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C. SCOTT VANDERHOEF
County Executive
March 30, 2012

Mr. Michael P. Anderson
Project Director
Tappan Zee Hudson River Crossing Project
New York State Dept. of Transportation
4 Burnett Boulevard
Poughkeepsie, New York 12603

RE: TAPPAN ZEE HUDSON RIVER CROSSING PROJECT

Dear Mr. Anderson:

Below please find Rockland County's comments on the Tappan Zee Hudson River Crossing Project Draft Environmental Impact Statement (DEIS) document. Included here are comments from the Department of Planning and Public Transportation, Highway Department and Division of Environmental Resources. The review was coordinated by the Department of Planning, and our comments are organized by chapter.

We support the Governor's mission to expedite the construction of a new Tappan Zee Bridge, and the best way to get that done is to have an open and transparent planning process. Any public works project of this magnitude must be a model of transparency and all relevant information including budget projections must be made available to local stakeholders and the general public.

We also wish to emphasize the following points:

FINANCING

The lack of any financing plan is disturbing and clearly makes the DEIS deficient in this regard.

TRANSIT

This project has ignored the fact that there is existing transit in the corridor and on the bridge that must be accommodated in a meaningful manner on the new bridge. What Rockland County has been calling for is a highway treatment – not a transit accommodation. Having TAPPAN ZEE Express buses use the emergency lanes on the new bridge is simply making more efficient use of the highway capacity the new bridge will provide – a concept that FHWA itself promotes in its Freeway Management Program (publication number: FHWA-HOP-10-023).

Therefore, the new bridge should have dedicated Bus Lanes from day one to improve transit reliability and remove the constraints of traveling in the general traffic lanes. The Thruway should also provide a bus-on-shoulder lane from the Palisades Center to the bridge during peak travel times.

We understand the new bridge will not preclude future transit. However, Rockland County is requesting that FTA/NYSDOT/MTA begin the environmental review process immediately to provide BRT in the corridor. This analysis should include a slip ramp/connector from the Toll Plaza area to Tarrytown Rail Station. This will prepare the agencies to be eligible for financing through FTA's New Starts, Small Starts or other funding programs.

Also, studies on future landside and transit improvements in the corridor should begin immediately. It is lack of landside improvements and transit accommodations that are the current major causes of delays.

The access ramp to the Westchester Bridge Staging Area should be constructed to eventually become a permanent route for a bus-only slip ramp from the Tarrytown Toll Plaza area to the Tarrytown railroad station.

Instead of rebuilding the Tarrytown Toll Plaza, the project should call for all highway-speed electronic toll collection, using overhead gantries instead of toll booths. Toll collection would be EZPass only - no cash - utilizing license plate readers to bill non-EZPass vehicles by mail. Benefits would include less congestion and fewer delays, and the space previously dedicated to the toll plaza could be "reclaimed". Elimination of the toll booths would assist in the ability to design and construct a dedicated ramp to the Tarrytown Station, to improve future BRT connections and allow space for NYS Police Troop T barracks for police presence.

We suggest that the project allow for toll-exemption for all Rockland County-owned public transit buses at Tarrytown and Spring Valley, as well as a significantly discounted bridge toll rate for all Rockland County resident E-ZPass® tag holders, similar to other such programs in the region.

We also request that the project allow a set aside of 2% from all tolls collected on the Tappan Zee Bridge, to be allocated to the Rockland County Department of Public Transportation for ongoing supplemental funding for the TAPPAN ZEEexpress commuter bus service and future BRT transit operations in the corridor.

VISUAL

The impacted communities must understand the effects of visual impacts in order to contribute to a final design, which fits appropriately within their environments. The two designs both for a short and long span "cable-stayed" or "arch" design present completely different visual impacts to the viewshed. The cabled-stayed option would be approximately 539 feet above mean high tide verse 339 feet for the arch design. Two hundred feet in height is a significant difference and change to the viewshed. Each design must include a comprehensive review with public input. It should not be left up to the contractor to select the final design of the replacement bridge.

AQUATIC & WATER RESOURCES

No runoff water quality controls are proposed on the new bridge. The proposed bridge is substantially larger than the existing bridge (73% more impervious surface), so more pavement contaminants would be released through runoff. Additionally the existing bridge has a long level span, distributing the runoff, while the new bridge will have a long constant grade span, potentially concentrating the runoff on the Rockland side. Therefore, water quality controls on the bridge should be mandatory, and should be relatively easy to implement in the open areas under the spans.

The DEIS limits the study area for aquatic and terrestrial resources to a ½ mile perimeter around the new bridge. Hydroacoustic effects extend 1.5 miles both up and downstream. The DEIS seems to “brush” over the potential severe environmental impacts that this project will have on the aquatic community. The significant dredging over 1.5 million cubic yards, rock armoring and pile-driving project has the potential to impact critical fish habitat and disrupt migratory species including the endangered or threatened Shortnose and Atlantic Sturgeon, Alewife, and Blueback Herring. All of these aquatic species are known to inhabit the area of the existing bridge either long-term or short-term. The EIS must provide a comprehensive analysis of any potential impacts to these species. Dredging and pile driving will have the most significant adverse consequences on the marine environment. A biological assessment of the acoustic impacts related both to the dredging and pile driving must be included in the DEIS.

Artificial Reefs can be constructed to increase fisheries habitat. They provide marine life and other organism’s additional opportunities for shelter and foraging. Artificial reefs are typically built out of hard structures such as rock, concrete and steel. The significant work required for the bridge construction provides an opportunity to create an artificial reef using construction material from the removal of the existing bridge. The EIS should provide an analysis of the benefits of creating an artificial reef along the dredged channel or in the footprint of the existing bridge.

We are extremely concerned about the short and long term impact of the dredging operations on the Hudson River and our County. Approximately 1.7 million cubic yards of sediment will be dredged for the construction of the new bridge, mostly from the Rockland side. The DEIS only addresses the removal of this material via barge to a site in the New York Bight, HARS. In our opinion, based on the high levels of certain contaminants seen in the sediment sampling, the dredged material may not pass the stringent qualifications required at the HARS site (interestingly, the RFP documents recognize in the pricing schedule that the material may not be able to go to HARS, and provide for upland disposal). Therefore, the DEIS is deficient in addressing the costs and impacts of dredge disposal on Rockland County, to the extent of 800 truck trips a day of contaminated material and associated trucking impacts and possible time delays. More must be done on addressing transport and beneficial re-use of this material, as well as host community benefits.

Dredging is proposed to be conducted during a three-month period from August 1 to November 1 for three years of the construction period. This is clearly a major impact on recreational uses during this time.

An Environmental Mitigation Fund should be created to protect, restore and improve aquatic habitats and fisheries resources in the Hudson River impacted by the construction of the new bridge and removal of the existing bridge.

CONSTRUCTION IMPACTS

A full time Inspector/overseer/monitor should be in place to ensure emission reduction strategies are being implemented at the worksite.

We are requesting a Construction Mitigation Transit Plan that will include FHWA/NYS DOT funding to increase the TZx bus service during the entire construction period, in the amount of \$3.0 million a year. This will reduce the number of Single Occupant Vehicles (SOV) traveling in the construction zone.

