



American Planning Association New York Metro Chapter

May 28, 2002

To the Lower Manhattan Development Corporation,

The APA Metro Chapter's Lower Manhattan Rebuild Task Force has reviewed the proposed LMDC "Public Input Process and Timeline," and some of us were present at your May 23rd Public Hearing to hear first-hand the responses of the public to the Draft Principles and Preliminary Blueprint.

We are pleased that the LMDC has clearly affirmed its intention to assure that an open public process of "continuing consultation" will take place in the next months. Metro APA fully appreciates the LMDC's unique challenge of integrating meaningful public participation into an accelerated and unprecedented planning process. The creation of seven special interest Advisory Councils has been a good first step in this process. We also commend LMDC for its public listening sessions and hearings, such as the planned "Listening to the City II" forum in mid-July.

As planners, we are well aware that there are many different kinds of planning challenges confronting the Lower Manhattan rebuilding effort. Urgent transportation infrastructure decisions, such as the need to rebuild the PATH and the #1,9 lines, for example, already have a broad consensus behind them and can proceed on a different schedule than issues like the memorial, which will engage very different sensitivities and constituencies. Metro APA is committed to comprehensive planning with both short and long-term strategies which will result in the World Trade Center site emerging as the centerpiece of a revitalized, resurgent Lower Manhattan. And we believe that public participation is the most effective, credible and timely process to achieve that goal.

We are concerned, therefore, that the announced public process for the site contains significant weaknesses which could ultimately impede the LMDC and its consultants from developing a practical and imaginative plan for the WTC site, and prevent a true consensus for the rebuilding of Lower Manhattan. These flaws are (1) a condensed planning process together with an absence of explicit mechanisms for responding to public input; and (2) a weak official role for New York City government participation and approval.

A condensed process versus the need for feedback and review

May we suggest to you an iterative planning process where, in response to meaningful comments and concerns of the public and other interested parties, alternative plans are modified or rejected, new approaches explored, and new alternatives presented to participants. We believe that the announced review process and the limited opportunity for thoughtful analysis and discussion may result in the public being heard at meetings but not included in deliberation and decision-making.

We are sure that this is not what LMDC intends, and we therefore urge you to revise the timeline to insert a series of follow-up meetings between your Advisory Councils' review and the public release of the planning options. These meetings (perhaps three for each group, but at least two), allowing for incorporating feedback into the plans, should lead to ratification of and buy-in for your planning concepts and alternatives. You may also find the General Advisory Council, with members from each, a useful body to make a final recommendation endorsing the selected alternative.

In addition to an iterative planning process, we suggest that decision-making be prioritized. For example, land use, density and open space decisions should precede major infrastructure decisions, which in turn will inform street, block and lot decisions. Once these priorities are understood, educating the appropriate stakeholders to the relevant

technical, design, social and economic challenges becomes a more manageable effort. And public participation can then be appropriately channeled to the issues which need to be resolved most immediately in order to build a foundation for other decisions to follow. LMDC and its consultants will have the benefit of timely, focused feedback.

The limited participation of New York City and the municipal general interest

We are deeply concerned with the limited role your proposed input process gives to the City of New York, which does embody the expression of the general municipal interest. This includes both the Department of City Planning and the City Planning Commission, which are never mentioned in the process as either participants or technical advisors, nor are they given any review or approval role. We are well aware of the complicated governmental relationships and responsibilities embodied in the World Trade Center site. Nevertheless, as planning professionals, we must remark upon this omission. The City's planning function can not be simply ignored as if this area were not an integral part of the City's urban fabric, transportation network, and economy.

Even more troubling is the lack of an official approval role for the City's municipal government. The only governmental entity that is mentioned in the "Public Input Process" is the State Senate Majority Task Force on WTC Recovery. This only represents one political party in one of the houses of the State legislature. Further, the City government has an important financial interest in the allocation and dispersal of all funds dedicated to the rebuilding of Lower Manhattan and cannot leave this function solely to the State Senate's majority. There is also a conspicuous absence of a number of city government entities, including all the community boards in Lower Manhattan, the Borough President and the City Council.

Whatever plans are selected for the development of Lower Manhattan, the support of all levels of our elected representation is essential. As planners we have seen that attempts to short-circuit the development process in its early phases invariably end up in a contentious, often acrimonious, and delayed implementation. Building a true consensus from the beginning will ultimately be more cost-effective for LMDC.

APA Metro Chapter stands ready to provide its pro bono professional assistance to the LMDC in refining the proposed "Public Input Process and Timeline." We are happy to meet with you or members of your staff to discuss our concerns in more detail and to suggest other techniques for strengthening your ambitious document.

Sincerely,

Bonnie Harken, Ethel Sheffer
Co-Chairs of the APA Metro Chapter
Lower Manhattan Rebuild Task Force