

**TZB-188E**

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In accordance with the National Environmental Policy Act (NEPA) and Section 6002 of the Safe Accountable Flexible Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), the New York State Department of Transportation (NYSDOT) has requested public comments on the revised scope, as well as the Purpose and Need Statement for the Tappan Zee Bridge/I-287 Corridor Project.

Scenic Hudson has been a leading voice in regional environmental and land use issues for nearly 45 years. Our 22,000 members have a keen interest in how transportation improvements affect land use and, subsequently, our environment. Thus, Scenic Hudson is writing to submit comments on this important project that will shape transportation choices, land use patterns, as well as impact environmental quality across the corridor and beyond literally for decades to come. It is important that sound planning principles be applied in this scoping document.

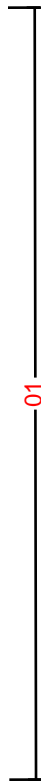
According to the project's scoping update packet, the Purpose and Need of a project “tells the story of the transportation problem so that appropriate actions can be proposed and evaluated as to how they address that problem.”

**The Story of I-287 Corridor-wide Transportation Problems**

The Tappan Zee Bridge/I-287 Corridor infrastructure improvements under consideration in this environmental review strive to address transportation problems that were in large part a result of the “Transportation/Land Use Cycle” triggered by the construction of the Tappan Zee Bridge, New York State Thruway, Palisades Interstate Parkway and, later, the I-287 connection (in New Jersey).

We must only look back to the 1950s and the last round of major transportation enhancements in what is now the I-287 corridor across Rockland and Westchester Counties to understand the direct and undeniable impact that transportation projects-- particularly the opening of the Tappan Zee Bridge and New York State Thruway (1955) and Palisades Interstate Parkway (1958)—have had on land use, particularly in Rockland County.

In 1950, before there was a Tappan Zee Bridge or I-287 corridor, Rockland was characterized as semi-rural countryside with compact villages and hamlets separated by forest, meadow, and farms. Rockland County's population numbered less than 90,000 (89,300). Upon completion of the Tappan Zee Bridge, Thruway and Palisades Parkway, the population skyrocketed to 136,800 in 1960, nearly 230,000 (229,900) in 1970 and to 286,753 in 2002.



As the population more than tripled, suburban subdivisions sprouted across Rockland and the number of farms and acreage of land in agricultural production declined precipitously. In 1950, over 400 (408) farms kept 17,376 acres in production. By 1969, the number of farms dropped to 50 with slightly over 4,000 (4,022) acres in farmland. In 2000, the number of farms had been reduced to 25 and acres in production numbered just 600 (New York Agricultural Statistics Service, [www.nass.usda.gov/ny](http://www.nass.usda.gov/ny)).

As the decades passed, traffic generated by the newly constructed homes and stores clogged regional and local roads. Ironically, the road improvements and subsequent increases in highway capacity (construction of new lanes) intending to provide access and relieve congestion served to make driving a more attractive choice and unwittingly unleashed an environmentally destructive land use transportation cycle which resulted in new development and associated roadway congestion at unprecedented levels. This traffic, enabled by the original construction of the Tappan Zee Bridge, New York State Thruway, and Palisades Interstate Parkway that the Tappan Zee Bridge/I-287 Corridor Project, is what this environmental review hopes to address.

Over the later part of the 20th century we have, in effect, painted ourselves into a corner by choosing to improve mobility by increasing highway capacity without a coordinated approach to land use planning. This has resulted in an auto-dependent pattern of suburban sprawl. This decentralized land use pattern has also undermined the viability of transit because population density in residential areas and locations of commercial/employment centers (e.g. trip origins and destinations) combine to preclude the collection and delivery of a critical mass of riders in a cost effective manner.

In 1999 the State of New York announced that plans to rehabilitate or replace the Tappan Zee Bridge and provide a modern transit system across the I-287 corridor to improve mobility. Upon receiving this news, Scenic Hudson was heartened to hear that the old paradigm (increase highway capacity) had been replaced with a multi-modal solution and we publicly praised the agencies. However, we have consistently advised in stakeholder meetings that land use planning that resulted in compact, mixed-use development around transit nodes was needed to “shortcircuit” the land use transportation cycle and preserve the newly provided highway capacity.

Thus, this project stands at an important crossroads. If the transit mode will rely primarily on riders arriving by car through the provision of park and ride lots, we will not have learned our lessons through past mistakes. Vehicle Miles Traveled (VMT) will continue to disproportionately rise and decentralized, auto-oriented, suburban sprawl will continue, in Rockland and Westchester County, but particularly in Orange County, west of the project limits. Alternately, if the transit mode is well supported by transit villages (transit-oriented development, or TOD) at strategic locations throughout the corridor, a more balanced approach to accessing transit would result. This could be accomplished by close coordination between the lead agency and municipal government, including the provision of funding for land use planning for TOD at appropriate locations. While the traditional costs (NEPA review, engineering, financing, construction, maintenance) of this project

are undeniably expensive, a small investment in land use planning is over time likely to yield big dividends as the project's capacity is preserved and transit ridership increased.