The "design-build" aspect of the project creates many unknowns as elements of the construction are at the contractor's discretion, including disposal and borrow sites, privately owned sites for pre-fabrication, production of materials, and the like. Although these independent decisions by the contractor are beyond the scope of federal action we feel that every aspect of the bridge construction should be included for review in the DEIS. Specific to Rockland County, we recommend that the locations of the concrete batch plant and lay down/storage areas be addressed in the DEIS. These include the Rockland Bridge Staging Area, West Nyack Staging Area and Tilcon Quarry Staging Area.

RFP and CONSTRUCTION

The County requests the right to comment on the RFP and the RFP process independently of the environmental review, as the RFP process is just as critical.

As one of the two impacted host communities, the County requests the right to be a part of the RFP selection committee and design-build oversight team.

The County is requesting that the project support a full time Rockland County project manager and a full time Rockland County construction inspector, appointed by the County and paid for by the project, as well as having the project reimburse any staff time expended during construction.

On behalf of Rockland County, I would appreciate your serious consideration of these issues and concerns. Thank you.

Sincerely,


C. Scott Vanderhoef
COUNTY EXECUTIVE

cc: Thomas B. Vanderbeek, P.E., Commissioner of Planning & Public Transportation

Rockland County Comments
Tappan Zee Hudson River Crossing Project DEIS and Section 4(f) Evaluation

CHAPTER 1 : Purpose and Need

1. Rockland County provided the following corrections in its November 2011 Scoping comments. However, the same incorrect information now appears in the DEIS. Please correct the following statements in Section 1-3-2 of the document:
 - a. “The population in Rockland County has more than tripled from about 89,000 in 1950 to 299,000 in 2010 (+235 percent).” This statement is factually incorrect. The correct statement should read as follows: “The population in Rockland County has more than tripled from about 89,000 in 1950 to more than 311,000 in 2010 (+249 percent)”
 - b. The 2010 population cited for Westchester County of 962,000 is not accurate and does not reflect the 2010 Census population total of 949,113 and should be corrected as well.
2. Also within this section, there is a discussion of projected population and employment growth for Rockland County, which states that Rockland County’s population is expected to increase by 50,000 between 2010 and 2047. We acknowledge that the data was obtained from NYMTC population and employment forecasts. However, it should be noted in the document that the Rockland County Planning Department’s own Population Projections, developed by the Program on Applied Demographics at Cornell University through a contract with the County, projects an increase of more than 41,000 between just 2010 and 2035 alone. (Rockland County’s projections project provides information from 2005 – 2035 and was developed before the 2010 Census was conducted). Also, updated population and employment projections to the year 2040 for Rockland and Westchester Counties have been developed by NYMTC. These updated forecasts, which incorporate results from the 2010 Census, indicate a more significant growth for Rockland, in terms of population and employment, than is currently reflected in the document. According to these updated NYMTC forecasts, Rockland's population is expected to increase by nearly 52,000 residents between 2010 and 2040, while employment in Rockland is expected to increase by more than 53,000 between 2010 and 2040. These updated forecasts should be used in place of those currently identified.
3. In addition to the growth in Rockland and Westchester Counties, the document should also reference recent and projected growth in Orange County, which is a factor in the context of our region and has potential impact on the crossing. Orange County saw a nine percent increase in population between 2000 and 2010 and is poised for more growth given the significant amount of vacant land still available there. Without improved transit options, growth in Orange County will also bring more single occupant vehicle (SOV) commuters through Rockland to cross the bridge.

4. In section 1-5, one of the clearly defined “Deficiencies” of the existing bridge is “Mobility Deficiency”. However, not one of the Goals or Objectives listed for this project in section 1-6 addresses congestion, despite the fact that section 1-6 states, “Project development is being guided by three goals with objectives that address the deficiencies of the existing bridge described above.” In fact, the word congestion does not appear anywhere in section 1-6. Reducing congestion and addressing “Mobility Deficiency” must be included in the project goals.

CHAPTER 2 : Project Alternatives

1. Why is there only one build option included? This appears contrary to the spirit of the EIS process. Section 2-3 titled “Alternatives Considered And Eliminated” does not mention how or why a “BRT from Day One” option was ruled out.
2. All alternative bridge and transit options considered but not advanced, including a tunnel and rehabilitating the existing bridge, must be fully described.
3. How would a “below the highway deck” (page 2-6) transit connection work in South Nyack without blocking access to River Road when “The highway would exit Rockland County at an elevation of between 16 and 23 feet above River Road”? (Page 2-8)
4. The figures used to describe transit costs (page 2-6) are unsubstantiated and, in Rockland County’s opinion, are overly inflated. Please provide documentation to justify the estimated transit costs.
5. “As specified in 23 CFR § 636.109, a Design-Build process must be coordinated with Review under NEPA.” Who is responsible for making sure the Design-Build contractor stays within the environmental impact parameters outlined in the EIS? Who is responsible for amending the EIS if/when changes need to made? (page 2-7)
6. Bike Path: How does the bike path connect to the Esposito Trail in South Nyack? Will accommodations be made for a safe transition from the bike path on the Tarrytown side to the local street network? (page 2-12)

CHAPTER 3 : Process, Agency Coordination, and Public Participation

1. The abrupt, radical change made without local stakeholder input from the former TZB/I-287 Corridor EIS process with transit to the “fast track” TZB process without transit does not appear to follow this federal requirement: “Section 6002 of SAFETEA-LU increased opportunities for federal, state, and local agencies to have active and early involvement in the NEPA process and to provide comments on the project’s purpose and need, environmental study methodology, and alternatives under consideration.” (Page 3-7)
2. The new planning process must be more transparent, especially with regard to projected costs and financing. Outreach efforts to stakeholders have been lacking in the new process and need to be improved before the FHWA releases a Record of Decision.
3. Is there any reality to back up the following statement? “The project’s Stakeholder Committee, formed during the Tappan Zee Bridge/I-287 Corridor Project and including over 500 members, and Stakeholders’ Advisory Working Groups, also formed earlier, have and will meet as appropriate.” (Page 3-10)
4. Subsection 3-3 Methodology, 3-3-1, Study Areas: The environmental analysis of both in-water and upland effects of the project’s construction and operation’s study area has been generally defined as the area along and extending ½ mile north and south of interchange 87/287. We recommend that the study area be significantly increased in length and width to accommodate both short-term construction impacts and long-term impacts. As indicated in our general comments, the mass transit options must be included in the EIS as the new bridge

is designed to accommodate this component in the future. The mass transit component will have far reaching effects to communities along the interstate 87/287. The close proximity of Haverstraw Bay and the Piermont Marsh identified, as a “Significant Coastal Fish and Wildlife Habitat” must require the study area to be expanded to include these areas. The replacement and existing bridge will have impacts both on local and migrating species; consequently, the study area must be expanded.

CHAPTER 4 : Transportation

1. 4-3-1 The Best Practice Model (BPM) travel forecast data entered into the Paramics Microsimulation Model are an important foundation to understanding and visualizing the future impacts on the bridge and corridor. Rockland County requests that the project show the Microsimulation Model for the entire Rockland & Westchester Corridor, and show this simulation for the five (5) years of construction. Most importantly, Rockland requests to see the model run of what the traffic volumes in the corridor (from Suffern to Nyack) will look like after the bridge is completed and with no dedicated transit in the corridor (the year 2047).
2. Please explain the projected drop in westbound peak hour traffic volumes for the next 30 years.
3. 4-5-2-1 (Traffic): The Replacement Bridge Alternative would change the two higher-speed E-ZPass® lanes (35 mph) at the Tappan Zee toll barrier to three highway-speed E-ZPass® lanes (65 mph). However, Rockland County proposes that instead of rebuilding the Tarrytown Toll Plaza to include toll booths, (as outlined in 4-4-1-1), the project should include only highway-speed toll collection (65 mph), using overhead gantries instead of toll booths. Toll collection would be collected electronically only - no cash - using EZPass® and license plate readers to bill non-EZPass® vehicles by mail. Benefits would include less congestion and fewer delays, and the space previously dedicated to the toll plaza could be "reclaimed". Elimination of the toll booths would assist in the ability to design and construct a dedicated ramp to the Tarrytown Station, to improve future BRT connections and allow space for NYS Police Troop T barracks for police presence. Toll collectors would need to be reassigned to other tolls on the Thruway, or be employed to process and collect license plate reader tolls in the back office.

