

## **III.E Traffic and Transportation**

## E. Traffic and Transportation

### Comment III.E-1:

For example, with respect to traffic, we were struck by the DEIS' failure to consider the Sugar Refinery's easement running along the western side of the Metro North rail tracks from the Refinery's northern gate. Moreover, the DEIS fails to account for the City's obligation to construct an extension of Water Grant Street as a public street to the northern boundary of the Sugar Refinery, which could accommodate over 150 Refinery truck movements per day.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 4/28/2008)*

### Response III.E-1:

See Response III.A-214.

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### Comment III.E-2:

Building safety - The proposed [Prospect Street] bridge can create a safety concern for the residents of our building (crime, vehicular traffic and exhaust emissions).

*(Vincent Wilson, Representative, Scrimshaw House (Pier Point on the Hudson), Letter, 5/13/2008)*

### Response III.E-2:

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. The traffic analysis for Palisades Point presented in the DEIS was undertaken without the bridge.

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### Comment III.E-3:

2) Privacy - How high will the [Prospect Street] bridge be and how close to the building will it pass? Will pedestrians and/or passengers in cars be able to look into the windows of our building?

*(Vincent Wilson, Representative, Scrimshaw House (Pier Point on the Hudson), Letter, 5/13/2008)*

### Response III.E-3:

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. The traffic analysis for Palisades Point presented in the DEIS was undertaken without the bridge.

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### Comment III.E-4:

What do the traffic studies show about the increase in cars throughout the already congested Getty Square intersection as well as further west along the river? Will Metro North permit a bridge over the tracks?

*(Aileen Kilcommon, Yonkers Rowing and Paddling Club, Letter, 5/19/2008)*

**Response III.E-4:**

The traffic studies conclude that the impact of the project on the Getty Square area as well as other intersections to the west of the project, can be accommodated within the existing roadway system. It should be noted that primarily traffic to/from the project is from the east along Yonkers Avenue and from north and south along Broadway and Warburton Avenue/Riverdale Avenue. Provided the recommended mitigation measures are implemented, the traffic can be adequately accommodated. See also Response III.E-3.

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**Comment III.E-5:**

I am very much in favor of bringing development to the downtown area. It has long needed a face lift, with viable businesses to support the people living in the area. However, I am very concerned about 2 issues. First, the traffic that will be on Nepperhan and Yonkers Avenue. There are times of the day that these roads can not handle the traffic that is already there. My drivers get caught up in this from time to time. I was recently informed that the town houses built on the corner of Ashburton and Nepperhan were built too close to the road. The proposed widening of Ashburton Avenue will not be able to occur as planned. You would know better than I if this widening is still possible.

*(Ross, Letter, 5/14/2008)*

**Response III.E-5:**

The Proposed Project calls for removal of on-street parking so that the Yonkers Avenue/Nepperhan Avenue roadway can function as an arterial leading into the downtown area. The Ashburton Avenue project is a City sponsored project and is not part of the development.

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**Comment III.E-6:**

The traffic plan submitted by the developers specifies essential improvements for the streets in the immediate vicinity of River Park center but fails to consider, unless I have missed it, the impact it will have on South Broadway and Riverdale Avenue. Anyone who has driven these streets knows they are already highly congested. River Park Center and Palisades Point will add many additional vehicles. Where is the plan to deal with this? Riverdale and South Broadway are not the responsibility of the developers but the traffic on these streets affects everyone who lives on the west side and the Council must consider it.

*(Gerard Wilson, Letter, 5/20/2008)*

**Response III.E-6:**

Numerous intersections along Riverdale Avenue and South Broadway were evaluated as part of the Traffic Study. The analyses indicate that traffic associated with this project can be accommodated by the existing roadway system provided that modifications are made to the existing signal timings at certain locations to ensure progression along Riverdale Avenue, South Broadway and other area roads. The signal timing modifications will be implemented by the City of Yonkers.

**Comment III.E-7:**

They spoke about seven thousand parking spots that are going to be better for the community and also the people that come to this community.

*(Michael Carriere, Rep. of District Council 9, Painters and Allied Trades, Public Hearing, 4/29/2008, Page 38)*

**Response III.E-7:**

Comment noted.

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**Comment III.E-8:**

However, even after the service enhancements, there is currently no passenger capacity available on several [bus] routes that serve downtown Yonkers during weekday rush hours. This existing condition is not captured in the draft EIS. In fact, the draft EIS states that the "Westchester County Department of Transportation indicated that the Bee Line bus routes in the area generally have available capacity and if ridership increases bus service is adjusted accordingly." The draft EIS does not indicate when this statement was made. However, it is assumed that it was made early on in the review process, prior to the introduction of MetroCard.

As the draft assumes a 30% transit use credit in its traffic projections, it appears that the project will necessitate an increase in bus service. The scale of this increase and the financial implications must be identified and addressed as a project related impact. The EIS should include quantified estimates of anticipated additional demand based on ridership numbers. The revised impact on ridership should include estimates for ridership increases for a typical weekday, Saturday and Sunday.

While it is difficult to determine the cost of service without defining the span of service, frequency of service and type of vehicle required, the EIS should describe a methodology that addresses how the additional cost is to be included as part of the mitigation measures dealing with the traffic and impact on community services.

The cost of additional service should not be assumed to become a public expense.

*(Westchester County Planning Board, Westchester County, Letter, 5/29/2008, Page 10; Westchester County Department of Planning, Westchester County, Letter, 5/29/2008 (C66))*

**Response III.E-8:**

The Traffic Study assumes a 30% credit. This credit accounts for utilization of mass transit and by-pass trips and/or interplay trips between the various components of the project. Depending on the land use, a transit credit (bus/rail) of 10% to 20% is appropriate. It should be noted that based on census data the current mass transit usage is greater than 20% for all modes of transit in this region. The office and residential uses would use primarily rail service, with the retail component primarily using the Bee Line bus system. It should be noted that retail is normally considered "off peak". It should also be noted that there are numerous bus routes passing through the Getty Square and downtown Yonkers. While some of these buses may be at capacity, the system has

the ability to accommodate the overflow. It is impossible to quantify the number of riders by bus route to determine the need for expanded service.

However, in October of 2006, the Applicant's representatives met with the Westchester County Department of Transportation to discuss not only the existing bus routes but also the proposed modification to the existing roadway system. Subsequent to that meeting, the Department stated in an October 20, 2006 letter (included in Appendix 2E of the DEIS) that the impacts to the bus system were likely to be minimal, and in fact the Project may improve operational effectiveness.

In addition, both Metro North and the Westchester County Department of Transportation encourage mass transit usage in lieu of private vehicles and as such would be expected to consider expanded service to meet the demand. This is normally the case with urban developments in the county (i.e., White Plains). Thus an evaluation of the costs for expanded services is not within the scope of this EIS.

The use of the ballfield for school activities is considered a special event. The issue of transportation will be addressed as part of the traffic management plan for that event, which will require City approval.

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**Comment III.E-9:**

Implementation of the project as described will necessitate several significant changes to existing bus routes and bus stops. Some of the project elements that would impact bus service include the elimination of New School Street and a reversal in direction of three one way streets (Palisade Ave/Elm Street and New Main Street). These factors alone will require a comprehensive assessment and re-alignment of the majority of all bus routes in the area of downtown Yonkers. In turn, this would necessitate the relocation of several bus stops in the area. Required changes in service (routes and stops) that are the direct result of new development should be considered a project related impact and addressed accordingly. The EIS should identify a proposed re-routing and new ADA accessible bus stop locations to replace displaced routes and stops. Proper siting of new, and improvements to existing, bus stops should be planned in accordance with the county's publication "Bus Stop Guidelines;" items such as signs, poles, benches, shelters, curb cuts and waiting areas must be considerations in the re-development of downtown. The anticipated cost associated with the provision of relocated service and stops should be presented.

*(Westchester County Planning Board, Westchester County, Letter, 5/29/2008, Page 10;  
Westchester County Department of Planning, Westchester County, Letter, 5/29/2008 (C66))*

**Response III.E-9:**

The Applicant's representatives met with the Westchester County Department of Transportation in October of 2006 to discuss the possible reorientation of certain City streets. The Department indicated that based upon their preliminary analysis the reorientation of streets would not cause a significant impact on current bus operation and in fact, might result in operational efficiencies. This was confirmed in a letter from Commissioner Salley dated October 20, 2006, and included in Appendix 2E of DEIS. The Applicant will continue to work with the City and the Westchester County Department of Transportation to plan bus stops in accordance with the "Bus Stop

Guidelines.” In addition, the design will include the required ADA elements. Any new bus stops or other bus infrastructure will be the responsibility of the Westchester County Bee-Line system.

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**Comment III.E-10:**

The draft EIS includes a discussion of a "trolley system" linking the several project areas with the Yonkers Metro-North train station. It appears that portions of the proposed trolley loop route (included in the draft EIS as Figure No. 14) would be duplicative of existing Bee-Line bus service. The Westchester County Department of Transportation questions the viability of such a service that would replicate existing, long established bus service and reduce ridership on Bee-Line routes. The EIS should identify who will pay the capital and operating cost of a trolley system. As a preferred alternative, we encourage the city to work with the county to identify means to adapt Bee-Line services to the needs of the city and its residents and employers. As noted above, the Bee-Line system is an important component of the quality of life in the city and it should be thought of in local terms as the transit provider of choice.

*(Westchester County Planning Board, Westchester County, Letter, 5/29/2008, Page 10-11;  
Westchester County Department of Planning, Westchester County, Letter, 5/29/2008 (C66))*

**Response III.E-10:**

The proposed trolley system is a loop system and will not compete with the Bee-Line System. It will be operated by the BID and provide continuous service during normal hours of operation, running between the railroad station and the River Park Center. Intermediate stops will be provided on North Broadway and Nepperhan Avenue as well as in the Getty Square area to provide for a link between the development and the train station. All trolleys will be fully ADA compliant. The Applicant has had preliminary discussions with the BID concerning the operation of the trolley amenity and specific details of operation, including where the vehicles will be stored and maintained, will be finalized by the BID.

The Applicant and the City recognize that the Bee-Line System is an important component of the quality of life within the City and anticipate close cooperation with all mass transit operators including the Westchester County Department of Transportation.

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**Comment III.E-11:**

At the request of the City of Yonkers, Bee-Line buses are no longer allowed to layover at the Yonkers railroad station. Therefore, buses are terminating, originating and laying over at several different locations and streets in the downtown area; this decreases efficiency of operations and increases operating costs. A bus layover area is needed to consolidate and organize Bee-Line operations within downtown Yonkers. We recommend that the EIS address this aspect and identify accommodation for- bus layovers as part of the redevelopment plan for the downtown.

