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Tri-State Transportation Campaign Releases Full Comments on Tappan Zee Replacement Project

Advocates Call for Supplemental Study

Tri-State Transportation Campaign has released its [full comments](#) on the Tappan Zee Bridge replacement project's Draft Environmental Impact Statement (DEIS). The organization, whose analysis was backed by Good Jobs New York, the Natural Resources Defense Council, NYPIRG, and Transportation Alternatives, found several outstanding issues with the project, and it hopes that the state will address them in a supplemental Draft Environmental Impact Statement. The organizations stated that the release of the project's request for proposals to private bidders on March 9, several months before finalizing its DEIS, is further evidence that a supplemental environmental review must be completed. Before the project moves forward, the public deserves a better understanding of its costs, and its impacts on our region's development patterns, air and water quality, and mobility. In brief, the advocates' comments are as follows:

- Eliminating transit and adding an eighth lane for private vehicles will result in more traffic for longer durations on the bridge and throughout the corridor. This traffic increase will negatively affect air quality, community character, and socioeconomic conditions throughout the corridor. The state's claim that the project will have no effect on these issues is therefore false.
- The DEIS must include a study of project alternatives that include transit. Many alternatives are suggested for study, ranging from an express bus system with a dedicated connection to the Tarrytown Metro-North station to full corridor bus rapid transit (BRT). Despite assertions in the DEIS to the contrary, these alternatives are completely feasible and reasonable under the National Environmental Policy Act (NEPA). The community character, socioeconomic, air quality, energy, and mobility benefits of these alternatives far outweigh any cost increase and must be analyzed.
- The DEIS does not include a full financial analysis (including costs, financing and funding) for the project and any alternatives eliminated because of cost. The law is well settled that in order to eliminate a project alternative because of cost, a detailed cost analysis must be done and made available to justify that decision.

- The DEIS does not explain traffic projections. First, traffic projections in the DEIS are significantly different than traffic projections made by the state in 2006 despite use of the same traffic model. Second, assertions about traffic in the DEIS are directly contradictory, e.g., comparing current traffic conditions quoted in Chapter 1 with traffic counts in Appendix B or comparing traffic projections for 2017 and 2047 in Chapter 4 with Chapter 11. Third, the DEIS assumes a 25% increase in non-peak road capacity will not induce traffic, despite overwhelming past experience to the contrary and no real analysis.
- The DEIS predicts that slightly wider lanes, changes in grading, and emergency access lanes will decrease accident rates and thereby increase mobility on the new bridges. This is contrary to past state studies that concluded that transit is the only way to increase mobility. The evidence presented by the state in the DEIS and in past studies suggests that driver behavior is a significant contributor to high accident rates on the bridge. It is therefore possible that the state's conclusion that mobility will be enhanced because of this project is false. If this is true, the project fails to meet a stated need in the Purpose and Need Statement. Driver behavior and accident effects on bridge mobility must be evaluated.
- The DEIS provides no evidence that transit is not being precluded by the project. No analysis has been done of the needs and location of future in-corridor transit. As such, the state cannot know if the bridges' spacing, grading, alignment and structure will truly support future transit. In addition, the political, environmental or financial impacts of delaying transit must be analyzed.
- The project does not meet a majority of the New York State Smart Growth Policy Act's criteria, especially those related to transit-oriented development, or comport with the state's greenhouse gas emissions goals. Projects that are not consistent with the New York State Smart Growth Policy Act cannot be approved.

A supplemental DEIS should be drafted and disseminated that addresses these problems before the project moves forward.

To view Tri-State's full comments, visit tinyurl.com/TZComments.

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Tri-State Transportation Campaign is a non-profit organization working toward a more balanced, transit-friendly and equitable transportation system in New York, New Jersey, and Connecticut.