Scenic Hudson understands that New York's "Tradition of Home Rule" requires that land use decisions are made at the local level and that transportation agencies are not in the land use business. Nevertheless, planners and engineers have recognized the relationship between land use and transportation. Municipal government and planning boards are making zoning and planning decisions that preserve highway capacity. Likewise, transportation agencies must ensure that their decisions do not result in unwanted sprawl that increases dependence on the automobile, degrades air quality through tailpipe emissions, exacerbates non-point stormwater pollution by increased impervious surfaces, and loss of farmland and open space.

This model is not without precedent as New Jersey Department of Transportation (NJDOT) and NJ TRANSIT spearhead a multi-agency Smart Growth partnership known as the Transit Village Initiative. This initiative intends to achieve several goals:

- 1) Help to redevelop and revitalize communities around transit facilities to make them an appealing choice for people to live, work and play, thereby reducing reliance on the automobile;
- 2) Reduce traffic congestion;
- 3) Improve air quality by increasing transit riders; and
- 4) Bring more housing, more businesses and more people into communities with transit.

Since the establishment of NJ Transit and NJDOT's Transit Village Program in 1999, 19 municipalities have become designated "Transit Villages. To gain this designation, municipalities must demonstrate a commitment to revitalizing and redeveloping the area around transit into a compact, mixed-use neighborhood with a strong residential component. Once designated, the localities benefit from technical support and priority funding from state agencies and the ability to apply for grants from the \$3 million a year NJDOT sets aside to promote TOD.

A recent New York Times (Transit Villages Come to Life, February 24, 2008) article highlighted how New Jersey's intensive efforts to promote TOD have led to dramatic neighborhood revitalizations in Hoboken, Jersey City, Cranford, and New Brunswick. (Mobilizing the Region, March 4, 2008, Tri-State Transportation Campaign).

NJ TRANSIT cites studies that have shown that an increase in residential housing options within ¼ to ½ -mile walking distance of a transit facility does more to increase transit ridership than any other type of development. Thus, the Transit Village Initiative is intended to bring more housing, more businesses and more people into communities with transit facilities.

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Likewise, here in New York, the Metropolitan Transit Authority (MTA) Metro-North Railroad, a co-lead agency in this process, has recognized that, as a transit provider, the construction of new mixed-use transit villages in close proximity to its stations provides many benefits. Thus, the MTA is pursuing specific TOD projects at a variety of stations in Long Island, Westchester County and Beacon. In Beacon, the MTA has recently issued a "Request for Expression of Interest" to developers to create a landmark TOD to serve as a catalyst for development around Beacon Station.

Our intent in submitting these comments is to ensure that the contemplated transportation improvements will ensure that this new, multi-modal paradigm will provide long-term benefits and a transportation system that breaks the land use/transportation cycle that created these problems.

### The Purpose and Need of This Project

#### Specific Comments

Following are specific comments relative to the Scope and Purpose and Need Statement that we hope you'll incorporate into the draft. If so, Scenic Hudson believes that the resulting project will more likely protect the public's investment in this transportation infrastructure and provide the region a more sustainable land use and transportation future.

1) Section 3, Purpose and Need Comment Process (page 13)

The Purpose and Need of this project should be revised to clearly tell the story of the transportation problem as we have described above.

Scenic Hudson urges the NYSDOT to make abundantly clear in the Purpose and Need Statement that, in addition to the obvious purpose and need of this project—provide a river crossing, preserve its integrity, improve highway and transit safety, mobility, capacity—the preferred alternative must not result in sprawling land use patterns that prematurely consume the highway capacity provided by this project. Since the unintended consequences of the aging bridge and now-congested highway have in large caused mobility problems that have resulted in the need for this project, we must learn from the story of these past transportation improvements in order to provide a solution that minimizes environmental impacts and does not undermine the public's investment in this infrastructure. In fact, in a time when financial resources are becoming increasingly scarce, it is more important than ever to ensure that this multi-billion dollar project yields land use that supports the transit component of the system. This simply makes good sense.

Ignoring these realities would constitute a breach of public trust, a waste of scarce financial resources, and do irreparable harm to the environment and community character.

We recommend that a second paragraph be added to Section 3.1 that describes the purpose and need in the context of the Tappan Zee Bridge/I-287 Corridor Project. Language for his paragraph

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should be borrowed from the section above, “The Story of I-287 Corridor-wide Transportation Problems.”

