

Memo

To: Ellen Lee
From: Nancy Neuman (SEA),
CC:
Date: August 19, 2013
Re: FASNY

I have reviewed FASNY's response to comments, as well as the modified project, and have the some comments and questions as noted below. The number of buses is my biggest concern. FASNY's new bus estimates were used to reduce vehicular traffic by about 50 %, yet FASNY admits they have no control over the type and number of buses. In addition, the student data they used to calculate the number of buses was not provided. FASNY really should prepare a separate mini-study on this issue with a lot more detail to support their conclusions and estimates. Otherwise, if the bus number is greater after the school is built, it will be too late to do anything about it. Also, having parents sign the bus policy may not prevent them from driving their kids to school, especially if the bus trips are long or inconvenient, so the enforcement of the mandatory busing needs more discussion.

Response to comments

One of our comments was not adequately answered. It is listed as unique comment ID 407 and the FEIS number is 3.12-1. Our original comment was:

p. 12-11. NYSDOT's EPM screening criteria include a 10% or more increase in vehicle emissions. Please state the total number of bus trips (a bus that enters and exits an intersection within a one-hour period counts as two trips) that would occur during peak hours and whether they would cause a 10% or more increase in emissions when included with the additional passenger vehicles.

The applicant's response was:

The volume used in the EPM screening analysis is based on the total number of vehicles. It does not distinguish between the vehicle mix, such as automobiles and buses. The vehicle counts in the No Build condition do not specifically identify bus trips. However, based on the total number of buses being added with the Modified Proposed Project and assuming the same distribution of all vehicles, there would be approximately 48 bus trips (24 bus trips in, 24 bus trips out) in the peak AM period and 56 bus trips (28 buses in, 28 buses out) in the peak PM period. Adding these buses to the intersections in the study area would not exceed the

EPM Volume Threshold, and therefore, in the Applicant's expert's opinion, would not result in a significant adverse impact.

Their response focused on vehicular trips, not emissions. The EPM clearly specifies that a 10% increase in *emissions* would warrant further analysis. The emissions of pollutants for background traffic volumes should be calculated for an average speed using an appropriate vehicular mix. The additional emissions that would be generated by the additional passenger vehicles and buses should then be calculated and compared with the No Action emissions to determine whether a 10% increase in emissions would occur for the pollutants at relevant intersections and free-flow segments.

Modified Project

Mandatory busing. The mandatory busing component needs additional analysis and detail to support an approximately 50% reduction in traffic, which implies a net benefit in noise and air quality compared to the DEIS. The information provided makes it difficult to evaluate the basis for FASNY's conclusions.

- Response 3.11-115 states that FASNY has no control over the availability and number of buses provided by each community. How, therefore, can FASNY estimate the numbers and types of buses with confidence? Although the bus estimates may represent efficient transportation at, e.g., 20 students per bus, the number of students per bus and the number of buses may be much greater due to the varied policies of the jurisdictions providing buses.
- Please provide the breakdown of the students eligible for busing by grade and township that was used to prepare the bus estimates.
- Bus trips shown in Tables 1.0-5a and 1.0-5b should show a breakdown of bus and shuttle trips since FASNY can control the size and frequency of the shuttle vehicles, but not the buses from other jurisdictions.
- How will the school prevent parents from simply driving their students to school even if they have signed the mandatory bus policy?
- What happens if parents fail to apply to their school district for the busing?
- Wouldn't extra-curricular activities allow a large proportion of students to be exempt from the mandatory program?
- Since White Plains does not provide busing to students in Grades 9 to 12, these students would not be eligible for mandatory busing. How many students would be in this category and therefore likely drive to arrive by auto?
- Will the proposed busing significantly increase the travel times for many of the students who would otherwise arrive/depart by private auto, thereby making it undesirable?
- How will FASNY determine which 40 students would be permitted to drive to school?
- How many students are in the N/K category and how many are grades 1-5. The DEIS listed a total for these two groups combined, but the FEIS shows separate vehicle occupancy ratios for the two groups, making evaluation of FASNY's bus/auto numbers difficult to evaluate.
- How many students per bus were assumed for the small buses and how many for the large buses?
- What are the passenger equivalents, for noise analysis purposes, for the small and large buses?
- Do the buses use gasoline or diesel fuel?
- What emissions of CO and fine particulates were assumed when analyzing the noise and air quality from the two types of buses?

The FEIS assumes that 1% of the students living in NYC would take Metro-North and a shuttle to the school. This appears to account for 12 auto trips (1% of 1200) in and out of the driveway during the peak hour

- Isn't the percentage of NYC residents likely to increase by 2025, given the redevelopment of many industrial areas to upscale residential use in New York City?
- Given the staggered start times, how many shuttles would be needed to/from the train station?
- How many of these students would be old enough to travel on Metro-North by themselves?
- What is the basis for assuming they would take the Metro-North RR and shuttle to campus considering that they would have to catch a 6:30 am train from Grand Central Station? Parents at the German School apparently contracted with a private bus company to avoid this.
- Since parents at the German School faced with a similar situation banded together and contracted with a private bus service, wouldn't this also occur for the FASNY students? The staggered school start times may result in multiple buses for these students.

North Street access driveway. Previously, North Street was not an access to the school. In the modified project, it now provides access for buses.

- A noise analysis should be carried out to determine the potential impacts for residents on Southdale Road. Since this is a new roadway, it should be modeled with the TNM model.
- The FEIS needs to provide a better comparison of the traffic at all site entrances, by mode, for the DEIS and FEIS.