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

Subject: **Tappan Zee Bridge/I-287 Environmental Review  
Comments on "Scoping Update Packet" February 2008**

Dear Mr. Anderson:

The Westchester County Department of Planning has reviewed the "Tappan Zee Bridge/I-287 Corridor Scoping Update Packet," dated February 2008, and has prepared the following comments and recommendations for your consideration in the finalization of the scoping update. We and the other interested County of Westchester departments look forward to reviewing the written response to these comments and to the comments submitted by other Westchester County municipalities and by the County of Rockland.

### **1. REVISE AND EXPAND "MODE DEFINITIONS"**

Section 4.2 describes three transit modes that are being evaluated in the study. These descriptions focus solely on a transit "facility" whereas a complete description of transit mode must address the "service" that utilizes a facility.

The inadequacy of the descriptions is most glaring for Bus Rapid Transit (BRT). At the "TZB BRT Workshop" held by the study project team on September 10 and 11, 2007, several international BRT experts were invited to present detailed information and facts on the characteristics of BRT systems worldwide. None of the findings gathered at this session by the project study team are reflected in the scope or in the transit mode description.

The scope – through the definition of mode – should be expanded to include the key findings of the workshop for two reasons. First, the experts pointedly summarized that if the characteristics that have been found to make a BRT program successful are not addressed and embraced at the earliest planning stages, the system may never realize its potential. Second, recognition of these characteristics is required **at the Tier 1 level of analysis** in order to competently identify, define and address potential impacts.

As a participant in the workshop, we noted the following critical characteristics:

- BRT must be discussed in terms of an area-wide, integrated transit operation and not as a stand-alone physical facility.
- BRT service must be conceived as inclusive of feeder services and local service runs.
- BRT facility must include more stations than commuter rail transit in order to provide service to more areas and users and to enable skip/stop service to achieve higher frequencies.
- BRT must serve land uses directly so as to maximize public access, preferably via walking; it is inappropriate to locate BRT service in an HOV or HOT lane in the center of an eight-lane expressway.
- BRT service must minimize transfers and transfer time.
- BRT facility must have maximum separation from general traffic.

Further, the scope should be revised to explicitly call for 1) the presentation in the draft EIS of a complete overlay of existing bus services and a discussion of required changes to implement a BRT system, 2) an overview of planned or potential connecting busway or BRT facilities in terms of both feasibility and necessity (for example - Central Park Avenue; Route 9A; and north/south routes in Rockland County) and 3) user-friendly examples of how residents and workforce may be able to utilize the BRT system from various start and end points (for example - New City to Westchester Airport; Peekskill to White Plains; Pearl River to a Westchester Avenue office park).

Similar discussions of connecting and integrated transit services are required as part of the description of commuter rail transit and light rail transit. Such systems will not – cannot - operate in isolation nor be dependent solely on car access to corridor stations. (We note that the unwillingness of Westchester County I-287 corridor municipalities to “host” large parking structures has been directly conveyed to us.) Therefore, the environmental review cannot be comprehensive unless the above characteristics are acknowledged and addressed.

## **2. CLARIFY AND REVISE ALTERNATIVE 3, OPTION 3A, ALTERNATIVE 4C AND OPTION 4D**

The descriptions of the bus transit component of these four alternatives (Section 4.3) require clarification to be consistent with the revised description of the BRT transit mode as discussed above. As presented, the diagrams and written descriptions confuse physical facilities with transit service. It is critical for public understanding and for confidence in the environmental review that the alternatives be clearly presented and understood. The plans must be annotated to identify and quantify the different segments that include independent busway, High Occupancy Vehicle (HOV) mixed traffic lanes and reduced or no special treatment for bus service.

It is also important that the scope and all study documents make clear that only Option 3B includes a full corridor BRT facility. Alternative 3, Option 3A, Alternative 4C and Option 4D do not meet the “Purpose and Need” of the study as set forth in Section 3 of the scoping document as they do not provide an independent transit system across Westchester County. If alternatives without a full

corridor BRT facility are to be carried forward, they each must be re-labeled to identify them for what they are.

### **3. REVISE BRT COMPONENT OF OPTION 4D TO BE CONSISTENT WITH OPTION 3B**

At this stage in the study, it does not make sense to add a new option that is inconsistent with the "Purpose and Need" of the study. The incomplete "BRT" component now shown as part of new Option 4D (Section 4.3) must be revised to match the full corridor "BRT" facility component of Option 3B.

