



**May 24, 2011**

**BY HAND-DELIVERY**

To: Mr. Thomas Heaslip, Chairman and Members of the Planning Board  
Planning Board of the Town/Village of Harrison  
Alfred F. Sulla, Jr. Municipal Building  
1 Heineman Place  
Harrison, New York 10528

From: Anne Gold, Executive Director

Subject: SFEIS Deficiencies regarding Traffic

Purchase Corporate Park Associate has failed to adequately address the transportation comments and problems PEPA brought to light during the DEIS review. The SFEIS is inadequate as the Traffic data is outdated and the Traffic Impact underestimated. Of particular concern we note the

- SFEIS Existing Conditions: 2006
- SFEIS Build Conditions/Impacts: 2008
- The Anticipated Build Year is not clear: 2012 (?)
- 4 years of traffic background growth since study was performed

Please see below highlighted gray, yellow and red in an excerpt of “Transportation” comments that were professionally researched, analyzed and submitted on March 19, 2007 (link below) to the Planning Board by the Louis Berger Group in response to the Purchase Corporate Park’s DSEIS for the Parcel B Application.

Overall, as we stated, the applicant did not respond to most of LBG comments made on Traffic/DEIS .

The Applicant only addressed the following three (3) comments (highlighted in gray).

- Parking, Safety, and the signalization and modification of the intersection of Purchase Street and Manhattanville Road.

The Applicant has not responded to the remaining 33 comments as **highlighted in yellow**. The **red underlined** comments are for emphasis added for the issues LBG considers the most severe. In spite of the fact the Applicant assured the Planning Board during the Public Hearing for the DSEIS that all comments would be addressed in the FSEIS they have failed to do so.

- They need to address comments on traffic, transit, and pedestrians.
- Peak hour factor – They need to address Berger’s comment on the use of 0.92 peak hour factor for all conditions. Using a high peak factor underestimates impacts. A peak factor of 0.92 is very unusual especially if a project causes impacts.
- There are two potential impacted intersections that they failed to identify and provide mitigation measures for in the FEIS.

EXCERPT OF THE LOUIS BERGER GROUP COMMENTS SUBMITTED TO THE HARRISON PLANNING BOARD ON JANUARY 17, 2007 AND RESUBMITTED ON MARCH 7, 2007 IN RESPONSE TO THE DSEIS [FOR PARCEL B APPLICATION]

## 10. Transportation

### A. General Comments

The transportation chapter is poorly organized, making a public review difficult, for the following reasons:

1. The chapter lacks a clear explanation of methodology and assumptions. The chapter does not explain how it relates to the 1983 analysis, nor does it explain how it relates to the appendices, which should include backup data such as traffic counts, analysis results, traffic flow maps, etc.
2. A typical setup for a traffic chapter consists of the following sections: Introduction, Methodology, Existing Conditions, No Build Conditions, Build Conditions, Mitigation, and Conclusion.
3. The transportation chapter only carries the traffic analysis through the Existing, No Build, and Build Conditions. The impacts on parking, pedestrians, and transit are analyzed inconsistent with this approach.
4. A No Build Condition section should be provided that includes a discussion of safety, traffic, parking, transit, and pedestrian conditions. Because no information is provided on whether the background growth would affect safety, parking, transit, and pedestrians, the project related impacts cannot be separated from the background conditions.

5. A Build Condition section should be provided that includes safety, traffic, parking, transit, and pedestrians.

Following are specific errors and omissions in the transportation analysis. It should be noted that these errors and omissions also result in corresponding errors in the analysis of related impacts such as vehicular noise and air quality impacts. A review of the technical adequacy of each specific section of the transportation chapter is presented below.

B. Traffic -Existing Conditions

1. Contrary to the statement in section 2.a. on Page 49 (regarding the NYSDOT letter referenced from Appendix L), the referenced NYSDOT letter does not mention the connection of Manhattanville Road to Corporate Drive. **(This is addressed in Response 33 but inadequately. While the letter the applicant provides discusses the closure of Manahattanville Road it does not mention the connection to Corporate Park Drive).**
2. The specific version of the Highway Capacity Software (HCS) program used to perform the analysis was not identified and should be to confirm that the appropriate version was used.
3. No mention is made of the fact that some vehicles generated by the project are assigned to the existing driveway for Site A on Manhattanville Road.
4. The document fails to identify which intersections in the study area are signalized or unsignalized.
5. The chapter fails to include a figure depicting the transportation study area boundaries and the intersections in the list, necessary to for the reviewer to understand the appropriateness of the traffic study area for analyzing project impacts.
6. Reference should be provided to the existing balanced traffic network for these intersections that are provided in the Volume III "Traffic Impact Study", 2006 appendix.
7. This section should reference the Existing Conditions Level of Service (LOS) results for the AM and PM peak hours found in Tables III.D-3 and 4. The numbering of the intersections in the first column of Tables III.D-3 and 4 is inconsistent. An explanation of the Existing Conditions LOS results is missing from section and should be provided.
8. A peak hour factor (PHF) of 0.92 was used for the approaches of every intersection in the Existing Condition traffic analysis. A peak hour factor is an

