

Attachment A:
Summary of Comments and Responses on the
MTA Metro-North Railroad North White Plains Parking Garage
Environmental Assessment, January 2011

A. INTRODUCTION

This document summarizes and responds to comments on the *MTA Metro-North Railroad North White Plains Parking Garage Environmental Assessment*, January 2011 (the EA). The EA was prepared by Metro-North Commuter Railroad ("Metro-North") in compliance with the National Environmental Policy Act (NEPA) for the Federal Transit Administration (FTA) as lead federal agency. Public review for the EA began with publication and distribution of the document on January 20, 2011 and closed on February 19, 2011.

A notice of the availability of the EA was advertised in the *Journal News*, *Northern Westchester Express*, *El Diario*, and *Amsterdam News*. Information regarding EA availability also appeared on the Metropolitan Transportation Authority, Westchester County, City of White Plains, and Town of North Castle websites and was the subject of letters sent to elected officials, repositories, agencies and interested parties.

Metro-North convened a public meeting for the proposed Project on February 8, 2011 from 6:30 PM to 8:30 PM at the Westchester County Center, 198 Central Avenue, White Plains, New York. At the meeting, a total of seven speakers provided comments on the proposed Project. Comments on the EA were also accepted via mail through February 19, 2011. In addition to the oral comments at the public meeting, 21 written submissions were received on the EA. A comment letter, dated February 28, 2011, from Congressperson Nita Lowey's office as well as a March 10, 2011 letter from a Darren B. Peister were received after the close of the comment period. All comments, including those submitted after the close of the comment period have been summarized and addressed herein. Copies of the transcript from the public meeting and the written submissions are provided at the end of this document in Attachment A.1.

It should be noted that the U.S. Fish and Wildlife Service provided written concurrence with the findings of the EA. As U.S. Fish and Wildlife Service provided no specific comments, their correspondence does not require a response.

This document is organized as follows: Section B lists all resource agencies, elected officials, and individuals and organizations that commented on the EA. This list is organized alphabetically. Following each commenter's name is a list of the comments made, referenced by comment number. Section C contains a summary of all comments made and a response to each of those comments. Where similar comments on the same subject matter were made by more than one person, a single entry summarizes all comments on that issue. Comments have been paraphrased in some instances. Following each comment is a list in parentheses of the people or organizations that made the comment.

B. LIST OF COMMENTERS

AGENCIES

1. Sandra Dorn, United States Department of the Interior, Fish and Wildlife Service, written comments dated February 8, 2011 (Dorn)

ELECTED OFFICIALS

2. David Buchwald, Councilman, City of White Plains, oral comments submitted February 8, 2011 and written comments dated February 19, 2011. (Buchwald)
3. Paul J. Feiner, Supervisor, Town of Greenburgh, written comments dated February 14, 2011. (Feiner)
4. Honorable Nita M. Lowey, Member of U.S. Congress 18th District, written comments dated February 28, 2011 (Lowey)
5. John M. Nonna, Legislator, Westchester County Board of Legislators, written comments dated February 16, 2011. (Nonna)
6. Tom Roach, President, White Plains Common Council, oral comments submitted February 8, 2011. (Roach)

MUNICIPALITIES

7. Rod Johnson, Environmental Officer, City of White Plains, written comments dated February 16, 2011. (Johnson)
8. Adam R. Kaufman, Director of Planning, Town of North Castle, written comments dated February 18, 2011. (Kaufman)

ORGANIZATIONS

9. Chuck Lesnick, President, Westchester Municipal Officials Association, written comments dated February 15, 2011. (Lesnick)
10. Michael Oliva, Mid-Atlantic Coordinator, East Coast Greenway Alliance, Co-Founder, Bike Walk Alliance of Westchester & Putnam, written comments dated February 14, 2011. (Oliva)
11. Kate Slevin, Executive Director, Tri-State Transportation Campaign, written comments dated February 19, 2011 (Slevin).
12. David Wilson, Executive Director, Bike Walk Alliance of Westchester & Putnam, Advocacy Director, Westchester Cycle Club, written comments dated February 14, 2011. (Wilson)