*(Westchester County Planning Board, Westchester County, Letter, 5/29/2008, Page 11;  
Westchester County Department of Planning, Westchester County, Letter, 5/29/2008 (C66))*

**Response III.E-11:**

Comment noted. Bus layover in the downtown is a current operational issue and is not impacted by the project.

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**Comment III.E-12:**

The EIS should provide greater clarification regarding the 30% traffic credit taken for transit usage and shared trips. We note that the developer is not assuming a 30% transit credit for the proposed 'parking' scheme; instead the draft EIS states that "by not applying a mass transit credit (10% - 20%), a 'cushion' is provided for parking during peak seasonal conditions."

*(Westchester County Planning Board, Westchester County, Letter, 5/29/2008, Page 14)*

**Response III.E-12:**

The 30% traffic credit accounts for utilization of mass transit and by-pass trips and/or interplay trips between the various components of the project. It is anticipated that the transit percentage will be between 10% and 20% depending upon the land use. However, to ensure that the parking supply will be able to meet peak seasonal demand, a transit credit (10% - 20%) was not applied to parking calculations. It is anticipated that during peak seasonal conditions the parking demand could be lowered by some 10% to account for transit usage. However, a 10% credit would be reasonable even during peak seasonal conditions.

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**Comment III.E-13:**

While the draft EIS assumes a 30% traffic credit for transit usage and shared trips, the draft EIS does not present or discuss a program to encourage more people to use transit instead of drive. Bicycle access and bicycle parking are completely absent from the draft EIS. Perhaps the savings would be greater if such a program were explored.

*(Westchester County Planning Board, Westchester County, Letter, 5/29/2008, Page 14)*

**Response III.E-13:**

The Applicant has proposed a trolley route system that would encourage the use of both rail and bus service within the area. This trolley system will be operated by the BID and will be available to everyone in the area. In addition, bike racks will be installed within the parking structures.

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**Comment III.E-14:**

We note that a discussion of enhancing transit use was called for in the final scoping document but it is not included in the draft EIS. The scoping document requires: "The study should discuss Traffic Demand Management (TDM) techniques as potential mitigation measures in order to encourage alternate modes of transportation. The TDM discussion should include the installation and improvement of bicycle facilities (bike racks, etc) within the city, possible price incentives to encourage transit use, etc." (page 19) We recommend that the city require preparation of this discussion as originally required.

*(Westchester County Planning Board, Westchester County, Letter, 5/29/2008, Page 14-15)*

**Response III.E-14:**

Various TDM techniques are being implemented to encourage alternate modes of transportation. These include the proposed trolley route system which will connect the rail station with the project and the Getty Square area. It will also afford the opportunity for additional stops within the trolley route to serve other users. For example, there is the potential for a trolley stop at the intersection of Broadway and Nepperhan Avenue. This stop could be utilized by employees of the hospital who currently take the rail service to and from work. Bicycle racks will be included within the parking structures.

It is anticipated that employers (office and retail) will participate to some extent in price incentives to encourage the use of mass transit by their employees.

Most of the large scale retail uses at River Park Center will not have direct frontage on the City street system. Thus, to accommodate pedestrian activity, each of the site driveways will have sidewalks which will connect to the City's sidewalks. Access to the various levels of retail for pedestrian shoppers will be through a vertical transportation system within the garage structure. The driveways to the site are numerous and provide access to Nepperhan Avenue, Elm Street, Palisades and New Main Street.

**Comment III.E-15:**

We are concerned that pedestrian access will not be uniformly provided to all parts of the downtown development sites from surrounding neighborhoods. For example, the draft EIS states, "primary shopper access to the supermarket will occur from the parking garage." Given that supermarkets are a necessity for both the new residents of the project as well as existing residents of the surrounding neighborhood (particularly because an existing supermarket on New Main Street will be demolished under the proposal), primary access should be from the street. Nearby residents should not be required to either drive or walk through a parking structure to buy groceries. While this is one example of inadequate pedestrian access described in the text of the draft EIS, without detailed site plans it is not possible to verify adequate pedestrian access from the street to other elements of the proposed developments. For example, will pedestrian access be provided on the new bridge over the Metro North tracks connecting to Palisades Point?

*(Westchester County Planning Board, Westchester County, Letter, 5/29/2008, Page 15)*

**Response III.E-15:**

The Project provides numerous pedestrian access points around the River Park Center site. Access to all uses is either made directly from the street in the case of grade level merchants or directly from vertical cores or lobbies in the Project, which are accessible at grade from the street or interior public plazas. Access to the supermarket from New Main Street is across a plaza and through Core A at grade in the northeast corner of the plaza directly on New Main Street. The supermarket is also accessible from Palisade Ave via a sidewalk connection west of Core C and across the parking field to a set of stairs west of the mechanical room. There are typically multiple access points to tenants in the Project. Note that there are no plans to demolish the existing ShopRite store in downtown Yonkers. Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the



Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

See Response III.A-21.

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**Comment III.E-16:**

I don't see any effort at putting forth a mass transit plan that would mitigate the kind of effects that we get from traffic, whether it's smog, whether it's noise, whether it's danger to pedestrians or just people's blood pressure rising as they get stuck in traffic. Measures have been proposed to widen streets, to reroute the traffic and that's fine as far as it goes, but I suggest that this is no substitute for a mass transit plan, and any environmental impact statement should incorporate a mass transit plan that has been worked out in consultation with the MTA or whoever else would have a barring on mass transit in this area.

*(Nan Beer, Resident, Public Hearing, 5/13/2008, Page 96-97)*

**Response III.E-16:**

Comment noted. Potential impacts on mass transit have been analyzed in the DEIS. Mass transit utilization has been taken into account in the Traffic Study.

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**Comment III.E-17:**

The question I would ask, and I am not kidding about this, we will be facing congestion pricing in downtown Yonkers in the future.

*(Kevin Gorman, Public Hearing, 5/13/2008, Page 112-113)*

**Response III.E-17:**

Comment noted.

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**Comment III.E-18:**

With the proposed development which, by the way, we support wholeheartedly, and look forward to seeing more development downtown take place, but we also want to be a little bit cautious about how the impact on South Broadway is with respect to traffic, and I am not just talking about regular passenger traffic, more importantly commercial traffic. I was pleased to see the lighting, the traffic signals on Nepperhan and Yonkers Avenue will be synchronized which is wonderful. We would like to see the same occur on South Broadway so that it handles the traffic flow going to and from downtown after the development. I didn't see anything like that nor did I hear anything like that in the current DEIS. So we would like to see that addressed somehow.

*(Jose Velez, Representative, Broadway Business Improvement District, Public Hearing, 5/13/2008, Page 145-146)*

**Response III.E-18:**

The Traffic Study analyzes numerous intersections along South Broadway and recommends retiming of signals as well as the coordination of signals to provide for signal progression. The primary truck route to River Park Center will be via Yonkers Avenue from the New York State Thruway. Commercial traffic currently using South Broadway could also be destined to the project site, i.e., to the proposed supermarket located to River Park Center. However, since this commercial traffic is already on South Broadway it will not be “new” to that roadway or the area.

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**Comment III.E-19:**

Concerning the Prospect Bridge, building safety is one of our main concerns. The proposed bridge can create a safety concern for the residents of the building, crime, traffic and exhaust emissions.

*(Vincent Wilson, Representative, Scrimshaw House (Pier Point on the Hudson), Public Hearing, 5/13/2008, Page 150-151)*

**Response III.E-19:**

The Draft Environmental Impact Statement assumed all traffic to and from Palisades Point will utilize the existing Main Street underpass to reach the waterfront area. Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

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**Comment III.E-20:**

I am also concerned in terms of the transportation. You know, when you create seven thousand parking spots and all those parking spots decide to be filled on the same day, how are we going to get out of Yonkers? How are we going to move? And I can remember July 4th with the firecrackers, there was a problem with one light, and this is no development, and a couple of hundred people sitting there, it took me an hour to get home because of the traffic, so this is a real concern and people here love Yonkers.

*(Rona Shapiro, Resident, Public Hearing, 5/13/2008, Page 183)*

**Response III.E-20:**

In the case of a special event such as the Fourth of July, there is potential for some congestion. However, the proposed computerized signal system along Yonkers Avenue and Nepperhan Avenue and at other locations will provide better operating conditions within the area. In addition, a transportation management plan, Exhibit II-16 of this FEIS, was developed and has been reviewed by the City and the City's consultant.

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**Comment III.E-21:**

Traffic concerns. To mitigate the development's traffic impacts, the DEIS proposes several things, but one very important thing is the elimination of parking along the Yonkers Avenue Nepperhan Avenue corridor from the Saw Mill Parkway to the downtown. In effect, this would create an urban expressway that threatens to divide neighborhoods, stifle pedestrian activity and hurt businesses. The proposed replacement of on-street parking with garage space would be less convenient for customers and would not provide a buffer between traffic on the proposed multi-lane arterial and the pedestrians on the sidewalk. The additional traffic lanes would also make pedestrians crossings much more difficult, in effect a highway would be created as a conduit to accommodate project related traffic, again at the expense of low income residents whose primary mode of transport is the bus or walking.

*(Jeff Anzevino, Senior Regional Planner, Scenic Hudson, Public Hearing, 5/13/2008, Page 211-212)*

**Response III.E-21:**

If the downtown core of the City is to be successfully revitalized, the Yonkers Avenue/Nepperhan Avenue corridor, which is the primary access route, must be improved to be able to accommodate increased traffic. Because the roads cannot feasibly be widened, improvements must be made within the existing right-of-way. One of the improvements that can be made within the existing right-of-way is the elimination of parking from the Saw Mill River Parkway to downtown, and the removal of this parking has been determined to be necessary to make the roads capable of efficiently accommodating the traffic. To mitigate the impact of the loss of the on-street parking, new off-street parking (a total of approximately 101 spaces) is proposed at four locations along Yonkers Avenue. See Exhibits II-49, II-49A, II-49B and II-49C in the DEIS.

The proposed improvements to Yonkers Avenue will also include a raised median that will provide for left turn storage bays at various locations with two lanes of travel in each direction. The proposed median is shown in Exhibit III-1 of this FEIS. It should be noted that Yonkers Avenue currently provides the same two lanes of travel in each direction. However, the elimination of the on-street parking will provide better traffic flow. Pedestrians will be accommodated as they are today with pedestrian crosswalks with "count down" indicators at an upgraded signal. The median will be from 4 to 16 feet wide and will provide safe areas for pedestrian crossing. Bus stops will also be provided.

