speed of slower freight equipment, degrading the capacity and attractiveness of the service.”

“Using PATH to move either goods or waste would nullify that (FRA) waiver (for buff strength requirements), and PATH would have to meet the more stringent conditions of mixed service.”

In discussing the impact on existing passenger service, the Staff Report implies that use of the PATH track for freight movement could shut down the entire system. The Staff Report discusses 67,000 passengers per day and concludes that “loss of service even for one day would create significant disruptions for commuters and add significantly to chronic congestion in Lower Manhattan, the Holland Tunnel and Hudson County commuters...”

In discussing the space required under the WTC site, the Staff Report asserts the operation would “consume considerable space in the sub grade, with possible conflicts with ...other uses on the site. The only available space that is not located in curves or switches would require that the waste transfer platform and the ramping to provide access to it be located under the footprint of Tower 1.”

The Staff Report indicates that the off-site sorting and consolidation center at Heathrow Airport reduced truck traffic by 75%, yet this option is dismissed in the Staff Recommendations as “not feasible at this time because of the additional costs, time, risk of damage, and liability associated with handoff it would entail.” The report contains no information to support this summary dismissal.

This resolution supported by the voting member organizations of the Civic Alliance, which include, as of 12-16-03:

9-11 Coalition of Families

AFG Construction Management, Inc.

American Institute of Architects, New York Chapter

American Planning Association New York Chapter

Asian Americans for Equality (AAFE)

Consortium for Worker's Education

CUNY Institute for Urban Systems

Environmental Advocates of New York

Environmental Defense

Fine Arts Federation of New York

Fiscal Policy Institute

Municipal Art Society

New School University Milano Graduate School

New York Metro American Society of Public Administration (ASPA)

NYPIRG Straphangers Campaign

Permanent Citizens Advisory Committee to the MTA

Pratt Institute Center for Community and Environmental Development

Rebuild Downtown Our Town

Regional Plan Association

ReHo

TIME/ To Improve Municipal Efficiency

University Settlement

Waterfront Park Coalition

Women's City Club of New York