INDIVIDUALS

13. Joan Billows, written comments dated February 14, 2011. (Billows)
14. Tracy Brown, written comments dated February 14, 2011. (Brown)
15. Stephen J. Carre, written comments received February 16, 2011. (Carre)
16. Colin T. Connor, written comments received February 22, 2011. (Connor)
17. Terry Conroy, oral comment submitted February 8, 2011. (Conroy)

18. Alan Federbush, oral comments submitted February 8, 2011. (Federbush)
19. Vito Fragala, oral comments submitted February 8, 2011. (Fragala)
20. Diane Houslanger, written comments dated February 14, 2011. (Houslanger)
21. Larry Kaiden, written comments dated February 11, 2011. (Kaiden)
22. Deb Keiser, written comments received February 14, 2011. (Keiser)
23. Mark J. Laloo, written comments dated February 16, 2011. (Laloo)
24. Darren B. Peister, written comment received March 10, 2011 (Peister)
25. Jim Reynard, written comments dated February 12, 2011. (Reynard)
26. Louisa Rutigliano, oral comments submitted February 8, 2011. (Rutigliano)
27. Barbara Schwartz, written comments dated February 11, 2011. (Schwartz)
28. Diane Taylor, oral comments submitted February 8, 2011. (Taylor)

C. RESPONSE TO COMMENTS ON THE ENVIRONMENTAL ASSESSMENT

GENERAL

Comment 1: The City of White Plains asks that any subsequent environmental findings specifically state that the 2,200 space parking garage on the west side of the railroad right-of-way is no longer being actively considered. (Johnson)

Response: Metro-North's 2009 Project Status Report identified that a new garage west of the right-of-way is no longer considered. The EA documents these statements on Page F-1.

Comment 2: The City of White Plains notes that the EA is project specific and does not offer a discussion of the Harlem Division corridor planning. The City reiterates its position that, with the proposed parking garage, there is no local roadway capacity for additional parking for commuters traveling to North White Plains to park on the east side of the railroad tracks. (Johnson)

Response: Comment noted. The traffic analysis for the proposed parking garage indicates that traffic to and from this proposed garage could be accommodated using existing capacity on local streets with only minor modifications to the local roadway network. The construction of additional parking beyond this proposed expansion would require an increase in capacity to the local roadway. This is confirmed by the findings of Metro-North's previous traffic analysis of a larger garage on the west side of the tracks.

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Comment 3: The project site is incorrectly noted as 50 Haarlem Avenue. The parcel identified as 50 Haarlem Avenue is located south of the Hertz facility and is a surface lot that connects to 525 North Broadway. (Johnson)

Response: Metro-North acknowledges the correction. Though the project site is technically the rear portion of the property at 525 North Broadway, existing signage at the project site identifies the address of the garage as 50 Haarlem Avenue. As this address is recognizable by the public, it was used to define the project in the EA. Please note that all project location figures and site maps provided in the EA identify the correct location of the project site.

Comment 4: Metro-North should identify where the proposed retail space would be located as well as where reserved parking would be provided for retail staff. (Johnson)

Response: The proposed location of the retail space is identified in Figure 2-1 of the environmental assessment. Should the option to construct retail space be exercised, the retail space will be approximately 1,000 square feet. As it is anticipated that the retail space would be for commuter compatible uses, additional parking for retail customers should not be required. Metro-North will provide one space for employee parking for retail use as it does for concessions at other stations. The one space will not be located at the new parking garage; it will be located at another nearby parking area owned by Metro-North.