In addition, in connection with final designs, the City and the Applicant will evaluate the potential for a bike lane along the Yonkers Avenue and Nepperhan Avenue to provide access for the bicyclist into the downtown area.

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**Comment III.E-22:**

On a personal note, you know, I live on Warburton Avenue. I have never seen Odell and Broadway included in the traffic study, and I think it will be a traffic block up there. Some mornings you have to wait three light changes to get through that traffic light.

*(Robert Walters, Yonkers Green Policy Task Force, Public Hearing, 5/13/2008, Page 218-219)*

**Response III.E-22:**

The scope for the DEIS requires approximately 60 intersections to be analyzed in detail. Although it was not studied in detail, an alternate route analysis was undertaken to determine the impact of the project traffic at the intersection of Nepperhan Avenue and Executive Boulevard. The analysis shows that there would be little if any project impact at this location. While the intersection of Odell Avenue and Broadway was not required to be studied, it is anticipated that this intersection would be also be minimally impacted by the project.

The intersection of Odell Avenue and North Broadway is currently affected by the hospital, the medical offices adjoining North Broadway, the South Westchester Executive Park and traffic to and from Warburton Avenue (Hudson River Museum).

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**Comment III.E-23:**

In the DEIS the traffic on Yonkers Avenue and Nepperhan, way back when before they made the arterial, Yonkers Avenue, you had a northbound where you can go north. You don't have that now. You have an overpass and with the school busing that you have now, if you have accidents, you need another way to get to, say, Ashburton Avenue or to downtown Yonkers, because if one end is cut off, you create a traffic jam that goes down to the Saw Mill. I mean, even now you wait like 10 or 15 minutes for the lights to change, so we need to do this, and the developer needs to address this because you are going to put so many people, three thousand people, folks, you need to have another way in, you have to have another way in and another way out.

*(Joseph Kozlowski, Board Member, Friends of the Old Croton Aqueduct, Public Hearing, 5/13/2008, Page 249-250)*

**Response III.E-23:**

Comment noted. Under accepted traffic engineering standards, roadway systems are not designed to account for accident conditions. The proposed traffic mitigation for the project includes the upgrading of the existing traffic control system along Yonkers Avenue and Nepperhan Avenue and other improvements to the corridor which will improve the overall effectiveness of the system.

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**Comment III.E-24:**

Also at Nepperhan Avenue and Chestnut Street which is also, I guess, paved over with a wall, that needs to be opened up too to have another access, and along Elm Street and Linden Street having an access to Park Hill Avenue. You need to move parking at least on one side of the street from there, because if you do have these backups and people need to get to wherever they have to go, or even emergency vehicles, we need alternate access if you are going to bring this amount of people into the city, into the downtown area. I didn't see that addressed in the DEIS.

*(Joseph Kozlowski, Board Member, Friends of the Old Croton Aqueduct, Public Hearing, 5/13/2008, Page 249-250)*

**Response III.E-24:**

There are no plans to open additional access along Elm Street or Linden Street. The proposed program calls for the removal of parking along Yonkers Avenue/Nepperhan Avenue and certain

streets within the vicinity of the project. Replacement parking will be at off-street parking locations along the Yonkers Avenue corridor or within the proposed parking garages. See Exhibit III.M-18 of the DEIS.

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**Comment III.E-25:**

Obviously the City Council is aware of traffic issues on Executive Boulevard, so it's critical that studies go as far up the river, or up to northern Yonkers to Executive Boulevard to consider those traffic issues.

*(Gary Weinberg, Resident, Public Hearing, 5/13/2008, Page 260)*

**Response III.E-25:**

The analysis of the intersection of Executive Boulevard and Nepperhan Avenue shows that there will be minimal impact at this location due to the project.

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**Comment III.E-26:**

The approach to the Hudson River from Prospect Street does not invite people visiting Yonkers and traveling down Prospect Street, a major street to the river and the new esplanade that is planned for the river to be fully appreciated. Instead the street terminates and goes into a parking garage. I recommend more thought be given to this major vista and terminus and that a major public space be placed at the end of the street at the river's edge in lieu of the current rendered approach shown in Exhibit III.B-4e.

*(Sharon Ebert, Deputy Commissioner of Planning and Development, City of Yonkers, E-mail, 5/22/2008)*

**Response III.E-26:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

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**Comment III.E-27:**

Building safety - the proposed bridge can create a safety concern for the residents of our building (crime, vehicular traffic and exhaust emissions)

*(Kimberly Lopez, Resident, E-mail, 5/30/2008)*

**Response III.E-27:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

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**Comment III.E-28:**

Privacy - how high will the bridge be and how close to the building will it pass? Will pedestrians and/or passengers in cars be able to look into the windows of our building?

*(Kimberly Lopez, Resident, E-mail, 5/30/2008)*

**Response III.E-28:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

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**Comment III.E-29:**

Noise: if the bridge is open 24 hours and so close to the building, will the car noise and pedestrians walking/talking disturb residents.

*(Kimberly Lopez, Resident, E-mail, 5/30/2008)*

**Response III.E-29:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

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**Comment III.E-30:**

Car lights - will car headlights constantly illuminate the building disturbing residents?

*(Kimberly Lopez, Resident, E-mail, 5/30/2008)*

**Response III.E-30:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

**Comment III.E-31:**

How will the two towers on the waterfront be serviced given the small size of the roads around them? What will it cost to create ample roads and services? What if, as predicted, the water level of the Hudson rises?

*(Michelle Jacobs, Resident, E-mail, 5/29/2008)*

**Response III.E-31:**

Access will be provided through the existing roads that serve the waterfront properties to the north, including Main Street, Dock Street, and Nepperhan Street.

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**Comment III.E-32:**

Traffic study omission Yonkers Ave. at Nepperhan Ave. needs a northbound access point, taken away when arterial was built to connect to Walsh Rd. & Ashburton Ave. to create an alternate route to downtown.

*(Joseph Kozlowski, Board Member, Friends of the Old Croton Aqueduct, E-mail, 5/30/2008)*

**Response III.E-32:**

Comment noted. The alternate route referenced by the commenter is not required to accommodate project traffic.

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**Comment III.E-33:**

What happens to the bridge plans if the Queen Daughter Day Care decides not to sell? Has an alternate access been considered?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-33:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

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**Comment III.E-34:**

Will the County be asked to share in some of the responsibility to make improvements to the Saw Mill River Parkway Northbound Ramp at Yonkers Avenue?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-34:**

Westchester County has no responsibility at this location - it is a State road. While the improvements at this location are included as part of the TIF plan, the City and the Applicant will seek financial assistance from the New York State Department of Transportation for improvements to the Saw Mill River Parkway Northbound Ramp at Yonkers Avenue as well as other traffic improvements, including the improvements to Yonkers Avenue.

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**Comment III.E-35:**

Could the upgrade of the entire signal system along the Yonkers/Nepperhan Avenue corridor be a combined cost with the State or County?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-35:**

See Response III.E-34.

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**Comment III.E-36:**

Guion is a very narrow area with poor lighting, what improvements will be made in that area?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-36:**

Comment noted. To accommodate the new fire headquarters and the future construction by the City of a new detention center, a portion of Guion Street at its intersection with New Main Street will be eliminated. The remaining portion of Guion Street will intersect with South Broadway and terminate in a cul-de-sac in front of the detention center. Rear access to the existing church would not be affected. See also Response III.E-40.

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**Comment III.E-37:**

Has a location been designated for the Bus Pick-up lane on Nepperhan Avenue westbound between Elm and New Main Streets? If so where?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-37:**

The exact location for the bus pick-up lane along Nepperhan Avenue westbound between Elm and New Main Street will be determined during the Site Plan Review process. Currently, the plan is to have Nepperhan Avenue used as a drop-off area for buses with a pick-up area located along New Main Street north of Nepperhan Avenue. This would eliminate the queuing of buses along Nepperhan Avenue waiting to pick up passengers.

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**Comment III.E-38:**

How will the Trolley be funded? Who will be responsible for the up keep of the Trolley? How many Trolley Cars are being proposed for the downtown area? Where will the Trolleys be stored when not in use?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-38:**

The trolley will be funded through the BID. Based on current fees, the project will provide approximately \$200,000 to the BID annually.

**Comment III.E-39:**

Has an agreement been reached with the daycare regarding the Prospect Street Bridge?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-39:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

**Comment III.E-40:**

Where are the residents and church members of Guion Street supposed to park their vehicles if you implement the improvements designed for Guion Street and eliminate on-street parking? Will their lighting be improved as part of the redevelopment? There is a retail unit there how will they get serviced and deliveries?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-40:**

The residents of Guion Street can use the new Cacace Center parking structure in lieu of on-street parking spaces. Lighting will be improved along portion of Guion Street that will remain. Deliveries to the existing retail units will continue to be provided for Guion Street.

**Comment III.E-41:**

I would like the plan include a comfort station for the cabbies and bus drivers.

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-41:**

Public restrooms will be programmed into the River Park Center site as practical.

**Comment III.E-42:**

I would like to see an alternative route from the current driveway to River Park Center proposed on Nepperhan Avenue in order to compare.

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-42:**

The driveway to River Park Center from Nepperhan Ave is strategically located so that the grade of Nepperhan Avenue meets the grade to the largest parking level. It is also located to provide convenient access to upper and lower levels of parking, and minimize time spent circulating through the garage. Convenient and fast access to the street from within the center is a design priority. Additionally, the location of the driveway permits it to serve both retail customers and River Park Center residents with a forked turn-off for the (private) residential drive. Lastly, the driveway acts to demark a transition from one type of pedestrian “riverwalk” experience to the east from a different pedestrian “riverwalk” experience to the west. Relocating the driveway would significantly impair the design of the center and the “riverwalk”.

**Comment III.E-43:**

The exit ramp as you turn onto Yonkers Avenue from the Saw Mill Parkway should be smoothed out and the west exit ramp needs a longer feed to exit

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-43:**

The exit ramp from the Southbound Saw Mill River Parkway to Yonkers Avenue (westbound) is proposed to be widened and improved as part of the proposed project. In addition, two right turn lanes will be provided on the northbound exit ramp from the Saw Mill River Parkway to Yonkers Avenue westbound. This will improve the operating conditions at both of these locations.

**Comment III.E-44:**

A Traffic Light should be placed at the corner of Buena Vista and Prospect if the traffic continues down towards the waterfront.

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-44:**

Projected traffic volumes do not warrant a signal at this intersection.

**Comment III.E-45:**

I would like to see an Alternate Main entrance into the stadium proposed. In my opinion having the entrance facing Nepperhan will create traffic as people take that opportunity to drop off passengers.