The following data justifies cashless tolling:

- Cash Lanes within the toll barrier process 250 vehicles per hour (VPH) per lane; E-ZPass® lanes within the toll barrier process up to 900 VPH per lane; Higher speed E-ZPass® lanes can process approximately 1,100 to 1,200 VPH per lane. The replacement of toll booths with all highway-speed electronic toll collection would eliminate toll booths and enable instant processing of tolls.
- The DEIS states that; “Off Peak and Weekend E-ZPass® usage is much lower. As such, weekend queues of cash-paying drivers block access to the E-ZPass® lanes and occasionally queue back onto the bridge, creating traffic delays.”

Highway-speed toll collection technologies are already in place throughout the country and around the world:



(Photo credit: HNTB)

4. Rockland County requests that the Spring Valley toll plaza also be converted to all highway-speed overhead electronic toll collection.
5. Rockland County requests that the project require toll-exemption for all County- owned public transit buses at Tarrytown and Spring Valley.
6. Rockland County requests a significantly discounted bridge toll rate for all Rockland County resident E-ZPass® tag holders, similar to other such programs in the region, such as on the Thruway Grand Island Bridges, in Staten Island on the MTA Verrazano-Narrows Bridge, and in Rockaway/Broad Channel for the MTA Marine Parkway and Cross Bay Bridges.
7. The Thruway Authority's "Green Pass Discount Plan" (offers a special 10% discount to Hybrid vehicles getting at least 45 miles to the gallon and meeting certain emissions standards) should be included in the pricing for the new bridge tolls.
8. Rockland County is calling for a set aside of 2% from all tolls collected on the Tappan Zee Bridge be allocated to the Rockland County Department of Public Transportation for ongoing funding for the TAPPAN ZEEExpress commuter bus service and future BRT transit operations in the corridor.
9. 4-4-3: Please correct the information for the TZx & OWL bus systems. The TZx bus service operates Monday –Saturday (not seven days a week). The OWL bus service is operated by Coach USA Shortline (not Short Lines) and operates Monday-Friday.
10. Please add the following information to Section 4-4-4: Bicycles are allowed to be placed under all TAPPAN ZEEExpress (TZx) buses in the luggage compartments at no extra cost. The newer TZx buses feature Sportswork bike racks in the luggage compartment.
11. 4-5-1-3: The DEIS admits that "...buses would use general traffic lanes and be subject to the same safety and mobility constraints as private vehicles and trucks." Therefore, the new bridge should have dedicated Bus Lanes from day one to improve transit reliability and remove the constraints of traveling in the general traffic lanes. The Thruway should also provide a bus-on-shoulder lane from the Palisades Center to the new bridge during peak travel times.
12. The Thruway Authority has stated in other documents that the project's design/build contract will require that the new bridge be fully able to support transit, and will provide immediate express bus service. Please explain how immediate express bus service will be accommodated.
13. The Thruway Authority should be planning Managed Lanes for this bridge project and corridor. Active Lane Management is when operational strategies are proactively implemented and managed in response to changing conditions. (Examples include HOT, HOV, green discount). Without any new transit being added to the bridge, Managed Lanes should be utilized in the interim in order to help address congestion.

14. 4-5-1-3: This section of the DEIS discusses projects on the TIP that may increase bus service across the bridge. The document states, “The Rockland County Department of (sic) Transportation is studying an expansion of the Tappan Zee Express system, which may result in higher frequencies on existing routes as well as new routes between Rockland County and points east via the Tappan Zee Bridge. NYSDOT is study (sic) new Orange-Westchester Link (OWL) bus service between Route 17 (I-86) and Westchester County with connections to other services (Tappan Zee Express, I-bus & local service).” These statements are factually incorrect. The Rockland County Department of Public Transportation’s TIP project to purchase vehicles for TZx service expansion has been pushed back until at least 2018, due to lack of operating funds. That project is NOT included in NYMTC’s 2008-2012 TIP. In addition, the OWL bus service is an existing service – not new – and already provides connections to the listed services. Therefore, the DEIS should be corrected to no longer state that, “these new or expanded services would increase transit ridership across the Tappan Zee Bridge.”
15. 4-5-2-3 : We understand the new bridge will not preclude future transit. However, Rockland County is requesting that the study team begin the environmental review process to provide BRT in the corridor. This analysis should include a slip ramp/connector from the Toll Plaza area to Tarrytown Rail Station. This will prepare the agencies to be eligible for financing through FTA’s New Starts, Small Starts or other funding programs.
16. When will the study team begin to look at the landside improvements and transit improvements that need to be made in the corridor in Rockland? It is lack of landside improvements and transit accommodation that are the current major causes of delays.
17. The access ramp to the Westchester Bridge Staging Area should be constructed to eventually become a permanent route for a bus-only slip ramp from the Tarrytown Toll Plaza area to the Tarrytown railroad station.
18. Regional traffic impacts must be fully analyzed. Additional travel lanes on Interstate 87/287 to the Garden State Parkway should be analyzed. The interchange on Mountainview Avenue must be analyzed.

CHAPTER 5: Community Character

1. How does the new bridge bring together Transportation and Land Use in this corridor?
2. Sound walls should have minimal impacts on the land owner and use the best materials and coverings to minimize the impacts on the homeowners and maximizing the reduction of sound.
3. The land uses highlighted in the Study Area, Figure 5-1, do not agree with the land uses highlighted in the Rockland County Land Use map, Figure 5-2. For example, the parcels highlighted in orange as commercial-retail in Figure 5-1 are shown as yellow – residential in Figure 5-2; the parcels shown as gray, manufacturing, industrial & warehouse in Figure 5-1 are shown as yellow, residential in Figure 5-2; and the parcels shown in black – not yet classified in Figure 5-1 are shown as residential in Figure 5-2. In addition, why are there no multi-family categories in Figure 5-2, a more detailed map for Rockland County, as they are shown on the Westchester County Land Use map, Figure 5-3? The legend on Figure 5-2 shows commercial as a dark gray, yet presumably the commercial land uses depicted on the map are highlighted with red. Lastly, Figure 5-2 does not include the entire study area in the map, missing the southernmost portion of the land uses. The land uses must be consistent on all of the land use maps, the legend colors correlate to the map, and the entire land use area must be included in Figure 5-2.