PURPOSE AND NEED

Comment 5: The community really does not want more people coming down from the Bronx River Parkway and Interstate 684 just to get a train at the North White Plains Station. We would rather help them get on a train closer to their homes. This could be addressed through a regional plan. (Roach)

Response: The project is intended to support projected demand for travel from the North White Plains Station. The Station is attractive to commuters because it provides frequent and express service to Grand Central Terminal. Furthermore, a number of communities that surround the North White Plains Station do not have direct commuter rail access as they are not traversed by the Harlem Line. Metro-North continually evaluates parking inventory at its stations. Metro-North has taken a regional approach to expanding parking, where it is not constrained by parking restrictions placed by the municipalities that own the parking at stations on the Upper Harlem Line. Additionally, Metro-North explored parking demand strategies, such as jitneys, park-and-ride lots, and other methods, but these alone would not meet the projected growth in ridership at the North White Plains Station.

SOCIAL CONDITIONS

Comment 6: Increases in parking are more appropriate at the White Plains Station than the North White Plains Station. The White Plains Station is a busy commercial area; whereas, the North White Plains Station has smaller, neighborhood retail uses that will not benefit from increased parking and traffic. Furthermore, the proposed retail space within the garage will compete with the small businesses that already exist in the North White Plains neighborhood. (Roach)

Response: As described on page 3-2 of the EA, the parking garage is a permitted use at this location, and the surrounding area is a mix of uses. The proposed garage does not represent substantial new development in this area nor does it conflict with existing uses. Increased traffic to the parking garage would not adversely affect the neighborhood retail uses. Furthermore, Metro-North does not own any land adjacent to the White Plains Station.

The proposed retail space would be quite small, approximately 1,000 square feet, and would provide commuter-oriented services. The size and use of this new retail space is not anticipated to adversely impact the operation of existing businesses in the surrounding area.

INFRASTRUCTURE, UTILITIES, AND ENERGY

Comment 7: Should there be a need for underground vaults for electrical service, these vaults must be located on private property and be adequately screened with landscaping. (Johnson)

Response: The need for additional electrical vaults cannot be determined until design of the garage is progressed. If there is a need for electrical vaults, Metro-North would coordinate their location, design and screening as appropriate with Consolidated Edison and the City of White Plains

Comment 8: Metro-North should prepare and supply calculations of the garage's water and sanitary sewer requirements to the City of White Plains. If the City determines that increased capacity is necessary, Metro-North should be responsible for the costs associated with these improvements. (Johnson)

Response: Metro-North will continue to coordinate with the City of White Plains regarding infrastructure requirements for the proposed parking garage. Metro-North will perform and pay for any appropriate improvements within the footprint of the garage and the tie-in point directly related to the projects sanitary sewer requirements.

Comment 9: The Stormwater Pollution Prevention Plan (SWPPP) should be submitted to the City of White Plains Department of Public Works as well as the New York State

Department of Environmental Conservation. The City of White Plains does not permit drainage to the street catch basins. All new drains must be connected to a new street storm drain manhole. (Johnson)

Response: Metro-North will file a Notice of Intent to the NYS Department of Environmental Conservation advising them of the SWPPP and provide the SWPPP to the City of White Plains. If there is a need for new stormwater drains, Metro-North will coordinate with the City of White Plains.

TRANSPORTATION

TRAFFIC

Comment 10: The White Plains Common Council will receive reports from its departments, boards, and commissions with respect to proposed traffic improvement measures before these mitigations are implemented. (Johnson)

Response: Comment noted. As noted in the Environmental Assessment, Metro-North has coordinated with the City of White Plains Traffic Commissioner on the development of the mitigation measures identified in the Environmental Assessment and will continue to coordinate with the City of White Plains to implement the mitigation measures identified in the Environmental Assessment.

Comment 11: The traffic impact study properly identifies adverse traffic impacts and measures to mitigate these effects. The traffic analysis also raises notice that any additional expansion on the specific garage site or on the adjacent MTA property at 656 North Broadway could not be supported by the existing roadway network. The City opposes any further reconfiguration of North Broadway and the local area roadway network to facilitate the construction of additional non-resident, railroad commuter parking beyond the specific project identified in the EA. (Johnson)

Response: It is Metro-North's understanding that the City's concern is with the construction of any additional parking at the North White Plains station beyond that which is the subject of the Environmental Assessment. Metro-North has no plans to expand parking at the North White Plains station beyond the garage that was identified in the Environmental Assessment. The Federal Transit Administration's statement of findings will specifically reflect the project as described on Page 2-1 of the Environmental Assessment. (Please note that the address of 525 Broadway was incorrectly noted as 656 Broadway in the comment letter.)