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-45:**

Coordination will be required between the ballpark operator and the Yonkers Police Department to ensure that traffic flow along Nepperhan Avenue is maintained at all times. A Traffic Management Plan for ballgames has been developed by the Applicant and has been reviewed by City and the City's consultant. That plan is included in Exhibit II-16 of this FEIS.

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**Comment III.E-46:**

What is the "pedestrian friendly streetscape" that will be developed along the River Park Center, Cacace Center and Government Center frontages (page III.E-15 to 16)?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-46:**

The "pedestrian friendly streetscape" refers to the street experience as perceived by a pedestrian walking along the sidewalk. The streetscape is comprised of both the street/sidewalk design as well as the ground floor elevation of buildings. A "pedestrian friendly streetscape" is usually designed with wide tree-lined sidewalks with ornamental streetlights, hanging baskets, decorative sidewalk pavers, granite curbing, attractive crosswalks, and benches. Pedestrian-oriented traffic-calming devices, such as raised pedestrian crosswalks, textured road beds, etc. are often implemented to protect pedestrian from vehicles. There are typically areas allocated for outdoor dining, art-work, special landscaping features, etc. all of which enhance the sidewalk experience. The first floor of the buildings are usually designed with a variety of building materials and details, including awnings, signage, building lighting and graphics to help bring vitality and interest to potential customers. These elements have been incorporated into the design of River Park Center, Cacace Center and Government Center.

The Applicant has retained an art consulting firm to manage the artist participation and art installation associated with the Project. New Rochelle, NY-based JMC Partners will develop a process for artist selection as the construction timeline is finalized.

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**Comment III.E-47:**

What is the minimum required curb width, important to accommodate existing and increased foot traffic?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-47:**

The minimum curb (sidewalk) width is 5 feet. The sidewalk in the vicinity of River Park Center is wider (up to approximately 20 feet) to accommodate anticipated pedestrian traffic around that site.

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**Comment III.E-48:**

What will be used to create a safe, buffered zone between pedestrians on sidewalks and streets with moving cars up to the curb (i.e., where there is no on-street parking)?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-48:**

Where appropriate, contrasting materials will be utilized along the curb line (edge) to visually identify the limit of the sidewalk.

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**Comment III.E-49:**

Will trees, important for reducing water runoff, cooling the air and providing shade, as well as for aesthetics, be planted along the curblines? How many?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-49:**

Approximately 230 street trees are proposed to be planted along the curblines as part of the Project.

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**Comment III.E-50:**

What is the paving material for sidewalks and walkways? Will pervious paving be used in order to reduce water runoff? Why is there no requirement for pervious paving?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-50:**

The sidewalks along the street will be a combination of pavers and concrete. The "riverwalk" at River Park Center will be a combination of pervious and impervious material.

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**Comment III.E-51:**

At new signalized locations, what "design features will be implemented to accommodate pedestrian activity" (III.E-15)? What paving material will be used for crosswalks?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-51:**

Pedestrian crosswalks will have "count down" indicators. Crosswalks will be asphalt and will be identified by thermoplastic markings. The new center median in Yonkers Avenue will provide safe areas for pedestrian crossing. See Exhibit III-1 of this FEIS.

**Comment III.E-52:**

Will the center median planned for Yonkers Avenue/Nepperhan Avenue be pedestrian friendly? Will trees be planted and maintained in order to make it pedestrian friendly and environmentally sustainable – reduce water runoff, cool immediate area, create green canopy above roads to reduce heat accumulation?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-52:**

The center median will have sufficient width (e.g., 4 to 16 feet) to accommodate left turn lanes at various locations. The median will be pedestrian friendly in that it will allow for crossings at signalized locations with pedestrian actuation. The median will also contain "mountable" curbs. The final design of the median, including plantings and lighting, will be determined during the Site Plan Approval process. See Exhibits II-15 and III-1 of this FEIS.

**Comment III.E-53:**

Where is there accommodation for existing and increased bicycle traffic and parking? Will bike racks be installed? How many and in what locations? Will they be placed in convenient locations so as to encourage use of bikes to keep traffic congestion down? Are bike lanes mandated by the plans? Have traffic patterns studies included bike lanes? How will bike lanes and/or increased bike traffic affect the planned accommodations to vehicular traffic? Will there be bike friendly traffic signaling?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-53:**

Bike racks will be located within the parking structures. Given pavement width limitations, bike lanes are not planned.

**Comment III.E-54:**

How will traffic impact be mitigated by reliance on existing bus and rail mass transit facilities (p. III.E-20)? Who will be monitoring, promoting, encouraging usage and who will be coordinating with the County re bus service and Metro North re train service to increase the frequency and capacity of service both when needed and in anticipation of need?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-54:**

A significant number of people are currently using the existing Metro North or Bee-Line bus systems to reach the downtown Yonkers area. This use will continue and increase due to the development. Conversations with Metro North and the Westchester County Department of Transportation indicated that service will be provided to accommodate the demand.

**Comment III.E-55:**

People will be more likely to ride a bus if they see it is making frequent stops along their route and is convenient for them to ride. Waiting for usage to drive increased frequency/capacity will not be an effective method of changing behaviors, and more people will continue to drive and the traffic/parking issues will be worse than projected in the DEIS. Improving use of mass transit will require pro-active measures - what pro-active provisions are planned to increase use of mass transit?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-55:**

The Applicant has no position as it relates to the number of stops on the Bee-Line Bus system, which is determined by the operator and the Westchester County Department of Transportation. However, for the trolley service, several stops are suggested to improve local circulation within the downtown area. It should be noted that there will be an increase in delay with each added stop. Therefore, to encourage ridership, it is preferred to have a limited number of stops as opposed to numerous stops. The number and location of trolley stops will be determined by the BID based upon demand and usage.

**Comment III.E-56:**

Why is the focus of the trolley limited to the train station to River Park path? Why does the trolley not service adjacent neighborhoods, including those not serviced by direct bus routes?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-56:**

Future expansion of the trolley to other locations can be considered by the City and the BID.

**Comment III.E-57:**

Who will design and pay for the "bus drop-off lane" that "will be provided on Nepperhan Avenue westbound between Elm Street and New Main Street" (p. III.E-23)?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-57:**

The Applicant will design the bus drop-off lane. The cost of constructing the improvements will be paid for by Tax Increment Financing.

**Comment III.E-58:**

Why is there no mention of or plan for a corresponding eastbound lane to accommodate the bus riders who are returning home? Who will design and pay for that improvement?

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-58:**

The need for and location of a bus pick-up area will be determined during the Site Plan Approval process and will be incorporated into the overall design of the Project. If it is determined to be needed, it is anticipated that this pick-up lane would not be located along Nepperhan Avenue (eastbound) but located along New Main Street just north of Nepperhan Avenue as part of the redesigned street grid.

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**Comment III.E-59:**

Private buses are anticipated in dropping of visitors to the ballpark. Is there an accommodation for parking of those buses? Where will they park? To encourage ride-sharing and bus use, and also to avoid idling, it is important to provide for parking.

*(Loretta Miraglia, Resident, E-mail, 5/26/2008)*

**Response III.E-59:**

The private buses anticipated for visitors to the ballpark are envisioned for groups attending events (e.g., summer campers, boy/girl scouts, etc.). Typically these private buses are staffed and remain off when not in use, avoiding idling. They often return to their facility if located nearby, rather than parking at the ballpark. Based on the Applicant's experience in Newark, NJ, it is expected that busses will only be utilized 4-6 times per year on special promotional days at the ballpark. During these days, busses will locate spaces to park in the nearby area. It should also be noted, that during these days, a significantly fewer number of cars would be expected. The operator of the ballpark will discuss specific plans with the City prior to selecting promotional days.

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**Comment III.E-60:**

The elimination of on-street parking makes bike lanes a more feasible alternative in the downtown. Are bike lanes being incorporated into roadway/off-road parking changes in the project area? Will parking garages include bike park stations?

*(Molly Roffman, Letter, 5/30/2008)*

**Response III.E-60:**

See Response III.E-53.

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**Comment III.E-61:**

It is recommended that the developer immediately compensate the city in order to hire a professional traffic engineer/project manager to analyze and comment on the details of this report and the EIS report. This engineer as member of the Traffic Engineering Staff would provide the coordination and review of all documentation for the DEIS/EIS process, act as a project manager during review of development site plans and the review of the final construction documents. This individual would also be required to oversee all construction phases and assist the traffic engineering staff in implementing all approved project traffic mitigation and

recommendations. This engineer would coordinate all aspects of the traffic engineering elements of the permitting process and supervise traffic engineering construction management.

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-61:**

Comment noted.

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**Comment III.E-62:**

Traffic Engineering disagrees with the statement that “these roads have an operating speed of between 30 to 40 MPH” These roads have significant delays caused by side friction created by on-street parking, mid-block left turns and the attempt to coordinate traffic in two directions.

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-62:**

Comment noted. Due to side friction, the on-street parking along Yonkers Avenue and Nepperhan Avenue will be eliminated. When coupled with the coordination of traffic signals and other recommended improvements, this will result in improved operating conditions. It is anticipated that post-improvement operating speeds will be in the order of 30 MPH.

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**Comment III.E-63:**

Back ground growth calculation is compounded not accumulated.

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-63:**

Comment noted.

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**Comment III.E-64:**

Trip distribution is not explained it is just assigned. What are the bases of the trip assignment?

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-64:**

The trip distribution was based upon the anticipated directional distribution of the shoppers, office workers and residents, and a review of current traffic in the downtown area. The primary routes would be Saw Mill River Parkway, South Broadway and Riverdale Avenue/Warburton Avenue.

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**Comment III.E-65:**

The data is difficult to analyze because of having to moving back and forth from the DEIS to the Appendix.



*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-65:**

Comment noted. Because of the complexity of the analyses and the number of intersections evaluated, there was no practical way to indicate the data without a summary in the main text and more detailed information in technical appendices.

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**Comment III.E-66:**

The trip distribution and access point impacts are not explained. How would the arrivals to ball games be processed at parking facilities? Would there be delays getting into parking facilities if the majority of patrons arrived at the same time and would this disrupt traffic circulation in the area? Identify the sources of the data.

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-66:**

Two-thirds of the patrons to the ballpark are anticipated to arrive one hour before the game. The parking assignments for these vehicles will be the new Government Center Garage and the Cacace Center Garage. They will be directed to not use the parking at River Park Center since that parking will be primarily used by retail and movie patrons.

Coordination will be required with the Police Department to reduce traffic impact in the area. A Traffic Management Plan, which has been reviewed by the City and its consultant, is included as Exhibit II-16 of this FEIS.

