Appendix C: Responses to Public Comments Received on the April 11, 2014 Draft Implementation Plan for Sustainable Development

1. Received April 17, 2014:

The proposals for the Sustainable East New York area are exciting, however I am very concerned to see no mention of plans to 1) improve connectivity and safety between the LIRR East New York stop and Broadway Junction and 2) make Broadway Junction handicapped accessible for the many people in East Brooklyn who use walkers, wheelchairs, strollers, and other devices that make the transfers at this station difficult or impossible.

Response:

The Implementation plan is the Consortium's platform to address broader issues of how our Consortium partners can collaboratively work towards a more sustainable region, in terms of providing more jobs, fair and affordable housing, transit-oriented development opportunities, and a cleaner environment. More detailed information on the East New York project can be found in the final project report by the New York City Department of City Planning.

Section 2B of the Draft Implementation plan briefly touches upon the work of the several different place-based projects by describing their outcomes. The Sustainable East New York's description (on page 23), provides some sense of the work completed. You can access the Department of City Planning's full report at http://www.sustainablenyct.org/docs/Sustainable%20Communities%20ENY%20Report%203.7.14.pdf.

Pages 76 and 106 of the full report address your first interest of improved connectivity between the LIRR East New York stop and Broadway Junction. The report recommends "maximizing transit accessibility by improving the condition of stations in the area, introducing new signage, as well as exploring the feasibility of adding accessibility elements."

Furthermore, an overarching recommendation throughout the report is to improve streetscape conditions as a means of enhancing access to transit, through the addition of better crosswalks, sidewalks, curb extensions, safety medians, and other measures that enhance connectivity for residents with various levels of mobility.

2. Received May 6, 2014

Transit-oriented development (TOD) is identified as "a foundation for sustainable and equitable development" (page 5). To support this, traffic congestion reduction is implicitly assumed as a TOD benefit. For example, referencing a Federal Highway Administration website, page 33 of the draft includes the following statement: "In addition, TOD boosts transit ridership and **reduce[s] automobile congestion**, providing value for both the public and private sectors, while creating a sense of community and place." On page 105 it states, "[The] vision has involved working together to foster livable and sustainable communities and growth centers around existing and planned transit services in the New York-Connecticut region to enhance affordable housing, **reduce traffic congestion**, improve the environment and continue to expand economic opportunities."

But statements implying congestion reduction is a direct consequence of transit-oriented, higher density, mixed-use developments are misleading.

The need to selectively expand highway capacity (in a smart way) and implement complementing travel demand management actions as part of TOD projects should be made transparent in the final implementation plan. For example, on page 34, the following sentence could be modified by adding the phrases in brackets: "TOD projects should be evaluated based on their impacts to neighborhoods and communities, **[including assessing localized traffic impacts,]** as well as how well they utilize existing infrastructure **[and whether additional transit, highway capacity, and travel demand management actions will be needed]**."

It is possible that a mixed-use TOD could experience worse *local* traffic congestion. Research by Zhang looked at proposed TOD scenarios in the Austin, Texas area. Among the conclusions was that **"**the non-TOD area benefits more than the TOD area, although TOD improves congestion regionwide. Traffic conditions in the TOD area may actually worsen due to the TOD-based concentration of people and jobs." Rubin, Mansour, and Feigenbaum found via their technical work that "Policies designed to promote transit utilization can in certain instances increase traffic congestion—as appears to have been the case in Portland, Oregon."

Consider areas such as car-based Long Island where travel patterns may be described as "everywhere-to-everywhere." While it's plausible to suppose people living within a TOD on Long Island would generate significantly fewer automobile trips per household than typical suburban residents due to increased opportunities to walk, bike, or use transit, it's also probable the increased density of residential development would lead to a significant number of additional automobile trips in the area. Adding to the additional auto trips produced by TOD residents would be more auto trips attracted to the area as people travel from "everywhere" to new activities centrally developed within the TOD (office, shopping, dining, recreation, etc.) or to the transit station around which the TOD was developed.

It should not be surprising that some TOD plans include additional parking. For example, the Wyandanch Rising project on Long Island includes construction of a 900-car LIRR parking facility (http://new.mta.info/news/2013/07/17/lirr-supports-wyandanch-rising-development).

Automobile parking will lead to more traffic concentrated within TOD areas, particularly during peak periods. Parking for retail activities will also generate traffic and at higher rates than commuter or residential parking.

Therefore, in addition to policies that promote transit utilization and reductions in parking requirements, other parking management measures and travel demand management actions (e.g., provision of 2+ high-occupancy-vehicle lanes on arterial streets such as the one on Jefferson Street in Stamford, Connecticut), as well as additional local highway capacity may be required to achieve transportation benefits claimed for TOD projects.

The cumulative traffic impacts of proposed TOD projects should be assessed on a regional (or sub-regional) basis in order to understand more fully the overall effect(s) of a multi-state TOD strategy on future traffic congestion and air quality. It is possible system-wide benefits from TODs would outweigh negative local effects (if any). NYMTC's Best Practices Model may provide a means to make such an assessment, and the final plan could make that explicit recommendation.

Additional recommendations for the "kinds of information" that could be made available on a clearinghouse website (pages 106- 107) are: a). Links to reports documenting actual experiences related to traffic impacts of sustainable, high-density, mixed-use developments in different types of areas (urban, suburban, etc.); b). Information should be made available in easy-to-use formats including, but not limited to empirical data on transit capture rates, before/after traffic volumes during peak and off-peak periods, usage of non-motorized facilities over time; and, c). A "toolbox" of travel demand management and parking management techniques to support sustainable development.

Many tangible benefits of TODs will accrue to private sector developers (more profit) and to local governments (more tax revenue). Since it is well understood that federal and state transportation funding levels are inadequate to meet existing needs, the final report should include some detail about other funding mechanisms that may be used to provide transportation improvements needed for TODs (pages 115 and 116). For example, can local-government/

private-sector financing partnerships accelerate transportation improvements needed for specific plans (including transit operation and highway modification)? Would special taxing districts or impact fees be appropriate? Could tax increment financing be used to provide needed infrastructure on a timely basis enabling more TOD projects to move forward more quickly?

Response:
As recommended, the referenced text on p. 34 of the Draft for Public Comment will be amended in the Final Draft to read as follows: "TOD projects should be evaluated based on their impacts to neighborhoods and communities, **including assessing localized traffic impacts,** as well as how well they utilize existing infrastructure **and whether additional transit, highway capacity, and travel demand management actions will be needed.**"
The referenced text on pp. 106-107 will be amended to include the following sentence (add bullet): "Links to reports and information documenting actual experiences, strategies and resources pertaining to sustainable development, such as traffic impacts, travel demand management, parking management techniques, community design, public engagement, financing and other issues."
No changes are made to pp. 116-117, since an analysis of other funding sources is beyond the scope of what the Consortium can do at this stage of the project.