



TOWN of GREENBURGH

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PAUL J. FEINER
 Supervisor

March 31, 2008

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A.L.

Michael P. Anderson, P.E., Project Director,
 Tappan Zee Bridge/I-287 Environmental Review,
 660 White Plains Road, #340
 Tarrytown, NY 10591.

RE: Updated Scope for the Tappan Zee Bridge/I-287 Corridor study

Dear Mr. Anderson:

The Town of Greenburgh respectfully submits the following in response to the Updated Scope, dated February 15, 2008, for the Tappan Zee Bridge/I-287 Corridor study being undertaken by the New York State Department of Transportation.

These comments include input from the Town of Greenburgh Town Board, the Town of Greenburgh's Conservation Advisory Committee, the Town of Greenburgh Department of Community Development and Conservation, the Town's Project Consultant, Ferrandino & Associates Inc., representatives of the Village of Tarrytown, the Village of Elmsford, and the Westchester County Department of Planning. The comments contained herein in no way invalidate or supercede any previously made comments by these other entities, nor do they represent the only comments to be considered from such entities.

1) **Keep the transit evaluation current with the highway studies.**

The EIS will now be prepared with two tiers of analysis. It is our understanding that the preferred transit mode will be chosen in the spring of 2008, without further evaluation of route specifics and transit station locations. In our view, the two tiered approach will postpone the evaluation of the transit mode's integration into the local communities and it is likely that a transit mode will be determined without addressing the local impacts on the affected communities. The details of the integration of the transit system into the affected communities should be evaluated prior to the transit decision, so that the best transit option is put into place. Expanded planning undertaken before a decision is made on the type of transit mode chosen will help to ensure that the preferred transit mode will be the best option. We urge that the scoping document be amended to reflect this approach.

Further, from a SEQRA -NEPA legal perspective, the tiered analysis has the practical and potentially illegal effect of 1) hindering full public review, participation and comment; 2) leading to an uninformed choice and approval of the "Preferred Alternative," and 3) postponing proper evaluation of the direct impacts and mitigation measures.

2) **Potential segmentation.**

The scoping document makes reference to a “subsequent NEPA action” that will commence in Spring 2010, only after the Tier 1 and Tier 2 RODs are issued.¹ This “subsequent NEPA action,” is the very one which will most directly affect the communities and physical environment along the Project Corridor and yet will not be used in the Tier 1 and Tier 2 EIS analyses. Moreover, because SAFETEA-LU Section 6002 provides for a shortened 180-day Statute of Limitations period (previously a 6-year statute of limitations under the Administrative Procedures Act), the time period for appealing the Tier 1 and Tier 2 decisions will expire well before the subsequent NEPA evaluation of direct impacts and mitigation measures is completed, or perhaps even begun. Thus, there will not be an opportunity to appeal or revisit the Tier 1 and Tier 2 final decisions once the direct impacts to the communities are fully reviewed in the NEPA evaluation. Accordingly, the planned tiering process will result in illegal segmentation as well as a failure to analyze cumulative impacts in violation of both NEPA and SEQRA. Please address this segmentation issue in the scoping document.

3) **Expand the analysis of impacts on local communities and reflect local comprehensive planning efforts.**

The results presented in the transit assessment show the global impacts on the region surrounding the I-287 Corridor. However, we cannot determine how the DOT Project Team has analyzed site specific impacts of the individual transit options as they would relate to the local communities. Accordingly, the scoping document needs to be more specific as follows:

- 1) Detail how you are considering the impacts on the municipalities where station stops, park-n-rides or transfer stations will need to be placed; and
- 2) Detail how the impacts on the local communities differ from one transit option to the next.

