

RECEIVED
3/28/08



TAPPAN ZEE BRIDGE/I-287
ENVIRONMENTAL REVIEW

TZB-217E

SCOPING UPDATE COMMENT FORM

You are invited to comment on the Tappan Zee Bridge/I-287 Corridor Project and this Scoping Update Packet in the space below. Note that in compliance with NEPA and SAFETEA-LU Section 6002, public comments are being specifically requested on the included purpose and need (Section 3.0 Appendix A), range of alternatives (Section 4.0) and coordination plan (Section 5.0 Appendix B).

See attached letters.

Multiple horizontal lines for writing comments.

Name: Alfred Strasser
Address: 17 Pokahoe Drive, Steepyn Hollow NY 10591
Email: Stras68@optonline.net

Please add my name to the Tappan Zee Bridge/I-287 Corridor Project Mailing list.

Comments can be submitted in writing until March 31, 2008 to the address listed below:

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

17 Pokahoe Drive
Sleepy Hollow, NY 10591

March 27, 2008

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

Dear Mr. Anderson,

First I wish to compliment you on the informative and cooperative Community Outreach Center and George Paschalis for being particularly helpful. I also wish to compliment the Project for looking at solutions for the entire corridor from Suffern to Port Chester, not just the river crossing; planning for the entire corridor is an absolute necessity. My comments are based on looking at the big picture without the advantage of having looked at all your detailed analyses and concentrate on the Hudson River crossing. In that respect I apologize for any comments that may not be applicable based on work that the organizations has already done.

My major comments are that the likelihood of achieving any of your alternatives range from medium to low, (assuming Alternatives 1 and 2 are not acceptable) and that several items lack the high priority that they should have, although they are probably in your agenda.

The three items that will block some or all of your alternatives will be **the environmental review, the funding and the schedule for completion**. Each is discussed below with a suggestion for an alternative that will have a significantly higher likelihood of success.

Block 1. The **environmental impact** evaluation of the new bridge alternatives as they cross over Nyack, as well as in Tarrytown, should conclude that the alternatives with buses will cause air pollution at unacceptable levels, higher than the currently unacceptable ones. The evaluation of the potential pollution levels proposed in the "Scoping Update Packet", page 24, par. 6.2.1 is to "--- determine the degree to which project alternatives impact air quality compared to the No Build alternative". This is clearly an improper comparison and the comparison should be made to the criteria of the 1990 Clean Air Act Amendment or equivalent standard.

The noise pollution will also be extensive especially from the overhead sections going over densely populated areas particularly in Nyack. While reasonable noise barriers exist when traffic is below grade in a cut or possibly by high noise absorbing walls level with residential areas, but effective noise barriers on an overhead highway are not feasible. The wording in your "Scoping Packet", page 25, par. 6.2.2 is that the Project will "---address incorporating features, such as constructing feasible and reasonable long-term noise barriers, into the Project design that effectively reduce noise levels". The wording itself clearly recognizes the potentially difficult task for reducing noise levels. The noise levels should meet recognized standards; alternatively these portions of the bridge could make some areas uninhabitable.

As a result of the above there is a very high likelihood that the bus alternatives and probably the rail alternatives as well will not meet the environmental standards that should be set.

02
03

Block 2. The **funding** needed for the project is in the range of \$5-6.5 billion for Alternatives 3 with buses and \$11.5 to 14.5 for Alternatives 4 in 2004 dollars. By the time construction starts in 2012 or probably later there will be significant escalation. Based on reducing air pollution and the country's drive for energy independence, the emphasis should be placed on a rail rather than bus connection which is the higher priced option.

As I understand it, there are no funds available at these levels at this time and in the current economy neither federal or state money is likely to save the situation, so without adequate funding none of the alternatives can be built. An improvement in the economy and government emphasis on mass transport by construction time could change the picture.

Block 3. The **schedule for completion** of your alternatives determines the lifetime of the current bridge. At this time your office stated that this schedule has not been estimated and could be anything depending on the designs chosen and the conditions at the time. The highest priority item is the safety and lifetime of the current bridge and as such, the status of the current bridge should determine the schedule of your alternatives, which is just the reverse.

I'll risk a sample schedule starting with the estimated issuance of the ROD in 2010, the design and contracting will take 2 years, construction 5 years, contingency for unknowns, delays, unexpected technical hurdles, etc. another 5 years, gets us to 2022. This means that the current bridge has to last another 14 years, which brings me to the high priority items.

The **priority 1** item is to determine what has to be or can be done to maintain the current bridge margin to safety as a function of the traffic load for the next 12 years (or any alternate conservative estimate). If the repairs and maintenance can maintain the margin with the projected traffic load and the funds are available to do it, then all is well. If maintenance or funding can not maintain the margin then the margin has to be maintained by reducing the traffic on the bridge. Limiting truck or passenger traffic on the bridge could cause serious economic consequences for the region and gridlock on the Washington Bridge and Cross-Bronx Parkway. This analysis, if not already done, should be done by an independent agency not involved in the project. If it has been done, it should be made available for public review.

In any case such an analysis should put a sense of urgency on this project which seems to have been lacking in the past.

