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TOC-4
SECTION 1: OVERVIEW AND BACKGROUND

- What is the I-81 Viaduct Project?
- What communities does I-81 serve, and how many people travel on I-81?
- What is “scoping” and what is the purpose of this document?

1-1 INTRODUCTION

The New York State Department of Transportation (NYSDOT) is proposing to address the existing structural, geometric, and operational deficiencies of Interstate 81 (I-81) from approximately Colvin Street to Hiawatha Boulevard (the “I-81 Viaduct Project”) in the City of Syracuse, Onondaga County, New York. NYSDOT is also investigating modifications along Interstate 690 (I-690) approximately between its interchange at West Street and Lodi Street and potential improvements on Interstate 481 (I-481) from its southern to northern termini.

NYSDOT, in cooperation with the Federal Highway Administration (FHWA), is preparing an Environmental Impact Statement (EIS) for the I-81 Viaduct Project in accordance with the requirements of the Council on Environmental Quality’s regulations for implementing the procedural provisions of the National Environmental Policy Act (NEPA) (40 CFR §1500-1508 and the FHWA’s Environmental Impact and Related Procedures; Final Rule (23 CFR §771), and the NYSDOT Procedures for Implementation of the State Environmental Quality Review Act (17 NYCRR [New York Codes, Rules and Regulations] Part 15). FHWA, serving as the Federal Lead Agency, and NYSDOT, serving as Joint Lead Agency, are progressing the development of the EIS. The project is also classified as a State Environmental Quality Review Act (SEQRA) non-Type II action, indicating that it has the potential for significant environmental impacts or substantial controversy on environmental grounds that should be evaluated, and an EIS shall be prepared. However, given that a Federal EIS is being prepared, NYSDOT and other New York State agencies undertaking a discretionary action for this project have no obligation to prepare an additional EIS under SEQRA. NYSDOT will give full consideration to the Federal Final EIS and will prepare a Joint Record of Decision with FHWA.

Scoping occurs early in the NEPA process and affords an opportunity for agencies and the public to provide input on the purpose and need for the project, project objectives, the potential alternatives under consideration, and the environmental analysis methodology. A Draft Scoping Report was published in June 2014, which built upon information presented in the Scoping Initiation Packet (November 2013), and presented information to assist agencies and the public in understanding the project and the approach to carry out the NEPA process.
This *Scoping Report* provides updated project information, takes into account public and agency comments received during the scoping of this project, and summarizes the status of the project to date. This document is organized into six sections, as follows:

- **Section 1, Overview and Background** describes the I-81 corridor through Syracuse;
- **Section 2, Purpose and Need** briefly presents the problem statement, the project “need,” and the project “purpose” statement, which describes that which the lead agencies are striving to achieve with the advancement of the action. The “purpose” statement also includes objectives, which further refine the purpose of the action and guide the review of alternatives under consideration;
- **Section 3, Project Alternatives** describes potential alternatives for the rehabilitation, reconstruction, or replacement of I-81 through Syracuse, as well as improvements on I-690 and I-481; the approach to assessing the benefits and adverse impacts of these project alternatives; the preliminary screening of these alternatives; and the project alternatives that will advance for further consideration and study;
- **Section 4, Environmental Considerations** describes the studies to be undertaken as part of the EIS and the methodologies that will be used to identify any potential adverse environmental impacts resulting from the project alternatives;
- **Section 5, Agency and Public Involvement** describes the tools and techniques that have and will be used to engage agencies and the public and to provide opportunities for their input throughout the NEPA process; and
- **Section 6, Responses to Comments** lists comments received during the public comment periods and provides responses to these comments.

### 1-2 Description of the Project Limits

I-81 is an approximately 700-mile-long highway in the eastern United States. It begins at I-40 in Dandridge, Tennessee, and extends northeasterly through Tennessee, Virginia, Maryland, West Virginia, Pennsylvania, and New York, terminating at Highway 401 in Ontario, Canada. It is the primary north-south highway through Central New York, serving Binghamton, Cortland, Syracuse, and Watertown, and provides an international crossing into Canada at the Thousand Islands Bridge.

I-81 serves many of the Syracuse region’s destinations and employment centers, including Downtown Syracuse; University Hill, which includes several hospitals, Syracuse University, SUNY College of Environmental Science and Forestry (SUNY ESF), and the Carrier Dome; Destiny USA Mall; and Syracuse Hancock International Airport. I-81 also connects to the east-west interstates that pass through Syracuse (Interstate 90/New York State Thruway and I-690) as well as I-481 (see Figure 1-1).

The I-81 Viaduct Project will focus on a priority area (I-81 viaduct priority area), which includes the section of I-81 between MLK East and Spencer Street and the portion of I-690
Interchanges

I-81 Viaduct Project • Scoping Report

Project Context
Figure 1-1
approximately between the West Street interchange and Lodi Street. In addition, NYSDOT is investigating interchange and safety improvements on I-81 between Spencer Street and Hiawatha Boulevard. Thus, the project limits have been defined to include an approximately 3.75-mile section of I-81 from Colvin Street to Hiawatha Boulevard and the 2.5-mile section of I-690 from approximately the West Street interchange (which extends to Leavenworth Street) to Lodi Street. Some alternatives under consideration may also result in improvements along I-481, including its interchanges with I-81, and along I-690. These improvements would be necessitated by potentially relocating I-81 from its current location within the City of Syracuse to the current I-481. The project limits are shown on Figure 1-2.

The project alternatives may include improvements to Almond Street and the east-west streets that intersect Almond Street. The alternatives may also include improvements to other local streets within Downtown Syracuse as shown in the inset of Figure 1-2. It should be noted that the project limits are dynamic and may be revised as options for the I-81 Viaduct Project are explored.

1-2-1 ROUTES AND GEOMETRIC FEATURES

I-81 is a limited-access highway, with two or three lanes in each direction through Syracuse. Traveling north from the southerly I-81/I-481 interchange (Interchange 16A), I-81 is on embankment through the south part of the city as it passes Morningside and Oakwood Cemeteries. Once I-81 crosses the New York, Susquehanna, and Western Railroad, it transitions from an embankment to a viaduct (an elevated bridge with multiple spans). Local streets pass under and along the viaduct through neighborhoods including Southside, University Hill, and Downtown. North of Fayette Street, I-81 turns westward and continues on a viaduct. A series of ramps connect I-81 with I-690. These ramps provide direct access from northbound I-81 to eastbound I-690 and from westbound I-690 to southbound I-81, but there are no direct connections between southbound I-81 and westbound I-690 or from eastbound I-690 and northbound I-81. The two highways use separate viaducts as they travel east-west along the north side of Downtown Syracuse. At about Butternut Street, I-81 turns northward and transitions from a viaduct to a depressed highway. Near Spencer Street, I-81 ascends to ground level and generally continues at grade through Salina and North Syracuse.

I-690 begins at Interchange 39 on the New York State Thruway (I-90) in Van Buren and travels in a southeasterly direction through Geddes, Syracuse, and East Syracuse. I-690 terminates at I-481 in DeWitt. I-690 travels through Downtown Syracuse where it has an interchange with I-81. The highway is about 14 miles long.

As discussed further in Section 2, “Purpose and Need,” the project limits identified in the Draft Scoping Report (June 2014) extended along I-690 to Teall Avenue. However, recent inspections identified an imminent need to address structural deficiencies at Interchange 14 (Teall Avenue), and this work will be advanced as a separate and independent undertaking.
I-81 Viaduct Priority Area

Project Limits (All Alternatives)

Potential Expanded Project Limits for Community Grid Alternative

I-81 Viaduct Project • Scoping Report

Project Limits
Figure 1-2
I-481 is a 15-mile interstate highway that loops through the eastern suburbs of Syracuse, bypassing the city. I-481 begins at I-81 (Interchange 16A) in the southern part of Syracuse and travels northeasterly through Onondaga. I-481 becomes a north-south roadway through DeWitt and East Syracuse, where it intersects with I-690 and the New York State Thruway (I-90). After the interchange with the New York State Thruway, I-481 takes a northwesterly alignment through Cicero. I-481’s interstate designation ends at Interchange 29 in North Syracuse where it rejoins I-81. After Interchange 29, the highway continues as NY 481 to Oswego.

Where I-81 passes through Downtown Syracuse (the viaduct), the local street network is characteristic of a typical city street grid, with east-west streets passing under the viaduct and Almond Street traveling north-south underneath and adjacent to the viaduct. Local streets also pass along and beneath the I-81 and I-690 interchange. Local streets comprise a mix of one-way and two-way streets. Most streets provide some level of pedestrian accommodations, with sidewalks at least on one side of the street, though some sidewalks are discontinuous. Pedestrian crossings across Almond Street (underneath the I-81 viaduct) are limited, and some intersections do not provide crosswalks at all legs of the intersection. Designated bicycle facilities are also limited in the I-81 viaduct priority area, with the exception of Genesee Street, which carries the Connective Corridor east-west under the viaduct. The Connective Corridor is a two-mile urban improvements project, managed by Syracuse University in partnership with the City of Syracuse and Onondaga County, connecting the University Hill area with downtown business and residential districts.

Several initiatives have been underway in the City of Syracuse to enhance bicycle and pedestrian connectivity. As shown in Figure 1-3, designated bicycle infrastructure has been established (or is planned) throughout the City. Some of these routes are part of local bicycle and pedestrian initiatives, such as the City/SMT Bikeway and Creekwalk, while others are part of larger regional routes, such as New York State Bicycle Route 11 and the Erie Canalway Trail. As noted earlier, Syracuse University has also worked to enhance bicycle and pedestrian infrastructure by developing the Connective Corridor. However, the existing bicycle infrastructure does not provide an interconnected system of bike routes for commuting, and bicycle infrastructure along the I-81 viaduct (near Downtown, Southside, and University Hill) is lacking, thereby limiting bicycle connectivity between areas east and west of I-81.

1-2-2 LAND USES

Where I-81 enters the project limits from the south, density increases substantially with residential uses to its immediate west (Pioneer Homes and Southside) and hospital, university facilities, and commercial uses to its immediate east (University Hill). At about Adams Street, the Southside neighborhood gives way to Downtown Syracuse with a mix of low-, medium-, and high-rise commercial uses, mid- and high-rise residential uses, and hotel, government, and institutional buildings. Numerous surface and structured parking
Existing and Near-Term Bicycle Infrastructure

- Existing City-Wide Bikeway
- New York State Bicycle Route 11
- Connective Corridor: Existing (On-road cycle track)
- Connective Corridor: Near-Term Proposed
- Creekwalk: Existing (Off-road multi use trail)
- Creekwalk: Near-Term Proposed
- Erie Canalway Trail: Signed On-Road Route
- University Hill Bikeway: Existing (Standard blue line)
- University Hill Network: Near-Term Proposed

Figure 1-3

Existing and Near-Term Bicycle Infrastructure
facilities that serve Downtown and University Hill are located adjacent to and beneath the highway. At about Fayette Street, I-81 turns westward and northward to separate Downtown and Northside. As it travels northwesterly, I-81 traverses a former warehouse and industrial area and then passes Destiny USA, a 2.4 million square foot shopping mall at the intersection of Onondaga Lake Parkway and Hiawatha Boulevard. Upon exiting the I-81 Viaduct Project limits, the highway passes a collection of low- and mid-rise hotels, and a few office parks surround the interchange with the New York State Thruway. I-81 then travels through mostly low-density, suburban commercial areas as it passes west of Syracuse Hancock International Airport. Continuing north to I-481, the highway serves the low-density residential and commercial uses of the northern suburbs.

