

Official BOT Comments
T2B Scoping Doc. 11/3/11



TARRYTOWN-ON-HUDSON

One Depot Plaza, Tarrytown, New York 10591-3605

Mayor
DREW FIXELL
Deputy Mayor
THOMAS T. BASHER

Trustees
THOMAS BUTLER
ROBERT HOYT
MARY McGEE
REBECCA McGOVERN
DOUGLAS ZOLLO

VILLAGE ADMINISTRATOR
914-631-1885
VILLAGE TREASURER
914-631-7873
VILLAGE CLERK
914-631-1652
VILLAGE ENGINEER
914-631-3668
DEPT. OF PUBLIC WORKS
914-631-0356

FAX NO. 914-909-1208

November 3, 2011

Mr. Michael P. Anderson
Project Director
New York State Dept. of Transportation
Four Burnett Boulevard
Poughkeepsie, New York 12603

Re: Village of Tarrytown Comments on Scoping Documents, Tappan Zee Hudson River Crossing Project

Dear Mr. Anderson:

The following should be considered the official submission of the Village of Tarrytown Board of Trustees in response to the invitation for comments on the scope of the Tappan Zee Hudson River Crossing Project contained within the project's Notice of Intent.

- 1) The Village of Tarrytown requests that the required hard look be given during the Environmental Review Process to alternatives and/or specific actions that would mitigate the substantial negative impacts the project outlined in the scoping packet ("the preferred alternative") will have on the eighty-nine unit Quay Condominiums (261 – 299 South Broadway). Specifically, the location of the northern edge of the project structure approximately 90-feet closer and abutting (and overlapping in places) the property line of the Quay will significantly diminish the monetary and use value of both the individual units facing the structure and the common property used for recreation, including the Condominium's pool, tennis courts and clubhouse. The proposed structure's proximity, size and operation will create a variety of substantial negative environmental impacts, including noise, air, light and visual pollution that appear to be completely unmitigated. In particular, since it appears that these impacts of the preferred alternative will render the condominium's common elements nearly valueless, the review must consider measures that will either directly mitigate these effects or enable the private property owners to recover the lost value.

- 2) The Village of Tarrytown requests that the required hard look be given to an alternative or alternatives that include a Bus Rapid Transit (BRT) component that would mitigate the negative environmental impacts associated with the increased automobile and truck traffic that is projected for the corridor and which will be accommodated by the preferred alternative bridge project outlined in the scoping information packet. With the exception of providing breakdown lanes, the preferred alternative does virtually nothing to mitigate such negative impacts, as it neither offers nor funds a mass transit option. To this end, the Village proposes that the lead agencies examine as a possible alternative (“the two-bridge rehabilitation alternative”) that, while keeping in place the “northern” half of the structure as contemplated in the preferred alternative, would replace the “southern” half with the existing bridge conventionally rehabilitated (i.e., repaired and maintained in order to provide safety and functionality, but not earthquake-proofed). Most importantly, this alternative, as it will almost certainly provide significant monetary savings as compared to the current proposal, offers the opportunity to transfer those savings to fund a BRT system, as well as to possibly fund other corridor improvements not contained in the preferred alternative that will further reduce traffic congestion. As reducing traffic congestion both mitigates negative environmental impacts and offers real economic efficiency gains, it is imperative that the environmental review take a hard look at this alternative, and calculate the true value of such improvements in order to accurately evaluate the preferred alternative.

It is important to note that such a rehabilitation of the existing structure, while not providing earthquake protection, would extend the life of the structure for many years and would offer most, if not all, of the capacity, driver safety and other features of a new structure, since the width of the existing structure is, in fact, approximately 8-10 feet wider than the proposed southern structure. Moreover, the absence of earthquake protection in the rehabilitated half should not be considered a fatal or even major flaw, as the new northern half will be built with such protections and which, because of its width and intentional design, will provide the needed redundancy and capacity to carry a full load of traffic in the unlikely event that a major earthquake or other mishap severely damages the rehabilitated structure.

There are a number of additional points regarding this alternative that need to be made:

- a) If there remains a concern that the alternative may eliminate the potential to provide commuter rail service, the utilization of the “long-span” alternative identified in the scoping packet should preserve that potential.
- b) This alternative does not preclude the construction of a new “southern” half if, in the future, additional funding is identified. The environmental review should examine such a possibility in order to avoid possible SEQRA segmentation issues.
- c) This alternative would allow for the immediate (or nearly immediate) investment of funds as the rehabilitation work could begin immediately and continue during the construction of the new northern structure. The value of proceeding in this fashion in terms of more rapid regional employment/economic benefits as well as an earlier completion date should be evaluated in the review process.

