

The Village of Elmsford

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

March 25, 2008

Dear Mr. Anderson:

Herein the Village of Elmsford respectfully submits the following in response to your draft-scoping outline for the Tappan Zee Bridge/I-287 Environmental Review dated February 15, 2008.

The Village has been asked if it has any comments with regard to the outline of the forthcoming Draft Environmental Impact Statement (DEIS) for the Tappan Zee Bridge/I-287 Corridor Environmental Review Project. Based upon the Village's review of available materials on behalf of Mayor Williams and the Village Board of Trustees I present the following comments. The comments are in keeping with the March 7, 2008 memorandum/Participating Agency Concurrence Under SAFETEA-LU 6002 Document.

- **The scope and EIS should present a clear discussion of each of the alternatives, their routes, and station locations** – The scope is rather ambiguous as to the specific elements of each of the alternatives considered. For example, Alternative 4A is described as commuter rail (CRT) service between Suffern and Port Chester, but does not indicate that there are two routing options, along I-287 and along Route 119. The location of the route will not only be an important variable in the analysis of impacts, but will be of specific interest to the Village. In addition, the type of transit service – CRT, light rail (LRT), or Bus Rapid Transit (BRT) will also be an important element of the analysis. The EIS should also include a description of the selection process of the alternatives to be discussed in the EIS. The Westchester County Planning Department is currently preparing an update to the County's comprehensive plan, entitled *Westchester 2025/plan together*. The placement of transit along I-287 or Route 119 has the potential to follow the proposed policies of "Enhance corridors", "Support transportation alternatives", and "Join regional initiatives" of *Westchester 2025/plan together*. The EIS should discuss how various alternatives respond to the County's proposed policies.

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- **The scope and EIS should provide an expanded discussion of BRT** – The scope should better identify the elements of the BRT option proposed in Alternatives 3 and 4C. For example, a dedicated busway along I-287 will have vastly different impacts to the Village than a limited-stop bus that is flexible to run off of I-287 and access local community centers, including the “downtown” portion of the Village. The EIS should discuss what type of BRT is contemplated, what some of the elements are, and the experience in comparable and successful BRT systems in the United States and World. 03

- **The scope and EIS should discuss the park-and ride facilities in detail** – Each of the alternatives proposes park-and-ride facilities for some, if not all, transit stations, including a specific facility south of I-287 on the west side of Route 9A in the Village. However, park-and-ride facilities are not economic generators and may take up valuable space, depending on location. The EIS should, therefore, discuss the purpose and need of these facilities, including the specific need of the proposed Village facility, its conceptual design, access, secondary traffic impacts that could result, the economic benefit to the Village, and the potential for redevelopment resulting from such a facility. 04

- **The scope and EIS should be expanded to discuss Transit Oriented Development (TOD) possibilities** – The Village is aware of the potential positive benefits of TOD and is supportive of the potential location of multiple stations within the Village. To that end, the EIS should provide greater detail of the potential beneficial (economic) impacts from TOD that could occur as a result of the stations, with specific focus on the potential development that could occur at a proposed station near Route 9A (whether on I-287 or Route 119). The EIS should also provide industry examples of TOD from other systems in the United States and World. The placement of stations within the Village has the potential to follow the proposed policies of “Channel development to centers” and “Nurture economic climate” in the aforementioned *Westchester 2025/plan together*. In addition, it will be important to ensure that such stations are designed within the context of the Village, as indicated in the proposed policy “Protect character” of *Westchester 2025/plan together*. 05

- **The scope and EIS should expand the analysis to include the potential impacts on local communities** – The scope currently indicates that the impacts analysis will be focused on the more general impacts on the region surrounding the I-287 Corridor (half-mile radius on each side of the Corridor), but does not delve into what the impacts may be on a municipality by municipality basis. For example, as indicated above, the location of a transit station in the Village will most likely have beneficial fiscal impacts to the Village. Further, as indicated above, the placement of a park-and-ride facility in the Village may result in negative traffic impacts and may involve relocation of businesses and individuals, without providing an economic benefit. The EIS should be able to quantify the specific impacts on the Village and other local communities. 06

- **The EIS should discuss drainage (stormwater) and ecosystems (flora and fauna) beyond the Hudson River** – The scope currently focuses its discussion of drainage and ecosystems on the Hudson River. However, the Village has had an historical issue with flooding along the Saw Mill River corridor. There is concern that any type of transit system along the I-287 or Route 119 corridors could impact upon this historical condition. The EIS, therefore, should include an evaluation of the stormwater, drainage, and ecological implications of the various alternatives. By considering these resources the Project could follow the proposed policies of “Preserve natural resources” and “Maintain utility infrastructure” of *Westchester 2025/plan together*. 07 and 08

- **The scope and EIS should contain an expanded discussion of construction impacts** – The scope currently contains a section dedicated to construction impacts. Due to the potential disruption of local everyday life in the Village (especially if the Route 119 corridor were to be chosen), the construction impact discussion should include a discussion of the type of impact, the extent of such impact, its duration, and meaningful measures to mitigate such disturbances. This could be expanded beyond the traffic and acquisition impacts mentioned in the scope to include employment (temporary increase), noise, air, and water quality. 09

- **The EIS should include consideration of other planned, proposed, or pending projects** – A number of larger projects and improvements are currently being considered in the communities along the I-287 Corridor. The EIS should include consideration and coordination with these other projects, including the 9A Bypass, Saw Mill River Flood Control, and Village of Elmsford Main Street Improvement Project. 10

Should you or your staff have any questions or require any additional information regarding the above please contact me by phone at 91-592-6555 or email mmills@elmsfordny.org.

Sincerely,



Michael C. Mills
Village Administrator

C: Mayor/Board of Trustees
Village Attorney
Village Engineer
Village Highway General Foreman
Village Planner – Mr. Dave Smith, Saccardi & Schiff, Inc.
Westchester County Planning Commissioner
Town of Greenburgh – c/o Ferrandino & Associates Inc.
U.S. Army Corps of Engineer NY Dist. – Mr. Eugene Brickman Deputy Chief Planning Division