Regional Plan Association NJ CT NY

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March 20, 2008

Mr. Michael P. Anderson
NYSDOT
Tappan Zee Bridge / I-287 Corridor Project Director
660 White Plains Road, Suite 340
Tarrytown, NY 10591

Subject: Comments on the Scoping Document Regarding the Tappan Zee / I-287 Corridor

Dear Mr. Anderson:

This letter provides Regional Plan Association's comments on the Scoping Document.

<u>Purpose and Need Goals and Objectives</u>
For the second goal related to accommodating demand a distinction should be made between creating the capacity to accommodate the demand and the use of that capacity. It is possible to build transit capacity that would not be used because the system is either not attractive enough to encourage people to use it or it does not serve the markets where the demand is. The objective as stated could be met by building an oversized alternative that would be well underused. Accordingly, the objective should be restated as "maximize the *use* of the capacity constructed to serve the travel demand." 01

<u>Coordination Plan</u>
The coordination plan is silent on how the steps outlined in Table 3.1 will involve the public from March through May when the decision on the highway bridge portion and the Tier 1 decision on transit will be made. The "public" is mentioned for comments on the scoping document in February and then again not until June when the DEIS is to be circulated. The implication is that the public will be handed a decision with no chance to comment on a wide range of matters *before* the decisions are made. These include input variables and parameters to the models, demand estimates, cost estimates, how criteria in the scoping document are used to make a decision, other decision-making criteria, etc. 02

In short, no plan is set forth as to how the Stakeholder Groups, the Bi-county Task Force, elected and appointed officials and other interested parties will be informed about this information early enough in the process to have input in the decision making process. It is insufficient to provide this information at the time the decision is announced, which appears to be the intent of the Coordination Plan as now written, and then allow the DEIS process to take its course.

This issue is of particular concern because of the Tier 1 and 2 decision process recently established. A transit alternative could be set in stone early to achieve progress on the bridge design, but without sufficient public input about the transit options that could alter the transit decision. If that 02 transpires then the intended progress on the bridge could be delayed, contrary to the objective of the Tier 1 and 2 decision's intent.

Evaluation Criteria

RPA has submitted material on the subject earlier, some of which has been incorporated into the current set of criteria, including auto diversions and VMT estimates. The current set of evaluation criteria is an improvement over early versions. However, a number of changes are still needed. They are:

1. In accordance with the comments on the goals and objectives above the evaluation criteria under the heading of Capacity Criteria, the number of seats provided by an alternative, is flawed. As now stated, it emphasizes the maximum that could be provided independent of whether there is demand for it. For example, the number of peak hour seats that could theoretically be provided by the commuter rail option might approximate 20 trains per hour with 10-car trains with 1,000 seats or 20,000. Similarly, the busway alternative could theoretically provide for close to 35,000 seats per hour given the experience of the Lincoln Tunnel Exclusive Bus Lane where 700 buses per peak hour offers 49 seats each. In either case the number of seats offered is irrelevant if they are never used, even under the most optimistic demand assumptions.

2. While the set of criteria includes travel benefits, capital costs, and operating costs separately, there is no attempt to include criteria that combine them in some way. The recently added criteria of cost 03 per rider and cost per passenger mile are improvements, but without comparing cost to benefit, it is difficult if not impossible to estimate the *value* of an alternative. While there is serious argument as to whether the current FTA cost-effectiveness index is the appropriate way to combine these measures, it is important to use some criterion that measures value. Moreover, it will begin to give an indication if there is any chance that federal funding is a realistic possibility. We suggest that one or more such criteria be included.

3. The calculation of trip benefits using only 22 trip pairs will not allow you to estimate the total benefits of each alternative and makes it impossible to measure the cost per travel benefit described in # 2 above. With using only a sample of trip pairs not only do you lose the ability to make such calculations you do not calculate the information you will ultimately need in the FTA "new starts" process. It also leaves you open, however unfairly that might be, to the accusation that the pairs were chosen with an outcome in mind.

4. The assumed date for all the costs should be explicitly stated, as should any assumption made about inflation factors.

We would appreciate an early response to these comments. Thank you for the opportunity to provide input for this important project.

Sincerely,

Robert D. Yaro

Robert D. Yaro
President