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TZB-208E

March 31, 2008

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

RE: TAPPAN ZEE BRIDGE/I-287 PROJECT SCOPING COMMENTS;
FEBRUARY 2008 REVISED NOI-SCOPING UPDATE PACKET.

Dear Mr. Anderson:

The following comments are submitted on behalf of the NYS Atlantic Chapter's Ramapo/Catskill Group (Orange and Sullivan Counties), and supplement comments submitted under separate cover by other Sierra Club representatives.

The public outreach efforts by the NYSDOT and other lead agencies regarding the current Environmental Impact Statement (EIS) process is commendable.

The following Scoping Update comments are limited to the Tier 1 transit mode aspects of the EIS upon which the Tier 2 highway/Tappan Zee Bridge (TZB) construction decisions are to be made.

The Scoping Update Packet (the Packet) wisely notes that the 30-mile TZB/I-287 Corridor Project (the Project) from Suffern across the Hudson River to Port Chester will have an enormous, indelible influence on the greater tri-state region's economy, and will have major land use impacts extending far beyond the Project's designated boundary. (Please note that Section 1.2 -- page 39 -- of the Packet incorrectly lists Orange County as part of New Jersey instead of New York State.)

The incorporation of public transportation (bus/rail) components into the Project design is most welcomed.

The following areas presented in the Packet need clarification and EIS evaluation.

I. DIFFERING CORRIDOR DESCRIPTIONS

The Project is a linear, 30-mile long corridor from the western side of Rockland County, crossing the Hudson River to the eastern side

of Westchester County. The width of the corridor extends one-half mile on either side of the I-287 transit route. The two-fold thrust of the Project is to resolve the rehabilitation/rebuilding needs of the TZB and also to mitigate bridge/corridor congestion, especially the east bound weekday morning commuter traffic over the TZB through the introduction of public transportation options.

Information in the Packet, however, alternately refers to the Project in terms of the one-mile width of the corridor boundary and/or the entire County of Rockland or Westchester. This blurring of the corridor shape and definition is significant regarding strategies needed to reduce the single occupancy commuter car travel through mass transit options.

The Packet notes that while the majority of the cars crossing the TZB originate in Rockland (52%, pg. 42), almost all drivers reside outside the Project corridor boundary, far beyond a reasonable walking distance into the corridor proper. No mention is made about how those residents are to travel from home to the proposed public transportation station/routes within the Project. Further, 51% of the cars crossing the TZB have a Westchester County destination, yet the vast majority of the job sites also are beyond the Project's boundary. No mention is made about how those drivers would travel from the public transportation destination within the Project to their actual employment destination. Thus, the majority of TZB commuters would need to use a personal auto at each end of any public transit trip.

The EIS must evaluate practical strategies to enable commuters to access any Project public transit option.

II. SUBURBAN SPRAWL VS. THE VIABILITY OF PUBLIC TRANSPORTATION

The Packet provides no information about how population density (both residential and work site) determines the ability for public transportation to operate in an efficient, point-to-point manner. An unsupported assumption is made that if west-to-east public transit (BRT, CRT, LRT...) is constructed, drivers will automatically abandon their cars. Were that only so...

The overwhelming number of drivers enter the Project corridor in a scatter site manner from any number of directions, and depart the Project corridor in a scatter site manner headed for any number of destinations with no realistic ability to utilize public transit.

Since the 1955 completion of the TZB, living, employment and transportation patterns have radically changed throughout the region. Existing population centers in villages and cities became "hollowed out." Low density suburban and rural housing in surrounding towns became the fashion. "Edge City" industrial/business parks and shopping malls soon followed. Multi-car households and single occupancy car travel became the norm. Existing bus and train service atrophied. Highway construction prevailed, and the economy became almost exclusively dependent on autos and trucks for the

delivery of people and goods. The EIS must evaluate how the effects of this fifty-year process can be reversed.

The various studies starting in the late 1960's by the Regional Plan Association, and the NYSDOT's 1995 "2020 Vision" transportation study have detailed the negative consequences of "sprawl" development and auto congestion. The consequences then and today favors the reintroduction of public transportation. The EIS should revisit the above noted reports.

Mass transit is neither practical nor economical in a low density living/work environment. The challenge of the EIS is to develop policy to discourage continued auto-dependent sprawl development, and to encourage a new "density model" through collection centers combining coordinated bus-train depots and car parks both within the Project corridor and in points of origin within a 50-mile radius of the TZB.

