

**Carter Ledyard & Milburn LLP
Memorandum**

**World Trade Center Memorial and Redevelopment Plan
Summary Schedule of Environmental, Historic and Regulatory Reviews**

This schedule was designed to assure compliance with:

- (1) National Environmental Policy Act (“NEPA”);
- (2) National Historic Preservation Act (“NHPA”);
- (3) New York State Environmental Quality Review Act (“SEQRA”);
- (4) New York State Urban Development Corporation Act (“UDC Act”);
- (5) New York State Historic Preservation Act (“SHPA”);
- (6) New York State Eminent Domain Procedure Law (“EDPL”); and
- (7) other applicable laws

by Lower Manhattan Development Corporation, as lead agency (“LMDC”), the U.S. Department of Housing and Urban Development and other cooperating or involved agencies in connection with the review and approval of the World Trade Center Memorial and Redevelopment Plan, including preparation of a Generic Environmental Impact Statement (“GEIS”) under both NEPA and SEQRA and a Programmatic Agreement under NHPA.

DATE	ACTIONS
<u>Scoping Period</u> May 2003	Circulate among Governmental Entities: (1) Proposed MOU (NEPA) (2) Proposed Lead Agency Letter (SEQRA) (3) Part I of Environmental Assessment Form (“EAF”)
June 2003	- Lead Agency Declaration - NEPA Determination of Potentially Significant Impact & SEQRA Positive Declaration - Draft Scope for GEIS
July 2003	- Public Meeting on Draft Scope
September 2003	- Approve Final Scope for GEIS - Approve General Project Plan (“GPP”) under UDC Act
<u>Environmental Impact Statement Review</u> September-December 2003	- LMDC and consultants prepare Draft GEIS (“DGEIS”) - In consultation with SHPO, identify historic properties and evaluate their historic significance under NHPA - Commence NHPA Section 106 process with federal agencies - In consultation with SHPO and cooperating agencies, identify and invite other parties entitled to participate as consulting parties - Letter to ACHP under NHPA regarding coordinated review - Commence acquisition of street access rights and adjacent sites (appraisals, offers, negotiations and documentation)
January 2004	- Meeting of consulting parties (including SHPO) regarding historic properties affected by the undertaking - LMDC, as lead agency, approves DGEIS for public review - Notice for early public review of proposal in the 100-year floodplain

February 2004	<ul style="list-style-type: none"> - Consultation with SHPO and Section 106 consulting parties to identify historic properties and adverse effect to historic properties - Distribute coordinated determination of National Register Eligibility for WTC Site - Proposed Finding of No Adverse Effect Under Section 106 of NHPA - Public Hearings on DGEIS & GPP - Consultation meeting with SHPO and Section 106 consulting parties with respect to Proposed Finding of No Adverse Effect under NHPA
March 2004	<ul style="list-style-type: none"> - LMDC and consultants respond to comments on DGEIS and prepare Final GEIS (“FGEIS”) - LMDC distributes Draft Programmatic Agreement under NHPA - Coordinated Determination of National Register Eligibility for WTC Site
April 2004	<ul style="list-style-type: none"> - LMDC, as lead agency, approves FGEIS and notices public comment period - Execute Programmatic Agreement under NHPA - Issue Draft Conformity Determination under Clean Air Act
May 2004	<ul style="list-style-type: none"> - Notice of Intent to Request Release of Funds - Public Hearing on Condemnation
<u>Project Approval</u> June 2004	<ul style="list-style-type: none"> - Adopt NEPA/SEQRA ROD and Findings Statement - Affirm GPP Findings and GPP, as modified, and override NYC Zoning - Adopt Determination and Findings pursuant to UDC Act and EDPL - Final Conformity Determination

Questions concerning this memorandum should be directed to Stephen L. Kass at Carter Ledyard & Milburn LLP, 2 Wall Street, New York, NY 10005, Tel: (212) 238-8801; Email: kass@clm.com.