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Official Comments of the Board of Trustees Regarding The Tappan Zee Bridge/I-287 Environmental Review

While the Alternatives Analysis (AA) report for the Tappan Zee Bridge/I-287 project is an extensive and generally comprehensive document, a fundamental flaw compromises its usefulness and accuracy, and therefore undermines the next stages of the environmental review. This flaw is one of omission, i.e., the AA report fails to properly consider in its review of Alternative 2 (Bridge Rehabilitation with TDM/TSM Measures) a full range of roadway and mass transit improvements that would enable this alternative to be analyzed on a comparable basis with the other alternatives. The significance of this cannot be overstated – this omission clearly tilts the analysis against the lone alternative not embodying a new crossing since it seriously understates the potential improvements to travel time and traffic mitigation from this alternative. Put another way, by not fully exploring these improvements, the analysis falsely overstates the marginal improvements in traffic flow available from the other alternatives. Consequently, without changes, it is impossible to develop accurate cost-benefit analyses for this project.

The failure to consider roadway improvements (that is, improvements to I-287 other than those embodied in new bridge itself) that are included in all of the other alternatives is particularly difficult to understand. Though there may be specific items that cannot be incorporated into Alternative 2, measures such as the addition of a westbound climbing lane to the highway west of Central Nyack not only are easily accomplished but also surely would result in significant reductions in traffic congestion (it is demonstrably true that most westbound PM rush-hour traffic congestion on the bridge stems from the narrowing of the highway from 4 lanes to 3 in Central Nyack). It also appears that improvements to the toll plaza and easy-pass system were left out as well.

Moreover, there also is no attempt in the AA report to consider measures, in addition to those included in the other alternatives, specifically designed to mitigate the limitations inherent in the Bridge Rehabilitation alternative. For example, while the absence of shoulders is noted as a shortcoming of Alternative 2, a portion of the resultant problems could be alleviated by substantially increasing tow-truck patrols. There also are likely to be

other roadway and operation improvements uniquely designed for this alternative; however, since the environmental review fails to explore the potential for such measures, it is impossible to determine whether they exist or are feasible.

Similarly, the AA report does not analyze the one mass transit alternative that could be incorporated into the Bridge Rehabilitation alternative, namely a fully built-out Bus Rapid Transit system (BRT), such as that considered in Alternative 3. The major difference between the two alternatives would be that the BRT in Alternative 2 would return to regular travel lanes for the length of the bridge. While this clearly would diminish, to some extent, the desirability of the system and perhaps its ridership, the magnitude of the impact needs to be carefully measured. Moreover, it is entirely possible that the impact would not be substantial since the data indicate that during the rush hours, speeds on the bridge average approximately 30 miles per hour for the 3 mile length of the bridge. In any case, in order to accurately measure the marginal benefit of constructing a new bridge, the analysis must be conducted.

There are three additional measures that also should be considered in the analysis of Alternative 2 (as well as Alternative 3). First, the construction of a new Hudson line transfer station at the current site of the State Police Station/NYDOT facility should be included. Though such a station would require a lengthy escalator and/or elevator to reach the train tracks near the river, this does not appear to be an insurmountable barrier (for example, there are several extremely long escalators in the Washington D.C. Metro). Such a station would be in addition to, not a replacement for the existing Tarrytown train station, and could also include additional parking to accommodate both Rockland and south Tarrytown drivers. Though the operational details obviously must be worked out, the additional train stop would likely only add a few minutes to the regular Hudson line commute, while significantly reducing commutation times for Rockland commuters when compared to current conditions or to the proposed connections to the existing Tarrytown train station.

The second measure that should be included in the analysis of Alternative 2 would be to include BRT *and* to provide a separate adjacent structure to carry the BRT vehicles across the river, much as is described in Section 7.3.2 (Rehabilitation plus LRT) of the AA report. Though the latter option is ruled out in the AA report precisely and only because full-corridor LRT is ruled out in general, there is no similar justification for not including it as a BRT option. In fact, it is perplexing that no mention at all of this option can be found in the AA report.

The third and final measure is the most significant in terms of its impacts, in particular its potential positive impacts on the environment and its general impact on the environmental review process, since it does not appear to have been reviewed in Level 2 screening or in the AA report. This measure, which needs to be evaluated separately from the BRT bridge structure discussed in the preceding paragraph, would be a separate single tunnel to carry both "through" mass transit and truck traffic. The tunnel proposed here, unlike the one analyzed in the AA report, would neither be limited to commuter rail (in our view, BRT would likely be the preferred mode) nor provide a connection to the existing Tarrytown station; rather, it would bypass Tarrytown entirely and any connection to the Hudson Line, if deemed feasible and desirable, could be provided by either BRT service on the rehabilitated bridge transferring passengers at a new TZB station or, if CRT is sought, by a

branch tunnel with an alignment similar to the one proposed in Alternative 4 (though such a tunnel would likely traverse the river bed as opposed to the land beneath Kraft Foods). As an alternative, a CRT connection to the Harlem line should also be evaluated.

The advantages of this option are potentially numerous and include:

- 1) Costs and environmental impacts of tunnel construction are minimized since only one tube is constructed
- 2) Costs and environmental impact are significantly reduced when compared to the rail tunnel option analyzed in the AA report since the lengthy connection to and new construction at Tarrytown station are eliminated
- 3) Pollution from trucks can be mitigated with scrubbing technology built into ventilation facilities
- 4) Visual impacts from ventilation facilities are minimized since only one tube is constructed
- 5) Other visual impacts are minimized since no additional bridge structure is constructed
- 6) Residential land takings and proximity impacts (noise and air pollution) are minimized since no new structure is constructed closer to existing residences
- 7) Traffic on the rehabilitated structure is reduced by diversion of through truck traffic and availability of effective mass transit
- 8) Wear and tear on bridge is minimized by diversion of through truck traffic.
- 9) Security concerns associated with tunnels are minimized since only one tube is constructed
- 10) Overall security is enhanced since two separate crossings would be available.

As can be surmised from the above comments, the underlying concern is that the Bridge Rehabilitation alternative is not being fairly and fully considered. Rather than treating it as equal to the various replacement bridge alternatives, the AA report inexplicably omits a variety of potential measures that could substantially increase the relative benefits of the rehabilitation alternative. It is imperative that these changes be made before the environmental review proceeds any further.