Comment 12: The current roadway bridge over the Bronx River to access the parking from the Bronx River Parkway is deteriorated and should be replaced with a proper truss bridge of larger capacity. Also, under the current configuration of Fisher Lane,

additional commuter parking at or near this location would have significant adverse impacts that could not be mitigated. (Johnson)

Response: Metro-North's proposal to provide additional parking on the east side of the tracks does not impact traffic operations at this bridge located on the west side of the tracks. Metro-North's proposal to provide additional parking on the east side of the tracks does not impact traffic operations at this bridge located on the west side of the tracks. Metro-North understands that the Town of Greenburgh is reconfiguring and/or rehabilitating the existing bridge over the Bronx River. A sign at the site indicates that the construction will be complete in July 2011. The traffic impact analysis in the EA considered the existing configuration of Fisher Lane below the Metro-North tracks and did not identify a significant adverse impact at this location.

Comment 13: The City and Metro-North must monitor the implementation of traffic mitigation measures to determine if any additional improvements such as signage or signal adjustments would be necessary. (Johnson)

Response: As required, Metro-North will continue to coordinate with the City of White Plains to implement the mitigation commitments of the Environmental Assessment. Metro-North and the City will also coordinate in monitoring the traffic mitigation measures in order to ensure that they are effective.

Comment 14: The Town of North Castle requests that all mitigation described in the EA be in place prior to completion of the garage and the addition of site-generated traffic on roadways within the Town of North Castle. (Kaufman)

Response: Metro-North will continue to coordinate with all appropriate local and state agencies to implement the mitigation commitments identified in the EA and FONSI prior to the opening of the parking garage.

Comment 15: Haarlem Avenue is currently one way, but many use the street in the wrong direction. If you start allowing two-way traffic along a small segment, this problem will increase. (Taylor)

Response: The conversion of Haarlem Avenue to two-way traffic between the garage driveway and Bond Street is to improve traffic and pedestrian access by keeping traffic destined for the garage on public streets rather than cutting through an existing City owned parking lot.

Comment 16: Could you clarify which segment of road is proposed to change from two-way to one-way operation? There was mention of a portion of Haarlem Avenue and a portion of Bond Street east of North Broadway. (Conroy)

Response: Haarlem Avenue is proposed to be two-way for 200 feet south of Bond Street just to the entrance of the parking garage. This is intended to dissuade garage users from cutting through the existing surface parking lot as occurs under current conditions. The remaining portion of Haarlem Avenue will stay one-way northbound from Holland Avenue to the garage entrance. While not required as part of this project, making a portion of Otis Avenue east of North Broadway one-way westbound can also prevent traffic from cutting through the residential neighborhood. However, with the addition of the proposed traffic signal at North Broadway and Bond Street/Otis Avenue, left turns out of Bond Street onto North Broadway would be permitted and there would be less incentive to use Otis Avenue as a bypass.

Comment 17: How can 400 cars parking in the garage, even though it's spread out over three hours, translate to only 17 or 12 cars at specific locations in the different analysis periods? (Conroy)

Response: The traffic study evaluated potential impacts from 391 new parking spaces at the 500 space parking garage. The study evaluated several different peak periods corresponding to the heaviest volumes anticipated for the proposed garage (the site peak hour) and the heaviest volumes observed for the roadway network (the street peak hour). The specific figure of 17 new trips at the intersection of Route 22 and Reservoir Road is based on the exiting volume of 29 trips at this time (approximately 7 percent of the spaces), assuming there are multiple ways out of this garage, and is examining the effects of the parking garage on the street peak hour (between 5 PM and 6 PM) traffic on the adjoining streets. Metro-North anticipates that more of its customers (approximately 119 vehicles) would exit the proposed parking garage between 6 PM and 7 PM, at which time the anticipated volumes at Route 22 and Reservoir Road would be 69 trips. The study also indicate site entry and exit activity also occur outside of the Street and Site Peak hours as discussed in Appendix D *Traffic Impact Analysis*.