4. Page 5-3 states that there are no industrial uses within South Nyack. However, Figure 5-2 shows two light-industrial/warehouse uses within the Village, one of which is located within the study area. This should be clarified.
5. Pages 5-3 and 5-4 list prominent land uses within the study area. Nyack College, one of the handful of colleges located within Rockland County, is located in the Village of South Nyack and the study area. This should be noted as one of the prominent land uses within the Village as it encompasses a significant proportion of the land area of the Village of South Nyack.
6. Page 5-4 discusses the land uses within the Village of Grand View-on-Hudson. Hader Park, a linear park that serves as the western boundary for the Village should be identified as one of the Village's defining elements, especially since park and trail connect to both the Village of South Nyack's Esposito rail-to-trail park to the north, and the Village of Piermont's rail-to-trail to the south.
7. Page 5-9 discusses Rockland County's proposal to adopt the County's comprehensive plan as its Greenway Compact Plan. The second sentence of the first paragraph on page 5-9 should be rewritten to indicate that only the County's Comprehensive Plan would serve as the Greenway Compact Plan. The funds received from the New York State Quality Communities grant were used for other projects within Rockland County. Footnote 2 should also be changed, as the Greenway's website has been updated for Rockland County as follows: Rockland County: Rockland County's recently completed comprehensive plan, *Rockland Tomorrow*, <http://www.rccompplan.com/> will serve as the Greenway Compact Plan for the county. The plan represents Rockland's vision for the future by balancing growth with good planning principles and the protection of natural resources. The development process recognizes a variety of resources, plans and concepts that are already in place. Rockland County's Compact will provide planning assistance and guidance to its municipalities, businesses and civic leaders in an effort to strengthen local and regional economies, protect the unique natural and cultural resources, and work to ensure sustainability. The Greenway Council authorized Rockland's Compact in January 2012, so, as indicated above, the end of the same paragraph should be changed to indicate that on January 18, 2012, the Hudson River Valley Greenway communities Council adopted "*Rockland Tomorrow: Rockland County Comprehensive Plan*" as Rockland County's Greenway Compact Plan.
8. On Page 5-9, under the Hudson River Valley Greenway Trail System, designated Greenway Trail sections in Rockland County are listed. Several corrections to this list should be made. The Joseph B. Clarke Rail-Trail is located in the Town of Orangetown, not the Village of Grand View-on-Hudson, and is not within the study area. This trail traverses north from Oak Tree Road in Palisades north to the Sparkill area, ending at the Village of Piermont boundary. The Esposito-Hader Link Trail is located within the Town of Orangetown, and not within either the villages of South Nyack or Grand View-on-Hudson. These corrections should be made to the DEIS.
9. Page 5-11 notes the criteria for review authority for county governments. One additional criterion for Rockland County is the Long Path, a regional hiking trail. This trail was made a part of the County Official Map, Part III, and referrals are sent to the County Planning Commissioner as part of the General Municipal Law mandate. Since the Long Path is within the study area, it should be included as one of the criteria for the County's review authority.
10. On page 5-14, Section 5-4-3-2 Town of Orangetown, Rockland County, discusses the Town of Orangetown Comprehensive Plan. As is noted for the Village of South Nyack, it should be noted that the Town of Orangetown is currently updating parts of their comprehensive plan.
11. Under Section 5-4-3-3 it should be noted that on February 23, 2012, NYMTC's Program Finance and Administration Committee (PFAC) adopted a resolution to amend the Regional Transportation Plan (2010-2035) to add the South Nyack Lid Park project. This request was for \$500,000 to fund a feasibility study for a project to construct a 'lid' or deck over Interstate

287 as it bisects the Village of South Nyack. The 'lid', combined with land recovered from the reduction of the Exit 10 interchange, would be used to create a unique environmental, recreational, and light commercial asset. This will promote economic revitalization for the river villages region through the conversion of unutilized space above a major urban freeway in an ecologically sensitive manner to promote local sustainable community development, setting a new standard for sustainable urban parks.

12. Though the zoning for the southern portion of the study area is the same as what is shown, the entire study area should be depicted in Figure 5-4, instead of being cut off as drawn.
13. The word "Grandview" should be changed to "Grand View" in both Table 5-1 and in the legend on Figure 5-6 where they list and locate the "South Nyack-Grandview Police Department."
14. The Living Christ/Simpson Memorial Church in the Village of South Nyack should be added to the list of Community Facilities in Table 5-1 and on Figure 5-6.
15. Section 5-5-2-1 states that "the project would be expected to preserve and enhance the quality of life and character of the communities and neighborhoods in the study area as a result of the improvements to access, mobility, and safety." How can this be stated if there are to be no real improvements to the structure of the bridge, i.e. number of lanes, transit components, etc.? The only enhanced quality of life that could occur with this bridge proposal, since no transit components are being implemented, would be when there are emergency situations on the bridge – and access time to arrive at the scene by emergency vehicles would be lessened. Congestion, noise, and visual impacts will continue with the construction of the new bridge, impacting the surrounding residential neighborhoods. Removal of any existing residences will have a negative impact to the remaining surrounding dwellings, as they will now experience greater noise, visual, and pollution impacts. In addition, land takings in the Village of South Nyack, though minimal, should not be minimized, as the Village has already experienced great economic impacts from the original bridge construction. Removal of even a small green space should be mitigated by provision of a comparable green space somewhere else in the Village.
16. Section 5-5-3 states that, "The project would not introduce any new residents or permanent workers to the surrounding area." We believe that the reverse commute will increase and improve with the 4 lanes in the westbound during AM peak and eastbound during PM peak, which currently does not exist today.
17. We are glad that the new bridge will meet current engineering design standards. Please describe specific impacts on how the community character will be enhanced or impacted.
18. 5-6 MITIGATION: The DEIS states that the replacement bridge would not result in any adverse impacts on community character. Please provide computer animation for both the short span and long span and the land side improvements to show how this will not impact the residential areas including Bradford Mews Complex and the surrounding areas where the Thruway cuts through Rockland to S. Broadway.
19. The concerns raised by impacted communities must be fully analyzed and responded to.

CHAPTER 6: Land Acquisition, Displacement, and Relocation

1. Any land takings should be minimal, must provide justification and owners should be fairly compensated. This not only includes actual takings but degradation of land values, quality of life, and other impacts due to the construction and proximity.