- d) The reasoning noted in the scoping package underlying the rejection of the “two-bridge” alternative is premised on the assumption that the rehabilitated bridge would be earthquake proofed, which significantly increases the financial and environmental impacts of the two-bridge alternative relative to a pure new construction alternative. Similarly, the earlier analyses also found that the long-term maintenance needs of a rehabilitated bridge would be greater than that of a new bridge. However, these earlier analyses were also based on the additional assumption that BRT would be provided regardless of which bridge alternative was chosen. Consequently, while earthquake proofing and lower maintenance may be desirable goals, since the preferred option eliminates BRT (and other improvements) from consideration and the alternative proposed here restores it, the review must measure the relative benefits of earthquake proofing and lower maintenance against the significant environmental and economic benefits that would be derived were BRT to be provided.
 - e) The review must also take a hard look at the marginal environmental benefits, in particular those related to energy consumption and greenhouse gas emissions, derived from the reuse of the materials and reduced demolition activities, were a rehabilitated bridge to replace the new southern structure.
- 3) The Village of Tarrytown requests that the required hard look be given to measures and alternatives, including the two-bridge rehabilitation alternative described above, that will mitigate the negative environmental justice impacts and the broader negative economic impacts in Tarrytown and Westchester County that will result from the significantly higher toll charges likely to be required to fund the preferred alternative. The review must consider that since the preferred alternative eliminates BRT from consideration, there will be no meaningful, less costly alternative mode of transportation provided. In particular, as indicated in the scoping package (section 3-14-16), the review should “identify and address any disproportionate and adverse impacts (of the project) on minority and lower-income populations” who 1) live on the west side of the Hudson River and must cross the Tappan Zee in order to reach employment destinations throughout Westchester County, Connecticut and areas of New York City not served by Metro North; and 2) live on the east side of the Hudson River who must cross the Tappan Zee in order to reach employment destinations in Rockland County, Orange County and northern New Jersey. In addition, the negative impact of higher toll charges on discretionary travel, such as that related to tourism and retail activities, should also be considered.
 - 4) Given that the preferred alternative in fact contains the physical capacity to accommodate BRT in the so-called “emergency lanes” without reducing the number of general traffic lanes, and given the often-stated goal and reasonable expectation that BRT will be implemented within the foreseeable future, the Village of Tarrytown requests that the review consider whether the lead agencies’ failure to take a hard look at the environmental impacts of BRT constitutes segmentation as defined under SEQRA and/or NEPA or any other applicable State or Federal statute.

Mr. Michael P. Anderson

Page Four

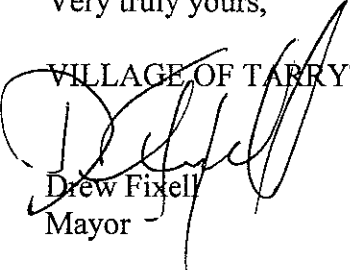
November 3, 2011

- 5) The Village of Tarrytown requests that a hard look be given to the provision of a TZB Bus-Train transfer station constructed as part of the toll plaza in the preferred alternative and any other alternatives that may be considered. Whether or not new and enhanced BRT service is provided, the advantages of such a station in terms of reduced commute times and mitigation of the negative environmental impacts associated with bringing either the existing buses or potential future BRT vehicles to the Tarrytown Metro-North Train Station are likely to be considerable. Moreover, by providing convenient, pedestrian and drop-off access to residents living in the vicinity of such a transfer station, such a station has the potential to both mitigate a portion of the negative impacts associated with construction of a new and larger bridge on the Quay Condominiums, but also to provide considerable environmental benefits to the larger region by shortening and, in many cases, eliminating, automobile commutes of others headed for the Hudson Line. It is only by taking the requisite hard look at this measure will the review be able to accurately balance any costs or other negative impacts of this proposal against its benefits.

Thank you for providing the Village of Tarrytown the opportunity to provide comments in regards to the Tappan Zee Hudson River Crossing Project scoping documents. In addition, I would like to note that the Village will be submitting the form in order for the Village to be a Cooperating Agency.

Very truly yours,

VILLAGE OF TARRYTOWN



Drew Fixell
Mayor