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**Comment III.E-67:**

Coordinating events schedules with available parking. What does this mean? Who is going to be responsible for the coordination? What part will the City have in this process?

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-67:**

The operator of the ballpark will notify all relevant City agencies and departments regarding the scheduling of special events. This will be part of the on-going communication between the ballpark operator and the City of Yonkers.

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**Comment III.E-68:**

The point-by-point intersection analysis is difficult to follow from a project overview. Mapping should be provided to present operational conditions and areas of anticipated congestion. There should be a narrative that highlights the anticipated traffic conditions. The developer needs to present a macro view of the City to accurately depict the impact of all development activities on this project. Specifically the impact of the Alexander Street development and SWEP should be discussed.

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*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-68:**

The impact of the Alexander Street development was not included as part of the DEIS since it is a proposed future urban renewal initiative with its own Generic Environmental Impact Statement. The South Westchester Executive Park is located in the vicinity of Executive Boulevard, significantly north of the Study Area. Although it was not studied in detail, an alternate route analysis was undertaken to determine the impact of the project traffic at the intersection of Nepperhan Avenue and Executive Boulevard. The analysis shows that there would be little if any project impact at this location.

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**Comment III.E-69:**

The Mitigation/Recommended Improvements: Primary Intersections is comprehensive and detailed. Who is responsible for making these improvements? What is the timing of these improvements and who is responsible for the design and cost of implementing these improvements?

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-69:**

The Applicant is responsible for the design of all required improvements. It is anticipated that the improvements will be funded through Tax Increment Financing, and will be in place at the time of the opening of River Park Center. The improvements will be the responsibility of the Applicant and/or the City. The City and the Applicant will also seek financial assistance from the New York State Department of Transportation for improvements to the Saw Mill River Parkway Northbound Ramp at Yonkers Avenue as well as other traffic improvements, including the improvements to Yonkers Avenue.

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**Comment III.E-70:**

Is there to be any discussion of when and why the alternative routes identified will be selected? How will these alternative routes be impacted and what will be the impact to the neighborhoods along these routes?

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-70:**

The alternative routes were outlined in the Scope based upon a concern that some motorists would not utilize major roadways, such as Yonkers Avenue, to access the ballpark. Although it would not be desirable for ballpark traffic to utilize neighborhood roads, if it were to occur, additional signalization would have to be constructed.

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**Comment III.E-71:**

What is a sensitivity analysis?

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-71:**

A sensitivity analysis is an evaluation of an alternate distribution pattern based on the diversion of a certain percentage of the traffic to the alternate route.

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**Comment III.E-72:**

This development must employ the most modern and state-of-the-art pedestrian standards for “walkable downtown streets.”

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-72:**

Comment noted. As part of the site plan process, elements required to ensure “walkability” will be identified and included in the final plans.

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**Comment III.E-73:**

The Public Transportation section should address park and ride facilities in conjunction with a shuttle to mitigate the difficulties associated with the Cross County Parkway and the Saw Mill River Parkway interchange.

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-73:**

Park and ride facilities are not warranted by the project.

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**Comment III.E-74:**

Who will operate the trolley? Will it be free? What will it cost to operate? Who will pay for its operational costs and the cost of providing the GPS/AVL function in conjunction with the Traffic System Central Computer?

*(Brian O Rourke, P.E., Director of Traffic Engineering, City of Yonkers, Memo, 5/30/2008)*

**Response III.E-74:**

The trolley service will be operated by the BID with the cost of the operation funded by the BID. Currently, plans envision a nominal payment for the use of the trolley service to partially cover the operating costs.

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**Comment III.E-75:**

Clarify the impact of the proposed Project on bus drop-off points presently located in downtown Yonkers in the vicinity of Getty Square including but not limited to Nepperhan Avenue/New Main Street, New Main Street/So. Broadway and North Broadway.

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*(Debra S. Cohen, Esq., Attorney, C.H. Martin, Letter, 5/30/2008)*

**Response III.E-75:**

It is anticipated that most of the drop-off points presently located within the downtown area especially in the vicinity of the Getty Square will be maintained. Certain modifications, subject to the approval of the City of Yonkers and the Westchester County Department of Transportation, will be needed due to the reorientation of several streets.

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**Comment III.E-76:**

Clarify the location of the nearest bus drop-offs to Getty Square during construction and after construction of River Park Center.

*(Debra S. Cohen, Esq., Attorney, C.H. Martin, Letter, 5/30/2008)*

**Response III.E-76:**

Bus service will continue to be provided to Getty Square area during construction with specific locations to be determined based on the construction schedule. See also Response III.E-75.

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**Comment III.E-77:**

24) What city streets will be closed to, or have fewer lanes, during the construction period of Phase 1? Detail by street, direction and number of lanes, and time period.

*(Deirdre Hoare, Resident, Letter, 5/30/2008)*

**Response III.E-77:**

The construction schedule is discussed in detail in Chapter III.M of the DEIS. Except for the closure of New Main Street between Nepperhan Avenue and the Getty Square for several months during the demolition of 87 Nepperhan Avenue and the existing Government Center Garage, it is anticipated that the street system will remain open throughout the entire construction process (although sections of sidewalk will not be available).

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**Comment III.E-78:**

There are already severe traffic flow problems in the Greystone area. Executive Boulevard has high traffic during the day, peaking at rush-hour in the morning and the afternoon. Odell Avenue is a winding narrow road that is also over-crowded much of the time. Many automobiles access the Greystone area passing through Hastings. It is critical that the EIS examine traffic at the following intersections: (1) Saw Mill River Parkway and Executive Boulevard, (2) Executive Boulevard and North Broadway, (3) North Broadway and Odell Avenue, (4) Odell Avenue and Warburton Avenue, (5) Warburton Avenue and Washington Street in Hastings, and (6) Warburton Avenue and Main Street in Hastings.

*(Gary Weinberg, President, The Greystone, Memo, 5/29/2008)*

**Response III.E-78:**

The impact of the proposed project on these intersections would be minimal. As part of the DEIS, a sensitivity analysis was undertaken for the intersection of Executive Boulevard and Nepperhan Avenue. That analysis indicated that the project would have minimal impact at this location.

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**Comment III.E-79:**

In addition to the traffic issues detailed above, it is critical that the impacts of the traffic during the construction phase be evaluated. The DEIS documents state that 1,000 automobiles will be parked at the JFK Marina located adjacent to the Glenwood train station. The impacts of the traffic to and from this site must be evaluated in the same light.

*(Gary Weinberg, President, The Greystone, Memo, 5/29/2008)*

**Response III.E-79:**

Due to concerns regarding the impacts to the surrounding neighborhood, the Applicant no longer proposes using JFK marina for construction worker parking. In lieu of using the marina area, the underutilized parking structure at Cromwell Towers will be used. Cromwell Towers is located at 77 Locust Hill Avenue, less than a quarter mile north of the River Park Center site. This area can accommodate 750 vehicles per day and will not require a shuttle due to its proximity to the River Park Center site.

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**Comment III.E-80:**

The Traffic Study provides data on accidents (p. 3, e25-27). This table indicates that 384 crashes have occurred in the Study Area between 2003 and 2005. The DEIS should indicate if this is higher than the state average. Since measures proposed to mitigate traffic congestion would include the removal of on-street parking and the addition of travel and turn lanes, we are concerned that the wider road will result in more cars and trucks traveling at faster speeds. In effect, a highway would be created as a conduit to accommodate project-related traffic, again at the expense of low-income residents whose primary mode of transport is bus and walking. This is not only a safety concern but an environmental justice issue, as the motorists benefiting from this wider road passing through low-income areas will be residents of expensive homes.

*(Jeff Anzevino, Senior Regional Planner, Scenic Hudson, Letter, 5/13/2008)*

**Response III.E-80:**

See Responses III.E-15, III.E-21.

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**Comment III.E-81:**

How will deliveries be accommodated - moving vans and the like? What accommodations would be needed to South Broadway to allow truck access to this street for merely necessary uses? Explain "suitable access?"

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-81:**

Deliveries to the River Park Center will be primarily “on site” with indoor loading areas proposed. There will be an occasional delivery made on-street for the small shops with street frontage. There are no deliveries planned from South Broadway.

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**Comment III.E-82:**

III E-6 Explain what this credit is? Is a 30% credit "normal"? What expectation is there for which transit use modes? Be clear about the demographics of what groups use which transit mode. Explain pass by trips. Explain how the trip distribution was determined?

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-82:**

A 30% credit is normally considered typical in urban areas. This credit accounts for utilization of mass transit and by-pass trips and/or interplay trips between the various components of the project. Currently, there is a substantial bus usage in the Getty Square area as well as the rail transit to the Yonkers Railroad Station. Many of the patrons and residents of the proposed project will already be using the existing mass transit facilities in the area. The census data indicates that mass transit usage is in excess of 20% for the City of Yonkers.

A by-pass trip is a vehicle which is already on the roadway system that stops at a given site, as opposed to a vehicle on the roadway system specifically destined to that site.

The distribution of traffic to the project was based upon the primary route system as well as the existing traffic patterns in the area.

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**Comment III.E-83:**

III E-10 No trips from the Thruway and then to the site by Yonkers Avenue?

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-83:**

The vehicles using the Thruway have been assigned to Yonkers Avenue. It is anticipated that a significant portion of the trips to the project would utilize the Saw Mill River Parkway in lieu of using the New York State Thruway.

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**Comment III.E-84:**

III E-12 Variable message signs should be included with traffic signs to align traffic where it is best placed. Use these signs in the same manner as at air ports.

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-84:**

Variable message signs will be used to direct people to the appropriate parking areas and venue. Details regarding the signs will be presented during the Site Plan Review process.

**Comment III.E-85:**

III E- 13 Truck Factor - does this mean that it is expected that 5% of the total traffic is trucks?

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-85:**

The truck factor includes not only trucks but also buses (including school buses).

**Comment III.E-86:**

III E 15. What part of the traffic improvements needed are attributable to the proposed project? Are the project's payments via the TIF equal in percentage to needed traffic improvements?

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-86:**

The project impacts evaluated changes in Level of Service for the No-Build to the Build condition. The No-Build includes existing traffic plus traffic for other development in the area. Hence, the proposed traffic improvements are based on the needs of the existing system or project impacts. The amount of Tax Increment Bonds proposed to be issued by the City will be sufficient to cover the costs of the traffic improvements, as well as other public improvements and infrastructure. With regard to the estimated costs of the proposed improvements, see Response LA-26.

**Comment III.E-87:**

III E-16 A walkable downtown analysis needs to be conducted to determine which traffic and other improvements will most assist in pedestrian safety. Signal timing and pedestrian phases may not be sufficient to allow for ease of crossing. Changes from existing and common design may be necessary to accommodate.