acceptable method in traffic analysis to address the effects of surges in traffic volume within a peak hour for a given intersection approach. High factors indicate that there is little variability (i.e. surges) within the peak hour in the number of vehicles that use a specific intersection approach. However, the analysis is erroneous because by using a single peak hour factor for all intersection approaches in the study area, it ignores the fact that traffic characteristics vary by location and direction of travel. Furthermore, the actual PHF should be derived for each intersection approach based on the actual counts conducted in 2006, not a universally applied factor. All HCS analyses should therefore be reanalyzed to reflect the appropriate PHF for each approach as derived from the field data. As the current analysis is incorrect, it does not provide full disclosure of potential traffic impacts and the document is therefore incomplete.

### C. No Build Conditions

1. The statement is made that "the 2008 Build Year traffic volumes were conservatively assumed to include 100% occupancy of the existing building on Parcel B, even though the building is currently not fully occupied". No information is provided how this assumption affects the project-generated traffic volumes.
2. This section omits a discussion of the No Build Condition balanced traffic network for the analyzed intersections, including LOS results for the AM and PM peak hours. This information is contained in Volume III "Traffic Impact Study", 2006 appendix and in Table III.D-3.
3. Similar to the error made for the analysis of Existing Conditions, the No Build analysis assumes a PHF of 0.92 for the approaches of every intersection. As stated above, this analytical method is erroneous and the actual PHF should be derived for each intersection approach based on the counts conducted in 2006. Furthermore, all HCS analyses should be reanalyzed to reflect the appropriate PHF derived from the field data.

### D. Build Conditions

1. The analysis does not provide the proposed modal split information assumed for new trips generated by the development and the veracity of the impact analysis can therefore not be verified.
2. The reference to the Peak AM Highway hour and Peak PM Highway hour is unclear as these terms are not referred as such anywhere else in the document. The relevance of these terms to the impact analysis should be stated.

3. The analysis fails to explain why all vehicles entering from and exiting to the site from the east are assumed to use the Manhattanville Road and East Driveway (as shown on Figures III.D-1 and 2). No explanation is provided as to how the proposed parking plan determines the network assignment as the parking plan would dictate which driveway project vehicles would use to enter the site. Without this information, the analysis results cannot be verified.
4. Similar to the error made for the analysis of Existing Conditions and the No Build analysis, the Build analysis assumes a PHF (Peak Hour Factor) of 0.92 for the approaches of every intersection. As stated above, this analytical method is erroneous and the actual PHF should be derived for each intersection approach based on the counts conducted in 2006. Furthermore, all HCS analyses should be reanalyzed to reflect the appropriate PHF derived from the field data.
5. The document fails to identify the specific criteria that define whether an intersection would be impacted from the No Build to the Build Condition requiring mitigation., nor does the document clearly identify (for example in a table) which intersections would incur significant impacts and how the Build Condition LOS results compare relative to the accepted traffic impact criteria.. Without this information the accuracy of the impact analysis cannot be verified. Furthermore, no reference is provided in the chapter itself to the Build Condition balanced traffic network for the analyzed intersections.

#### E. Mitigation

1. The document erroneously asserts that the following changes in traffic Level Of service (LOS) from the No Build to the Build Condition would not constitute a traffic impact:
  - Eastbound left turn movement in the AM peak hour at the Hutch NB & Purchase Street intersection (LOS E to F with an increase in delay of more than 13 seconds)?
  - Northbound right-turn movement and overall intersection in the AM peak hour at the Manhattanville Road & 684 NB intersection (LOS D to E with an increase in delay of more than 10 seconds)?

Based on our review these conditions do represent impacts that require mitigation, which is not provided. The conclusion of the analysis is erroneous and the omission of mitigation renders this analysis incomplete.