Comment 18: The section of Route 22 from Virginia Road north to Stop & Shop has only one lane northbound and one lane southbound and is regularly congested between 5:00 PM and 7:00 PM. Will any improvements be made there? (Fragala)

Response: NYSDOT is currently implementing an improvement at the Route 22 northbound approach at Reservoir Road that would remove curbside parking and extend the right-turn lane by approximately 120 feet. This improvement would ease congestion that extends south to Virginia Road during the stated hours. This improvement is not part of the Metro-North project, but it is considered in the analysis of future traffic impacts with the proposed parking garage.

Comment 19: While adding a signal at Route 22-Bond Street/Otis Avenue helps get traffic in and out of the garage, it is not necessarily an improvement for people driving on Broadway since it is another traffic light to deal with. (Roach)

Response: As shown in Table 3-3 of the EA, northbound and southbound Route 22 (Broadway) will operate at acceptable level of service (LOS) C or better with installation of a traffic signal at the Bond Street/Otis Avenue intersection.

Comment 20: Did the traffic impact assessment include the effect of White Plains Bus Company traffic which regularly queues on Haarlem Avenue back to Bond Street? (Federbush)

Response: Bus traffic was included in the collection of traffic data. The project includes installation of a signal at Bond Street providing an alternative exit path for vehicles seeking to head northbound on Route 22 for those who want to avoid the buses and other traffic. Currently, those vehicles must proceed north on Haarlem to Fisher Lane from which the left turn onto northbound Route 22 is permitted.

Comment 21: The traffic impact analysis does not account for undeveloped or underdeveloped sites near the garage that could result in new traffic in this area if developed in the future. (Roach)

Response: The traffic impact analysis accounts for all known development and transportation projects in the vicinity of the North White Plains Station. Information on these projects was collected from a variety of sources, including Westchester County and the City of White Plains. In addition, the traffic analysis includes an annual background traffic growth rate to account for smaller developments that may come online before the garage is operational.

Comment 22: Metro-North should widen the Fisher Lane underpass to two or three lanes to allow for better access and egress from the west. (Rutigliano)

Response: As part of the planning study which was published in 2005, Metro-North investigated the possibility of widening Fisher Lane underpass and determined that the widening would be difficult to implement without substantial disruption of commuter rail service, as well as property takings and therefore, was not considered further. .

Comment 23: The peak conditions at the North White Plains Station are not over a four hour period. Rather, it is far more compressed and drops off quickly around 8:30 AM. (Roach)

Response: The EA includes a detailed assessment of traffic operations at area roadways and recommends measures to mitigate the impacts of the proposed project. The

analysis is for both the peak hours of rail customer traffic (i.e., 7AM to 8AM and from 6PM to 7PM) and the peak hours of street traffic (8AM to 9AM and 5PM to 6PM). Both peak hours were assessed to determine the potential impacts on local roadways when Metro-North-generated traffic is highest and when local roadway congestion is highest. Our traffic analysis also indicates site entry and exit activity also occur outside of the Street and Site Peak hours as discussed in Appendix C *Traffic Impact Analysis*.

PARKING

Comment 24: Is there any way that Metro-North can provide preference to residents of the immediate neighborhoods for either parking permits or parking rates? (Conroy)

Response: Generally for park and ride and parking garage projects, funding provided under federal law cannot be used to provide preferential treatment to one group over another, such as providing reserved spaces or preferential rates.