CHAPTER 7: Parklands and Recreational Resources

1. There are several mislabels on Figure 7-1, Parklands and Recreational Resources. The Joseph B. Clarke Rail Trail (#7) is located within the Town of Orangetown, traversing between Oak Tree Road and the Sparkill/Piermont railroad triangle split and outside of the study area. However, the map shows this trail to be located within the Village of Grand View-on-Hudson; this portion of the rail trail is Hader Park. Hader Park (#6) is also mislabeled, as the label for this park is labeled in the area outside of the Village of Grand View-on-Hudson. The Raymond G. Esposito Memorial Trail (#5) is shown and labeled within the Town of Orangetown boundary, instead of within the Village of South Nyack. These labels must be corrected. In addition, two trail links are missing from the map: the Esposito-Gesner Avenue Park Link Trail and the Esposito-Hader Link Trail. The Esposito-Gesner Avenue Park Link Trail, located within the Village of South Nyack, connects Gesner Avenue Park to the Raymond G. Esposito Memorial Trail, and has been designated as a Hudson River Greenway Trail. The Esposito-Hader Link Trail is located within the Town of Orangetown, and connects the Raymond G. Esposito Memorial Trail to the Hader Trail. This trail has also been designated as a Hudson River Greenway Trail. These two additional segments should be added to the map.
2. Table 7-1 lists the parklands and trails within the study area. The description/notes for the Raymond Esposito Memorial Trail are misleading, as this trail is significantly inland and follows the old railroad right-of-way. The description should also indicate that it has been designated as part of the Hudson River Greenway Trail. The spelling for Grand View should be corrected from “Grandview” for the Hader Trail. Two additional trails should be included in Table 7-1, as they have both been designated as segments of the Hudson River Greenway Trail. These two trails are the Esposito-Gesner Avenue Park Link Trail, located within the Village of South Nyack, and the Esposito-Hader Link Trail located within the Town of Orangetown.
3. Page 7-3 describes the parklands and recreational resources in close proximity to the I-87/287 right-of-way. The Raymond G. Esposito Memorial Trail should be included in this section, as it is not only in close proximity to the right-of-way, but in fact crosses the corridor. Bike Route 9 should also be described within this section as it traverses directly under the Tappan Zee Bridge.
4. Included in this list is the Palisades National Natural Landmark. As this is a significant natural resource, and has impacted location of the bridge and development patterns in general, this area should be highlighted on the Parklands and Recreational Resources in Figure 7-1.
5. Section 7-4 –1-3 describes the Hudson River Greenway Water Trail. Parelli Park is incorrectly listed as being in the Town of Orangetown; it is located within the Village of Piermont. Within that same section, it is stated that “Canoeists and kayakers using the Hudson River Greenway Water Trail traverse beneath the existing Tappan Zee Bridge to access these landing sites.” This sentence is incorrect as stated, as none of the sites are located under the bridge, and could be accessed without traversing beneath the existing bridge. This should be rewritten to better clarify access to these landing sites.
6. Page 7-5 briefly describes the proposed shared-use path across the north structure of the new bridge between the Esposito Trail and Route 9. Do the plans include new connections to the land area immediately adjacent to the path so that users can access the new shared-use path from the Esposito Trail? Since this path is being described as a means to “fully compensate for the loss of the green space within the Village of South Nyack,” more details must be provided as to how access to the Village from this path will be provided, whether any parking areas are being proposed for users of the path, what specific benefits there will be to the Village, and any other information relevant to its construction.

7. The following parklands and historic sites appear to be omitted: Lyndhurst, Taxter Ridge, former Unification Church Property (now an unnamed County park), and possibly Kingsland Point Park.
8. The project should provide for clear designation of connections to the trails and parks through the provision of trail head signs, kiosks, emergency call boxes and other amenities for directional purposes and improved safety for users. The statement “The Replacement Bridge Alternative would not result in adverse impacts to parklands and recreational resources” on page 7-6 needs explanation.
9. This project should not preclude the South Nyack Lid Park project at Interchange 10 - a feasibility study for a project to construct a ‘lid’ or deck over Interstate 287 as it bisects the Village of South Nyack. The ‘lid’, combined with land recovered from the reduction of the Exit 10 interchange, would be used to create a unique environmental, recreational, and light commercial asset. This will promote economic revitalization for the river villages region through the conversion of unutilized space above a major urban freeway in an ecologically sensitive manner to promote local sustainable community development, setting a new standard for sustainable urban parks.
10. Please identify what will happen to the old bridge. Existing bridge demolition or preserving for public use must be thoroughly analyzed.
11. A link from the bike path to the rail trail in South Nyack should be examined. The Emergency access lane and Future BRT lane should be next to the Shared-use Path on the North Deck. This will provide a future Transit stop to serve this Shared Use Path.
12. The EIS should include as identified in the Rockland County Comprehensive Plan, the feasibility of incorporating open space components of the Tappan Zee corridor Project. The County supports exploration of constructing a “Lid Park” in the Village of South Nyack, which connect existing trails, create new open space, and help to mitigate negative impacts from the new bridge construction.
13. The EIS should include a review of the preservation of a portion of the existing bridge as a “Linear Park”. The preservation of several thousand feet of the bridge from the Rockland County shoreline could be used as a walkway similar to the City of Poughkeepsie’s “Walkway over the Hudson”. Fishing opportunities could also be accommodated due to the lower height of the roadway then the Westchester County side. This could become a major recreational resource for local residents and tourists alike.
14. The share-use bicycle/pedestrian path across the new bridge must include a review on how such a facility can be linked to existing and future trail networks. Public access points and parking locations must be identified.

CHAPTER 8: Socioeconomic Conditions

1. The statistics and methodology used to derive the statistics are sound and acceptable. However, Rockland County has some concern with regard to the estimated 2004-2009 Median Household Income of \$144,427 for the Rockland County Study Area. This figure is based on weighted averages of the median household income for Census Tracts 130.03 and 132, which cannot be replicated at this time. However, the Median Household Income for these tracts, according to the 2005-2009 American Community Survey, is \$121,250 for Census Tract 130.03 and \$97,292 for Census Tract 132. After inflating these figures to 2011 dollars, using 2004 as the base, the Median Household Income for these tracts would be \$144,383 for Census Tract 130.03 and \$115,854 for Census Tract 132. Considering these figures, it would appear that the 2004-2009 Median Household Income of \$144,427 for the Rockland County Study Area seems a little high.

2. For this chapter, as well as for Chapter 19 (Environmental Justice), the information should be updated with 2006-2010 American Community Survey data, where appropriate. In addition, in Chapter 8 (pg 8-12) it is mentioned that approximately 22 people will be displaced in Rockland County, while Chapter 19 (pg. 19-9) indicates that approximately 21 people will be displaced in Rockland County (7 in Tract 132- BG 1 and 14 in Tract 132- BG 2). This number should be clarified and consistent throughout the document.
3. Demographic and Socioeconomic information regarding communities included in the Study Area and the Construction Study Area, such as the Village of Nyack and the hamlets of Blauvelt, Orangeburg, Valley Cottage and West Nyack should be provided in the tables and referenced in this chapter.

CHAPTER 9: Visual and Aesthetic Resources

1. The impacted communities must understand the effects of visual impacts in order to contribute to a final design which fits appropriately within their environments. The two designs both for a short and long span “cable-stayed” or “arch” design present completely different visual impacts to the viewshed. The cabled-stayed option would be approximately 539 feet above mean high tide verse 339 feet for the arch design. Two hundred feet in height is a significant difference and change to the viewshed. Each design must include a comprehensive review with public input. It should not be left up to the contractor to select the final design of the replacement bridge.
2. Visual impacts of the roadway, bridge, and sound walls need to be identified and shown on computer animation to those most effected by this project.
3. 9-5-2-1: Rockland County wants to see the Visual Simulation for Bradford Mews complex and other areas adjacent to the I-87/I-287 Corridor. This should show before and after for both the new bridge and the new noise barrier and what type of aesthetics can be used to improve visualization for their perspective.
4. Understanding the effects of visual impacts contributes to a final design that fits appropriately within its environment and benefits the communities that are most impacted. The two designs both for a short and long span “cable-stayed” or “arch” design present completely different visual impacts to the viewshed. The cabled-stayed option would be approximately 539 feet above mean high tide verse 339 feet for the arch design. Two hundred feet in height is a significant difference and change to the viewshed. Each design must include a comprehensive review. It should not be left up to the contractor to select the final design of the replacement bridge.

CHAPTER 10: Historic and Cultural Resources

1. The County is pleased that an appropriate archaeological treatment plan will be developed and implemented in coordination with SHPO and consulting parties, as appropriate, to mitigate unavoidable adverse effects associated with the project.

CHAPTER 11: Air Quality

1. We ask that a temporary air quality monitor be placed near the construction area to monitor the air quality during construction.
2. This replacement bridge project presents a great opportunity for the State to reduce mobile source emissions by creating a dedicated transit lane on the bridge.