I-481 begins in the southern portion of the City of Syracuse and then traverses the City’s southern, eastern, and northern suburbs. Land uses along I-481 generally are low-density residential and commercial uses. There are some wholesale and industrial uses near I-481’s interchange with I-690, and retail centers are located near the highway in DeWitt. I-481 also crosses over rail yards for CSX.

The land uses along I-690 in the project limits are generally commercial and light industrial and vacant former industrial buildings. A number of surface parking lots are located adjacent to and beneath I-690 as it traverses the northern portion of Downtown Syracuse.
SECTION 2: PURPOSE AND NEED

➢ Why is the project needed?
➢ What does the project intend to accomplish?
➢ What are the goals and objectives of the project?

2-1 INTRODUCTION

This section of the Scoping Report discusses the deficiencies and limitations of Interstate 81 (I-81) and Interstate 690 (I-690) in the City of Syracuse that initiated the I-81 Viaduct Project (i.e., the “need” for the project) and how those needs would be addressed by the project (i.e., the “purpose” of the project). In addition, this section discusses goals that have been established to guide project development and the objectives that have been established to further refine the project purpose.

2-2 IDENTIFYING THE NEED FOR THE PROJECT

The future of the I-81 corridor is important to the efficient movement of people and goods in and around greater Syracuse and is also important to the integrity of the national transportation network. Within greater Syracuse, I-81 is a principal north-south transportation route for commuters, travelers, and commercial vehicles and provides direct access to Downtown. Nationally, I-81 is a major north-south corridor that extends from Tennessee to Canada, providing links to major cities, such as Washington, D.C., Philadelphia, and New York City, via east-west connections. I-690 is a principal east-west arterial in Syracuse that also provides direct access to Downtown.

As evidenced by the I-81 Corridor Study (NYSDOT, July 2013) that preceded this project (discussed further in Section 2-2-2), the I-81 viaduct and I-81/I-690 interchange have been the subject of community and agency concern because of ongoing congestion and safety issues, as well as aging infrastructure. The I-81 Corridor Study identified a section of I-81 and I-690 in and near Downtown Syracuse as a priority area for improvements due to a concentration of structural and geometric deficiencies, as well as frequent congestion and high vehicle accident rates. As such, the “I-81 viaduct priority area” (described in Section 1-2 and shown in Figure 1-2) was established and is the focus of the I-81 Viaduct Project. In many instances, highway design features (such as shoulder widths, median widths, interchange spacing, etc.) pre-date current design standards and, coupled with heavy traffic volumes, have led to recurring congestion and high accident rates. In addition, the highway infrastructure is nearing the end of its intended design life, and the viaduct and other
highway bridges have deteriorated due to age, wear, and harsh winter weather conditions. The I-81 viaduct priority area exhibits a high concentration of traffic incidents and non-standard and non-conforming features. Although highway infrastructure is maintained in a state-of-good repair to ensure its structural integrity remains safe for the traveling public, continued deterioration could lead to increased maintenance costs, weight and speed restrictions on bridges, and potentially, eventual closure of bridges.

I-81 and I-690 are not only vital to the movement of people and goods in greater Syracuse but also, as major highways passing through a dense urban center, have a considerable influence on the character and economic vitality of the city and region. Syracuse is the region’s largest economic center, and the presence of I-81 and I-690 in Downtown Syracuse and adjacent neighborhoods can influence development, vehicular and pedestrian connectivity between neighborhoods, and community character.

To ensure safety and conformity throughout the national highway system, the American Association of State Highway and Transportation Officials (AASHTO) has established interstate highway design standards, which are implemented by the Federal Highway Administration (FHWA) and the New York State Department of Transportation (NYSDOT). Infrastructure that pre-dates current design standards is considered “non-standard” or “non-conforming.” Non-standard design features include geometrical aspects that are considered critical design elements, such as lane and shoulder widths, sight-line distances, grades (i.e., slopes or steepness), etc. Non-conforming design features include design elements that do not conform to accepted engineering practice but are not considered critical design elements, such as the spacing between interchanges and the lengths of acceleration and deceleration lanes.

The limitations and deficiencies of the transportation infrastructure, as well as the project’s relevance to long-term planning visions, are discussed in the sections below.

2-2-1 THE NEED TO IMPROVE TRAFFIC FLOW AND SAFETY

Important indicators of the functionality of a highway network are levels of congestion and accidents rates. Level of service (LOS) is a measurement of congestion and travel delays, based on a scale from LOS A (free flowing) to LOS F (highly congested). The I-81 viaduct priority area is prone to congestion and high accident rates, largely due to high traffic volumes combined with non-standard and non-conforming design features (discussed further below).¹

According to the NYSDOT Highway Design Manual (HDM) design criteria, interstate highways should function at LOS C or better. During peak periods (i.e., AM and PM rush

---

¹ The information presented in this section of the Scoping Report is based on analyses prepared for the I-81 Corridor Study (NYSDOT, July 2013). There will be additional data collection and analyses prepared for the EIS, and the EIS will present the updated information.
hours), traffic congestion is a frequent occurrence in certain sections of the I-81 viaduct priority area where traffic conditions typically operate below LOS C. As shown on Figures 2-1 and 2-2, many roadway and ramp segments in these areas often approach capacity (LOS D to E) or are over capacity (LOS F), as indicated by orange and red, respectively. This often results in reduced travel speeds that average approximately 20 MPH (well below the posted 45 MPH speed limit), indicating notable travel delays.

Frequent peak hour congestion is a result of heavy traffic volumes combined with numerous highway design features that do not meet current standards, largely due to the viaduct’s age and physical constraints. The I-81 and I-690 corridors accommodate heavy traffic volumes, with up to nearly 100,000 vehicles per day in some Downtown sections near the I-81/I-690 interchange.

Non-standard features, such as narrow (or non-existent) shoulders and poor sight-line distances, contribute to traffic congestion and high accident rates. Accident rates near the I-81/I-690 interchange are four to five times higher than statewide averages for similar facilities and approximately three times higher than the statewide average along the viaduct segment. In addition to creating safety hazards, non-standard features compound the problem by diminishing the ability to manage or respond to incidents resulting from these same hazards. As a result, disabled vehicles have limited space to move from general traffic lanes, and emergency response vehicles have limited access during incidents. Another important consideration is that Syracuse is located in an area subject to heavy snowfall each winter. Limited space for snow storage and removal can further contribute to space constraints created by non-standard design features.

2-2-2 THE NEED TO CORRECT NON-STANDARD AND NON-CONFORMING DESIGN FEATURES

In New York State, AASHTO design standards are supplemented by NYSDOT’s Highway Design Manual. These standards vary based on design speed and include criteria for grades and roadway curvatures, lane widths, shoulder dimensions, median design, and interchange spacing, among many others. Design standards have evolved over time as engineering and safety practices have improved. As such, highway infrastructure that was constructed in the 1950s and 1960s, including portions of the I-81 corridor, does not always meet current standards.

A survey of the I-81 and I-690 corridors identified over 100 non-standard and non-conforming features along the I-81 viaduct and I-81/I-690 interchange, as shown in Table 2-1. While not all features are equally critical to safe operations, this tally indicates the extent of potential design-related safety issues in this area.
Figure 2-1

Existing Level of Service - Morning Peak Hour

Legend

- **Over Capacity**
- **Approaching Capacity**
- **Good**
- **Waterways**

Figure 2-2

Existing Level of Service - Evening Peak Hour

Legend
Level of Service
- Over Capacity
- Approaching Capacity
- Good
- Waterways

Table 2-1
Summary of Existing Non-standard and Non-conforming Features

<table>
<thead>
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<th>Interchange/Viaduct</th>
<th>Non-standard Features</th>
<th>Non-conforming Features</th>
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<td>Shoulder Width</td>
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<tr>
<td>Viaduct*</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>I-81/I-690 Interchange</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>North Approach</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>I-690/West Street</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>I-690/East Side</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL</td>
<td>7</td>
<td>5</td>
</tr>
</tbody>
</table>

Note: *The viaduct is defined as the highway segment between Van Buren Street and Genesee Street for purposes of Table 2-1.


Within the relatively short viaduct and I-81/I-690 intersection segment, there are a host of non-standard features, including inadequate sight-distances, shoulder widths, lane widths, median widths, grades, curve radii, and super elevations (see Figures 2-3 and 2-4). In some areas, shoulders are non-existent and medians are simply narrow Jersey barriers that separate opposing traffic lanes. In addition, spacing between ramps in the viaduct segment varies from just 1,200 feet to 3,100 feet, failing to conform to AASHTO’s recommended design standard of one mile (5,280 feet). As discussed above, these conditions reduce safety and impede emergency response, thereby contributing to potential traffic incidents and traffic congestion.

The I-81/I-690 interchange is a complex intersection of two elevated highways with multiple lane merges and on- and off-ramps. The level of intricacies through which drivers must navigate combined with the abundance of non-standard and non-conforming features create limited margins of error and further contribute to the diminished safety of this corridor. Moreover, this interchange is missing connections from eastbound I-690 to northbound I-81, and southbound I-81 to westbound I-690 and therefore does not provide complete and seamless transitions between the two highways. Except in extreme cases, partial interchanges are inconsistent with FHWA’s “Interstate System Access Informational Guide” (August 2010), which states, “not providing for all movements violates driver expectation and may lead to ‘wrong-way’ movements on ramps. Therefore, alternatives for the construction of partial interchanges should generally be avoided. If partial interchanges are being considered, clear and detailed analysis must be conducted and documented as
Existing Nonstandard Highway Features of I-81 Viaduct Segment

Figure 2-3
Figure 2-4
Existing Nonstandard Highway Features of I-81/I-690 Interchange

Legend
Shoulder Width
- Less Than Standard
Grade
- Less Than Standard
Horizontal Curve Radius
- Less Than Standard
Sight Distance
- Less Than Standard
Superelevation
- Less Than Standard
Lane Width
- Less Than Standard
Median Width
- Less Than Standard
Exit Number

justification for their construction or retention. . . . In the extreme and extraordinary circumstances where a partial interchange is being considered, a full interchange must be included as an alternative for comparison in the decision-making process.” Also, AASHTO’s “A Policy on Design Standards Interstate System” dated January 2005 states interchanges shall be provided between all interstate routes and all interchanges shall provide for all traffic movements. Initial estimates conducted by NYSDOT indicate that during the peak hours in 2050, approximately 2,000 vehicles would use the missing connectors if they were available. Absent the missing connectors, these vehicles may continue to be routed to local streets such as Bear Street and Hiawatha Boulevard.

As noted above, an important consideration in Syracuse is snowfall, which can amplify the effects of non-standard and non-conforming features, particularly the lack of adequate shoulders and medians. Like much of western and central New York, Syracuse is subject to lake effect snow due to its proximity to the Great Lakes, resulting in heavy yearly snowfall accumulations. Syracuse is routinely rated as one of the snowiest [sizable] cities in the U.S. based on average yearly snowfall, which typically exceeds 100 inches. Lack of adequate shoulders and medians reduces the available space to store or remove snow, in turn reducing space for traffic and emergency access.

2-2-3 THE NEED TO IMPROVE HIGHWAY BRIDGE INFRASTRUCTURE

I-81 and I-690 are elevated through Downtown Syracuse. The I-81/I-690 interchange and viaduct comprise 33 highway bridges, with 17 additional bridges along the I-81/I-690 interchange approaches. These bridge structures were constructed primarily in the 1960s and many of their components are nearing the end of their design service life. Over time, these structures have experienced varying levels of deterioration from exposure to weather, de-icing salts, and heavy vehicle use. Bridges are particularly susceptible to wear and tear because many of the structural elements are directly exposed to weather conditions (i.e., ice in winter and heat in summer).