Further, the scope should be expanded beyond the relatively narrow half mile wide corridor on either side of I-287 as needed in order to include roadways and intersections that would be negatively impacted by various elements of the planned highway and transit improvements. We suggest a minimum one mile radius from I-287 as more comprehensive, since this would include, for example, Benedict Avenue in Tarrytown, the Saw Mill River Parkway in the Eastview/Route 100C area and the Route 100A-Route 100B intersection in Greenburgh. All traffic impacts should be studied as the impacts effect parts of Greenburgh, Tarrytown, and Elmsford, as well as adjacent municipalities such as Sleepy Hollow. Please amend the scoping document to reflect this expanded radius

In addition, several communities along the I-287 Corridor, including Greenburgh, Tarrytown and Elmsford, are amending or have amended their comprehensive plans. Please add “local comprehensive plans” and LWRPs to the plans that the DOT will take into account in its transit planning.

4) **Provide easy access to study models.**

We understand that extensive modeling has been performed to project future travel demands using the Best Practice Model developed by NYMTC. We believe that transit stop locations

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are being analyzed and we would like to see the results of these analyses. We cannot properly comment on the scoping document without that information. Please make this modeling available to us and include as an appendix to the scoping document.

5) Add other concepts to the non-highway design elements.

Most of the transit mode options include a connection to the existing Metro-North Tarrytown Station or a new CRT station located at or near the bridge toll plaza. For the BRT option through Westchester County, we urge that a bus-to-train direct transfer concept be studied. In this concept, at each of the three north/south Metro-North rail lines, a riding passenger-only transfer station would be built. This pedestrian transfer access would include stairs and elevators to accommodate bus/train grade separations as well as sidewalks and platforms for the riders to use as they change modes. The transfer stations could be located as follows:

- Hudson Line: between the Tappan Zee Bridge Toll Plaza and the railroad tracks.
- Harlem Line: at the White Plains Transportation Center
- New Haven Line: at either the Port Chester or Rye Metro-North Station depending on the BRT route.

The Hudson Line transfer station is of particular concern since the potential negative environmental impacts of the proposed BRT route to the existing Tarrytown Station are substantial. Please incorporate this analysis into the scoping document.

6) Include the NY 9A Bypass in the study

The highway and transit options being studied should analyze the effects of the NY 9A bypass currently being considered by NYSDOT. Please include this analysis in the scope.

7) Include an Elmsford Transportation Center in the study.

The Village of Elmsford has expressed an interest in hosting a transportation center as part of the chosen transit mode. A location in the I-287 corridor near NY 9A is considered to have the potential to accommodate the center, providing connected access to rail (a new CRT or LRT), bus (a new BRT and existing BeeLine Service), and highway (I-287, NY 9A and NY 119). Please include an Elmsford Transportation Center in the updated study scoping document.

8) Consider a pedestrian crossing over I-287/87.

The Village of Tarrytown has considerable interest in having the State construct a pedestrian crossing over I-287/87 in order to re-connect the northern and southern sections of the Old Croton Aqueduct trail. With all of the construction and disturbance planned in the area, such a project would be a valuable addition to the transportation network. Please include this analysis in the scoping document.

9) Expand Transportation System Management (TSM)/Travel Demand Management (TDM) studies.

The alternatives to be analyzed, specifically the bridge rehabilitation option, do not consider additional improvements such as increasing or moving EZPass lanes, or increasing tow-truck patrol along the bridge to deal with breakdowns or accidents that may cause backups on the bridge. As previously stated in a letter to the DOT from the Village of Tarrytown dated October 20, 2006, "...the AA report fails to properly consider in its review of Alternative 2

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(Bridge Rehabilitation with TDM/TSM Measures) a full range of roadway and mass transit improvements that would enable this alternative to be analyzed on a comparable basis with the other alternatives.”² The need to rehabilitate or replace the Tappan Zee Bridge may be too heavily influencing the evaluation of traffic demand management. If there was no need to replace or rehabilitate the bridge, what measures would be taken to address the increasing traffic along the corridor? How would BRT, CRT or LRT options be considered differently if the costs associated with the river crossing were only necessary to bring mass transit across the river? The scope should address and analyze the lower cost measures that could be implemented to change travel patterns and reduce the number of vehicles using highway facilities. It is critical to include a proper evaluation of the Bridge Rehabilitation option, including all possible TSM/TDM measures, in the scoping document.