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-87:**

Currently, the DEIS reflects the anticipated pedestrian traffic at the critical locations, as well as the capacity of the existing and proposed sidewalk system to accommodate that pedestrian traffic. The initial plans have been developed to indicate preferred pedestrian circulation/crossings, which are shown in the diagram of the Nepperhan Avenue median, Exhibit II-15 of this FEIS. These will be refined during the site approval process. Additional analysis is beyond the scope of this EIS.

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**Comment III.E-88:**

III E-16 The provision of a center median in Yonkers Avenue is clear. The use of the center island for left turns at intersecting streets is not clear. Does this mean the island will be interrupted or that the cars will mount the island? Will the Prospect Street bridge be truck accessible? Will it hinder the Sugar house easement from that site to Main Street underpass?

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-88:**

The Yonkers Avenue median will be interrupted for side streets. See Exhibit III-1 of this FEIS. Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. See Response III.A-214.

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**Comment III.E-89:**

Current problems exist with Domino sugar trucks using South Broadway to access the Degan via Van Cortlandt Park south. Will the new volumes on Yonkers Avenue have any impact on the route decisions of the sugar tankers?

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-89:**

The improvements to Yonkers Avenue will benefit all traffic with improved traffic flow and an improved traffic control system, and route decisions of American Sugar Refinery trucks are not anticipated to be impacted by the project. The trucks from the Sugar Refinery were included in the traffic analysis.

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**Comment III.E-90:**

III E 20 Trolley Loop. What provisions will be made to continue the trolley loop for the life of the project? Will there be guarantee for a nominal length of time?

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*



**Response III.E-90:**

The trolley will be operated by, and funded through, the BID. The length of time that the trolley operates will be determined by the BID.

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**Comment III.E-91:**

III E 23 - Pedestrian issues Proposed project does not have significant pedestrian improvements beyond the statement that there should be ped phases in the new cross walks. Given the large increase in the number of cars, the opportunity to rebuild all of the downtown streets and the likelihood of increased pedestrian traffic there is a need for a wholesale revisiting of pedestrian downtown improvements. The downtown should be reworked with the latest in "walkable community" techniques. At a minimum, the wide arterials should be made far more pedestrian friendly by the addition of mid street refuge areas, the relocation of cross walks from the end of medians and the installation of ped friendly controllers potentially with median mounted signals and controls.

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-91:**

Comment noted. As part of the site plan process, elements required to ensure "walkability" will be identified and included in the final plans.

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**Comment III.E-92:**

III E 24 Trolley service. Who pays and for how long? What will the metric be to make the decision if the service is to be discontinued? What guarantee is offered to maintain the service?

*(Lee J. Ellman, Planning Director, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/23/2008)*

**Response III.E-92:**

See Response III.E-90.

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**Comment III.E-93:**

3. Foot traffic

a. What is the "pedestrian friendly streetscape" that will be developed along the River Park Center, Cacace Center and Government Center frontages (page III.E-15 to 16)?

b. What is the minimum required curb width, important to accommodate existing and increased foot traffic?

c. How will the pedestrian connection described between River Park and the waterfront be created? Will SFC bear the financial responsibility for this?

d. At new signalized locations, what "design features will be implemented to accommodate pedestrian activity" (III.E-15)? What paving material will be used for crosswalks?

(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-93:**

See Responses III.E-15, III.E-46, III.E-47, III.E-50.

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**Comment III.E-94:**

a. The DEIS fails to prepare an analysis of traffic associated with “other” potential events at the ballpark such as concerts or shows.

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-94:**

The detailed traffic analysis for the ballpark is a worst case traffic analysis for special events, such as concerts, etc. In addition, these events are certain to occur as a result of the Proposed Action, while other potential events for the stadium are not yet known.

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**Comment III.E-95:**

c. Traffic along alternate routes was not adequately evaluated. A formalistic approach was used with conclusory statements regarding expected levels of traffic (Appendix 2.J). No real statements were made so that citizen of the affected neighborhoods can assess the impact on itself.

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-95:**

The alternate routes are based upon the Scoping Document approved by the City Council. A detailed traffic analysis was undertaken at each of these locations to determine the impact of diverted trips. The alternate route intersections are currently operating at or above capacity and require installation of traffic control devices such as traffic signals. The intersections will be monitored after the project opens to determine if warrants are met for the traffic control devices.

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**Comment III.E-96:**

d. What is the impact of the finding that “certain Alternate Route Intersections will operate at or above capacity under Existing, No-Build or Build Conditions”? What accommodation is being made to address this?

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-96:**

See Response III.E-95.

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**Comment III.E-97:**

## e. Holiday Traffic

Is the ITE Trip Generation Handbook the appropriate reference to calculate increased holiday traffic, given the reality of the huge increase in traffic at existing Yonkers shopping centers, such as Cross County?

The guidelines suggest an increase in only 160 vehicles entering and 190 vehicles exiting during holiday peak hours, and these are said to be comparable to weekday peaks. Wouldn't actual experience at area malls be better predictors of increased volume during holiday times?

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-97:**

The Institute of Traffic Engineers has undertaken detailed analyses in their "Trip Generation" document to differentiate between typical traffic volumes and holiday traffic volumes. While the volume of traffic associated with the Christmas holiday is not significantly higher than typical conditions, there is a significant impact on parking during the holiday season (since the shopper spends more time in the store). Thus, the holiday condition is more pronounced in the parking analysis than in the traffic analysis. This was indicated in the DEIS.

**Comment III.E-98:**

## h. ballpark and Traffic

Page III.E-12 – "The schedule would be coordinated with the availability of parking." Is this a defensible statement? Does it adequately address the issues of traffic and parking if it fails to address or require here the reality of when a ball game or special event will occur?

If putting off until a later time – who will do this coordinating and who will pay for that person's time? Will it be possible to schedule events and games only when parking is available and traffic low?

Will the economic and social benefit of the ballpark be reduced if the timing of events has to be scheduled during undesirable times because SFC fails to provide appropriate traffic accommodations and parking to allow for events to occur during desirable times of day?

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-98:**

In the case of a special event such as the Fourth of July, there is potential for some congestion. However, if the recommended mitigation measures are implemented, the traffic for special events can be adequately accommodated. Specifically, the proposed computerized signal system along Yonkers Avenue and Nepperhan Avenue and at other locations will provide better operating conditions within the area. In addition, a transportation management plan, Exhibit II-16 of this FEIS, was developed and has been reviewed by the City and the City's consultant. This plan addresses parking for ballgames. Many elements of this plan can be utilized for non-ballgame events. Finally, the operator of the ballpark will notify all relevant City agencies regarding the scheduling of special events. This will be part of the on-going communication between the ballpark operator and the City of Yonkers.

**Comment III.E-99:**

## i. Traffic accommodations

Do the traffic accommodations provide adequate [facilities] to accommodate the scale of the project? Should more permanent and costlier solutions be put into place now, during this major development project?

Should minimum capacity be the goal (as it seems the numbers are estimated in the lower range and just accommodate peak requirements) – or should this – the early stages of tremendous city-wide development – be the time to build in extra capacity to accommodate unanticipated need?

Why are the traffic accommodations not being paid for in total or in greater part by Applicant?

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-99:**

The proposed improvements to the existing City street system will adequately mitigate the traffic impact of the project. The improvements to the City street system and to the Saw Mill Parkway ramps are all public improvements that will be funded through the Tax Increment Financing Program. The City and the Applicant will also seek financial assistance from the New York State Department of Transportation for improvements to the Saw Mill River Parkway Northbound Ramp at Yonkers Avenue as well as other traffic improvements, including the improvements to Yonkers Avenue.

**Comment III.E-100:**

## 2. Pedestrians

a. What will be used to create a safe, buffered zone between pedestrians on sidewalks and streets with moving cars up to the curb (i.e., where there is no on-street parking)?

b. Will trees, important for reducing water runoff, cooling the air and providing shade, as well as for aesthetics, be planted along the curblines? How many?

c. What is the paving material for sidewalks and walkways? Will pervious paving be used in order to reduce water runoff? Why is there no requirement for pervious paving?

d. Who will pay for upkeep of public sidewalks and existing crosswalks?

e. Will the center median planned for Yonkers Avenue/Nepperhan Avenue be pedestrian friendly? Will full shade trees (not small flowering specimens) be planted and maintained in order to make it pedestrian friendly and environmentally sustainable – reduce water runoff, cool immediate area, create green canopy above roads to reduce heat accumulation?

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-100:**

The City of Yonkers is responsible for the maintenance of public sidewalks and crosswalks. See also Responses III.E-48, III.E-49, III.E-50, III.E-52.

**Comment III.E-101:**

## 3. Bicycles

- a. Where is there accommodation for existing and increased bicycle traffic and parking?
- b. Will bike racks be installed? How many and in what locations? Will they be placed in convenient locations so as to encourage use of bikes to keep traffic congestion down?
- c. Are bike lanes mandated by the plans?
- d. Have traffic patterns studies included bike lanes?
- e. How will bike lanes and/or increased bike traffic affect the planned accommodations to vehicular traffic?
- f. Will there be bike friendly traffic signaling?

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-101:**

See Response III.E-53.

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**Comment III.E-102:**

## 4. Bus and Rail Mass Transit/Trolley

The DEIS indicates that there is “available capacity” of buses and “if ridership increases bus service is adjusted accordingly.” However, people will be more likely to ride a bus if they see it is making frequent stops along their route and is convenient for them to ride. Waiting for usage to encourage increased frequency/capacity will not be an effective method of changing behaviors, and more people will continue to drive and the traffic/parking issues will be worse than projected in the DEIS. Improving use of mass transit will require practical measures – what provisions are planned to increase use of mass transit?

- a. How will traffic impact be mitigated by reliance on existing bus and rail mass transit facilities (p. III.E-20)?

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-102:**

See Responses III.E-13, III.E-14, III.E-54, III.E-55.

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**Comment III.E-103:**

- b. Who will be monitoring, promoting, encouraging usage and who will be coordinating with the County re bus service and Metro North re train service to increase the frequency and capacity of service both when needed and in anticipation of need?
- c. SFC and the City should be encouraging visitors to use bus and rail service.

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-103:**

Promoting the use of mass transit will be the responsibility of the City, the Applicant, and the BID, which will run the trolley as well as Metro North and the County Department of

Transportation. This can be done separately and/or in a coordinated manner. See also Responses III.E-13, III.E-14, III.E-54.