Interstate highways and their bridges are regulated by FHWA and are owned and maintained by the state departments of transportation (NYSDOT, in this case). To monitor the structural adequacy of highway bridges, FHWA has established a National Bridge Inventory (NBI) condition rating system. A bridge that is considered “structurally deficient” has a condition rating of 4 or less (based on a scale from 0 [failing condition] to 9 [excellent condition]) for the deck, superstructure, or substructure; or an appraisal rating of 2 or less (based on a scale from 0 [closure] to 9 [superior]) for structural condition or waterway adequacy. Similarly, NYSDOT uses a bridge inspection program to rate structural conditions of bridges on a scale of 1 (failing condition) to 7 (new condition). Based on its system, NYSDOT considers bridges with a condition rating of less than 5.000 to be “deficient.”

NYSDOT inspects highway bridges at least every two years to assess their structural conditions, which informs the FHWA NBI ratings and NYSDOT condition ratings. Condition ratings that are deficient do not necessarily indicate unsafe traveling conditions in the near term, but are used to prioritize areas of repair and maintenance and identify areas that may need more extensive measures to address future deterioration.

FHWA uses an additional classification system to identify bridges as “functionally obsolete” based on dimensional aspects—such as deck geometry (e.g., lane widths), vertical clearances, etc.—that do not meet current design standards. The functionality of a bridge is a measure of its effectiveness to carry traffic on or under the structure. Bridges that are functionally obsolete are not necessarily in poor structural condition but may not operate with optimal safety and efficiency.

Of the nearly 50 bridges within the I-81 viaduct priority area, seven bridges are classified as structurally deficient and approximately 20 bridges are classified as functionally obsolete per FHWA standards. Over 25 bridges meet NYSDOT “deficient” condition ratings of less than 5.000.

Considering the level of capital investment needed where more long-term solutions are deemed necessary to correct structural deficiencies, NYSDOT determines whether bridges can achieve desirable lifespans through rehabilitation or whether replacement is required. Based on its evaluation of the bridges within the project limits, NYSDOT recommended replacement of all bridges in the viaduct and I-81/I-690 interchange (except for one recently constructed bridge) and replacement of six bridges in the approach sections. All others were recommended for rehabilitation, with the exception of several recently constructed bridges.3

Table 2-2 summarizes the structural conditions of the “significant” bridges within the project limits, which for the purposes of this study are those bridges that are at least 1,000 feet long, or have NYSDOT condition ratings of less than 5.000, or that meet FHWA criteria for being structurally deficient or functionally obsolete.

NYSDOT predicts future conditions of bridges using its Bridge Needs Tool. As shown in Table 2-3, the condition ratings of the “significant” bridges in the project area are expected to continue to decline by 2020 and 2050, many to poor conditions (NYSDOT condition rating of less than 4.4). This demonstrates a pressing need to implement corrective measures in the near term to maintain safe traveling conditions.

---

<table>
<thead>
<tr>
<th>Bridge</th>
<th>Length (ft.)</th>
<th>NYSDOT Rating*</th>
<th>- FHWA – Structurally Deficient</th>
<th>- FHWA – Functionally Obsolete</th>
</tr>
</thead>
<tbody>
<tr>
<td>I-81 NB &amp; SB over North Salina Street</td>
<td>163</td>
<td>5.097</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Ramp from I-81 SB to Route 11 over Route 11</td>
<td>950</td>
<td>4.219</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>I-81 over East Adams Street (Viaduct)</td>
<td>4,097</td>
<td>3.931</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>I-81 SB over Route 11</td>
<td>1,780</td>
<td>5.016</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>I-81 NB over Route 11</td>
<td>1,787</td>
<td>4.887</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>I-81 NB over Erie Boulevard (I-81/I-690 Interchange)</td>
<td>1,169</td>
<td>3.944</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>I-81 SB over North Townsend Street (I-81/I-690 Interchange)</td>
<td>1,425</td>
<td>4.319</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Ramp from I-690 WB to I-81 SB (I-81/I-690 Interchange)</td>
<td>1,723</td>
<td>4.708</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>I-690 Corridor Bridges</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp from West Street to I-690 EB over I-690</td>
<td>269</td>
<td>3.594</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Ramp from I-690 WB to West Street over I-690</td>
<td>360</td>
<td>3.754</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Ramp from N. Franklin Street to West Street over Onondaga Creek</td>
<td>200</td>
<td>3.861</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Ramp from West Street to I-690 EB over Onondaga Creek</td>
<td>172</td>
<td>6.067</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Ramp from I-690 WB to West Street over Onondaga Creek</td>
<td>116</td>
<td>4.125</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>I-690 over I-81 (I-81/I-690 Interchange)</td>
<td>3,147</td>
<td>3.972</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>I-690 over Beech Street</td>
<td>1,522</td>
<td>3.828</td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

**Sources:** NYSDOT, April 2014.
### Table 2-3

Future Condition Ratings of Significant Bridges

<table>
<thead>
<tr>
<th>Features Carried &amp; Crosses</th>
<th>Current Condition Rating</th>
<th>2020 Condition Rating</th>
<th>2050 Condition Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>I-81 Corridor Bridges</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I-81 NB &amp; SB over North Salina Street</td>
<td>5.097</td>
<td>4.672</td>
<td>3.077</td>
</tr>
<tr>
<td>Ramp from I-81 SB to Route 11 over Route 11</td>
<td>4.219</td>
<td>3.798</td>
<td>2.258</td>
</tr>
<tr>
<td>I-81 over East Adams Street (Viaduct)</td>
<td>3.931</td>
<td>3.577</td>
<td>2.231</td>
</tr>
<tr>
<td>I-81 SB over Route 11</td>
<td>5.016</td>
<td>4.610</td>
<td>3.090</td>
</tr>
<tr>
<td>I-81 NB over Route 11</td>
<td>4.887</td>
<td>4.424</td>
<td>2.765</td>
</tr>
<tr>
<td>I-81 NB over Erie Boulevard (I-81/ I-690 Interchange)</td>
<td>3.944</td>
<td>3.572</td>
<td>2.220</td>
</tr>
<tr>
<td>I-81 SB over North Townsend Street (I-81/I-690 Interchange)</td>
<td>4.319</td>
<td>3.940</td>
<td>2.524</td>
</tr>
<tr>
<td>Ramp from I-690 WB to I-81 SB (I-81/I-690 Interchange)</td>
<td>4.708</td>
<td>4.327</td>
<td>2.935</td>
</tr>
<tr>
<td><strong>I-690 Corridor Bridges</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramp from West Street to I-690 WB over I-690</td>
<td>3.594</td>
<td>5.356</td>
<td>3.779</td>
</tr>
<tr>
<td>Ramp from I-690 WB to West Street over I-690</td>
<td>3.754</td>
<td>5.524</td>
<td>3.979</td>
</tr>
<tr>
<td>Ramp from N. Franklin Street to West Street over Onondaga Creek</td>
<td>3.861</td>
<td>5.588</td>
<td>3.994</td>
</tr>
<tr>
<td>Ramp from West Street to I-690 EB over Onondaga Creek</td>
<td>6.067</td>
<td>5.616</td>
<td>3.687</td>
</tr>
<tr>
<td>Ramp from I-690 WB to West Street over Onondaga Creek</td>
<td>4.125</td>
<td>5.538</td>
<td>4.085</td>
</tr>
<tr>
<td>I-690 over I-81 (I-81/I-690 Interchange)</td>
<td>3.972</td>
<td>3.575</td>
<td>2.157</td>
</tr>
<tr>
<td>I-690 over Beech Street</td>
<td>3.828</td>
<td>3.399</td>
<td>1.840</td>
</tr>
</tbody>
</table>

**Note:** Where future condition ratings improve over existing conditions, this is due to planned capital projects for these bridges.

**Sources:**
NYSDOT, April 2014.
Subsequent to publication of the *Draft Scoping Report*, inspections identified severe deficiencies on I-690 along the 1,500-foot segment of bridge that spans Beech Street, calling for its imminent replacement. Thus, NYSDOT is undertaking the I-690 bridge replacement and upgrades to the adjacent interchange at Teall Avenue as a separate project. This separate project has independent utility; connects logical termini and is of sufficient length to address environmental matters on a broad scope; and would not restrict consideration of alternatives for other reasonably foreseeable transportation improvements. This separate project and the I-81 Viaduct Project are not dependent upon each other and each can proceed prior to, concurrently with, or subsequent to, the completion of the other.

2-2-4 THE NEED FOR TRANSPORTATION INFRASTRUCTURE TO SUPPORT LONG-RANGE PLANNING EFFORTS

Several local and regional long-range plans have established goals for the regional transportation network, and/or have identified I-81, particularly the I-81 viaduct, as an influential feature within Downtown Syracuse and adjacent neighborhoods. The I-81 viaduct and I-81/I-690 interchange are prominent elevated features in Downtown Syracuse that can affect adjacent land uses and connectivity between land uses, thereby influencing the livability, sustainability, and economic vitality of the city. In addition, as described in several regional long-range plans and through comments received during the project’s scoping process, I-81 is considered an important asset to the region’s economic vitality. As such, in addition to the structural and design needs previously described, NYSDOT has and will continue to be mindful of regional and community planning initiatives.

I-81 CORRIDOR STUDY

The I-81 Viaduct Project stems from a three-year planning study (the “*I-81 Corridor Study*”) and public involvement effort ("*I-81 Challenge*") prepared by NYSDOT in cooperation with the region’s metropolitan planning organization (MPO), the Syracuse Metropolitan Transportation Council (SMTC). The *I-81 Corridor Study* evaluated the 12-mile section of I-81 through greater Syracuse between its interchanges with I-481 and identified the I-81 viaduct priority area as an area with substantial structural and geometric deficiencies, thereby prompting the I-81 Viaduct Project. The *I-81 Corridor Study* included extensive engineering evaluation of highway infrastructure conditions and public outreach initiatives. The engineering studies, along with the extensive public input, provided the initial basis for developing potential alternatives for the I-81 Viaduct Project to address these deficiencies (alternatives development is described further in Section 3, Project Alternatives).

The *I-81 Corridor Study* was guided by a set of goals and objectives grouped into four broad categories, which informed the goals and objectives established for the I-81 Viaduct Project (described below in Sections 2-3 and 2-4). The goals presented in the *I-81 Corridor Study* included:
I-81 Viaduct Project
Section 2: Purpose and Need

- Transportation:
  - Enhance the Transportation Network;
  - Enhance Region-wide Mobility; and
  - Improve Public Safety;
- Economic Competitiveness:
  - Maintain or Improve Economic Opportunities;
  - Exercise Fiscal Responsibility;
- Social Equity/Quality of Life:
  - Support Community Quality of Life;
  - Share Burdens and Benefits; and
- Environmental Stewardship:
  - Preserve or Enhance Environmental Health.

SMTC LONG-RANGE TRANSPORTATION PLAN (LRTP)

SMTC is responsible for transportation planning in the Syracuse metropolitan area and develops a Long-Range Transportation Plan (LRTP) to guide development and evolution of the region’s transportation system. The current 2020 LRTP (2011 Update) identifies goals for the region’s transportation system, both in terms of how it operates and how it affects the surrounding communities. The goals in the LRTP are:

- To enhance the safety of the people using the transportation system;
- To improve the mobility options for people within the Syracuse Metropolitan Planning Area (MPA);
- To provide a clean and environmentally sound transportation system for current and future residents;
- To enhance the area’s economic competitiveness, thereby increasing opportunities for employment;
- To promote the development of an efficient urban area and a sense of community through transportation planning; and
- To provide safe, clean, well-maintained and efficient transportation infrastructure.

SMTC is currently developing a 2050 LRTP, which may have modified goals and objectives. In the interim, SMTC gives consideration to the goals and objectives outlined in the I-81 Corridor Study (described above), which it helped prepare.