Comment 25: There are currently empty spaces on the parking lot adjacent to Fisher Lane. If there are already empty spaces, why do we have to have a garage? (Rutigliano)

Response: The current economic climate has resulted in a reduction in Metro-North ridership and parking demand at the North White Plains Station. However, ridership is steadily increasing as the economy improves, and the excess capacity is forecasted to be filled. In the long term, as the Environmental Assessment indicates, this capacity is not sufficient to meet anticipated ridership growth above and beyond the results of the improving economy. Therefore, the proposed garage is intended to meet a portion of the projected long-term demand for parking.

TRANSIT

Comment 26: Metro-North does not project operational changes be made to accommodate the additional demand at the North White Plains Station. With Metro-North now using a peak load factor of 95 percent for its trains, there is serious doubt as to the capacity of the current schedule to accommodate the added riders from 400 additional cars at the proposed parking garage. (Buchwald)

Response:

Metro-North anticipates that new train services would not be needed specifically to accommodate the new garage. Rather, Metro-North will continue to monitor its train usage and is committed to maintaining a 95 percent load factor. As necessary, and as a routine, Metro-North adjusts schedules or train consists to maintain its loading standard. The number of anticipated new Metro-North customers resulting from the construction of the North White Plains garage

represents less than one percent of total projected 2015 Harlem Line AM Peak ridership. As additional riders would be spread out over various existing trains over the peak period and beyond, no equipment or extra trains would be required to accommodate new riders.

BICYCLING

Comment 27: The new parking structure will include just 5-10 spaces for bicycle storage. Providing, covered, secured storage space for bicycles will encourage some who live in the vicinity to bike to the station rather than drive. Metro-North is encouraged to consider expanding the number of bicycle spaces and providing lockers for cyclists within the new facility. (Buchwald, Billows, Brown, Carre, Connor, Feiner, Houslanger, Johnson, Kaiden, Keiser, Laloo, Lowey, Nonna, Oliva, Peister, Resnick, Reynard, Slevin, Schwartz, Wilson,)

Response: As design of the parking garage progressed, Metro-North will provide 20 bicycle parking spaces (a combination of 10 lockers and 10 racks) within the new parking garage instead of the 5-10 bicycle parking spaces as originally planned. Metro-North will also consider the flexibility of the design of the garage to allow for the provision of a greater number of spaces for bicycles should they be warranted by future demand.

PEDESTRIANS

Comment 28: New traffic patterns call for a more comprehensive examination of pedestrian access to the North White Plains Station. Crosswalk repainting, sidewalk repair, and pedestrian signage should be provided throughout the vicinity in conjunction with the parking garage. (Buchwald)

Response: The EA proposes a new signal and crossing at the intersection of Route 22 (North Broadway) and Bond Street/Otis Avenue, which will improve access to the North White Plains Station for customers while also providing an improvement in pedestrian amenities for those whose destination is other than the train. Metro-North will continue to work with the City of White Plains during design and construction on traffic and pedestrian matters as they relate to the garage.

Comment 29: Pedestrian safety crossing Broadway at Bond Street/Otis Avenue and at Holland Avenue is of great concern. With additional traffic generated by this project, conditions for pedestrians must be improved. (Roach)

Response: The EA proposes a new signal and crossing at the intersection of Route 22 (North Broadway) and Bond Street/Otis Avenue, which will improve access to the North White Plains Station for customers. This new signal with pedestrian

crossing is in addition to the existing crosswalk and signal at Route 22 (North Broadway) and Holland Avenue.

Comment 30: Pedestrian safety is severely compromised on Haarlem Avenue and Broadway by high traffic volumes and the existing parking garage. Making Haarlem Avenue two-way and increasing the size of the garage will make pedestrian safety even more problematic. Drivers in this area do not respect traffic controls and travel at high speeds. (Taylor)

Response: The EA proposes a new signal and crossing at the intersection of Route 22 (North Broadway) and Bond Street/Otis Avenue, which will improve access to the North White Plains Station for customers. This new signal with pedestrian crossing is in addition to the existing crosswalk and signal at Route 22 (North Broadway) and Holland Avenue. Additionally, making Haarlem Avenue a two way street from Bond Street to the garage entrance improves safety by reducing the number of cars cutting through an existing off-street parking facility on Haarlem Avenue to access the new garage.