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**Comment III.E-104:**

d. Bus drop-off lane

Who will design and pay for the “bus drop-off lane” that “will be provided on Nepperhan Avenue westbound between Elm Street and New Main Street” (p. III.E-23)?

Why is there no mention of or plan for a corresponding eastbound lane to accommodate the bus riders who are returning home? Who will design and pay for that improvement?

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-104:**

See Responses III.E-57, III.E-58.

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**Comment III.E-105:**

f. Trolley Why is the focus of the trolley limited to a route between the train station and River Park Center? Why does the trolley not service adjacent neighborhoods, including those not serviced by direct bus routes? Will COY operate and pay for the trolley? Will there be a transportation charge or is this free to the public?

*(Board of Directors, Yonkers Committee for Smart Development, Letter, 5/30/2008)*

**Response III.E-105:**

See Responses III.E-38, III.E-56, III.E-74.

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**Comment III.E-106:**

The DEIS recognizes that there will be substantial traffic when an event at the 6500-seat ballpark lets out and people get into their cars to drive home. It then suggests a route which it concedes will likely not be used by drivers, and then offers "mitigation" in the form of traffic police and better signage. This will do little or nothing to address traffic, noise and air quality concerns. The developer should be required to consult with the MTA and put forward a genuine traffic mitigation plan, one that makes public transportation more attractive and reduces the number of cars moving through the area. The proposed trolley does not constitute such a plan.

*(Nan Beer, Resident, Letter, 5/30/2008)*

**Response III.E-106:**

The DEIS evaluates the preferred routing of vehicles to and from the project including the ballpark. It is anticipated that the majority of the traffic would utilize these roads to reach their primary destination. As part of the DEIS, the City Council requested analysis of alternate routing under various conditions. The identified alternate routes are not anticipated to be primary routes used by the ballpark patrons.

A Traffic Management Plan for the ballpark has been developed and has been reviewed by the City's consultant (Exhibit II-16 of this FEIS). This plan was developed for the "worst case" event. However, it is anticipated that a significant number of fans will use mass transit to reach the ballpark.

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**Comment III.E-107:**

Executive Summary, 1-9, 3. Amendment to the Waterfront Master Plan: The proposed Prospect Street Bridge-would pedestrian access and a vista overlook be included in the design of this bridge?

*(Mario Caruso, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/2/2008)*

**Response III.E-107:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

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**Comment III.E-108:**

Executive Summary, 1-10, 5. Sale of Land: In the sentence describing the closing of School Street, the phrase "the New Main Street and" needs to be eliminated.

*(Mario Caruso, Planning Bureau of Yonkers, City of Yonkers, Memo, 5/2/2008)*

**Response III.E-108:**

Comment noted.

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**Comment III.E-109:**

Who will construct, own and maintain proposed public bridge over Metro-North rail road from Prospect Street to Palisades Point?

*(Joseph Moran, P.E. Acting City Eng, Department of Engineering, City of Yonkers, Memo, 5/13/2008)*

**Response III.E-109:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Proposed Action. These concerns include issues of safety, security and traffic congestion for residents of the Scrimshaw House, and issues of potential impacts on the children's playground and parents' ability to drop-off their children at the Queen's Daughter daycare facility.

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**Comment III.E-110:**

The kind of traffic generated by the components of this development project will not be supportable with the current access roads.

*(Taffy Lee Williams, Resident, Letter, 5/30/2008)*

**Response III.E-110:**

See Responses III.E-99.

**Comment III.E-111:**

The DEIS fails to deal with public transportation issues. The projected increases in parking facilities and deference to accommodating automobiles rather than an analysis of mass transit options is a serious omission in the study. The recent increases in gasoline costs and the public's search for mass transit options only magnify the importance of this issue.

*(William Dennison, Resident, Memo, Not Dated)*

**Response III.E-111:**

Vehicular traffic and mass transit usage are both addressed in the DEIS. The trolley system will provide the opportunity for increased use of mass transit. The Applicant considers the use of mass transit to be of critical importance for this project and has proposed a trolley system to provide direct connections with Metro North.

**Comment III.E-112:**

How is SFC encouraging walking, and biking, for obvious health benefits, but also for the greening of the designs.

*(Margaret Setterholm, Resident, E-mail, 5/30/2008)*

**Response III.E-112:**

The "riverwalk" at River Park Center, "art walk" at Cacace Center and esplanade at Palisades Point will create new walking environments in downtown Yonkers. Publically accessible open space and new restaurants, shops and entertainment will encourage walking. Bike racks will be provided.

**Comment III.E-113:**

In its section pertaining to Modifications to Street Patterns on page III.A-22, the DEIS does not mention any changes as being proposed near the Palisades Point project. That no changes are proposed should be set forth affirmatively.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-113:**

See Response III.E-114.



**Comment III.E-114:**

In this Traffic and Transportation Study, an insufficient description of the Palisades Point development is presented. The description should include the provisions for vehicular access through the site with particular attention paid to the preservation of the Easement and access for the adjacent ASR property. This access Easement must be maintained both during and after construction of Palisades Point; the Supplemental DEIS should describe how this will be accomplished. Furthermore, it is not clear how the proposed Prospect Street Bridge will impact the Easement and access to the ASR property, or if access to Prospect Street from the Easement will be available.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-114:**

Given concerns expressed by area residents and others, as well as cost factors, the proposed Prospect Street bridge has been eliminated from the Project. See Response III.A-214.

**Comment III.E-115:**

The Scope requires the DEIS to describe the existing roadway volumes and road system, including road and right-of-way widths, on-street and off-street parking, one way designations and traffic controls. While the existing lane geometry and type of traffic control for each of the intersections are illustrated, the descriptions of the roadways found in the text fail to indicate the one-way streets. A description of existing on/off street parking could only be located in the parking study (Appendix 2.M; Section A). The road and right-of-way widths are only provided for eleven "primary roadways." ASR requests that Table 1: Road and Right-Of-Way Widths illustrate all (40+/-) roadways included in the analyses and that designated truck routes be identified as well. This description should include the route used by ASR trucks through the study area between the ASR facility and the New York State Thruway (1-87). A map showing the ASR truck route is attached hereto as Exhibit "E."

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-115:**

The table has been updated and is included below.

ROAD AND RIGHT-OF-WAY WIDTHS

		Pavement Width Curb to Curb	Right-of-Way
1	NEPPERHAN AVENUE (BETWEEN SOUTH BROADWAY AND YONKERS AVENUE)	108'	142'
	ELM STREET	35'	45'
	NEW SCHOOL STREET	35'	55'
	NEW MAIN STREET	34'	50'
	SOUTH BROADWAY	60'	81'
	LAKE AVENUE	36'	49'
2	ELM STREET (BETWEEN NEPPERHAN AVENUE AND PALISADE AVENUE/NEW SCHOOL STREET) PALISADE AVENUE NEW SCHOOL STREET	35' 36' 34'	54' 46' 50'
3	PALISADE AVENUE (BETWEEN ELM STREET/SCHOOL STREET AND MAIN STREET)	32'	50'
	MAIN STREET	34'	53'
	LOCUST HILL AVENUE	24'	48'
	ELM STREET	34'	50'
4	BUENA VISTA AVENUE (BETWEEN DOCK STREET AND PROSPECT STREET)	34'	50'
	DOCK STREET	38'	62'
	NEPPERHAN STREET	38'	70'
	MAIN STREET	46'	78'
	HUDSON STREET	34'	48'
	PROSPECT STREET	58'	79'

## ROAD AND RIGHT-OF-WAY WIDTHS

		Pavement Width Curb to Curb	Right-of-Way
5	<b>YONKERS AVENUE (BETWEEN NEPPERHAN AVENUE AND THE SAW MILL PARKWAY RAMPS)</b>	<b>68'</b>	<b>90'</b>
	WALNUT STREET	30'	46'
	PRESCOTT STREET	30'	44'
	SAW MILL RIVER PARKWAY SB RAMP	14'	50'+
	SAW MILL RIVER PARKWAY NB RAMP	27'	50'+
6	<b>YONKERS AVENUE (BETWEEN THE SAW MILL PARKWAY RAMPS AND CENTRAL PARK AVENUE)</b>	<b>64'</b>	<b>104'</b>
	MIDLAND AVENUE (WEST)	36'	53'
	MIDLAND AVENUE (EAST)	40'	50'
	SEMINARY AVENUE	44'	64'
	CENTRAL PARK AVENUE (SB)	31'	53'
	CENTRAL PARK AVENUE (NB)	35'	59'
7	<b>ASHBURTON AVENUE (BETWEEN WARBURTON AVENUE AND YONKERS AVENUE)</b>	<b>36'</b>	<b>50'</b>
	LOCUST HILL ROAD	25'	40'
	PALISADE AVENUE	26'	46'
	WALNUT STREET	37'	50'
	NYS ROUTE 9A	41'	57'
8	<b>WARBURTON AVENUE (BETWEEN GLENWOOD AVENUE AND RIVERDALE AVENUE)</b>	<b>30'</b>	<b>43'</b>
	DOCK STREET	25'	45'
	NEPPERHAN STREET	24'	44'
	MAIN STREET	46'	71'
	GLENWOOD AVENUE	28'	45'
	LAMARTINE AVENUE	33'	50'

ROAD AND RIGHT-OF-WAY WIDTHS

		Pavement Width Curb to Curb	Right-of-Way
9	RIVERDALE AVENUE (BETWEEN NEPPERHAN AVENUE/PROSPECT STREET AND VALENTINE LANE)	81'	100'
	HUDSON STREET	35'	50'
	PROSPECT STREET	60'	87'
	VARK STREET	29'	48'
	HERRIOT STREET	29'	47'
	LUDLOW STREET	57'	39'
	RADFORD STREET	31'	49'
	VALENTINE LANE	45'	72'
10	NORTH BROADWAY (BETWEEN GLENWOOD AVENUE AND MAIN STREET) GLENWOOD AVENUE LAMARTINE AVENUE	32' 34' 43'	49' 45' 60'
11	SOUTH BROADWAY (BETWEEN NORTH BROADWAY AND VALENTINE AVENUE)	65'	85'
	HUDSON STREET	26'	51'
	MAIN STREET	34'	74'
	VARK STREET	30'	49'
	HERRIOT STREET	29'	46'
	BRIGHT PLACE	24'	40'
	LUDLOW STREET	30'	50'
	MCLEAN AVENUE	55'	73'
	RADFORD STREET	29'	49'
VALENTINE LANE	46'	75'	
12	PROSPECT STREET (BETWEEN BUENA VISTA AVENUE AND RIVERDALE AVENUE) BUENA VISTA AVENUE HAWTHORNE AVENUE	35' 24' 43'	49' 38' 60'

