

TZB-146E

TRI-STATE TRANSPORTATION CAMPAIGN



Mobilizing the Region

March 31, 2008

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

RE: Comments on the Tappan Zee Bridge/I-287 Corridor Project Scoping Update

Dear Mr. Anderson:

Thank you for the opportunity to submit comments on the scoping update documents for the Tappan Zee Bridge/I-287 Corridor Project. The Tri-State Transportation Campaign is a nonprofit working for a more balanced, equitable, and environmentally sustainable transportation network. We have followed the project since its inception, and are represented on two of the project Stakeholder Advisory Working Groups.

Throughout the evolution of the project, the Tri-State Campaign has had three major concerns: that all transit modes are evaluated comprehensively and fairly, that the project proceed with real public input, and that the project incorporate land use planning with the understanding that it will have wide-ranging development impacts on the Hudson Valley, which has already been irrevocably transformed by the opening of the original Tappan Zee Bridge.

Transit and Highway Comments

The project appears to include a more comprehensive analysis of all transit modes, particularly bus rapid transit. The Campaign is interested in the new transit options included in the Range of Alternatives (Section 4), specifically Options 3A and 3B (new full corridor BRT options), and 4D (full corridor BRT and Rockland-Manhattan CRT). The Campaign had advocated for the reconsideration of the full corridor BRT/Rockland-Manhattan CRT option, which had been dropped from consideration, because it has the highest projected ridership of any alternative.

It is concerning, however, that the section (and almost the entire scoping update document) refers only to HOV lanes and not to High-Occupancy Toll lanes. HOT lanes could provide

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a revenue stream for transit operations or bridge maintenance, ensure that drivers have a congestion-free alternative to general purpose lanes, and, unlike HOT lanes, would likely avoid public pressure to convert to general purpose lanes. This last point is particularly crucial as the HOV/HOT lanes would provide congestion-free access for transit buses.

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The Campaign urges that the project team do everything in its power to ensure that the tiering of the project does not result in years-long delay or abandonment of a cross-corridor transit system. While the project’s Goals and Objectives include improving transit mobility, capacity, and modal share, the cost of building a transit system may put it at risk given New York’s fiscal realities. State Comptroller Tom DiNapoli has on several recent occasions expressed doubt that the state can afford to pay for the Tappan Zee project. It also must be made clear when the public can expect to see the results of the separate financial study, which will supposedly examine financing options for the Tappan Zee project.

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Public Input

While it is encouraging that one stated rationale for tiering the project was to increase opportunities for public input, the project team must continue to accept its responsibility to inform the public. For example, the team should indicate when updated ridership and cost estimates will be released, and must release this information with enough time before the selection of a transit mode that the public can comment on the transit alternatives in an informed way.

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In addition, the project team should explain in detail how the comments from the Stakeholder Advisory Working Groups will be incorporated into the project. SAWG members have devoted considerable time to attending meeting and providing input, and need to know that their contributions are of value to the project.

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Land Use Planning

The project team has also made efforts towards incorporating land use planning into the project, which municipalities have long asked for. For example, in November 2006, four Rockland County elected officials sent a letter to NYSDOT requesting that the project include funding for local master planning; they did not receive a response. This month, however, the team released a Request for Proposals seeking a contractor to provide transit-oriented development training for communities in the corridor, suggesting that the project team now understands the need for the state to encourage mixed-use, transit-oriented development and to provide localities with the expertise to needed to zone for this type of land use. The project should further support TOD by providing funding for local master planning efforts, and the project’s Purpose and Need statement should be modified to reflect that assisting localities in planning development centered around a new transit system is now a project goal.

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Specific Comments:

1) Section 3.2, Goals and Objectives (pgs. 14-15)

- Under *The following needs have been identified for the Corridor*, add a bullet reading “Through coordination with municipal governments, provide corridor-wide system improvements that direct land use to compact nodes of mixed-use development at existing or strategically planned transit villages (transit-oriented development).”
- Under *Improve the mobility of people, goods and services for travel markets served by the Tappan Zee/I-287 Corridor* add a bullet reading “Maximize transit’s effectiveness by providing the framework for transit-oriented development at appropriate locations.”
- Added highway capacity often quickly disappears because of induced sprawl development, and can be preserved through compact, mixed-use, transit-oriented development. Under *Maintain and preserve vital elements of the transportation infrastructure* add a bullet reading “Preserve system capacity by providing funding, coordination, and assistance to local government land use planning.”
- Under *Avoid, minimize and or mitigate any adverse environmental impacts caused by feasible and prudent corridor improvements* a bullet reading “Minimize growth inducing impacts that would result in decentralized, sprawl development that would increase automobile dependence, worsen highway congestion and air pollution, and result in loss of open space.”