### **4. COMMIT TO BRIDGE DESIGN THAT CAN MEET POTENTIAL LONG-RANGE TRANSIT NEEDS**

In the discussion of the alternatives that call for construction of a new bridge (Section 4.3), the scope should discuss the full life span of the bridge and its ability to meet future transit demands and needs. This discussion should address the potential that future transit and mobility needs may differ significantly from the needs identified now though the projections utilized to select the short-range transit mode. The new bridge must be built to support a transit mode that may become viable over the next 100 years. Addressing this long-range potential suggests that a double-deck design for a new bridge is required and not optional. The scope must call for this aspect to be addressed.

### **5. GUARANTEE TRANSPARENCY OF LEVEL 3 SCREENING**

The scoping document describes the process for Level 3 screening (Section 4.4) which is intended to result in a decision on rehabilitation or replacement of the Tappan Zee Bridge and a selection of transit mode. In addition, a "Transit Mode Selection Implementation Plan" is described. That plan, Appendix D of the scoping document, describes "the essence of the process is simplicity and transparency." Unfortunately, the scoping document does not describe how that transparency is to be accomplished. This is particularly alarming as the scoping document states that the bridge decision and transit mode selection will be made in May 2008 – less than 60 days from the date of this letter.

For at least two years, the project study team has stated that the component subject studies of the overall project would be released as completed and that a flow chart of deliverables would be provided. No flow chart was released and few if any of the studies have been made available to area governments or residents. We are concerned that the announcement of decisions on the bridge and transit mode may be unconvincing if the facts behind the decisions are not made available or are not accessible for review until the draft EIS is released in June 2009.

The scoping document should be revised to list all component subject studies and the timing for public release. Studies that have been described by the project study team as underway or essentially complete include:

- Finance plan part 1: 12 worldwide case studies of lessons learned
- Finance plan part 2: identification of options

- Ridership projections
- Transit service plans
- HOT lane white paper outlining HOT lane impact on transit and justification
- River crossing paper

These studies, and others not publicly discussed, should be made available as soon as possible.

We also must emphasize that the municipalities will be conducting significant comprehensive planning work concurrent with the Tappan Zee Bridge/I-287 environmental review. The work commissioned by the project study team, including data, analysis and case studies, must not be kept as proprietary information but shared or distributed to the municipalities to keep their costs down and make sure that they have the best and most useful data in working on their comprehensive plans and municipal codes to prepare locally for the transit option. This step will help ensure seamless integration.

## 6. EXPAND SCOPE OF ASSESSMENT METHODOLOGIES

### a. TRANSPORTATION

For a project of the scope and long-term significance as the TZB/I-287 Corridor, adjustments may need to be pursued in the standard modeling practices (Section 6.1). Of particular concern is whether or not the modeling includes sensitivity for fuel price change. This should be a major concern of all transportation planning agencies today. If major changes in fuel price continue and the modeling is unable to account for it, the modeling results may become an unreliable basis for decision-making and planning for future transit service and mobility.

A second concern is the scope of roadway and traffic analysis (Section 6.1.1). The scope identifies the target of study being limited to "the interchange areas and approach roads within one-half mile." This is arbitrary and insufficient. Applicants for large development projects are routinely required to study, address and mitigate traffic impacts over a much wider geographical area. The scope should be revised to identify by list and on a map the roadway network that is to be studied.

Further, the scope should be revised to specifically require in the draft EIS a discussion of the relationship and impacts between this project's alternatives and other programmed road and transit improvements in and near the I-287 corridor.

The discussion of public transportation analysis (Section 6.1.2) should be revised to be consistent with our recommendations under comment #1 above.

The discussion of goods movement analysis (Section 6.1.5) should be expanded to require an iterative process that would require the results to be evaluated to determine of the project and its alternatives should be revised to better address and serve goods movement.

**b. NATURAL ENVIRONMENT**

Section 6.2.5 "Visual Resources and Aesthetics" appears to require that the draft EIS only address the potential visual impacts of a river crossing. Even at the Tier 1 level of analysis, it would be appropriate and necessary to identify, discuss and offer mitigation for the potential visual impact of the transit facility alternatives. The scope should be revised to require this component.