#### F. Parking

1. The document does not provide an up-to-date analysis of parking impacts. Parking data is presented as part of Figure III.B-1 (Table of Land Use), but this is not an impact analysis. **(Addressed in Response 33)**

2. Since this is an important issue, the first paragraph of text under “Parking Occupancy Analysis” identified in the 2000 Traffic Impact Study, The Centre at Purchase – Parcel ‘B’ Office Building (Page 8) should be reiterated in this section.
3. The parking counts included in the 2000 Traffic Impact Study, The Centre at Purchase – Parcel ‘B’ Office Building (Page 8) were conducted in 1999. They are more than seven (7) years old and were collected during the week before Christmas. This renders the data inaccurate for two reasons: The data is outdated (more than 7 years old) and the data was collected the week prior to Christmas, when many people take time off and the utilization of the parking facilities is artificially low. The analysis therefore does not reflect a typical condition and underestimates parking demand and project impacts. As the current analysis is incorrect, it does not provide full disclosure of potential traffic impacts and the document is therefore incomplete.
4. To remedy this analytical error, parking counts should be repeated to determine an accurate, current parking occupancy rate on the existing site. These counts should be conducted throughout a typical mid-week day (Tuesday, Wednesday, or Thursday) when the local schools in Westchester County are in session. The most important time periods are between 10:00 and 11:00 AM and 2:00 and 3:00 PM when the maximum number of employees and visitors are on the site. The site should be broken up into four or five zones for the purpose of the counts so that it becomes apparent how the various sections of the parking lot are being utilized at various times during the day. The number and type of parking spaces on the site has also not been reviewed in the field since 1999 and should also be updated. The types of parking spaces should be disaggregated into specific categories including: reserved for individuals, reserved for visitors, handicapped, unrestricted, etc.
5. The parking analysis of Build Conditions fails to identify the locations of new parking spaces, quantity of spaces, and type of spaces (reserved/unreserved) that would need to be added as part of the proposed project.
6. No explanation is provided as to why 22 handicapped spaces are proposed for Building B when seven are required and only six handicapped spaces are proposed for Building A when 21 are required (as presented in Figure III.B-1 (Table of Land Use)). The document fails to provide a detailed plan and explanation of parking, including the distribution of vehicles throughout the site, occupancy rates by location (four or five sub areas and new parking areas), and by type of space (reserved/unreserved). This is also relevant for the impact analysis as the pattern of parking on the site would dictate which driveway existing and new vehicles would use to enter and exit the site, thereby affecting the distribution of traffic volumes.

## G. Transit

1. The transit section contains verbatim text copied from The New York State Department of Transportation, Transit Bureau 2002 Annual Report, Section III Status and Performance of Major Transit Systems ([www.nysdot.gov](http://www.nysdot.gov)). The source of this information should be appropriately referenced and where information is copied literally from another report such citation should be formatted appropriately, or removed from the document.
2. The transit section identifies only Bee Line Route 3 as serving the project site. However, the site is also served by bee Line Route #12 (Yorktown-Purchase-White Plains) operating on Purchase Street and The Shuttle – Loop E operating on Manhattanville Road. The text and related transit analysis should reflect this.
3. The transit section does not include a map of transit (bus) lines, without which the existing and future conditions cannot be reviewed. In addition the document omits a transit capacity analysis for each of these routes served, as well as supporting information regarding the time periods served; frequency of service; capacity of the vehicles used to operate these routes; and, ridership data by trip at the peak load points for these routes. In addition the locations of the bus stops closest to the project site are not identified, nor whether bus shelters are provided. As the current transit analysis omits critical information, it does not provide full disclosure of potential transit impacts and the document is therefore incomplete.
4. The document fails to identify which bus routes are proposed to be routed into the project site as part of the proposed action and where the proposed bus stops would be located on the site.

## H. Pedestrian

1. No information is provided regarding recent pedestrian counts to support the contention in the section that Pedestrian volumes are generally low. No discussion is provided of the conditions encountered by pedestrians walking from bus stops in terms of amenities (sidewalks, paths, lighting, etc.), or for pedestrians walking from the existing parking lots to the building. No information is provided regarding adequacy and safety of ADA access and circulation to the parking facilities and the buildings they serve.
2. The document also fails to identify the nature of the pedestrian circulation patterns from the existing and proposed parking lots to the proposed office building. This may require that additional pedestrian amenities, including ADA accessibility be provided as part of the project. Without this supporting information the pedestrian impact analysis is incomplete and conclusions about

pedestrian impacts are premature and not full disclosed, rendering this analysis incomplete.

I. **Safety (Addressed in Response 33)**

1. The accident analysis fails to identify the number of accidents in the project area over the period analyzed or the specific locations where these accidents occurred.
2. The section also fails to identify if there are any high accident locations within the study area as required by NYSDOT criteria. The accident data should be included in the Volume III "Traffic Impact Study", 2006 appendix and referenced in the text, in order to confirm the analysis results. If the proposed project is not projected to affect safety, it should be explained.

The Louis Berger Group March 19, 2007 Letter (that above is excerpted from) can be found here:

<http://www.town.harrison.ny.us/docs/PlanningZoning/ParcelBOfficeBldg/Volume%20I%20Appendix%2018.pdf>