III. GROWTH INDUCING IMPACT OF THE TZB PROJECT

The Packet describes the Project primarily in terms of its transit function to resolve existing auto congestion and to accommodate projected growth within the corridor. The Packet makes it appear that "growth" somehow just is going to happen on its own and ignores the fact that the Project itself will cause and stimulate enormous growth within the Project footprint as well as throughout the larger tri-state region. (Witness the development enabled by and attributed to the TZB since 1955...)

Political and business leaders, especially in Rockland and Orange Counties, favor the costliest Project options to promote housing and business development in their respective jurisdictions that otherwise would not occur independent of the Project. Those land use consequences, over which DOT has no direct control, would nevertheless compromise the transit functions of the TZB and would ultimately sabotage the eventual Project transit purpose and design.

The EIS must evaluate the growth inducing outcomes of the Project both within the Project's corridor boundary and within the greater region.

IV. CAR RIDERSHIP SURVEY AND PROJECTIONS

Page 41 of the Packet states that the origin and destination survey used for reference was conducted five years ago in 2003. The details of that survey focus only on corridor traffic in the east-bound direction. It is noted that an average of 80,457 east-bound vehicles cross the TZB on a daily basis. During the average weekday AM peak period, 27,813 vehicles cross the TZB eastward. Without further refinement, the figures lead only to ambiguous conclusions.

The problem with the information presented is that the cars

originating west of the Hudson are listed in aggregate numbers, and cars arriving at destination points east of the Hudson are listed in a different set of aggregate numbers. The ability to track the origin and destination of each driver cannot be determined, nor can one determine if a driver's origin and destination is the same each day, or the time of day of the return trip if any return trip is made.

There is no indication if any driver would or could use public transportation if such service were made available.

There is no indication what incentives are needed, like parking lots and connecting services, that would make public transit feasible.

The EIS must conduct a current, detailed study of travel patterns across the TZB in both directions each day, by time of day, and determine the trip origin and destination of each car.

The EIS must also determine the cost/benefit of the various public transportation options proposed for the Project as well as other competing options that would divert travel from the TZB, even if diversion would diminish revenue from TZB tolls. For instance, the survey indicates that 7% of the cars crossing the TZB had a destination of Manhattan. There is no indication where in Manhattan the car trips terminated or the time of day the trips took place. The implication is that Grand Central Terminal would be the final destination if the TZB CRT option were constructed. That conclusion must be verified.

Further, the Port Jervis/NJ Transit Line CRT options (ARC, Secaucus Junction, PATH Lines...) into Manhattan must be fully evaluated since those alternatives would divert TZB corridor traffic altogether and deem the CRT Suffern to the Hudson Line option unnecessary.

The EIS must also evaluate the pattern of commuter return trips from work to home. Commuters who could take mass transit into work in Manhattan in the morning rush hour will instead drive by car if they cannot return home by public transportation at a convenient time and in a rational manner.

V. TZB DIVERSION OPTIONS: THE NEW JERSEY ALTERNATIVES

The Scoping Update Packet focuses on channelling both auto and public transportation options from Suffern eastward over the TZB. The costly CRT option routing an Orange County to Hoboken PJ/NJ Transit Line train into the Project corridor at Suffern, continuing over the TZB and onto the Hudson Line tracks to Grand Central Terminal in Manhattan is such an example. Realistic alternatives that would divert travel over the TZB using existing and proposed infrastructure from Suffern south through New Jersey to Manhattan are omitted from the Packet.

The EIS must evaluate the following public transportation alternatives which collectively facilitate travel into Manhattan and which

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avoid the corridor and travel over the TZB:

1) Restoration of the Port Jervis/NJ Transit CRT from its current single track configuration to a double track configuration from Orange County to Hoboken. (Prior to 1980, the PJ Line, the former Erie RR Line, had high speed double track service on the same route.)

2) Proposed increased frequency and reliability of PJ/NJ CRT service.

3) Proposed improved transfer connections from the PJ/NJ Line at Secaucus Junction into Penn Station in Manhattan.

4) Proposed improved transfer options from the PJ/NJ Line's Hoboken Terminal into the World Trade Center transportation complex and the lower Manhattan financial district via the PATH Lines.

5) Access to the Region's Core (ARC): proposed new trans-Hudson River tunnel and service directly into Penn Station providing a one-seat ride from the PJ/NJ Line into Manhattan.