CITY OF SYRACUSE COMPREHENSIVE PLAN 2040

The City of Syracuse prepared its Comprehensive Plan 2040 to establish policies to meet its vision for the future, some of which involve transportation infrastructure. The role of
transportation in Downtown Syracuse is identified as an important consideration in the Comprehensive Plan. The City of Syracuse Comprehensive Plan 2040 aims to:

- Smooth the transitions between Downtown and the surrounding neighborhoods. Remove or minimize barriers between Downtown and the surrounding neighborhoods.
- Improve connectivity between Downtown and the surrounding neighborhoods, focusing on removing or otherwise mitigating visual barriers and barriers to circulation—for example, physical barriers such as the highways and major arterials and visual barriers such as large expanses of surface parking; and
- Ensure that transportation options Downtown are compatible with its function as the regional urban core. Encourage businesses to share parking. Provide incentives for businesses to encourage their employees to use alternative means of transportation to and from work, including ride-sharing, mass-transit, bicycling, etc.

The Comprehensive Plan also includes a Syracuse Bicycle Plan, which indicates continued efforts to promote non-motorized modes of transportation in the City of Syracuse. As stated in the plan, “in 2010, the demand for more bicycle infrastructure remained strong, and the City administration determined a need to create a plan for a cohesive and connected bicycle network, or a blueprint for future growth.” This plan identifies various roadway treatments and improvements needed in the City to enhance bicycle travel, including on some streets that pass under I-81.

**CENTRAL NEW YORK REGIONAL ECONOMIC DEVELOPMENT CORPORATION (CNYREDC) FIVE YEAR STRATEGIC PLAN: 2012-2016**

The Central New York Regional Economic Development Corporation (CNYREDC) developed its Five Year Strategic Plan: 2012-2016 as an economic strategy to build a solid foundation for sustainable growth and prosperity in the region. The goals of the Strategic Plan are to:

- Strengthen targeted industry concentrations that leverage unique economic assets;
- Improve competitiveness in, and connections to, the regional, national, and global economies; and
- Revitalize our region’s urban core, main streets, and neighborhoods.

The Strategic Plan identifies building 21st century infrastructure—including air service, port access, roads and railways—as one of the critical mechanisms to fuel economic growth and improve connectivity between regional goods and wider markets. The Strategic Plan states that economic development efforts must include regional infrastructure projects like waterfront revitalization and the I-81 Viaduct Project in Downtown Syracuse to help Central New York achieve its vision.

**VISIONCNY REGIONAL SUSTAINABILITY PLAN**

Led by the Central New York Regional Planning and Development Board (CNY RPDB), the Central New York Regional Sustainability Plan (VisionCNY) (June 2013) was developed to
serve as a foundation for investments to advance a sustainable future in the Central New York region. The plan promotes expansion of the region's pedestrian and bicycle infrastructure; implementation of green infrastructure for stormwater management; improved connectivity between parks and other public spaces; a decrease in the number of roads and bridges that are rated “deficient” or “poor”; and reductions in greenhouse gas emissions to support the State’s long-term goals. VisionCNY highlights I-81 as a structure nearing the end of its useful life, where innovative solutions will need to be implemented to redefine the Downtown area and create an iconic image for the community.

ONONDAGA COUNTY SUSTAINABLE DEVELOPMENT PLAN

Onondaga County is currently developing a new Sustainable Development Plan. Focusing on nine areas of interest, the draft Sustainable Development Plan provides a basis from which sustainable development decisions can be made through recommended policies and practices. One of these areas of interest includes transportation and land use, where the plan points towards Complete Streets policy and practice to incorporate multi-modal design and function for their social, economic, and environmental community benefits.

ONONDAGA COUNTY SETTLEMENT PLAN

The Onondaga County Settlement Plan (2001) was developed by the Syracuse-Onondaga County Planning Agency (SOCPA) and stresses the importance of improving quality of life within the 35 municipalities of Onondaga County through an emphasis on neighborhoods. To achieve a higher quality of life, the Settlement Plan describes several transportation policies with an emphasis on transportation infrastructure that supports healthy neighborhoods through the encouragement of pedestrian life. Some of the Settlement Plan’s regional transportation policies focus on attaining a healthy balance between transportation modes; improving pedestrian and bicycle accessibility; and minimizing effects of highways and roadways on neighborhood character.

OTHER LOCAL AND NEIGHBORHOOD PLANS

A number of municipalities and community planning organizations have established visions for neighborhoods and communities near the I-81, I-690, and I-481 corridors. These include the University Hill Corporation, Northside Urban Partnership (Northside UP), and the Town of DeWitt. Aspects of these organizations or their plans include:

- The University Hill Corporation: A consortium of businesses and institutions aimed at guiding growth and development in University Hill;
- Northside UP: A collaboration of businesses and community organizations, whose mission is to improve the quality of life for residents of Syracuse city, particularly those within the Near Northside neighborhoods. The focus area of Northside UP generally forms a triangle bounded by I-81 to the west, I-690 to the south, and Lodi Street to the north/east, and includes St. Joseph’s Hospital Health Center; and
- Town of DeWitt: The Town of DeWitt municipality encompasses a substantial portion of the I-481 Corridor and its 2002 Comprehensive Plan identifies several concerns related to transportation, such as the arterial highways that divide the community, the pass-through traffic that use DeWitt as a corridor, and the lack of safe pedestrian and bicycle access.

Other relevant local plans will be explored, as necessary.

2-2-5 THE NEED TO IMPROVE PEDESTRIAN AND BICYCLE INFRASTRUCTURE

While pedestrian and bicycle facilities are common considerations in the long-range vision plans noted above, more near-term efforts have also focused on identifying the existing conditions of pedestrian and bicycle infrastructure in and near the I-81 corridor as well as improvements to those facilities. SMTC has conducted several pedestrian- and bicycle-related studies to identify existing conditions and to look for solutions to improve pedestrian and bicycle facilities. Some of these studies focused on University Hill (just east of the I-81 viaduct) where several educational institutions and hospitals generate high pedestrian activity, and some have focused on Almond Street along the I-81 viaduct.

As part of its University Hill Transportation Study (2006/2007), SMTC provided an overview of existing pedestrian and bicycle conditions and made recommendations for potential improvements. The University Hill Transportation Study focused on conditions within University Hill and considered connectivity between University Hill and Downtown. The study identified I-81 as a barrier to pedestrian and bicyclist mobility, noting the width of Almond Street, as well as inadequate pedestrian infrastructure and multiple vehicular turning movements on the street, as concerns.

In 2010, SMTC released the Almond Street Corridor Pedestrian Study to address potential increasing pedestrian activity associated with anticipated growth in the University Hill area. This growth was expected to result in increased pedestrian activity crossing Almond Street between E. Genesee Street and Adams Street (under I-81), which is within the I-81 viaduct priority area. The Almond Street Corridor Pedestrian Study identified various constraints in this corridor, such as incomplete or inadequate pedestrian infrastructure, uninviting pedestrian environment, and dangerous pedestrian and vehicle conflicts. In addition, the study noted that there are no designated bike lanes along Almond Street, requiring bicyclists to use general travel lanes.

Several initiatives have been underway in the City of Syracuse to enhance bicycle and pedestrian connectivity. As shown in Figure 1-3, designated bicycle infrastructure has been established (or is planned) throughout the City. Some of these routes are part of local bicycle and pedestrian initiatives, such as the City/SMTC Bikeway and Creekwalk, while others are part of larger regional routes, such as the New York State Bicycle Route 11 and the Erie Canalway Trail. Syracuse University has also worked to enhance bicycle and pedestrian infrastructure by developing the Connective Corridor between University Hill and
Downtown with designated bike lanes on local streets, including Genesee Street, which passes under the I-81 viaduct.

With respect to enhanced connectivity and safety, NYSDOT has identified the need to address the following:

- Incomplete routes, missing or inadequate crosswalks, and pedestrian signals under and near the I-81 viaduct, and compliance with the American Disabilities Act (ADA);
- A lack of connectivity between pedestrian and bicycle generators and their destinations; and
- Inadequate lighting and pedestrian refuge locations under and near the I-81 viaduct.

2-3 PROJECT GOALS

Because of the needs described in the preceding sections, NYSDOT is pursuing the I-81 Viaduct Project. While it is important that the highway fulfill its primary charge of moving people and goods safely and efficiently, it is also important for NYSDOT to consider the extent to which the transportation infrastructure can enhance economic growth and vitality in the city.

With the project needs and local plans in mind, NYSDOT has developed the following goals for the I-81 Viaduct Project:

- Improve safety and create an efficient regional and local transportation system within and through greater Syracuse; and
- Provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse.

2-4 PROJECT PURPOSE AND OBJECTIVES

The purpose of the I-81 Viaduct Project is to address the structural deficiencies and non-standard highway features in the I-81 corridor while creating an improved corridor through the City of Syracuse that meets transportation needs and provides the transportation infrastructure to support long-range planning efforts (such as SMTC LRTP, Syracuse Comprehensive Plan, and others discussed above).

The project’s purpose statement is intended to address the needs identified throughout this section. To meet the project’s purpose, five project objectives were established in the Draft Scoping Report. After publishing the Draft Scoping Report, NYSDOT and FHWA identified the need to modify the project objectives based on public input. The project objectives are to:

- Address vehicular, pedestrian, and bicycle geometric and operational deficiencies in the I-81 viaduct priority area;
I-81 Viaduct Project
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- Maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area.
- Address structural deficiencies in the I-81 viaduct priority area;
- Maintain or enhance the vehicular, pedestrian, and bicycle connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations; and
- Maintain access to existing local bus service and enhance transit amenities\(^4\) within and adjacent to the I-81 viaduct priority area.

The purpose, need, and objectives are the basis to determine the range of alternatives that have been developed for the I-81 Viaduct Project (see **Section 3, Project Alternatives**).

\(^4\) Transit amenities that may be explored could include bus stops and shelters, bus turnouts, and layover and turnaround places.
SECTION 3: PROJECT ALTERNATIVES

What alternatives are being advanced for further evaluation and development?
Will additional concepts be developed and screened?
What process is being used to screen potential alternatives?
What potential alternatives were considered for the I-81 Viaduct Project?
What potential alternatives were dismissed from further consideration?

3-1 INTRODUCTION

The identification, consideration, and evaluation of reasonable alternatives are central to the Environmental Impact Statement (EIS) process under the National Environmental Policy Act (NEPA). This section of the Scoping Report describes the reasonable alternatives that are being advanced for evaluation in the Interstate 81 (I-81) Viaduct Project Draft Environmental Impact Statement (Draft EIS), potential alternatives that continue to be developed, and concepts that have been dismissed from further consideration.

As part of the scoping phase of the EIS process, the Federal Highway Administration (FHWA) and the New York State Department of Transportation (NYSDOT) have provided opportunities for the public to review and comment on the potential alternatives and to suggest additional concepts that may satisfy the project’s purpose and objectives. NYSDOT and FHWA have considered the comments received during the scoping comment periods, including those made on the potential alternatives. In addition to considering comments on the potential alternatives presented, FHWA and NYSDOT have reviewed proposals for new potential concepts offered by elected officials, stakeholder groups, and members of the public. These concepts, presented as Alternatives V-5: New Stacked Viaduct, Alternative T-4: Tunnel on Eastern Alignment, and Alternative O-2: West Street, are described in Section 3-4 of this Scoping Report. FHWA and NYSDOT also considered potential concepts (e.g., Rethink I-81 Plan, Access Syracuse Plan, 81’ Below Syracuse rev1, “Two Boulevards and a Bridge I-81 Boulevard Option: Using Roundabouts [Ver. 2.1]”) proposed by members of the public following the publication of the Draft Scoping Report. The public comments received and responses to those comments are presented in Section 6-3 of this Scoping Report.