3. We agree with the ICG determination that this project is non-exempt under the air quality conformity regulations and thus must be included in the regional transportation emissions analyses.
4. We do not agree with the conclusion that, “no exceedances of the NAAQS or applicable incremental thresholds were projected to result from the Replacement Bridge Alternative, mitigation is not required.”
5. The project should ensure adherence to Rockland County’s Local Law #4 of 2007, which states, “No person shall cause or permit the engine of a motor vehicle, except as otherwise permitted by section 12.12.1.2, 12.12.2.1, 12.12.2.2., 12.12.2.3, and 12.12.2.4 of the sanitary code of Rockland county, to idle for longer than three consecutive minutes when the motor vehicle is not in motion.” The project should also require that no off-road construction vehicles be allowed to idle for more than three minutes when not in motion. The County would like to see battery back-up that allows equipment to load and unload without idling.

CHAPTER 12: Noise and Vibration

1. Future truck traffic is forecasted to increase, how does your analysis take into account future truck growth?

CHAPTER 13: Energy and Climate Change

1. Section 13-2-2 discusses making the lanes 12’ wide and replacing the two 35 mph EZ-Pass lanes with three 65 mph highway-speed EZ-Pass lanes. An identified outcome is improved climate through improved incident management, thereby reducing fuel consumption from accident delays and idling. Unfortunately, this section does not discuss the chronic congestion and fuel consumption associated with the approaches to the bridge, and the continued delays that would be associated with toll booths. As mentioned in chapter 4 comments, Rockland County is calling for the Tarrytown tolls to be all highway-speed (65 mph) toll collection, using overhead gantries instead of toll booths. Toll collection would be electronic only - no cash - utilizing EZ-Pass and license plate readers to bill non-EZPass vehicles by mail.
2. The feasibility of placing “Green Energy” initiatives on the span should be explored.

CHAPTER 14: Topography, Geology, and Soils

No comments.

CHAPTER 15: Water Resources

1. No runoff water quality controls are proposed on the new bridge. The proposed bridge is substantially larger than the existing bridge (73% more impervious surface), so more pavement contaminants would be released through runoff. Additionally the existing bridge has a long level span, distributing the runoff, while the new bridge will have a long constant grade span, potentially concentrating the runoff on the Rockland side. Therefore, water quality controls on the bridge should be mandatory, and should be relatively easy to implement in the open areas under the spans.
2. The DEIS limits the study area for aquatic and terrestrial resources to a ½ mile perimeter around the new bridge. Hydroacoustic effects extend 1.5 miles both up and downstream. The DEIS seems to “brush” over the potential severe environmental impacts that this project will have on the aquatic community. The significant dredging over 1.7 million cubic yards, rock

armor and pile-driving project has the potential to impact critical fish habitat and disrupt migratory species including the endangered or threatened Shortnose and Atlantic Sturgeon, Alewife, and Blueback Herring. All of these aquatic species are known to inhabit the area of the existing bridge either long-term or short-term. The EIS must provide a comprehensive analysis of any potential impacts to these species. Dredging and pile driving will have the most significant adverse consequences on the marine environment. A biological assessment of the acoustic impacts related both to the dredging and pile driving must be included in the DEIS.

3. Artificial Reefs can be constructed to increase fisheries habitat. They provide marine life and other organism's additional opportunities for shelter and foraging. Artificial reefs are typically built out of hard structures such as rock, concrete and steel. The significant work required for the bridge construction provides an opportunity to create an artificial reef using construction material from the removal of the existing bridge. The EIS should provide an analysis of the benefits of creating an artificial reef along the dredged channel or in the footprint of the existing bridge.
4. We are extremely concerned about the short and long term impact of the dredging operations on the Hudson River and our County. Approximately 1.7 million cubic yards of sediment will be dredged for the construction of the new bridge, mostly from the Rockland side. The DEIS only addresses the removal of this material via barge to a site in the New York Bight, HARS. In our opinion, based on the high levels of certain contaminants seen in the sediment sampling, the dredged material may not pass the stringent qualifications required at the HARS site. Therefore, the DEIS is deficient in addressing the costs and impacts of dredge disposal on Rockland County, to the extent of 800 truck trips a day of contaminated material and associated trucking impacts and possible time delays. More must be done on addressing transport and beneficial re-use of this material, as well as host community benefits.
5. Dredging is proposed to be conducted during a three-month period from August 1 to November 1 for three years of the construction period. This is clearly a major impact on recreational uses during this time.
6. An Environmental Mitigation Fund should be created to protect, restore and improve aquatic habitats and fisheries resources in the Hudson River impacted by the construction of the new bridge and removal of the existing bridge.
7. Provide more specific guidance to the design-build team. Do not eliminate all green practices.
8. The sediment data collected supports our statement of the probable non-viability of the HARS site.
9. The DEIS indicates that the Hudson River is not listed in the State's 303(d) list of impaired water bodies. It further indicates that on the new landings and bridge, stormwater runoff would be discharged directly to the Hudson River without treatment, as occurs on the existing bridge (page 15-19). On page 15-20 the DEIS states that under both the Short and Long Span options, the ability to provide stormwater quality treatment for the proposed modification to the landings would be constrained by a number of factors that would precluded the development of large water quality management facilities. We recommend that the EIS identify and detail all alternative means for collecting and treating stormwater runoff from the new bridge and approaches prior to discharge into the Hudson River.

CHAPTER 16: Ecology

1. All construction in the river should use construction techniques that minimize impacts to the natural wildlife in the Hudson River.
2. As discussed above in the chapter 15 comments (#2), the DEIS limits the study area for aquatic and terrestrial resources to a ½ mile perimeter of the new bridge. Hydroacoustic

effects extend 1.5 miles both up and downstream. The DEIS seems to “brush” over the potential severe environmental impacts that this project will have on the aquatic community. The significant dredging over 1.7 million cubic yards, rock armoring and pile-driving project has the potential to impact critical fish habitat, disrupt migratory species including the endangered or threatened Shortnose and Atlantic Sturgeon, Alewife, Blueback Herring. All of these aquatic species are known to inhabit the area of the existing bridge either long-term or short-term. The EIS must provide a comprehensive analysis of any potential impacts to these species.

3. Easter Oyster- The DEIS has identified both existing and historical oyster beds in the proximity of the existing bridge. Approximately 13-acres of oyster habitat would be adversely impacted during construction operations.
4. Endanger of threatened Birds – The Bald Eagle, Peregrine Falcon, Common Loon and Pied-billed Grebe are known to appear in the area of the existing bridge. The cable-stayed option would be significantly taller than the arch design. Support cables on the cable-stayed design could pose a greater risk for bird collisions than the arch design. Lighting designs for either option could also increase or decrease bird collisions. The EIS must provide in depth analysis of both designs on potential bird collisions to all species known to inhabit the study area.
5. Artificial Reefs can be constructed to increase fisheries habitat. They provide marine life and other organism’s additional opportunities for shelter and foraging. Artificial reefs are typically built out of hard structures such as rock, concrete and steel. The significant dredging that is required for the bridge construction provides an opportunity to create an artificial reef using construction material from the removal of the existing bridge. The EIS should provide an analysis of the benefits of creating an artificial reef along the dredge channel.

CHAPTER 17: Hazardous Waste and Contaminated Materials

1. The DEIS states that, “no post-construction mitigation would be required for the replacement bridge alternative.” Proper procedures and cautions must be in place during construction for unforeseen circumstances.