6) Proposed continuation of ARC from Penn Station providing direct access to Grand Central Terminal.

7) Proposed Long Island RR (CRT) connection directly to Grand Central Terminal. Currently, LIRR tunnels under Manhattan past Grand Central to its Penn Station terminus.

8) Proposed extension of service by Metro-North trains beyond the current terminus at Grand Central Terminal to Penn Station, service made possible by the ARC and LIRR projects noted above.

9) Improvements to the Pascack Valley/NJ Transit Line from Spring Valley to Manhattan as per ARC noted above.

10) Regional bus routes from Suffern and beyond to the Port Authority Bus Terminal and also to street discharge in Manhattan. Regular service provided by major bus lines such as Coach/Short Line, currently provide express bus service from Orange County to Manhattan that bypasses the Port Authority Terminal and discharges passengers to mid-town Manhattan locations, just like a city bus -- the ultimate one seat ride... That same type of service can be replicated from the Project corridor in Rockland County.

VI. MANHATTAN CONGESTION PRICING

The EIS must evaluate the impact that the proposed congestion pricing regarding auto use in Manhattan will have on commuter travel patterns into New York City.

VII. STEWART INTERNATIONAL AIRPORT CONSIDERATIONS: SUFFERN TO TZB CRT OPTION TO GRAND CENTRAL TERMINAL

The CRT option for a PJ/NJ Transit Line branch from Suffern to TZB to the Hudson Line into Grand Central Terminal is being promoted as a means to create a northbound ride from Grand Central/Manhattan to Stewart Airport which is now under the operation of the Port Authority. Stewart Airport is currently served by two CRT's. The PJ/NJ Transit Line has the Salisbury Mills-Cornwall Station located some five miles from the airport terminal. The PJ/NJ Line improvements together with the ARC and related projects noted above would no longer favor the Suffern-TZB CRT option.

The primary CRT service to Stewart Airport is provided by the existing Hudson Line's Beacon Station which has exceptional CRT service through Westchester County directly into Grand Central Terminal. Further, AmTrack travels on the same Hudson Line tracks from Penn Station north to Albany. AmTrack currently does not stop at the Beacon Station, but the potential exists. The Beacon Station is connected by I-84 over the Newburgh-Beacon Bridge to a newly constructed I-84 interchange that leads directly into the Stewart Airport terminal. A shuttle bus meets the trains at Beacon and provides a 10-minute trip to the airport terminal. Direct regional bus service is also available at the I-84/I-87 interchange which serves the airport terminal via the same shuttle bus .

The EIS must revisit the efficacy of the TZB CRT option from Suffern to Grand Central Manhattan in light of the PJ/NJ Transit - ARC projects, the existing Hudson Line service from Grand Central to Beacon, the shuttle bus service from Beacon to Stewart and from the PJ/NJ Line to Stewart, the new I-84 interchange into the airport terminal, and available regional express bus service via the adjacent I-87 NYS Thruway.

VIII. PUBLIC TRANSPORTATION OPTIONS WITHIN THE PROJECT CORRIDOR

The maximization of existing transit infrastructure connected to supporting park-and-ride lots is seen as the most efficient and cost effective response to the current TZB congestion issues.

Because of the need for a flexible system to connect intersecting CRT and bus routes, including regional and feeder bus service, the EIS should evaluate a BRT system that connects the PJ/NJ Line at Suffern, the Pascack Valley/NJ Line at Spring Valley-Nanuet, the Hudson Line at Tarrytown, the Harlem Line at White Plains, and the New Haven Line at Port Chester.

Other bus services crossing the TZB should be able to share the dedicated BRT lanes through portions of the corridor, especially over the TZB.

All local and regional bus services affecting the Project corridor should be evaluated regarding coordinated service including


existing bus franchise areas where one bus company has exclusive pick up and/or discharge rights which prohibits a competing bus company from providing service in the same catchment area.

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Commuter behavior must also be addressed in the EIS. While the prospect of a one-seat ride is enticing regarding any public transit service, such service may be impractical or cost prohibitive. The commuter's major concern is frequent, reliable, cost effective service which also includes transfers where transfers are coordinated and net travel time is reasonable.

Further, Single Ticket routing and pricing should be evaluated for all combinations of public transportation involving transfers between carriers.

Respectfully submitted,



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Group

Sterling Forest/Highlands Committee
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