Subsequent to publication of the Draft Scoping Report, FHWA and NYSDOT combined similar alternatives, renamed the Street-level Alternatives, refined components of the alternatives,
and identified additional options for the re-designation of I-81. Given the similarities of the three Viaduct Alternatives (Alternatives V-2, V-3, and V-4), they have been combined into a single alternative (the “Viaduct Alternative”). The Viaduct Alternative is presented in this *Scoping Report* with options for the design of seven curves within the I-81 and I-690 interchange. Likewise, the three Street-level Alternatives (Alternatives SL-1, SL-2, and SL-3) have been combined into one alternative, known as the Community Grid Alternative, with two options that differ in their use of the local street network.

Based on the evaluation and screening of the potential alternatives, and in consideration of public input, FHWA and NYSDOT will advance the Viaduct Alternative and the Community Grid Alternative. The No Build Alternative, which may include short-term maintenance and operational activities, might not seem reasonable as it does not meet the project’s purpose. However, the No Build Alternative is required by NEPA to serve as a baseline against which the other alternatives can be compared.

FHWA and NYSDOT will continue the environmental review process by preparing a Draft Environmental Impact Statement (DEIS) for public review and comment. The Draft EIS will present the reasonable range of alternatives considered (including the Viaduct, Community Grid, and No Build Alternatives); the potential social, economic, and environmental consequences that may be realized from the implementation of the alternatives; and measures considered to avoid, minimize, or otherwise mitigate adverse impacts. Ultimately, the environmental review will determine a preferred alternative for the I-81 Viaduct Project and any potential benefits and adverse impacts to the natural and built environment of Greater Syracuse.

As described in Section 3-2-4, based on public input received NYSDOT will conduct additional engineering and further analysis to determine if there is a tunnel alternative that addresses the project’s need and meets the project purpose and objectives, as well as the established screening criteria. If a tunnel alternative is determined to be reasonable based on these factors, it may be considered for further evaluation and analysis.

3-2 ALTERNATIVES ADVANCING FOR FURTHER EVALUATION

The I-81 Viaduct Project will focus on a priority area (I-81 viaduct priority area), which includes the section of I-81 approximately between Colvin Street and Spencer Street and the portion of I-690 approximately between the West Street interchange and Lodi Street. In addition, NYSDOT is investigating interchange and safety improvements on I-81 between

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1 It should be noted that the project limits previously identified in the *Draft Scoping Report* (June 2014) extended farther east along I-690 to Teall Avenue. However, recent inspections identified an imminent need to address structural deficiencies at Interchange 14 (Teall Avenue) and the Beech Street Bridge, and this work will be advanced as a separate undertaking.
Spencer Street and Hiawatha Boulevard. Thus, the project limits have been defined to include an approximately 3.75-mile section of I-81 from approximately Colvin Street to Hiawatha Boulevard and the 2.5-mile section of I-690 from approximately the West Street interchange (which extends to Leavenworth Street) to Lodi Street. The Community Grid Alternative (formerly, the Street-level Alternatives) also would result in improvements along I-481, including its interchanges with I-81. The project limits are shown on Figure 1-2.

As noted above, two build alternatives (the Viaduct Alternative and the Community Grid Alternative) have been determined reasonable and are being advanced for further evaluation in the Draft EIS. In addition, based on public input, NYSDOT will conduct additional engineering and further analysis to determine if there is a tunnel alternative(s) that addresses the project’s need and meets the project’s purpose and objectives, as well as the established screening criteria. Advancement of a tunnel alternative(s) for evaluation in the Draft EIS will depend on the results of this further analysis and engineering.

Alternatives that are advancing for further evaluation and analysis are described below. Please note that the descriptions of the alternatives provided within this document are considered conceptual and are based on limited engineering and operational analysis conducted to date during the scoping process. Further modifications or revisions to the various design elements or features of each identified reasonable alternative may be necessary as a result of further, more detailed engineering and operational analysis that will occur during the development of the Draft EIS. The need for any such modifications or revision will be clearly identified and the rationale for such modification or revision will be provided within the Draft EIS and shared with the public.

3-2-1 NO BUILD ALTERNATIVE

NEPA requires examination of a No Build Alternative. The No Build Alternative serves as the baseline against which the other alternatives can be compared. As described in Section 2-2, I-81 is in need of repairs, and current traffic safety issues are a key consideration for the I-81 Viaduct Project. The No Build Alternative would maintain the highway in its existing configuration with only routine maintenance and minor repairs to ensure the safety of the traveling public, implementing safety measures to the extent feasible and financially practicable.

Structural deficiencies and safety considerations would be addressed as part of NYSDOT’s ongoing maintenance program. Routine maintenance efforts would include filling pavement cracks, patching holes in bridge decks, cleaning drainage systems, and operational considerations (e.g., signage and other low-cost improvements). Over time, however, these repairs could become very costly as the highway continues to deteriorate. At the time when NYSDOT determines that a maintenance program is too costly or that conditions result in an increased safety risk to the public or disruptions to the public, the facility will be closed to traffic.
Under the No Build Alternative, large-scale replacement and rehabilitation efforts would not be undertaken, nonstandard highway features would not be corrected, and existing interchanges would not be modified.

The No Build Alternative would not involve changes in right-of-way (property line). Any maintenance or safety repairs would include upgrades to the existing highway or operational modifications such as changes in the posted speed limit, safety signage, restrictions on vehicle weights, or adjustments to traffic signals at intersections leading to and from the highway.

3-2-2  VIADUCT ALTERNATIVE

The Viaduct Alternative would involve a full reconstruction of I-81 between approximately Colvin Street and Spencer Street as well as modifications to highway features north of Spencer Street to Hiawatha Boulevard and along I-690 (see Figure 3-1). The Draft Scoping Report recommended three Viaduct Alternatives for further consideration in the Draft EIS. Given the similarities of these alternatives they have been combined into a single alternative with options for the design of seven curves within the I-81/I-690 interchange. Three Viaduct Alternative options (Option V-2, New Viaduct Fully Improved to Current Standards; Option V-3, New Viaduct with Substantial Design Improvements; and Option V-4, New Viaduct with Considerable Design Improvements) will be considered in the Draft EIS and are described below.

For comparative purposes, the typical section of the existing viaduct has two travel lanes in each direction (northbound and southbound) with two- to three-foot inside and outside shoulders. The existing viaduct becomes wider as it approaches I-690. The existing highway and street right-of-way, including Almond Street (“Almond Street right-of-way”), is approximately 198 feet wide. The new viaduct would have four 12-foot lanes (two in each direction), as well as inside shoulders (four feet in each direction) and outside shoulders (minimum 10 feet in each direction). It would be 82 feet wide, approximately 16 feet wider than the existing 66-foot-wide viaduct (see Figure 3-2). The new viaduct also could be the same height or up to about 10 feet taller (for potential aesthetic improvements) than the existing viaduct, which is about 20 feet tall.

Almond Street would be reconstructed. Bridges within the I-81/I-690 interchange would be replaced, and at this time, the following interchange modifications are proposed under the three Viaduct Alternative options.

- **New interchange on I-81 at Dr. Martin Luther King, Jr. East (MLK East, formerly East Castle Street):** To improve access to Southside and University Hill from the south, a new partial interchange with a northbound exit ramp and a southbound entrance ramp would be constructed at MLK East. The other ramp movements (a northbound entrance ramp and a southbound exit ramp) could not be constructed because these ramps would be too close, according to highway design standards, to the ramps at Adams Street. The
Existing Exit 15 at Madison St. would be replaced with a single off-ramp at Townend St. Access to Townsend St. would be provided.

New curve and new ramp would impact adjacent properties.

Wider curve and new ramp would impact adjacent properties.

New interchange (exited speed limit would be 55 mph currently posted at 40 mph).

New on-ramp at Townsend St. or other nearby location would connect Downtown/University Hill to eastbound I-690 – would replace existing connection or Townsend St.

New offramp connecting westbound I-690 to Downtown/University Hill – would replace existing connection on Townsend St.

Ramp from northbound I-81 to southbound I-690 would change from a right-side to left-side exit, eliminating a merging movement for traffic.

No access from Madison St. or Cedar St. to Arnold St.

Capturing way from Park Ave. to Arnold St. and cross streets under and adjacent to existing roadway.

New roadway would hinge as a bridge over the railroad, as does existing I-61.

New roadway would hinge as a bridge over the railroad, as does existing I-61.

New connecting ramp from northbound I-690 to northbound I-61.

New on-ramps at Pearl St. and State St. would be replaced with a single on-ramp at Willow St. or other nearby location.

Reconfigured exit lane.

Discontinued Harvard St. off-ramp with two lane.

Northside ramp would be closer to adjacent buildings.

Pearl St.

S. Townsend St.

S. Clinton St.

E. Adams St.

Cedar St.

Hawley Ave.

S. Main St.

S. Monroe St.

N. Monroe St.

Troy Ave.

Huntington Ave.

N. Washington St.

E. Washington St.

E. Perry St.

E. Front St.

E. Ontario St.

E. Michigan St.

E. Genesee St.

N. State St.

N. West St.

N. Pearl St.

E. Maple Ave.

E. Military Ave.

E. Washington Ave.

E. Monroe Ave.

E. Perry St.

E. Monroe St.

E. Military Ave.

E. Washington Ave.

E. Monroe Ave.

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E. Monroe Ave.

E. Perry St.

E. Monroe St.

E. Military Ave.

E. Washington Ave.
View from Harrison Street looking north

Typical Section

Viaduct Alternative - View and Section

Figure 3-2
new interchange would provide direct access to the Southside and to University Hill via Renwick Avenue. Burt Street also was explored as a potential location for this new interchange but was dismissed from further consideration because Burt Street does not connect to Renwick Avenue, which provides direct access to University Hill. Initial traffic studies also showed higher usage of MLK East over Burt Street during the PM peak. (This modification also is proposed under the Community Grid Alternative; see below.)

- **I-81 Interchange 18 (Harrison/Adams Streets):** To improve traffic flow at Interchange 18, a second exit lane to Harrison Street from southbound I-81 would be added.

- **I-81/I-690 Interchange:** To complete the missing connections between I-81 and I-690, new ramps would be built to provide direct connections between eastbound I-690 and northbound I-81 and between southbound I-81 and westbound I-690. These new direct connections would facilitate interstate-to-interstate movement without unnecessary use of the local street system. (This modification also is proposed under the Community Grid Alternative; see below.) Based on conceptual studies to date, an estimated two to five buildings may need to be acquired to construct the missing connections of the I-81/I-690 interchange. Further refinements will be made to the alternatives during preparation of the Draft EIS with the intent of avoiding or minimizing property impacts. The number of potential acquisitions will be included in the Draft EIS.

The existing condition from northbound I-81 to eastbound I-690 includes a non-conforming weave section. This condition would be addressed during preliminary design. At this time the conceptual design for the Viaduct Alternative would relocate this ramp from northbound I-81 to the west side of northbound I-81, and it would be changed from a right-side ramp to a left-side ramp.

- **I-81 Interchange 19 (Clinton Street/Salina Street) and Interchange 20 (Franklin Street/West Street):** Interchanges 19 and 20 would be combined to accommodate the new connections between I-81 and I-690. This would involve replacing the existing off-ramps from southbound I-81 to West Street/Franklin Street (Interchange 20) and to Clinton Street/Salina Street (Interchange 19) with a single ramp that serves Clinton Street and Franklin Street. In addition, the existing on-ramps from Pearl Street (Interchange 19) and State Street (Interchange 20) would be reconfigured as a single ramp at Pearl Street, Willow Street, or a nearby street. (This modification also is proposed under the Community Grid Alternative; see below.)

