



**Robert P. Astorino**  
County Executive

Department of Planning

Edward Buroughs, AICP  
Commissioner

March 30, 2012

Michael P. Anderson, P.E.  
Project Director  
NYS Department of Transportation  
4 Burnett Boulevard  
Poughkeepsie, NY 12603

**Subject: Tappan Zee Hudson River Crossing Project**  
**Comments on Draft Environmental Impact Statement, January 2012**

Dear Mr. Anderson:

Westchester County Executive Robert Astorino has long advocated for New York State to make replacement of the Tappan Zee Bridge a top priority. Noting that the state has spent over \$1 billion on repairs and studies over the past decade, he has said that the time to move into the construction phase is long past due.

As has been well documented, the Tappan Zee Bridge is not simply a connector between Rockland and Westchester counties. It is a major transportation artery and economic lifeline for the state, region and country. As described in the reports prepared by New York State agencies, the bridge serves more than 138,000 vehicles per day and does not meet today's standards for bridge construction and traffic operations. Although we are assured that the bridge is maintained in a safe condition, if it were to close for any reason, it would have devastating consequences for commerce and traffic patterns. Westchester County strongly supports prompt movement on the review and approval process for implementing a new Hudson River crossing

It has also been well documented by the NYS Department of Transportation over the years of study conducted for the "Tappan Zee Bridge/I-287 Environmental Review" that a new eight-lane bridge will not address traffic congestion and that the provision of new transit services are essential to help reduce congestion and provide mobility choices in the lower Hudson Valley. The NYS DOT's findings were summarized in a presentation made to the Westchester Rockland Tappan Zee Futures Task Force on October 14, 2010:

*Congestion in the (I-287) Corridor is already significant and will continue to worsen. The replacement bridge will not provide additional relief. Only new transit systems will help*

*improve mobility by affording alternative transportation choices in the future. Transit can also help promote and control smart growth.*

County Executive Astorino stated at the Scoping Session held on October 25, 2011 in Tarrytown that, “the lack of a mass transit component in the proposed plan is of major concern to Westchester County.” He described attempting to build a bridge that doesn’t address the needs of the region from the start as a prescription for cost overruns and delays. The object should not be simply to start the bridge quickly; it is to finish it on time and on budget.

It is critical that the research and findings of the Tappan Zee Bridge/I-287 Corridor Project not be set aside. Nothing has changed that would alter these findings. Furthermore, the years of study, community outreach and education have created clear and visible public support for new transit service. New York State needs to build on this public support, not brush it away, and use it to move forward on much needed transit services, an effort previously called the “Tier Two” step of defining transit services and infrastructure.

Bus Rapid Transit is the solution because it provides immediate and future value. This can be done at a modest cost and make an important stride forward on the problem of traffic congestion. Any studies that are necessary can begin immediately, separate from the environmental impact statement and NEPA process, with the goal that some form of Bus Rapid Transit implementation can be synchronized with bridge construction and potentially extended along the I-287 corridor on a phased basis in the future.

Westchester County has reviewed the "Tappan Zee Hudson River Crossing Project Draft Environmental Impact Statement" (EIS), dated January 2012. We have not found any factor that should slow down or delay prompt movement on the review and approval process for implementing a new Hudson River crossing. At the same time, we have not found evidence of commitment by New York State to take the lead in resuming the necessary transit planning that will complete the work started by the State so many years ago. We urge New York State to do so.

In addition to the overarching comments expressed above, our review has identified several specific topics, presented below, that we recommend be given further discussion in the final EIS, consistent with the environmental review process.

## **SPECIFIC TOPICS FOR FURTHER DISCUSSION IN FINAL EIS**

a. **Ensure ability for “ready-to-operate Bus Rapid Transit” (BRT) across the full project limits.** Appendix A: *Project Planning and Development, White Paper on Transit and the Tappan Zee Hudson River Crossing Project* acknowledges that, “not to preclude transit,” is defined very broadly. This is not acceptable. Instead, specific improvements must be identified and incorporated in the bridge approaches to ensure that some form of BRT (which in its simplest form could be designated bus lanes on the bridge) can be provided when the new

bridge opens. In particular, the exit/entrance to the Emergency Access Lane (Bus Rapid Transit lane) on each new bridge span must be designed to extend through the new toll plaza area and under the Route 9/South Broadway Bridge so that it can be used for transit immediately upon completion of the new bridge.

b. **Consider future use of temporary construction access road as Bus Rapid Transit access road to Tarrytown station.** In the draft EIS, Figure 18-4 “Westchester Landing Construction Access” shows how a new access road is to be built between the current Thruway offices on Route 9 (a site which will become the “Westchester Inland Staging Area”) and the “Westchester Bridge Staging Area” located on platforms in the Hudson River north of the bridge. This access road will extend south from the office area, pass under the bridge approach, cross the Metro-North Hudson Line/Amtrak rail lines south of the existing bridge and then turn north and parallel the river shoreline for over 1,000 feet. This figure also shows that an “emergency access road” will be constructed to extend this road north from the “Westchester Bridge Staging Area” to Green Street.