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**c. SOCIOECONOMICS AND LAND USE**

Section 6.3.1 "Land Use and Zoning" requires significant expansion so as to avoid inclusion in the draft EIS of a generic and useless assemblage of land use data. The content of this section will be of critical importance to the municipalities located along the I-287 corridor and its strength will play a large factor in building community understanding and, potentially, support for the eventual outcome. The opportunity should not be wasted nor should the burden on determining the potential full impact on land use and communities be shifted to the local governments.

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For example, the scope for a Tier I level of analysis should require a more specific analysis of potential land use relationships beyond the arbitrary one-half mile of I-287 limitation now set by the scope and specify that the subjects of review and discussion include parking facilities for transit services, access opportunities and constraints and transit oriented development opportunities. This discussion of the components of potential stations is valid and necessary even though final siting of stations may not be determined. The analysis of consistency with local comprehensive plans and county policies should be required to go further and outline the changes in such polices that may be required to achieve the project purpose and need. Also, the words "comprehensive plans" should be used in the scope.

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**7. EXPAND COMMUNICATION TOOLS**

Section 7.1.4 sets forth what appears to be a reasonable outline for programs to engage the public. However, we have found that the public outreach conducted to date – while well-meaning and at times aggressive – lacks originality and accessibility. We sense that there has been a problem translating the alternatives into lay terms and in engaging the public in terms that involve their daily life in the I-287 corridor. It is critical that the public, the business community and municipal officials recognize the importance of this review process and the eventual implementation plan.

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This section of the scope should be expanded to specifically require **the addition** of communication tools that place real life impact over regulatory process and technical detail. For example, as discussed above under comment #1, there should be user-friendly examples of how residents and workforce may be able to utilize the transit systems from various start and end points. Large-scale maps and diagrams should be made available for long-term posting in municipal buildings.

## 8. FURTHER CLARIFY PURPOSE AND NEED SECTION ON TRANSIT MOBILITY

Section 2.5 of “Purpose and Need” in Appendix A requires rewriting. With the decision made to only conduct a Tier I analysis of the transit mode as part of the current EIS process, it is vital that this section address directly the need for a new transit component – independent of the roadway system – across the entire length of the I-287 corridor. Transit must not be allowed to be perceived as an after-thought or as an optional add-on that may or may not be pursued in a second EIS process. Project Director Michael Anderson has repeatedly described the overall project as “assured advancement of a comprehensive multi-modal project.” The current purpose and need statement does not convey that concept with such clarity.

Further, the current text fails to give proper primary emphasis to the east-west transit need by equating that need with Manhattan-bound trips. The text also incorrectly describes the Access to the Region’s Core project as a “study.” The text must also be clarified in that it describes the existing west of Hudson passenger rail lines as both “operating at or near capacity” and “underutilized” just two sentences apart.

## 9. REVISE TRANSIT MODE SELECTION IMPLEMENTATION PLAN

The transit mode selection implementation plan (Appendix D) raises questions which should be resolved before the scope is finalized:

- The evaluation criteria are introduced with the phrase “shall be considered,” implying that the criteria may be optional. Are all criterion listed to be “utilized”?
- The measurements for “total daily transit trips” include “Cross Corridor.” What is the definition/length of a “Cross Corridor” trip?
- The measurements for “daily transit ridership” include Tappan Zee Station to/from Grand Central Terminal. Why is White Plains to/from Grand Central Terminal not included; we note that some alternatives do not include a Tappan Zee Station.
- The measurements for “transit accessibility west of Hudson” include “all Hudson crossings.” Why are other crossings besides the Tappan Zee Bridge included?
- The measurements for “capacity at peak load” are to be based on a “potential service plan.” When will the potential service plan be released for public review and comment?
- The measurements for “travel time for trip pairs” include “to and from the Bronx.” What is the route and end points for these trips?

- The measurement for "consistency with land use plans" is "local land use plan review." As discussed under comment #6c above, if the review and measurement is based solely on current plans, this may produce a meaningless result. The integration of a new transit facility in a community requires an integration process for proper planning. How will this be captured in the evaluation?

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Thank you for the opportunity to comment on this important document.

Sincerely,



Jerry Mulligan, AICP  
Commissioner

cc: Hon. Andrew J. Spano, County Executive