- **Butternut Street Overpass:** The bridge carrying Butternut Street over I-81 would be re-aligned to connect to Clinton and Franklin Streets in the Franklin Square neighborhood, providing better access into this area. This overpass must be rebuilt as part of the reconstruction of the I-81/I-690 interchange, due to shifts in interstate and ramp locations. Re-alignment of the bridge would allow the missing connection carrying traffic from eastbound I-690 to northbound I-81 to be constructed beneath the Butternut
• **I-81 from Interchange 20 to Interchange 23:** Based on needs identified from initial traffic data, a new travel lane in each direction would be provided on I-81 from I-690 to Hiawatha Boulevard to improve operations. Several non-standard highway features, such as narrow shoulders and tight curves, also would be corrected. To accommodate this wider interstate and correct the non-standard and non-conforming features, Genant Drive would be closed from approximately Spencer Street to Bear Street. The Court Street interchange (Interchange 21) would be reconstructed, and possibly reconfigured, with longer entrance ramps and better merges. The Route 370 (Onondaga Lake Parkway) on-ramp and Old Liverpool Road on-ramp to southbound I-81 would be consolidated into a single ramp, and the on-ramp to southbound I-81 from Genant Drive (between Spencer and Butternut Streets) would be closed because of its proximity to Interchange 20. (This modification also is proposed under the Community Grid Alternative; see below.)

• **I-690 Interchange 11 (West Street):** To improve safety on I-690 and the West Street ramps, NYSDOT would remove the existing, free-flow Interchange 11 and replace it with a new interchange, controlled by a traffic signal on West Street. An option to maintain the existing ramp configuration and slightly raise the elevation of West Street was considered but dismissed from further consideration because bringing the existing interchange to current design standards would enlarge its footprint, potentially requiring acquisition of property. Additionally, the new interchange would simplify connections to and from the interstate from West Street, as well as the connection to Genesee Street. (This modification also is proposed under the Community Grid Alternative; see below.)

• **I-690 Interchange 13 (Townsend Street/Downtown Syracuse):** To allow for the reconstruction of the I-81/I-690 interchange, the westbound exit ramp from I-690, which is now on Townsend Street, would be relocated to Almond Street. The existing on-ramp to eastbound I-690 from McBride Street could be relocated to either Townsend Street or Almond Street. This ramp also would serve motorists who currently use the existing on-ramp from Harrison Street to access eastbound I-690, a movement that would not be possible once the ramp from northbound I-81 to eastbound I-690 became a left-side ramp.

The Viaduct Alternative includes three options with respect to the design of the I-81 and I-690 interchange. The options differ in their ability to meet design standards for horizontal stopping sight distance. As defined by FHWA, “stopping sight distance is the distance needed for drivers to see an object on the roadway ahead and bring their vehicles to a safe stop before colliding with the object.” “Horizontal stopping sight distance” refers to the distance that a motorist needs to see around horizontal curves at a given speed.
- **Option V-2, New Viaduct Fully Improved to Current Standards**, would involve the reconstruction of all highway elements to 60 MPH design standards;
- **Option V-3, New Viaduct with Substantial Design Improvements**, would involve the reconstruction of the I-81 viaduct to meet 60 MPH design standards except for seven curves that would meet 55 MPH design standards for the horizontal stopping sight distance; and
- **Option V-4, New Viaduct with Considerable Design Improvements**, would involve the reconstruction of I-81 viaduct to meet 60 MPH design standards except for five curves that would meet 50 MPH and two curves that would meet 55 MPH design standards for the horizontal stopping sight distance.

Based on the current level of engineering, it is anticipated that Option V-2 would correct all non-standard and most non-conforming highway features within the I-81 viaduct priority area (see Table 2-1). Option V-3 and Option V-4 would correct 148 features of the 155 identified non-standard features in the I-81 viaduct priority area to meet 60 MPH design standards for horizontal stopping sight distance. As noted above, under Option V-3 the remaining seven non-standard features, which are highway curves between East Genesee Street and Butternut Street, would be improved to meet 55 MPH design standards for horizontal sight stopping distance (see Figure 3-3); under Option V-4 two of these seven curves would meet the 55 MPH design standard, and five curves would meet the 50 MPH design standard, for horizontal stopping sight distance (see Figure 3-3). While the design standards would vary under each option (from 60 MPH to 55 or 50 MPH), the posted speed limit on the viaduct under each option would be the same (55 MPH). However, under Option V-4, warning signs to encourage motorists to reduce speed would be installed at the five 50 MPH curves.

In general, the sight distance restriction under Options V-3 and V-4 would apply to only the inside lane of the seven curves. Even though the highway may have two or more lanes in each direction, only the inside lane of the curve would have the non-standard horizontal stopping sight distance. Options V-3 and V-4 also would correct most non-conforming features within the I-81 viaduct priority area.

Any exceptions to design standards for highway improvement projects on the Interstate System funded with federal aid requires FHWA approval, and design exceptions must be justified following federal guidelines. Under federal and state guidelines, an interstate in an urban area should be designed for a speed limit between 45 and 65 MPH. The Viaduct Alternative would meet this standard. At this time, it is estimated that approximately 30 to 35 buildings would need to be acquired for the construction of Option V-2. The tighter curves under Options V-3 and V-4 would result in a reduced footprint for the new viaduct. Based on current design plans, Option V-3 would require approximately 25 percent fewer building acquisitions than Option V-2 to construct the highway, and Option V-4 would
Viaduct Alternative: Option V-3 (New Viaduct with Substantial Design Improvements) and Option V-4 (New Viaduct with Considerable Design Improvements) - Variations in Horizontal Stopping Sight Distance Design Speeds

NOTE: For Option V-2 (New Viaduct Fully Improved to Current Standards), the horizontal stopping sight distance design standard would be 60 mph for all curves.
require approximately 40 percent fewer building acquisitions than Option V-2 to construct the highway. The new viaduct, bridges, and highway would be wider than the existing viaduct to accommodate a median and shoulders in compliance with FHWA and NYSDOT standards. Structural elements would be replaced, thereby correcting the structural deficiencies within the I-81 viaduct priority area.

Almond Street would be reconstructed, and turn bays or traffic signal modifications could be implemented on Almond Street and cross streets to improve traffic flow. To accommodate the wider viaduct, Monroe Street, Madison Street, and Cedar Street would become dead-end streets and would no longer have access to Almond Street. However, access to Almond Street would be maintained at all of the other existing intersections.

Local street improvements would comprise pedestrian and bicycle safety and connectivity enhancements in the viaduct priority area, which would include:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
- Bollards and traffic islands to provide safe refuge for pedestrians; and
- “Bump-outs,” or extensions, of the sidewalk corners, to narrow roadway crossing distance for pedestrians.

In addition, NYSDOT would coordinate with Centro on potential street improvements (transit amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives. The specific local street improvements, aesthetic treatments, and context-sensitive design features will be further investigated while developing the Draft EIS.

Construction of the Viaduct Alternative would be anticipated to take four to six years. The estimated cost of the Viaduct Alternative options, which includes preliminary property acquisition costs, is $1.4 billion (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1 for further details).

3-2-3 COMMUNITY GRID ALTERNATIVE

The Community Grid Alternative (previously called the Street-level Alternatives and At-grade/Surface Alternative) was presented at the November 2013 Scoping Meeting, the May 2014 Project Update Presentation, and the June 2014 Scoping Meeting. The three Street-level Alternatives (SL-1, “Boulevard”; SL-2, “One-way Traffic on Almond Street and Other Local Street[s]”; and SL-3, “Two-way Traffic on Almond Street and Other Local Street[s]”) have been combined into one alternative, known as the Community Grid Alternative.
Analyses of whether to carry one-way or two-way traffic on local streets, or on a combination of both, will be undertaken during development of the Draft EIS.

The Community Grid Alternative has two options: Option CG-1 ("Boulevard") and Option CG-2 ("Almond Street and Other Local Street[s]"). Under Option CG-1, Almond Street would become a boulevard and the primary thoroughfare carrying traffic lanes. Option CG-2 would involve reducing the number of traffic lanes on Almond Street by making greater use of the local street network.

For purposes of the discussion that follows, the section of the existing I-81 between its southern interchange with I-481 (Exit 16A) and Monroe Street is referred to as the “former I-81 south segment.” The section of I-81 between Butternut Street and its northern interchange with I-481 (Exit 29) is referred to as the “former I-81 north segment.”

Both Community Grid Alternative options would remove the I-81 viaduct between Monroe Street and the I-81/I-690 interchange and replace it with a street-level urban arterial. The former I-81 south segment (between the existing southern I-481 interchange [Exit 16A] and Monroe Street) would be re-classified as a non-interstate urban arterial.

Under both Community Grid Alternative options, a new route would be designated I-81 and would carry a minimum of four lanes of through traffic. In addition to the option of re-designating existing I-481 as the new I-81, previously identified as part of the Street-level Alternatives, NYSDOT will consider a new sub-option based on public input received. Under this option, I-481 from its northern to southern terminus would be re-designated as I-81, and a section of I-690 (between approximately I-81 and I-481) and the former I-81 north segment would be re-designated as I-481.

More detailed engineering and traffic analyses will be undertaken to support the potential de-designation and access modification of the affected Interstates. Interstate re-designation and associated numbering must meet American Association of State Highway Transportation Officials (AASHTO) protocols and receive approval from FHWA.

The change in highway designation and associated changes in traffic volumes would require some modifications to the new I-81. These modifications, shown in Figures 3-4 and 3-5, are based on preliminary traffic analyses and would include:

**I-481 DESIGNATED AS I-81:**

- **I-81/I-481 South Interchange (Interchange 16A):** The existing ramps that connect northbound I-81 to northbound I-481 and southbound I-481 to southbound I-81 would be reconstructed to be two lanes each and to meet 70 MPH design standards. The East Brighton Avenue bridge over the interchange would be reconstructed. The intersection of East Brighton Avenue and Rock Cut Road would be maintained but may be reconfigured or shifted slightly.
Reconstruct interchange to direct I-81 traffic to I-481

Highway with Interstate or NYS Route number

Surface street

Highway with NYS Route number

Reconstruct interchange to direct I-81 traffic to I-481

Make improvements to re-routed I-81, as needed

Add new I-81 signage and renumber interchanges as needed

Community Grid Alternative - Improvements to Designate I-481 as I-81

Figure 3-4

I-81 Viaduct Project • Scoping Report
Reconstruct interchange to direct I-81 traffic to I-481

Add new I-81 signage and renumber interchanges as needed

Make improvements to I-481, as needed

Modify interchange to direct I-481 traffic

Reconstruct interchange to direct I-81 traffic to I-481

Surface street

Highway with NYS Route number

I-81 Viaduct Project • Scoping Report

Figure 3-5

Community Grid Alternative - Improvements to Designate I-690 as I-481
A third southbound auxiliary lane would be provided between Kirkville Road (Interchange 5 southbound on-ramp) and I-690 (Interchange 4 southbound off-ramp).

A third northbound auxiliary lane would be provided between I-690 (Interchange 4 northbound on-ramp) and Kirkville Road (Interchange 5 northbound off-ramp).

A third northbound auxiliary lane would be added between Kirkville Road and I-90 (Interchange 5 northbound on-ramp) and I-90 (Interchange 6 northbound off-ramp).

A third northbound auxiliary lane would be added between Northern Boulevard (Interchange 8 northbound on-ramp) and Interchange 9 (I-81/I-481 North Interchange).

I-81/I-481 North Interchange (Interchange 29): The existing ramps that connect northbound I-481 to northbound I-81 and southbound I-81 to southbound I-481 would be reconstructed as two-lane ramps with a 70 MPH design speed.

The section of the existing I-81 north of Butternut Street would be retained as a freeway, but it would be assigned a new interstate designation (e.g., I-581) or would be designated as a New York State Route.