This work will require a significant investment and careful coordination with Metro-North so as to allow the road’s use by heavy construction equipment and the delivery of supplies. This investment should not be short term or temporary. We request that the final EIS review and discuss the potential future conversion of this access road and its emergency extension into a Bus Rapid Transit only ramp that would link the BRT lanes on the new bridge spans to the Tarrytown Metro-North Railroad station.

c. **Include construction of RiverWalk as part of the project.** The Hudson RiverWalk is a planned 51.5-mile multi-faceted pathway paralleling the Hudson River in Westchester. Many sections have been completed and are in use, created through a partnership of the County, municipalities, developers and land owners. A link that does not exist is the section below the Tappan Zee Bridge along the river. We recommend that the design and construction of this section be part of the Tappan Zee Hudson River Crossing Project because 1) the route location is within the project limits, 2) the potential path is already planned to be developed as an access road (discussed above) and 3) its completion along with new connections to the bridge would provide for a seamless bicycle/pedestrian network which would maximize the potential of the new bridge pathway/bikeway. The final EIS should discuss this potential.

d. **Consider provision of bicycle and pedestrian links into the project.** The current plans show the proposed pedestrian and bicycle lanes on the new north bridge span to end/begin at Route 9/South Broadway. This cut-off point would limit safe and convenient access to these features on the new bridge. We recommend that the final EIS explore the feasibility of providing bicycle and pedestrian connections to existing on and off road links including Route 119, Hudson RiverWalk and the Croton Aqueduct.

e. **Provide details on the cost estimate of BRT.** The BRT cost estimates supplied in the draft EIS are not accompanied by detailed, itemized breakdowns. Such breakdowns should be provided in the final EIS to explain why the cost estimates in the draft EIS are more than triple all prior estimates provided by the NYS Department of Transportation for BRT across the I-287 corridor. Explanation is also needed in the final EIS as to why the cost per mile estimate in the draft EIS is significantly higher than the industry standard for constructing BRT systems. The breakdowns should reflect a phasing of construction of the sections and elements of BRT. These specific cost breakdowns, which the draft EIS indicates have been developed, could provide important guidance on how to implement the most important, time saving elements first, such as bus priority lanes and transit signal priority.

f. **Provide more explanation of future traffic estimates.** The draft EIS states that 2010 traffic volumes on the Tappan Zee Bridge approach 135,000 on a typical day. Peak hour growth is projected to be 0.3% for each year from 2017 to 2047. However, the traffic projections shown in Table 4-4 identify a decrease in westbound peak PM travel in future years. It is not clear how such a projection was obtained. The fact that the proposed crossing will have an extra lane in the reverse peak direction could potentially generate increased demand for travel. Further, the lack of transit service may result in traffic volumes overtaking capacity of the new crossing. We also question the use of 2005 as the base year for traffic analysis; 2005 data may not capture pre-recession growth in downtown White Plains. We recommend that these items be addressed in the final EIS.

g. **Explain consistency with the NYS Smart Growth Public Infrastructure Policy Act.** The draft EIS states that the project is consistent with the New York State Smart Growth Public Infrastructure Policy Act. However, based on the information provided, the project appears to be inconsistent with two of the 10 criteria of the act:

- Item F – “To provide mobility through transportation choices including improved public transportation and reduced automobile dependency” (The project fails to provide transportation choices); and
- Item J – “To promote sustainability by strengthening existing and creating new communities which reduce greenhouse gas emissions and do not compromise the needs of future generations.” (Without a transit option, the project maintains reliance on driving and supports dispersed development patterns, thereby doing nothing to reduce greenhouse gas emissions.)

We recommend that the final EIS provide a more specific discussion of consistency with these criteria.

h. **Provide discussion of financing approach.** In Westchester County’s scoping comment letter dated November 15, 2011, we stated, “Westchester County is justly concerned about how this project will be paid for. It is incumbent on the involved agencies to look at the best fit for

the taxpayers with a public-private partnership as a potential option, particularly if it allows greater flexibility in building a better bridge. While toll revenues could be a partial funding resource, the state must do everything it can to keep tolls as low as possible for already-overburdened taxpayers and commuters. As funding is being investigated, it is critical for the state and federal government to keep the lines of communication open with the local governments and communities that are directly affected by this project. Therefore, this subject should be addressed in the draft EIS.”

The draft EIS does not provide the requested detail or assurances that the cost burden will not be unjustly placed on the residents and business community of Westchester and Rockland counties. The final EIS must address this subject in detail.

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

Sincerely,



Edward Burroughs, AICP  
Commissioner

cc: Hon. Robert P. Astorino, County Executive  
Kevin J. Plunkett, Deputy County Executive  
Jay Pisco, P.E., Commissioner of Public Works and Transportation