2) Section 4, Range of Alternatives (pgs. 16-21)

The section should include a brief explanation of High-Occupancy Toll lanes, enumerating their benefits as described above. Throughout the section, “HOV lanes” should be replaced with “HOT lanes.”

This section should also clarify whether each transit alternative or option would be feasible on both on a new bridge and a rehabilitated bridge. (This appears to be the case, but language on pg. 17 seems to imply that the original five build alternatives from the Level 2 screening process will not be evaluated with a rehabilitated bridge.)

3) Appendix A, Section 1.2 Project Overview (pgs. 40-41)

This section should state that it is imperative that a viable transit system be established to provide capacity across the corridor, as transit’s capacity is less vulnerable than highway capacity to growth-induced impacts. The project must provide municipal government the ability to ensure that new development is directed to places that are accessible to transit – particularly by walking and bicycling.

4) Appendix A, Section 2, Purpose and Need (pgs. 44-51)

Add Section 2.6: “Through coordination with municipal governments, provide corridor-wide system improvements that direct land use to compact nodes of mixed-use development at existing or strategically planned transit villages (transit-oriented development).”

This section should elaborate on the bullet suggested under Section 3.2 (pg. 14), explaining the effects previous transportation projects (Tappan Zee Bridge, New York State Thruway,

Palisades Interstate Parkway, and I-287) have had on land use, particularly auto-dependent suburban sprawl that has made difficult the provision of efficient transit service. It should explain the benefits of compact, mixed-use, transit-oriented development, including reduced VMT and increased transit ridership, and should discuss the need for a planning assistance program for local government to achieve TOD near proposed transit stations.

5) Appendix A, Section 3, Goals and Objectives (pg. 52)

- Under *Improve the mobility of people, goods and services for travel markets served by the Tappan Zee/I-287 Corridor* add a bullet reading “Maximize transit’s effectiveness by providing the framework for transit-oriented development at appropriate locations.”
- Under *Maintain and preserve vital elements of the transportation infrastructure* add a bullet reading “Preserve system capacity by providing funding, coordination, and assistance to local government land use planning.”
- Under *Avoid, minimize and or mitigate any adverse environmental impacts caused by feasible and prudent corridor improvements* a bullet reading “Minimize growth inducing impacts that would result in decentralized, sprawl development that would increase automobile dependence, worsen highway congestion and air pollution, and result in loss of open space.”

6) Appendix A, Table 1-3, left column, “Purpose and Need” (page 52)

- Add third bullet to the first box that reads “Through coordination with municipal governments, provide corridor-wide system improvements that direct land use to compact nodes of mixed-use development at existing or strategically planned transit villages (transit-oriented development).”
- Add fifth bullet to the fifth box (Avoid, minimize, or mitigate any significant adverse environmental impacts...) reading “Minimize growth inducing impacts that would result in decentralized, sprawl development that would increase automobile dependence, worsen highway congestion and air pollution, and result in loss of open space.”

7) Appendix A, Table 1-3, right column, “Goals and Objectives” (page 52)

- Add under *Maintain and preserve vital elements of the transportation infrastructure* a second bullet that says “Preserve system capacity by providing funding, coordination, and assistance to local government land use planning.”

Conclusion:

The Tappan Zee Bridge/I-287 Corridor project will have a larger, more far-reaching impact on the Hudson Valley than any other transportation project currently under study. With this project, New York has the ability to remedy some of the original Tappan Zee Bridge’s destructive legacies, most notably sprawl development and the automobile dependence, traffic congestion, and air pollution it has engendered. It is critical that the project team not lose sight of its commitments to build a viable transit network and to provide a framework for local governments seeking to guide development around that transit network.

Best,

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Executive Director

Steven Higashide
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