CHAPTER 18: Construction Impacts

1. The “design-build” aspect of the project creates many unknowns as elements of the construction are at the contractor’s discretion, including disposal and borrow sites, privately owned sites for pre-fabrication, production of materials, and the like. Although these independent decisions by the contractor are beyond the scope of federal action we feel that every aspect of the bridge construction should be included for review in the DEIS. Specific to Rockland County, we recommend that the locations of the concrete batch plant and lay down/storage areas be addressed in the DEIS. These include the Rockland Bridge Staging Area, West Nyack Staging Area and Tilcon Quarry Staging Area.
2. Rockland County wants the project to require no construction at night or on weekends, and no lane closures in the AM peak eastbound and the PM peak westbound.
3. 18-3-4: If the permit application for Historic Area Remediation Site (HARS) for ocean disposal of dredged material is denied, the contractor is required to specify alternate means of transport such as barge, barge to rail or barge to truck. If the alternative site is in Rockland County, we will require that the project provide a model simulation for County review for the movement of trucks, including all roadways, intersection, and hot spots. Rockland will also require construction mitigation of locations identified by the County. The DEIS estimate of 800 daily truck trips will have major impacts to Rockland County if the site selected is in Rockland County.

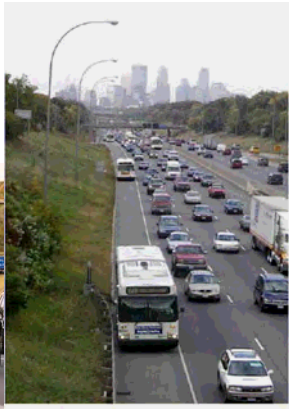
4. Exit 10 will be used as a temporary staging area. After completion of the new bridge, all temporary staging areas must be removed.
5. Where will the permanent facility be for the NYS Police (Thruway) Troop T and Thruway maintenance area? It should not be at Interchange 10, as this site should be preserved for future park usage.
6. NYSDOT must work to minimize condemnations and other adverse impacts in South Nyack.
7. The new Tarrytown Highway Speed Tolls that Rockland County is requesting will provide space for Troop T, Emergency Bridge Tow and Thruway maintenance by eliminating 7+ toll lanes and the toll headquarters.
8. We ask that a temporary NYS DEC Air quality monitoring station be placed in the construction area to monitor the Air Quality during construction.
9. Demolition of TZB landings during STAGE 3 construction will require partial demolition of the old bridge. What remediation will be required for the old bridge structure to ensure protection of the Hudson River from hazardous materials?
10. The access ramp to the Westchester Bridge Staging Area should become a permanent structure for a bus-only slip ramp/connector from the Tarrytown Toll to the Tarrytown Rail Station.
11. From what location outside the construction area will construction workers be bused? Please identify what area will be used for parking of worker vehicles.
12. The project should ensure adherence to Rockland County's Local Law #4 of 2007, which states, "No person shall cause or permit the engine of a motor vehicle, except as otherwise permitted by section 12.12.1.2, 12.12.2.1, 12.12.2.2., 12.12.2.3, and 12.12.2.4 of the sanitary code of Rockland county, to idle for longer than three consecutive minutes when the motor vehicle is not in motion." The project should also require that no off-road construction vehicles be allowed to idle for more than three minutes when not in motion. The County would like to see battery back-up that allows equipment to load and unload without idling.
13. A full time Inspector/overseer/monitor should be in place to ensure emission reduction strategies are being implemented at the worksite.
14. A temporary construction access road/shoulder in both directions from Exit 12 to the Rockland Bridge Staging Area (RBSA) should be provided, and later become a dedicated Bus Lane.
15. Create a bus-only slip ramp/connector from Exit 10 westbound directly to S. Franklin Street for buses only to access Nyack and bypass the Interchange 10 circle in the PM peak.
16. Section 18-4-1 discusses a comprehensive and detailed Work Zone Traffic Control Plan. Please provide a simulation model run of the construction area, especially when all east and westbound traffic is on the new North Structure.
17. Since construction delays, removal of the westbound on-ramp from Route 9 during the construction staging and other construction-related issues will create congestion and have a negative effect on regional motorists, especially those traveling in the Thruway corridor, Rockland County is requesting that a Construction Mitigation Transit Plan be formulated, in partnership with the County
18. Rockland County requests that part of the Construction Mitigation Transit Plan include FHWA/NYS DOT funding to expand the TAPPAN ZEE Express (TZx) bus service during construction. This will reduce the number of Single Occupant Vehicles (SOV) traveling in the construction zone. The Rockland County Department of Public Transportation is requesting \$3 million in new operating funds per construction year to operate this enhanced bus service in the corridor. Once funding is in place, the County will purchase additional vehicles, add trips to the TZx service and add Sunday service.
19. Another component of the Construction Mitigation Transit Plan should include expansion of the Haverstraw/Ossining Ferry. Rockland County requests that NYSDOT work with Metro-

North to expand the operating hours of the service to further reduce the number of SOVs crossing the Hudson during construction and providing more transit options during construction.

20. There are conflicting statements at various chapters of the report regarding the expected impact on River Road for the proposed project ranging from no road closing to closure could occur at any time during the construction. Please clarify.
21. A more elaborate study should be conducted for the upcoming FEIS to identify reasonable scenario for assessment of the potential impact that may occur from the sequence of construction. The temporary access ramp from interstate highway 287/87 for the subject construction should be provided in greater detail. Sections shown on the report should be located next to the corresponding plan and closer to actual scale rather than schematic.
22. In lieu of limited vertical clearance available at the bridge and River Road junction, it appears constructing a new access tunnel on River Road between the crossing near the access ramp and Rockland Bridge Stage Area would be a logical solution. The separation of operations for use of River Road could maintain the safe traffic flow with minimum impediment.
23. In view of complications from landing, approach spans, tie-in extents where existing, temporary and final structures will overlap at different stages of construction and new bridge abutment are also shown to be built in close proximity, basic considerations to minimize impact on River Road crossing area should be outlined in greater detail through process of elimination to narrow down the design options for this design-build project.
24. A Rockland County Highway Department (RCHD) Work Permit will be required prior to any construction affecting the County road. Solutions of the above comments the satisfaction of the Highway Department will be part of the permit conditions. A separate Road Opening Permit shall be secured from the RCHD for any Sewer and utility connection within River Road. The Contractor should be aware of and responsible for obtaining any vehicle hauling permits that may be necessary to transport over State, County and local roadways. It is also necessary for the Contractors to restore the damaged roadways curb to curb in kind on River Road.
25. Coordination and communication with all regional local officials will be important during construction and after project completion. The use of technology and communication during and after construction is important. The use of the HVTMC in the corridor, including radio, VMS signs and other early warning systems to improve mobility and incident management outreach to surrounding communities. Facilitate integration with all emergency services, Rockland County Public Transportation and Rockland County Highway Dept. The region's 511NY system should be enhanced and utilized during construction.
26. As stated in Chapter 18 Section 4, the Westchester Inland Staging Area (WISA) currently contains a westbound on-ramp from southbound Route 9 that would be removed during construction staging. Highway access to WISA is available directly to the westbound I-287 shoulder, eastbound from I-287 by a short restricted-use ramp leading south of the Toll Plaza to the administrative area, and from South Broadway via Interchange 9. In order to access the Westchester Bridge Staging Area (WBSA), vehicles would travel along the north-south access road under the Tappan Zee Bridge. From there, they would pass onto a temporary haul road that will be constructed in order to bring trucks over the Metro-North Railroad (MNR) Hudson Line to the WBSA. Rockland wants to see the project plan for this ramp construction to be used in the future for BRT/bus access to Tarrytown Rail Station.
27. The dual Bridge Design should have an emergency ramp to connect both structures. This will provide an emergency turn-around/access in case of emergencies/shut downs.
28. Rockland County is requesting that our TAPPAN ZEEexpress (TZx) commuter buses to be permitted to use the emergency access lanes on the new bridge when the bridge opens, and

that the bridge project connect the emergency lanes to the travel lanes at the landings to ensure the buses do not sit in merging traffic.