AIR QUALITY

Comment 31: By increasing traffic in this neighborhood, you are degrading, not improving, air quality. (Taylor)

Response: As described on page 3-19 of the EA, the project will result in a total reduction of approximately 121,510 kg of carbon monoxide (CO), 3,665 kg of volatile organic compounds (VOC), 2,365 kg nitrogen oxides (NO_x), and particulate matter (160 kg of PM_{2.5} and 355 kg of PM₁₀) emissions within the New York metropolitan region over the next 18 years. It is important to note that the project study area does not contain a CO "Hot Spot".

CONSTRUCTION IMPACTS

Comment 32: The EA does not adequately address the impact of construction on the existing users of the parking garage. It does not state how long the garage would be closed during construction. It does not provide any details on the available capacity at the White Plains Station or North White Plains Station to accommodate diverted vehicles, and it does not identify a contingency plan if there is not sufficient capacity at these stations for those displaced by construction activities. (Buchwald, Federbush)

Response: The construction duration is anticipated to be approximately two years. The existing parking garage will be closed through the duration of construction since it will be demolished as a first step in clearing the site. Metro-North will contact customers who currently hold permits for the existing parking garage using techniques such as online (email) notification and windshield notices. Metro-North will also provide signage and other informational material to direct customers to available parking areas during construction. Metro-North has experienced a reduction in ridership resulting from the current economic climate, and it is anticipated that some excess capacity will be available at the North White Plains and/or White Plains Stations during the construction period. Displaced customers could use any available spaces at the Westchester County operated North White Plains and White Plains station lots where there is some available capacity despite current waiting lists to purchase parking permits at the Metro-North garage at North White Plains. This capacity is recent and a temporary effect related to current economic conditions, which have been responsible for short-term reductions in Metro-North ridership. Metro-North will monitor parking conditions at both stations prior to and during construction. If a shortfall is anticipated, Metro-North will work with Westchester County to implement other methods to expand parking spaces during construction such as valet parking and shuttles to other lots if required

Comment 33: The White Plains Department of Public Works will meet to carefully evaluate the timing, duration, and need for any street closures, traffic diversions, and the use or occupancy of any portion of public right-of-way. The City of White Plains should adhere to the provisions of the City's Construction Management Protocol, which was provided to Metro-North. (Johnson)

Response: Metro-North has indicated to the City that it will review the protocol and incorporate relevant sections into the construction specifications for the North White Plains Parking Garage.

OTHER

Comment 34: Metro-North should provide a plan to the City to identify a location for office parking should Metro-North vacate the building at 525 North Broadway and sell it to a private owner. (Johnson)

Response: At this time, Metro-North has no plan to vacate the building at 525 North Broadway. This comment is speculative and outside the scope of this EA.

Comment 35: Metro-North installed two surface-mounted transformers on the corner of Bond Street and North Broadway that are eyesores. (Rutigliano)

Response: Comment noted. As part of its current work at its 525 North Broadway office building, Metro-North put two surface mounted transformers on the corner of

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Bond Street and North Broadway; however, this is not related to the parking garage project.

Comment 36: How many people are going to be housed in 525 North Broadway and has that population been included in traffic study projections? (Fragala)

Response: The projected population of the new building is estimated to be between 200 and 250 persons. Traffic counts were undertaken in 2005 when 525 North Broadway was occupied by its previous tenants; therefore, the traffic analysis considers trips to and from 525 North Broadway.

Comment 37: Where are the occupants of 525 North Broadway going to park? (Fragala)

Response: Many Metro-North employees will arrive by train. Metro-North provides transit subsidies to its employees, and strongly encourages them to use mass transit for their commute. With limited parking ability on site, employees will park at employee facilities in the North White Plains yard, which is located approximately one (1) block north of the Project site.*