**Comment III.E-116:**

The Scope requires a capacity analysis for all project site driveways. Some site driveways were analyzed, but no analysis was found regarding access to the Palisades Point site. Capacity analysis should be provided for the Palisades Point site driveway (Build Condition). The Scope also required that the Applicant "conduct one week of Automatic Traffic Recorder ("ATR") counts at three locations in the study area." The machine count data provided for three intersections did not satisfy this requirement. The John Collins Engineers counts conducted on Nepperhan Avenue between Elm Street and Waverly Street were conducted for just under a week (Friday, June 16, 2006 at 12:00 PM to Tuesday, June 20, 2006 at 2:00 AM). The two other ATR counts included in Appendix G were obtained from NYSDOT and only provided count data for three and four day intervals. The ATR count conducted on Riverdale Avenue between NYC Line and Warburton Avenue was conducted from Tuesday, May 25, 2004 at 8:00 AM to Friday, May 28, 2004 at 12:00 PM. The ATR count conducted on Warburton Avenue between Ashburton Avenue and Dock Street was conducted from Monday, September 20, 2004 at 1:00 PM to Wednesday, September 22, 2004 at 1:00 PM. In order to satisfy the Scope, three full weeks of ATR counts must be performed as specified. This information should be provided in the Supplemental DEIS, and can be used to examine other hourly volumes on key streets along the ASR truck route in order to establish conditions impacted by the Project, but not typically considered "peak hours." This is particularly true in the afternoon from approximately 2:00 P.M. to 4:00 P.M., when a very busy downtown Yonkers street system must accommodate a surge of school bus traffic, transit bus traffic, truck traffic, base traffic volumes and new traffic generated by the proposed development.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-116:**

The Traffic Study assigns all Palisades Point traffic to the Main Street underpass. The capacity analysis indicates satisfactory operating conditions at this location. Since the Palisade Point development is at the end of the "connection," a driveway analysis was not undertaken and is not needed since the level of service would be better than at the underpass.

The purpose of the ATR counts was to ascertain the peak hours. The City's traffic department and independent consultant reviewed the ATR data referenced in the comment and concluded that additional ATR counts would not yield information that would reasonably be expected to change the conclusions with regard to the peak hours. Therefore, the additional counts were not undertaken. In addition, the data collected by the Applicant's traffic engineers shows that the traffic volume along the Nepperhan Avenue/Yonkers Avenue corridor during the 3 PM to 4 PM period is lower than the peak hour traffic evaluated in the traffic study, and therefore no separate analysis of this time period is warranted.

**Comment III.E-117:**

The DEIS fails to recognize that an increase of 196 students will generate an increase in school bus ridership and vehicular traffic during the peak school traffic hours.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-117:**

Comment noted. Additional school busses will be required. The residential trip generation rates used in the analysis account for different types of trips, including school trips.

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**Comment III.E-118:**

The additional police and emergency services that will be required by the Project will generate additional traffic that therefore must be quantified, distributed to the roadway network and analyzed. Moreover, the Scope requires that the DEIS include an assessment of the Project's traffic impact on emergency services (e.g., fire station ingress and egress). Any increase in delay times caused by such additional traffic will increase the response time for emergency personnel, and this difference must be quantified and analyzed.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-118:**

Under accepted traffic engineering methodologies, traffic generated by emergency service providers is not typically quantified and distributed to the road system, and that type and level of analysis is not warranted here. The traffic plan for the Project has been reviewed by the Police and Fire Departments and has been modified based on their review to include, among other things, pre-emption devices to facilitate emergency response by the Fire Department.

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**Comment III.E-119:**

The Scope states that the background growth rate should be calculated in consultation with the Westchester County Department of Planning. The DEIS indicates a flat 1% growth rate per year was applied to all intersections, but ASR is unable to ascertain how the 1% background growth rate was determined, or whether any consultation with the Westchester County Department of Planning took place.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-119:**

The Westchester County Department of Planning was contacted and they deferred to the City Traffic Department. The 1% growth rate was accepted by the City Traffic Department.

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**Comment III.E-120:**

ASR requests that the Supplemental DEIS include documentation of the discussion with the City which led to the conclusion that 5% is a justified growth factor for these adjacent developments,

as well as a detailed trip generation or a distribution of the trips generated for each of the adjacent developments.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-120:**

Comment noted. The growth factor was determined in consultation with the City Planning Bureau and Traffic Department and was accepted by the City's independent consultant. Detailed trip generation for the adjacent developments was not considered to be necessary under accepted traffic engineering methodologies and is not already utilized as part of a no-build analysis.

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**Comment III.E-121:**

Moreover, the Supplemental DEIS should identify access points to these adjacent developments, and analyze them. Trip generation for each adjacent development of substantial size should be calculated and distributed to the roadway system. This type of detailed analysis will more clearly illustrate the future traffic conditions. In order to conduct a thorough review of the impact associated with the identified adjacent developments, the Supplemental DEIS needs to provide the location of access points, trip generation calculations/methodology and trip distribution information for each of the noted developments.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-121:**

The analysis called for in the comment is not warranted under accepted traffic engineering methodologies. In accordance with typical and accepted traffic engineering practice, trip generation from the adjacent developments is accounted for in the 5% growth factor. See also Response III.E-120.

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**Comment III.E-122:**

Because the DEIS does not make information regarding project traffic volume easily accessible, ASR cannot determine the accuracy of this information. ASR requests that a model/technique be provided illustrating the development of the Project traffic volumes and how it impacts the study locations. The DEIS indicates that the amount of trips to be generated by the Project was estimated using trip generation rates obtained from the Institute of Transportation Engineers ("ITE") Trip Generation Handbook, 7th Edition. The DEIS also noted a 30% reduction in trips taken to account for mass transit usage, trips internal to the site, and pass-by trips. (Page 22 of the Traffic Study.) The Supplemental DEIS should justify the usage of a flat 30% credit across all of the development sites.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-122:**

All traffic analyses and supporting documentation is in the DEIS either in the main body of the document or in publicly available technical appendices. Regarding the 30% credit, see Responses III.E-8, III.E-12, III.E-82.

**Comment III.E-123:**

Please provide justification for the internal capture rates used for "interplay" for each development site. The exact percentage that is given as credit for internal trips should be provided, and should represent the size and type of development within the site where such internal trips would be made. Pass-by trips are defined in the ITE Trip Generation Handbook, "... as intermediate stops on the way from an origin to a primary trip destination." (Page 29 of the Traffic Study) While it may be argued that a pass-by trip credit is justifiable for the retail destinations at the River Park Center (i.e., someone passing by the area might stop at a store on the way to another location), pass-by credit is not appropriate for trips to the residential, movie theatre, office space or hotel destinations at River Park Center, Cacace Center, or Palisades Point. Please provide a breakdown of the pass-by credit allocated to the development sites.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-123:**

It was determined with the City of Yonkers and their traffic consultant that a maximum 30% credit (reduction in trips) be taken for all uses (in lieu of individual credits) to take into consideration mass transit usage, interplay between uses and pass-by trips.

For example, based on commuting to work census data for this area, 27% used public transportation, 13% car pooled, 7% walked/worked at home. This could potentially result in a reduction of some 47% of the residential and office trips. Based on limited ITE data, the office-retail interplay would be 22% and the residential-retail interplay would be 38%. Based on ITE data, the retail pass-by credit would be 25%. Thus, a combination of these credits would result in significantly higher credits (reduction in trips) than the 30% utilized.

It should also be noted that a trolley system will be implemented to shuttle people to the railroad station to River Park Center and the Cacace Center. The trolley system will have the ability of multiple stops within the area based on the demand.

See also Responses III.E-8, III.E-12, III.E-82.

**Comment III.E-124:**

The Applicant classified the area type of a majority of the intersections in the HCS Analysis as Central Business District ("CBD") under both Existing and No-Build Conditions and then removed this classification in the Build Analysis. According to the Highway Capacity Manual 2000 ("HCM"), an area type can be classified as either a "CBD or "similar" or "Other;" with a default of other. CBD or similar should be coded if the area exhibits many central business



district characteristics, such as narrow streets or sidewalks, frequent parking maneuvers or vehicle blockages, abundant taxi/bus activity, small radius turns, limited use of exclusive turn lanes, high pedestrian activity, dense population, mid-block curb cuts, etc. Although this classification may be justified for a few intersections at Getty Square, it does not seem appropriate to assign to the majority of the intersections as the Applicant has done. Pedestrian counts were performed at select areas which may qualify as similar to a CBD due to the high pedestrian activity. In these cases, the HCS analyses should have selected "other" as the area type, then input specific parameters such as the information obtained from the pedestrian counts, truck percentages and on-street parking characteristics; this would provide more accurate results in the analysis. The information regarding pedestrian volumes and heavy vehicle percentages at these intersections was available to produce a more accurate analysis. At certain intersections, a CBD classification is not applicable based on the definition of a CBD according to the HCM. Classifying intersections as CBD allows the HCS to make adjustments to parameters which may affect Levels of Service results. Removing this classification in the Build scenario enables improvements to Levels of Service without actually providing any mitigation measures. Please provide a justification of the change of area type from "CBD or similar" in the Existing and No-Build conditions to "other" in the Build condition. ASR is concerned that an inappropriate use of an analysis parameter - such as the CBD area type - will result in an underestimation of potential project impacts at key intersections along the ASR truck route.

*(Daniel Riesel, Esq., Sive, Paget & Riesel, P.C., American Sugar Refining, Inc., Letter, 5/30/2008)*

**Response III.E-124:**

Based on discussions with the City Traffic Department, it was determined that the use of the Central Business District type area for the capacity analysis was appropriate to take into considerations factors such as frequent parking maneuvers, vehicle blockages, etc. Where these conditions did not exist, a non CBD area was used, i.e., the Saw Mill Parkway ramps/Yonkers Avenue. For the Build Condition, a non CBD type area was to be used only at those intersections where the significant improvements were proposed. These improvements include the upgrading to the entire signal system along the Yonkers/Nepperhan Avenue Corridor extending from the Saw Mill River Parkway into the downtown area to be included as part of the City's Computerized Traffic Signal System as well as the removal of on-street parking.

It should be noted that the capacity analysis (CBD and non CBD) also took into account appropriate truck factors as well as pedestrian activity under Existing, No-Build and Build Conditions.

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**Comment III.E-125:**

Is consideration or a study as it relates to traffic towards the South Broadway area (especially Truck Traffic?) being done?

*(Patricia McDow, City Council Member, City of Yonkers, Letter, 5/30/2008)*

**Response III.E-125:**

See Responses III.E-6, III.E-18.