



American Planning Association
New York Metro Chapter

APA New York Metro Chapter
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Attention: David Fields
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Making Great Communities Happen

March 21, 2012

Michael P. Anderson, Project Director
New York State Department of Transportation
4 Burnett Boulevard
Poughkeepsie, New York 12603

RE: Tappan Zee Hudson River Crossing
Draft Environmental Impact Statement

Dear Mr. Anderson:

The NY Metro Chapter of the American Planning Association is a professional, educational, and advocacy organization representing over 1,200 practicing planners and policy makers in New York City and its surrounding suburbs. We are part of a national association with a membership of 41,000 professionals and students who are engaged in programs and projects related to the physical, social and economic environment. In our role as a professional advocacy organization, we offer insights and recommendations on policy matters affecting issues such as housing, transportation and the environment.

After an in-depth review of the history and recent changes to the scope of the Tappan Zee Hudson River Crossing, we would like to offer our comments on the DEIS. Our specific concerns may be summarized as follows:

1. Future Traffic Growth

According to the DEIS, in 2010 traffic volumes on the Tappan Zee Bridge (TZB) approach 135,000 on a typical day. Peak hour growth is projected to be 0.3% for each year from 2017 to 2047. The lack of alternative modes will do nothing to reduce this figure and may cause volume to overtake capacity well before intended the service life of the bridge has elapsed. The fact that the future bridge would have an extra lane in the reverse peak direction could potentially generate increased demand for travel. This contrasts with the traffic projections provided in the document, which show a *decrease* in westbound peak PM travel in future years. It is not clear how such a projection was derived.

The DEIS states the project will have no potential adverse effects or cumulative impacts as the project will improve mobility and reduce congestion. The analysis should substantiate whether this would still hold true if the lack of transit options actually increases congestion and the associated emission of greenhouse gases.

2. Lack of Transit Connectivity

Presently, train commuters from Rockland and Orange counties to New York City must take the Metro-North/NJT Port Jervis line and transfer to the PATH at Hoboken. The original project was to have evaluated a rail link to Tarrytown, which would have enabled direct access to Grand Central Terminal. Later iterations of the project included discussions of a BRT link from the Bridge to the Station.

At a minimum, the future bridge project should provide priority access for commuter buses between the existing Palisades Center Park & Ride facility and the Metro-North Tarrytown station. Moving from west to east, this should include: 1) priority access from the bridge landing in Nyack to the Palisades Center 2) use of the “emergency access lane” on the bridge for bus operations, and 3) an access ramp from the new bridge down to the Tarrytown Station. This third element is important to allow existing commuter buses the ability to bypass local roads in the center of Tarrytown. This would also provide a foundation for a future BRT expansion to serve important regional destinations such as White Plains.

3. Loss of Economic Opportunity

The development of a full-corridor transit alternative could greatly amplify the economic development opportunities for Westchester and Rockland Counties in a way that embodies smart-growth principles. Transit routes are more than just a transportation link. A transit station is often a catalyst for successful downtown revitalization or could serve to attract large employers. A new transit system along the entire I-287 corridor would bring new opportunities to re-think land development in underutilized areas or struggling downtowns, if stations were placed appropriately, and development controls put in place at the local level to take advantage of those stations.

An example of this would be Westchester’s “Platinum Mile” which is currently struggling with high office vacancy rates. This office park corridor was developed after the initial construction of the Tappan Zee to take advantage of easy automobile access from the new I-287. Half a century later, office development has trended back towards downtowns, leaving auto-centric, single tenant office parks as partially-occupied reminders of a by-gone era. In response, municipalities have been adapting their zoning laws to allow for multi-tenant buildings and new uses, such as colleges, health clubs and residential units, in an effort to reinvigorate underutilized properties. A full I-287 corridor transit option could further the transformation with new mixed-use, transit-oriented development around new stations. Such development would increase tax revenues, providing a return on the public investment.

4. Costs of Retrofitting

NYSDOT states that the bridge will be designed to accommodate transit should future funding sources materialize. It is not reasonable to believe that all of the loads, grades, clearances and provisions for parking & access will have been sufficiently accommodated in the current design proposal. It can only be more expensive to redesign and retrofit for these items at a later date. In a similar vein, it is far more cost effective to construct these items at one time, when contractors are mobilized and traffic detouring schemes are in place.

5. Whole Cost Approach

The fiscal justification was based almost entirely on the immediate costs of replacing the bridge. On-going operating costs for transit do not appear to have considered the interim years between 2013 (the proposed build-year for the replacement bridge) and whenever transit routes are implemented in the future and operational. The cost of longer travel times for transit vehicles operating in mixed-vehicular traffic should be considered when evaluating the costs of delaying the investment in transit.

We believe the costs associated with the BRT option appear to be inflated in the DEIS, possibly skewing the comparative analysis. The assumed costs per mile seem significantly higher than the industry standard for constructing BRT systems. A detailed, itemized breakdown of the cost estimate provided for BRT is needed. Utilizing accurate figures, emphasis can be placed on implementing the most important, time saving elements first, such as bus priority lanes and optimized transit signals.

6. Climate Change

Chapter 13 of the DEIS curiously states that greenhouse gas emissions will not change because of improved vehicle emission standards and fuel efficiency, yet in the same sentence states that an increase in vehicles miles traveled may outpace the emission reductions. The omission of transit alternatives can only serve to ensure this prediction comes true.

The DEIS claims that the project is consistent with the New York State Smart Growth Public Infrastructure Policy Act. However, the project is inconsistent with at least 2 of the 10 criteria:

- Item F – *“To provide mobility through transportation choices including improved public transportation and reduced automobile dependency”*.
- 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”*.

The New York State *Climate Action Council Climate Action Plan Interim Report* (November 2010), identifies the means by which the State can achieve a 40% reduction in Green House Gas emissions by 2030. The Report presents a range of transportation and land use mitigation strategies, including: mass transit, priority growth centers; transit-oriented development and "location-efficient" land use. Location-efficient land use is described as "*implementing mixed-use, smart growth land-use, and planning policies that result in communities that require less driving*". As there is not any specific additional capacity for transit, or measures to mitigate driving, the project proposal effectively induces driving and precludes location-efficient land use.

In conclusion, we believe a project designed so as "not to preclude" transit realistically does have the effect of precluding transit. The physical and fiscal constraints of retrofitting the bridge and, essentially, the entire I-287 corridor at a future date will likely prove unfeasible. We understand that the deteriorating condition of the bridge necessitates that action can not be delayed indefinitely. We also understand the uncertainties of future transit funding levels but the opportunity costs of not fully integrating a transit plan when the bridge is undergoing a full redesign and when construction crews will be mobilized is far greater.

We favor evaluating the Tappan Zee Bridge and I-287 corridor as more than just a conduit for automobiles, but as a vital component of a regional economy and in the context of regional development patterns. We thank you for this opportunity to comment and urge that the provisions for Commuter Rail or Bus Rapid Transit be fully reinstated in the project scope.

Sincerely,

Michael A. Levine

Michael A. Levine, AICP
VP for Intergovernmental Affairs
APA NY Metro Chapter