I-481 signage would be replaced with I-81 signage, and interchanges may be renumbered to correspond to the sequencing of I-81 interchanges south and north of Syracuse.

Other improvements to I-481 will be considered as needed based on the detailed analyses in the Draft EIS.

I-690 DESIGNATED AS I-481 SUB-OPTION:

The existing connections between westbound I-690 and northbound I-81 and between southbound I-81 and eastbound I-690 would be reconstructed to be two lanes each and to meet 60 MPH design standards. Currently, these two movements are each accommodated with one lane with a minimum 40 MPH design standard. The need for this additional lane and the higher interstate speeds may necessitate property acquisitions, which will be investigated during development of the Draft EIS.

I-81/I-481 South Interchange (Interchange 16A): The existing ramps that connect northbound I-81 to northbound I-481 and southbound I-481 to southbound I-81 would be reconstructed to be two lanes each and to meet 70 MPH design standards. The East Brighton Avenue bridge over the interchange would be reconstructed. The intersection of East Brighton Avenue and Rock Cut Road would be maintained but may be reconfigured or shifted slightly.

Some or all of the capacity improvements (i.e., the addition of auxiliary lanes) on I-481 would be required for this option.

I-81/I-481 North Interchange (Interchange 29): The existing ramps that connect northbound I-481 to northbound I-81 and southbound I-81 to southbound I-481 would be reconstructed as two-lane ramps with a 70 MPH design speed.
I-481 signage would be replaced with I-81 signage, I-690 signage would be replaced with I-481 signage, and interchanges may be renumbered to correspond to the sequencing of I-81 interchanges south and north of Syracuse.

**INTERCHANGE MODIFICATIONS UNDER THE COMMUNITY GRID ALTERNATIVE**

Like the Viaduct Alternative, the Community Grid Alternative would improve interchanges on the former I-81 south segment, the former I-81 north segment, and I-690. At this time, the following interchange modifications are proposed.

- **New interchange at MLK East:** To improve access to Southside and University Hill from the south, a new partial interchange, with a northbound exit ramp and a southbound entrance ramp, could be constructed at MLK East. Burt Street also was explored as a potential location for this new interchange but was eliminated from further consideration because Burt Street does not connect to Renwick Avenue, which provides direct access to University Hill. Initial traffic modeling results also showed higher usage of MLK East over Burt Street. (This modification also is proposed under the Viaduct Alternative.)

- **I-81/I-690 Interchange:** To complete the missing connections between I-81 and I-690, new ramps would be built to provide direct connections between eastbound I-690 and northbound I-81 and between southbound I-81 and westbound I-690. These new direct connections would facilitate interstate-to-interstate movement without unnecessary use of the local street system. (This modification also is proposed under the Viaduct Alternative.) Based on conceptual studies to date, an estimated two to five buildings may need to be acquired to construct the missing connections of the I-81/I-690 interchange. Further refinements will be made to the alternatives during preparation of the Draft EIS with the intent of avoiding or minimizing property impacts. The number of potential acquisitions will be included in the Draft EIS.

- **I-81 Interchange 19 (Clinton Street/Salina Street) and Interchange 20 (Franklin Street/West Street):** Interchanges 19 and 20 would be combined to accommodate the new connections between I-81 and I-690. This would involve replacing the existing exit ramps from southbound I-81 to West Street/Franklin Street (Interchange 20) and to Clinton Street/Salina Street (Interchange 19) with a single ramp that serves Clinton Street and Franklin Street. In addition, the existing on-ramps from Pearl Street (Interchange 19) and State Street (Interchange 20) would be reconfigured as a single ramp at Pearl Street, Willow Street, or a nearby street. (This modification also is proposed under the Viaduct Alternative.)

- **Butternut Street Overpass:** The bridge carrying Butternut Street over I-81 would be re-aligned to connect to Clinton and Franklin Streets in the Franklin Square neighborhood, providing better access into this area. This overpass must be rebuilt as part of the reconstruction of the I-81/I-690 interchange, due to shifts in interstate and ramp locations. Re-alignment of the bridge would allow the missing connection carrying traffic...
from eastbound I-690 to northbound I-81 to be constructed beneath the Butternut Street overpass. (This modification also is proposed under the Viaduct Alternative.)

- **I-81 from Interchange 20 to Interchange 23:** Based on initial traffic data, a new travel lane in each direction would be needed on I-81 from I-690 to Hiawatha Boulevard. Several non-standard highway features, such as narrow shoulders and tight curves, also would be corrected. To accommodate this wider interstate and correct the non-standard and non-conforming features, Genant Drive would be closed from approximately Butternut Street to Bear Street. The Court Street interchange (Interchange 21) would be reconstructed, and possibly reconfigured, with longer entrance ramps and better merges. The Route 370 (Onondaga Lake Parkway) on-ramp and Old Liverpool Road on-ramp to southbound I-81 would be consolidated into a single ramp, and the on-ramp to southbound I-81 from Genant Drive (between Spencer and Butternut Streets) would be closed because of its proximity to Interchange 20. (This modification also is proposed under the Viaduct Alternative.)

- **I-690 Interchange 11 (West Street):** To improve safety on I-690 and the West Street ramps, NYSDOT would remove the existing, free-flow Interchange 11 and replace it with a new interchange, controlled by a traffic signal on West Street. An option to maintain the existing ramp configuration and slightly raise the elevation of West Street was considered but dismissed from further consideration to avoid the required acquisition of property. (This modification also is proposed under the Viaduct Alternative.)

At this time, it is estimated that approximately 5 to 10 buildings would be acquired under the Community Grid Alternative.

Construction duration for the Community Grid Alternative would be an estimated four to six years, including work on the new route (i.e., I-481) to carry I-81. The estimated cost of the Community Grid Alternative, which includes preliminary property acquisition costs, is $1.0 billion (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1 for further details).

**OPTION CG-1: BOULEVARD**

Option CG-1 (Boulevard) would involve demolition and replacement of the existing viaduct with a two-way street that would carry traffic between Monroe Street and the I-81/I-690 interchange (see Figure 3-6). Between MLK East and Monroe Street, the former I-81 south segment would transition from the highway bridge over the New York Susquehanna and Western Railroad to street level. North of Monroe Street, a boulevard would be constructed within the existing I-81 and Almond Street right-of-way. Based on the initial traffic studies, the boulevard would consist of three northbound traffic lanes (11-12 feet each), three southbound traffic lanes (11-12 feet each), turning lanes at intersections (where required), bicycle path(s), widened sidewalks, and a landscaped median and could include curbside parking lanes (see Figure 3-7).
Investigating two options to connect the elevated I-81/I-690 interchange to the surface roadway:

**Option 1:** The Boulevard would extend from Monroe Street to One Boulevard. The Boulevard would connect to the elevated I-690 via a new interchange, called a single-point urban interchange. The new interchange would have only one signalized intersection, as opposed to the traditional two signals.

**Option 2:** The Boulevard would extend from Monroe Street to Willow Street. In this case, vehicles would pick up speed, heading northbound, as the road gradually transitions from a Boulevard to an interstate at Butternut Street.

Almond Street would end at Taylor Street under the bridge over railroad (no connection from Taylor Street to Adams Street).

Existing I-81 south of I-690 would be designated as a new NYS route.

New connections at MLK/East.

Existing I-81 north of I-690 could be designated as a "spur" or branch of I-81 (e.g., I-381 or I-581).

No access from Jackson Street to Almond Street, with no connection to the Boulevard (motorists would need to detour to Taylor Street).

Existing West Street/Franklin Street and Clinton Access to Franklin Street still provided.

Potential new overpass to carry Erie Boulevard over Almond Street.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

Existing I-81 south of I-690 could be re-designated as a "spur," or branch, of I-81 (e.g., I-381 or I-581).

No through traffic on Holida,
St. John's Park Ave., and Water Street. Motorists would need to detour to Townsend Street.

Existing on-ramps from Pearl and State Street would be replaced with a single on-ramp at Pearl, Willow, or nearby street.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

No access from Jackson Street to Almond Street, with no connection to the Boulevard (motorists would need to detour to Taylor Street).

Ongoing traffic on Holida,
St. John's Park Ave., and Water Street. Motorists would need to detour to Townsend Street.

Existing West Street/Franklin Street and Clinton Access to Franklin Street still provided.

existing interchange at Pearl Street.

existing interchange at State Street.

Investigating two options to connect the elevated I-81/I-690 interchange to the surface roadway.

**Option 1:** The Boulevard would extend from Monroe Street to One Boulevard. The Boulevard would connect to the elevated I-690 via a new interchange, called a single-point urban interchange. The new interchange would have only one signalized intersection, as opposed to the traditional two signals.

**Option 2:** The Boulevard would extend from Monroe Street to Willow Street. In this case, vehicles would pick up speed, heading northbound, as the road gradually transitions from a Boulevard to an interstate at Butternut Street.

Almond Street would be reconstructed as a Boulevard with bicycle and pedestrian enhancements.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

New connections at MLK East.

Existing I-81 south of I-690 would be designated as a new NYS route.

New connections at MLK East.

Existing I-81 north of I-690 could be designated as a "spur," or branch, of I-81 (e.g., I-381 or I-581).

No access from Jackson Street to Almond Street, with no connection to the Boulevard (motorists would need to detour to Taylor Street).

Ongoing traffic on Holida,
St. John's Park Ave., and Water Street. Motorists would need to detour to Townsend Street.

Existing on-ramps from Pearl and State Street would be replaced with a single on-ramp at Pearl, Willow, or nearby street.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

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**Option 2:** The Boulevard would extend from Monroe Street to Willow Street. In this case, vehicles would pick up speed, heading northbound, as the road gradually transitions from a Boulevard to an interstate at Butternut Street.

Almond Street would be reconstructed as a Boulevard with bicycle and pedestrian enhancements.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

New connections at MLK East.

Existing I-81 south of I-690 would be designated as a new NYS route.

New connections at MLK East.

Existing I-81 north of I-690 could be designated as a "spur," or branch, of I-81 (e.g., I-381 or I-581).

No access from Jackson Street to Almond Street, with no connection to the Boulevard (motorists would need to detour to Taylor Street).

Ongoing traffic on Holida,
St. John's Park Ave., and Water Street. Motorists would need to detour to Townsend Street.

Existing on-ramps from Pearl and State Street would be replaced with a single on-ramp at Pearl, Willow, or nearby street.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

No access from Jackson Street to Almond Street, with no connection to the Boulevard (motorists would need to detour to Taylor Street).

Investigating two options to connect the elevated I-81/I-690 interchange to the surface roadway.

**Option 1:** The Boulevard would extend from Monroe Street to One Boulevard. The Boulevard would connect to the elevated I-690 via a new interchange, called a single-point urban interchange. The new interchange would have only one signalized intersection, as opposed to the traditional two signals.

**Option 2:** The Boulevard would extend from Monroe Street to Willow Street. In this case, vehicles would pick up speed, heading northbound, as the road gradually transitions from a Boulevard to an interstate at Butternut Street.

Almond Street would be reconstructed as a Boulevard with bicycle and pedestrian enhancements.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

New connections at MLK East.

Existing I-81 south of I-690 would be designated as a new NYS route.

New connections at MLK East.

Existing I-81 north of I-690 could be designated as a "spur," or branch, of I-81 (e.g., I-381 or I-581).

No access from Jackson Street to Almond Street, with no connection to the Boulevard (motorists would need to detour to Taylor Street).

Ongoing traffic on Holida,
St. John's Park Ave., and Water Street. Motorists would need to detour to Townsend Street.

Existing on-ramps from Pearl and State Street would be replaced with a single on-ramp at Pearl, Willow, or nearby street.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

No access from Jackson Street to Almond Street, with no connection to the Boulevard (motorists would need to detour to Taylor Street).