The **priority 2** item is to do the environmental review for air and noise pollution (and perhaps other items) of the alternatives as soon as possible to screen out the unacceptable alternatives and save unnecessary work and time by their elimination

My **alternate suggestion** that would alleviate all 3 blocks in the way of the current alternates is:

- maintenance of the current bridge (Alternate 2)
- in combination with a rail tunnel for truck and passenger traffic.

A similar alternate has been considered in your CRT2, but in this case the rail tunnel will include a trucks-on-rail train system which will take trucks, with their engines turned off on an electric train through the tunnel. Such systems have been working successfully and I believe that the Chunnel is an example. The

tunnel would have 2 or 3 rails in one tube, one for the truck train, one for passenger rail transit, and one perhaps for emergencies. On the Tarrytown side they would divide, the passenger track looping into the Metro-North tracks as in other alternatives. This would alleviate matters as follows:

The **environmental review** would show that air and noise pollution will be reduced from the current levels, since the trucks and some of the commuter passenger car and bus traffic have been taken off the bridge and converted to rail transport in the tunnel eliminating both air and noise pollution from those sources, not to mention reducing the load on the bridge.

The **funding** will be reduced. Alternate 2, the current bridge maintenance, has been estimated at \$2-2.5 billion and the tunnel will cost significantly less than the new bridge. According to Sandy Saunders the recently completed tunnel in Shanghai of similar length but larger was completed for \$1.5 billion in 3 years. While the Shanghai Tunnel was built with German engineers having great benefit packages, but with cheap Chinese labor, in the US the same project would cost more. Even increasing the cost to \$2 billion would probably be less than the cost of a new bridge. (Your office was not able to give me any costs for the proposed bridges alone.)

A review of the cost of the new rail tunnel under the Hudson from New Jersey to Manhattan and similar tunnels in Europe and Asia should be made to obtain ballpark figures for similar construction here, prior to a more detailed estimate. Your consultant ARUP, knowledgeable in this field, and input from Sandy's research should give you a good picture of the potential costs.

The funding for the bridge could continue via the State of New York and the tunnel could be privatized as a separate cost center. There are numerous companies that finance and manage bridges and tunnels, Turner Construction/Hochtief to name one example. Of course that can be suggested for the new bridge as well.

The **schedule** for this alternate would be shorter and independent of the life of the current bridge, since it will have been rehabilitated to the tune of several billion dollars. Key to this suggestion is of course the ability to extend the life of the current bridge for the next decades, to be determined in the Priority 1 review described above. An additional benefit of this alternative is that the truck and some commuter traffic will be taken off the bridge, reducing the loads and extending the safety margins and the life of the bridge.

This alternate will then allow further expansion in future years with a second tube which could carry passenger cars. The grade for its approach could be steeper and the tunnel shorter. Plans for this future option should be developed as part of the design for this alternative.

Some of the reasons the tunnel concept was eliminated were, as I understand it, as follows:

High cost. The costs for similar tunnels made with modern equipment around the world sound competitive and lower than the potential cost of a new bridge. The review recommended under "Funding" above should clarify that issue.

Ventilation towers. Large unsightly ventilation towers were blamed. The electric rail tunnel, without engine emissions, will require a lot less ventilation and air purification reducing the size of the equipment.

Limited grade requirement for rail exit and entrance. This lengthens the tunnel increasing the cost. The cost is probably still competitive with the total advantages of the rail tunnel. Advantages are that the tunnel entrances and exits can be placed where they cause the least disturbance to the resident population as well as reducing air and noise pollution in that extra distance.

Accident hazards. A fire hazard can be worse in a tunnel than bridge. However, bridges have their own hazards in addition to collapsing. One winter night in the '60ies the entire Tappan Zee Bridge was stalled with cars both ways all night long without the ability to move the cars due to accidents blocking the way. A colleague of mine with his family that night ran out of gas to heat the car and were saved from freezing by a neighboring car with sufficient gas. Luckily there were no fatalities. There are no solutions without risks; one must pick the one with the combination of most advantages with the least risks.


A total of 4 passenger car tunnels and an even a higher number of rail tunnels have operated for decades in and out of Manhattan essentially without fatal accidents.

Disturbing fish life in the Hudson. The fish will undoubtedly be disturbed during construction and the human beings along the construction route even more so; subsequently, however, they should not be affected. The current rail tunnel construction under the Hudson between New Jersey and Manhattan has not been stopped by this criterion and may have come to a different conclusion on this subject --- the Project should review their EIS if not already done so.

Emotional. Though it may be unspoken, it is possible that concern for a perceived, greater driver or passenger discomfort in a tunnel as compared to on a bridge is a factor influencing the decision in favor of a bridge. One can only point to the fact that there are more tunnels than bridges in and out of Manhattan serving millions of people whose primary concern is getting stuck in a traffic jam.

I would be glad to discuss any other reasons for the rejection of a tunnel and would look forward to your comments on my comments.

With best regards,


Alfred Strasser
(914) 631-5644
Stras68@optonline.net

cc George Pascalis
Sandy Saunders