29. We also request that the project include in its design the critical components for BRT to be implemented, and that it not preclude a future bus/BRT access ramp from the bridge to the Tarrytown Rail Station. Currently TZx buses travel the narrow, congested streets of Tarrytown from the bridge to the Tarrytown train station. We will request that the study team begin to simultaneously study and construct a Slip Ramp from Tarrytown Toll Plaza to Tarrytown Rail Station to coincide with the TZB Hudson River Bridge Crossing and be completed and ready as close to the opening of the new bridge.
30. Bus on Shoulder from the bridge landing in Rockland to Exit 12 should be provided, including signage. NYSDOT/Thruway Authority must work together to enhance shoulders at minor cost for buses during construction and after construction until the full corridor BRT is built (Suffern to White Plains). Note: this is not a substitute for high-quality BRT service in the near future. For the sake of regional quality of life, movement of people, a consistent commute, the environment, and common sense, the design, construction and financing of the BRT system should commence now. By intelligently leveraging existing transportation assets in the Tappan Zee Bridge corridor, this plan provides immediate relief from traffic congestion on the day the bridge opens at minimal costs to taxpayers. Equally important, it provides solid foundation for a future cross-corridor bus rapid transit system to service important regional destinations such as downtown White Plains.



31. The lack of a planned Bus Lane on the new Hudson River Crossing is unacceptable.
32. The previous TZB study/Alternative Analysis, repeatedly emphasized the importance of mass transit as an integral part of the bridge project and that without it, the negative impacts would be great.
33. With regard to dredging, the DEIS states that peak days approximately 15,000 cubic yards would be generated. The DEIS should differentiate between the Rockland and Westchester sediment amounts, as the Rockland component is clearly at least 75% of the total. In our opinion, based on the high levels of certain contaminants seen in the sediment sampling, the dredged material may not pass the stringent qualifications required for disposal of sediment at the HARS site. It essentially only accepts very clean material. Therefore, the DEIS is deficient in addressing the costs and impacts of dredge disposal on Rockland County, to the extent of 800 truck trips a day of contaminated material and associated trucking impacts and possible time delays. More must be done on addressing transport and beneficial re-use of this material. We are extremely concerned about the short and long term impact of the dredging operations on the Hudson River and our County.
34. The DEIS also states that dredging would only be conducted during a three-month period from August 1 to November 1 for the three years of the construction period in which dredging

would occur. Despite the limited timeframe for dredging, Rockland County is concerned that there will clearly be a major impact on recreational uses of the River during this time.

35. Dredging and pile driving will have the most significant adverse consequences on the marine environment. A Biological Assessment of the acoustic impacts related both to the dredging and pile driving must be included in the EIS. The EIS must thoroughly examine these potential negative impacts.
36. The replacement of the South Broadway Bridge over the Thruway should not be built to preclude future transit in the corridor. The construction of this bridge must provide adequate movement of traffic and not cause delays during construction.
37. The County requests the right to comment on the RFP and the RFP process independently of the environmental review, as the RFP process is just as critical.
38. As one of the two impacted host communities, the County requests the right to be a part of the RFP selection committee and design-build oversight team.
39. The County of Rockland and Rockland County residents should be involved in the detailed design decisions.
40. The County requests that the project support a full time Rockland County project manager and a full time Rockland County construction inspector, appointed by the County and paid for by the project, as well as having the project reimburse any staff time expended during construction.

Chapter 19: Environmental Justice

1. The statistics and the methodology used to derive these statistics are sound and acceptable. However, for this chapter, as well as for Chapter 8 (Socioeconomic Conditions), the information should be updated with 2006-2010 American Community Survey data, where appropriate. In addition, Chapter 19 (pg. 19-9) indicates that approximately 21 people will be displaced in Rockland County (7 in Tract 132- BG 1 and 14 in Tract 132- BG 2), while in Chapter 8 (pg 8-12) it is mentioned that approximately 22 people will be displaced in Rockland County. This number should be clarified and consistent throughout the document.
2. The County takes exception to the extremely limited area of impact used in the document for the Environmental Justice (EJ) analysis. While we understand that EJ study areas generally include the census block groups that overlap with the ½-mile perimeter around the project site, this project should cast a wider net. An expanded study area that included communities such as the Village of Nyack and the hamlets of Blauvelt and Orangeburg, would reveal that there are other minority and low-income areas that could be impacted. The County is asking that the study expand the EJ study area. Therefore, it may be premature to conclude that, “the Replacement Bridge Alternative would not result in any disproportionately high and adverse effects on minority and low-income populations during operation or construction and therefore no mitigation would be required.”(page 19-11)
3. The limited public outreach conducted as part of the new “fast track” TZB EIS process would seem to be something short of robust, as stated in the document: “FHWA, the New York State Department of Transportation (NYSDOT) and NYSTA have engaged in a robust public outreach effort.” (page 19-11)

CHAPTER 20 : Coastal Area Management

No comments.

CHAPTER 21 : Indirect and Cumulative Effects

1. As discussed in chapter 18 comments, Rockland County is concerned that dredging material may not be accepted by HARS. The alternatives cannot be to truck dredged material in or through Rockland County.

CHAPTER 22 : Other NEPA and SEQRA Considerations

1. The DEIS states that the New York State Department of Transportation (NYSDOT) and the New York State Thruway Authority (NYSTA) have developed policies to ensure the project complies with the NYS Smart Growth Public Infrastructure Policy Act that was adopted September 29, 2010. Please provide the policies that have been developed.
2. Please provide details regarding how the project will establish the required Smart Growth Advisory Committee, which is charged with preparing the Smart Growth Impact Statement and advising how the agency or authority can promote smart growth goals.

CHAPTER 23 : Draft Section 4(f) Evaluation

1. Why isn't the Hudson River listed as a 4(f) property due to heavy recreational watercraft use and Congressional designation as a heritage area?
2. Why is there no acknowledgement of the majority of parkland listed in Chapter 7 (Parklands and Recreational Resources) as 4(f) properties?
3. The construction and operations of the proposed pair of bridges will have clear "proximity impacts/constructive use" on nearby parks and recreational areas including:
 - Gesner Ave Park in South Nyack
 - Memorial Park in Nyack
 - Losee Park in Tarrytown
 - Pierson Park in Tarrytown
 - RiverWalk in Tarrytown
 - Blauvelt State Park in Orangetown
 - Nike Overlook Park in Orangetown
 - Mountainview Nature Park
 - Village Hall Green in South Nyack
 - Rail-Trail in Nyack/South Nyack/Grandview
 - Lyndhurst
 - Taxter Ridge
 - Former Unification Church Property (now an unnamed County park)
 - Kingsland Point Park