10) Expand study of truck and freight traffic.

Wear and tear on the bridge is significantly affected by truck traffic. Considering the large amount of truck traffic that utilizes I-287 and the Tappan Zee Bridge daily, more detailed analysis would be beneficial. Please incorporate this important element into the scoping document.

11) Analyze tunnels as an alternative river crossing exclusive to trucks and mass transit.

As stated in the October 20, 2006 letter from Tarrytown, there is a need to analyze a separate “tunnel to carry both “through” mass transit and truck traffic. The tunnel proposed here, unlike the one analyzed in the AA report, would neither be limited to commuter rail (in our view, BRT would likely be the preferred mode) nor provide a connection to the existing Tarrytown station; rather, it would bypass Tarrytown entirely and any connection to the Hudson line, if deemed feasible and desirable, could be provided by either BRT service on the rehabilitated bridge transferring passengers at a new TZB station or, if CRT is sought, by a branch tunnel with an alignment similar to the one proposed in Alternative 4.”³ The negative environmental impacts of such a proposal may be far less than those generated by either the currently proposed alternatives or the tunnel alternatives considered earlier in the review process. In addition, since under the current rehabilitation alternative the existing bridge is treated as a “lifeline crossing” requiring extensive modifications such as earthquake proofing, the addition of a tunnel to this alternative would create an additional river crossing and eliminate the need for many of these measures. Please include this expanded alternative river crossing analysis in the scope.

12) BRT Pilot Program.

In order to estimate the actual usage of the transit mode selected, as well as to provide traffic congestion relief during construction of any bridge and highway improvements, a mass transit pilot program could be beneficial and should be included in the evaluation. Please include as a scope element.

13) The cost evaluation criteria for the transit mode selection should be itemized.

Cost estimates should provide breakouts for each major item in the alternative. The appendix to the Scoping Update Packet discusses the cost estimate evaluation criteria measured by alternative and the transit option. Capital and operating costs should also be broken down by the components of each alternative and transit mode. For example, in the CRT alternatives, what are the costs associated with each component of the Hudson River crossing (i.e. the GCT-

bound route versus the east-west route)? Please include in the Scoping Document.

8

- 14) **Village of Tarrytown concerns.** Included by reference is the Village of Tarrytown's October 20, 2006 comment letter transmitted to the DOT Project Team (see attached).
- 15) **Village of Elmsford concerns.** The foregoing comments on the Updated Scoping Packet reflect discussions we have had with representatives from the Village of Tarrytown and the Town of Greenburgh. We have also met with the Village Administrator of Elmsford. His comments were submitted in a letter dated March 25th, 2008 to the Tappan Zee Bridge/I-287 Project Team (see attached).

Should you or your staff require any additional information or have any questions regarding the above comments, please contact Thomas Madden, AICP, Commissioner, Department of Community Development and Conservation, by phone at 914-993-1532 or email tmadden@greenburghny.com.

The Town of Greenburgh looks forward to working with you on this project.

Sincerely,



Paul J. Feiner
Supervisor
Town of Greenburgh

PJF/trn

Attachments

CC: Town Board
T. Lewis, Town Attorney
A. Regula, Commissioner Department of Public Works
T. Madden, Commissioner Department of Community Development and Conservation
V. Ferrandino, Ferrandino & Associates Inc., Town Project Consultant
G. Mulligan, Westchester County Planning Commissioner
Hon. Mayor D. Fixell, Village of Tarrytown
Hon. Mayor R. Williams, Village of Elmsford
M. Mills, Village Administrator, Village of Elmsford
U.S. Army Corps of Engineer NY Dist. – Mr. Eugene Brickman Deputy Chief Planning Division

¹ Scoping Document at p 10.

² Official Comments of the Board of Trustees Regarding The Tappan Zee Bridge/I-287 Environmental Review at p 1.

³ Official Comments of the Board of Trustees Regarding The Tappan Zee Bridge/I-287 Environmental Review at p 2-3.