2) Section 3.2, Goals and Objectives (page 13)

- Add under *The following needs have been identified in the Corridor* a fifth bullet that acknowledges that transportation improvements can affect land use and the desired effect in this case is to encourage compact land use in strategic centers. We suggest that the bullet should read “Through coordination with municipal government, provide corridor wide system improvements that direct land use to compact nodes of mixed use development at existing or strategically planned transit villages (TOO).”
- Add under *Maximize the flexibility and adaptability of new transportation infrastructure to accommodate changing long-term demand* a third bullet that says “Maximize transit's effectiveness by providing the framework for transit-oriented development at appropriate locations.”
- Often, the value added by highway capacity is all too often quickly eroded through induced development and associated increased in VMT. Therefore, add under the heading *Maintain and preserve vital elements of the transportation infrastructure* a second bullet that says “Preserve system capacity and ensure the long-term viability of transit by providing funding, coordination, and assistance to local government land use planning.”

3) Section 3.2 Goals and Objectives (page 14)

- Add under *Avoid, minimize and or mitigate any significant adverse environmental impacts caused by feasible and prudent corridor improvements* a third bullet that says "Minimize impacts to the Hudson River estuary through alternative selection, project design and mitigation."
- Add under *Avoid, minimize and or mitigate any significant adverse environmental impacts caused by feasible and prudent corridor improvements* a fourth bullet that says “Minimize growth inducing impacts that would otherwise result in decentralized sprawl development that increases dependence on the automobile, degrades air quality through tailpipe emissions, exacerbates non-point stormwater pollution by increased impervious surfaces, and loss of farmland and open space.”

4) Section 6, Assessment Methodologies (page 22)

To the last bullet *Indirect (Secondary) and Cumulative impacts* add “including growth inducing impacts to land use.”

5) Section 6.3.1 Land Use and Zoning (page 25)

In recognition that alternatives with a large park and ride at the project's western terminus in Hillburn is likely to attract drivers from--and induce development in--Orange County,

and text indicating that growth inducing land use impacts in Orange County will be mitigated.

6) Section 6.5, Indirect (Secondary) and Cumulative Impacts (page 27)  
This section indicates that the discussion will include “major land use patterns and trends, centers of economic activity, ...” This should be expanded to include a discussion of the historic background as to how the construction of the Tappan Zee Bridge, New York State Thruway, I-287 and Palisades Interstate Parkway induced growth in Rockland County between 1955 and 2000.

7) Appendix A, Section 1.2 Project Overview, (page 39)  
In the second paragraph starting *Many of these counties have seen rapid urbanization over past several decades*, change “urbanization” to “suburbanization characterized by sprawling land use patterns that have reinforced dependence on the single occupancy vehicle and made provision of transit more difficult.”

Also, indicate that that previous transportation projects, such as the construction of the Tappan Zee Bridge, New York State Thruway, I-287, and Palisades Interstate Parkway greatly enabled the suburban sprawl that has generated the traffic that the present project is attempting to address.

This section should also state that since only two percent of the commuters presently cross the Tappan Zee Bridge by transit, it is imperative that the project's transit system will increase ridership. We suggest setting an aggressive target of ten percent or more increase in transit ridership.

Transit's capacity is less vulnerable to highway capacity to growth induced impacts. Therefore, the project must provide municipal government the ability to ensure that new development be directed to places that are accessible to transit-particularly by walking and bicycling.

8) Appendix A, Section 2.3, Provide a River Crossing that has Structural integrity, Meets Current Design Criteria and Standards and Accommodates Transit (page 44)  
At the end of the second paragraph add “and air quality impacts from idling vehicles” (to the sentence that reads *In turn these can become major problems in terms of safety and traffic flow*).

9) Appendix A, Section 2.4 Improve Highway, Safety, Mobility, Capacity Throughout the Corridor (page 44-47)  
Neither Tables I-1 (page 45) nor 1-2 (page 47) includes entries for Exit 10 to Port Chester. These should be added.

10) Appendix A, Figure 1-4 (page 48)  
Figure 1-4 indicates that in “AM eastbound, No Build 2025” the level of service (LOS) on I-287 between Exit 9 and Port Chester at the eastern end of the project will actually

improve from LOS D to LOS C. This is counterintuitive. Is this an oversight? Or is there a reason that without the project, traffic congestion is expected to improve over the next 15 years?

11) Appendix A, Section 2, Purpose and Need (page 50)

Add Section 2.6: “Through coordination with municipal government, provide corridor wide

system improvements that direct land use to compact nodes of mixed use development at existing or strategically planned transit villages (TOD).”

This section should elaborate on the bullet we suggested under Section 3.2 (page 13). A full explanation of the causal effect previous transportation projects (Tappan Zee Bridge, New York State Thruway, Palisades Interstate Parkway, and I-287) have had on land use, particularly autodependent suburban sprawl that has increased VMT and made difficult the provision of efficient transit service.

This section should discuss the need for a planning assistance program for local government to achieve TOD near proposed transit stations, such as the NJ TRANSIT “Transit Village Initiative.”

Further, this section should discuss the need for mitigation to reduce the growth inducing land use impacts in Orange County, as well as increases in traffic on the New York State Thruway (I-87) and associated local roads in the corridor between Suffern and Newburgh.

12) Appendix A, Section 3.0, Goals and Objectives (page 51)

Add under *Maximize the flexibility and adaptability of new transportation infrastructure to accommodate changing long-term demand* a third bullet that reads “Maximize transit's effectiveness by providing the framework for transit-oriented development at appropriate locations.”

13) Appendix A, Section 3.0, Goals and Objectives (page 51)

Add under *Maximize the flexibility and adaptability of new transportation infrastructure to accommodate changing long-term demand* a fourth bullet that reads “Preserve highway and transit system capacity by providing funding and assistance to municipalities for land use planning processes that result in transit oriented development at strategic locations throughout the corridor.”

14) Appendix A, Section 3.0, Goals and Objectives (page 51)

Add under *Avoid, minimize and or mitigate any significant adverse environmental impacts caused by feasible and prudent corridor improvements* a third bullet that says “Minimize impacts to the Hudson River estuary through alternative selection, project design and mitigation.”

15) Appendix A, Section 3.0, Goals and Objectives (page 51)

Add under *Avoid, minimize and or mitigate any significant adverse environmental impacts caused by feasible and prudent corridor improvements* a fourth bullet that says

“Minimize growth inducing impacts that would otherwise result in decentralized, sprawl development that increases dependence on the automobile, degrades air quality through tailpipe emissions, exacerbates nonpoint stormwater pollution by increased impervious surfaces, and loss of farmland and open space.”

16) Appendix A, Table 1-3, left column, "Purpose and Need" (page 52)

- Add third bullet to the first box (opposite *Improve the mobility of people, goods and services...* ) that reads Ensure long-term transit feasibility through planning assistance and funding that will help local governments plan and implement TOD at appropriate locations along the corridor
- Add a third bullet to the second box (opposite *Maximize the flexibility and adaptability...* ) that reads
- Add third bullet to the third box (*Maintain and preserve vital elements ...* ) that reads “Preserve highway and transit system capacity by providing funding and assistance to municipalities for land use planning processes that result in transit oriented development at strategic locations throughout the corridor.”
- Add sixth bullet to the fifth box (*Avoid, minimize, or mitigate any significant adverse environmental impacts ...* ) that reads "Minimize growth inducing impacts that would otherwise result in decentralized sprawl development that increases dependence on the automobile, degrades air quality through tailpipe emissions, exacerbates non-point stormwater pollution by increased impervious surfaces, and loss of farmland and open space."

17) Appendix A, Table 1-3, right column, "Goals and Objectives" (page 52)

- Add under *Maximize the flexibility and adaptability of new transportation infrastructure to accommodate changing long-term demand* a third bullet that says “Maximize transit's effectiveness by providing the framework for transit-oriented development at appropriate locations.”
- Add under *Maintain and preserve vital elements of the transportation infrastructure* a second bullet that says “Preserve system capacity and ensure the long-term viability of transit by providing funding, coordination, and assistance to local government land use planning.”
- Add under *Avoid, minimize and or mitigate any significant adverse environmental impacts caused by feasible and prudent corridor improvements* a third bullet that says “Minimize impacts to the Hudson River estuary through alternative selection, project design and mitigation.”

18) Appendix B, SAFETEA-LU 602 Coordination Plan

Add to the box indicating issues that the NYS Department of State will comment on Consistency Determination.

## Conclusion

The Tappan Zee Bridge/I-287 Corridor Project represents our best opportunity to develop a balanced transportation system across the lower Hudson Valley. However, to do so we must ensure that the improved access to transportation does not result in sprawling land use development patterns that increases VMT, undermines transit, harms the environment, or consumes open space. Thus, land use impacts must be more than "considered;" land use planning must occur in tandem with the planning of the bridge, transit, and highway improvements.

While we understand our system of "Home Rule" requires land use decisions be approved at the local level, we cannot ignore the interrelationship between land use and transportation. We hope that these comments will ensure that the contemplated transportation improvements will result in a sustainable multi-modal approach that will provide long-term benefits and a transportation system that breaks the "land use/transportation cycle" that created these problems in the first place.