Investigating two options to connect the elevated I-81/I-690 interchange to the surface roadway.

**Option 1:** The Boulevard would extend from Monroe Street to One Boulevard. The Boulevard would connect to the elevated I-690 via a new interchange, called a single-point urban interchange. The new interchange would have only one signalized intersection, as opposed to the traditional two signals.

**Option 2:** The Boulevard would extend from Monroe Street to Willow Street. In this case, vehicles would pick up speed, heading northbound, as the road gradually transitions from a Boulevard to an interstate at Butternut Street.

Almond Street would be reconstructed as a Boulevard with bicycle and pedestrian enhancements.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

New connections at MLK East.

Existing I-81 south of I-690 would be designated as a new NYS route.

New connections at MLK East.

Existing I-81 north of I-690 could be designated as a "spur," or branch, of I-81 (e.g., I-381 or I-581).

No access from Jackson Street to Almond Street, with no connection to the Boulevard (motorists would need to detour to Taylor Street).

Ongoing traffic on Holida,
St. John's Park Ave., and Water Street. Motorists would need to detour to Townsend Street.

Existing on-ramps from Pearl and State Street would be replaced with a single on-ramp at Pearl, Willow, or nearby street.

New interchange posted speed limit would be 55 mph (currently posted at 45 mph).

No access from Jackson Street to Almond Street, with no connection to the Boulevard (motorists would need to detour to Taylor Street).
Community Grid Alternative
(Option CG-1, Boulevard) - View and Section

Figure 3-7

Typical Section
North of Washington Street, the boulevard would transition to a highway section. Two sub-options are under consideration for this segment of Option CG-1. The connection made from the boulevard to I-690 would replace the current Interchange 13.

- **Sub-option 1—Single Point Urban Interchange:** Under this option, the boulevard would end at or near Erie Boulevard and would connect to the elevated I-690 and the former I-81 via a new interchange, called a Single Point Urban Interchange. This type of highway interchange design has the ability to accommodate large volumes of traffic in limited space. To maintain adequate traffic flow within the interchange, it would not be possible to allow traffic to continue north of I-690 onto Catherine Street. However, access between Catherine Street and the I-690 and the I-81 former north segment would be provided.

- **Sub-option 2—Highway Ramp:** This sub-option would provide a ramp that would lead upward from McBride Street and ascend to the former I-81 north segment near Townsend Street. Ramp connections to I-690 also would be provided.

Option CG-1 would be designed to meet FHWA, NYSDOT, and local design standards for an urban arterial roadway. Any highway segments and interchanges that need to be reconstructed would meet FHWA and NYSDOT highway design standards. Thus all or most of the existing non-standard and non-conforming design features as well as structural deficiencies within the I-81 viaduct priority area would be addressed.

The boulevard would replace the existing Almond Street, providing access to existing intersections with the following four exceptions.

- **Jackson Street:** To avoid a steep grade between the elevated section and the street level, it would be necessary to close Jackson Street where it crosses Almond Street.

- **Erie Boulevard:** Based on an initial traffic analysis, it may not be possible to provide an intersection between Erie Boulevard and the new boulevard. One possible solution would be to construct a new overpass to carry Erie Boulevard. The new overpass would maintain east-west traffic flow on Erie Boulevard and would provide enough unimpeded queuing space on the new boulevard to prevent traffic from backing up onto I-690.

- **Water Street:** A median barrier would prevent east-west traffic along Water Street from crossing the new boulevard, but vehicles could make a right turn onto or off Water Street.

- **McBride Street** would be closed from Water Street to Burnet Avenue.

Parking lots beneath the viaduct may be removed under Option CG-1, but the new boulevard may include on-street parking; parking data will be collected and potential impacts to parking, both temporary (during construction) and permanent (with implementation of the project), will be assessed, and potential mitigation will be presented in the Draft EIS. The new boulevard would also include left- and right-turn lanes at certain
intersections. All of these elements would be accommodated within the Almond Street right-
of-way.

Option CG-1 would include bicycle and pedestrian facilities to improve connectivity between existing local, regional, and state multi-use paths within the project limits. At Water Street, it may be possible to provide a new bicycle and pedestrian bridge over the boulevard. New intersections along the boulevard would incorporate measures to enhance bicycle and pedestrian safety such as:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
- Bollards and traffic islands to provide safe refuge for pedestrians; and
- “Bump-outs,” or extensions, of the sidewalk corners, to narrow roadway crossing distance for pedestrians.

NYSDOT also would coordinate with Centro on potential street improvements (transit amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives. Local street improvements, context-sensitive design features, and aesthetic treatments will be examined during development of the Draft EIS.

**OPTION CG-2: ALMOND STREET AND OTHER LOCAL STREET(S)**

As with Option CG-1 (Boulevard), Option CG-2 (Almond Street and Other Local Street[s]) would involve demolition of the viaduct section of I-81, and a new surface street would be constructed along the Almond Street corridor to provide access to local destinations and the remaining interstate system (see Figure 3-8). The new Almond Street would include accommodations for pedestrians and bicycles and would be entirely constructed within the Almond Street right-of-way. An additional local street (e.g., Townsend Street, State Street, Salina Street, Clinton Street, West Street, University Avenue, Crouse Avenue, or Irving Avenue) or a combination of streets also would be used to carry traffic (see Figure 3-9). Like Almond Street, these streets would be located within the public right-of-way and may include accommodations for pedestrians and bicycles.

Option CG-2 would disperse traffic throughout the city grid by making use of one or more local streets in addition to Almond Street. NYSDOT will consider the potential impacts on both north-south and east-west movements. Shifting traffic to these other streets would allow a reduction in the number of lanes on Almond Street. Traffic analysis will be undertaken during development of the Draft EIS to determine the potential effects of Option CG-2 on local and interstate traffic operations and the operation and configuration of the individual streets, for example, if they would function as one- or two-way streets and the number of through and turning lanes (if required) needed.
Connections from the elevated I-81/I-690 interchange to the surface roadway would be achieved with traditional on-ramps. Connections between Burnet Ave. and Water St.; motorists would need to detour to Townsend St.

End Almond St. at Taylor St. under the bridge over railroad (no connection from Taylor St. to Adams St.).

Traffic would be dispersed onto Almond St. and/or other local streets (initial streets to be considered for operational improvements shown in yellow).

Potential new overpass to carry Erie Blvd. over Almond St.

New connection at MLK East

New connecting ramp from southbound I-81 to northbound I-690

Existing I-81 South of I-690 would be designated as a new NYS route

New interchange posted speed limit would be 55 mph (currently posted at 45 mph)

New connecting ramp from northbound I-81 to southbound I-690

Potential new ramp to ramp

Potential new ramp connection to ramp

New connecting ramp from eastbound I-690 to northbound I-81

Potential new ramp connection to ramp

New connecting ramp from southbound I-81 to westbound I-690

Existing I-81 north of I-690 could be re-designated as a “spur,” or branch, of I-81 (e.g., I-381 or I-581)

Existing West St./Franklin St. and Clinton St./Salina St. would be replaced with a single on-ramp of Pearl, Willow, or nearby street

No through traffic on MLK Blvd.

betweener Avenue, Pelton Street, and Monroe St.

Connections from the elevated I-81/I-690 interchange to the surface roadway would be achieved with traditional on-ramps.

Roadway remains on a bridge over railroad, then descends to surface near Monroe St.

Jackson St. would become a dead-end street at Almond St., with no connection to the Boulevard; motorists would need to detour to Taylor St.

Community Grid Alternative 
(Option CG-2, Almond Street and Other Local Street(s)) - Overview

Figure 3-8

Existing I-81 South of I-690 could be designated as a new NYS route

New connecting ramp from southbound I-81 to westbound I-690

Existing West St./Franklin St. and Clinton St./Salina St. would be replaced with a single on-ramp of Pearl, Willow, or nearby street

No through traffic on MLK Blvd.

betweener Avenue, Pelton Street, and Monroe St.

Connections from the elevated I-81/I-690 interchange to the surface roadway would be achieved with traditional on-ramps.

Roadway remains on a bridge over railroad, then descends to surface near Monroe St.

Jackson St. would become a dead-end street at Almond St., with no connection to the Boulevard; motorists would need to detour to Taylor St.
Community Grid Alternative
(Option CG-2, Almond Street and Other Local Street(s)) -
Potential Streets to Combine with Almond Street

Figure 3-9
Streets incorporated into Option CG-2 would be designed to meet FHWA, NYSDOT, and local design standards for an urban arterial roadway. Highway segments and interchanges that are reconstructed would meet FHWA and NYSDOT highway design standards, and thus, it is anticipated that all nonstandard features and most nonconforming features of the existing highway within the I-81 viaduct priority area would be addressed. By removing the viaduct and reconstructing or rehabilitating remaining highway segments within the I-81 viaduct priority area, Option CG-2 also would eliminate the existing structural deficiencies identified in Section 2-2.

Almond Street would be reconstructed with access to existing east-west streets except for Jackson Street, which would be closed to traffic crossing Almond Street. Additional street closures, similar to those in Option CG-1, may be necessary and will be studied in the EIS. Existing parking lots beneath the viaduct may be removed under Option CG-2, but the reconstructed Almond Street may include on-street parking. The new street also would include left- and right-turn lanes at certain intersections. All of these elements would be accommodated within the existing Almond Street right-of-way. Similar provisions also would be provided on the additional street(s) (e.g., Townsend Street, State Street, Salina Street, Clinton Street, West Street, University Avenue, Crouse Avenue, Irving Avenue).

Option CG-2 would include bicycle and pedestrian facilities to improve connectivity between existing local, regional, and state multi-use paths within the project limits. Intersections along the reconstructed Almond Street and parallel southbound street(s) (e.g., Townsend Street, State Street, Salina Street, Clinton Street, West Street, or University Avenue) would incorporate measures to enhance bicycle and pedestrian safety such as:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
- Bollards and traffic islands to provide safe refuge for pedestrians; and
- “Bump-outs,” or extensions, of the sidewalk corners to narrow roadway crossing distance for pedestrians.

NYSDOT would also coordinate with Centro on potential street improvements (transit amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives. These local street improvements, context-sensitive design features, and aesthetic treatments will be examined during development of the Draft EIS.

3-2-4 TUNNEL ALTERNATIVE(S) TO BE DEVELOPED AND EVALUATED

NYSDOT developed four potential tunnel alternatives (Alternatives T-1, T-2, T-3, and T-4, described in Section 3-4-4), which failed the alternatives screening and have been dismissed from further consideration as described in Section 3-5. However, during the June 20, 2014
to September 2, 2014 scoping comment period, the public presented new tunnel concepts (e.g., Access Syracuse Plan [see Section 6, Comment 3-121]; 81’ Below Syracuse rev1 [see Section 6, Comment 3-160]) and expressed interest in further tunnel development. In response, NYSDOT will conduct additional engineering and further analysis to determine if there is a tunnel alternative that addresses the project’s needs and meets the project purpose and objectives, as well as the established screening criteria.

As with the Viaduct and Community Grid Alternatives, for a new tunnel alternative to be considered reasonable and advance for further study in the Draft EIS, it must address the project’s purpose and objectives and meet the following criteria, as explained in Section 3-5: property needs, constructability, and cost. For example, the new tunnel alternative must maintain reasonable access and connectivity to local streets.

The analysis for the new tunnel alternative will assess the following:

- The need for and location of ancillary facilities, which could include ventilation buildings, maintenance structures, control rooms, access shafts, and cross passages;
- The need for and location of a water control system necessitated by the high water table in the Downtown area;
- The treatment and disposal of saline groundwater;
- The need for ground treatments such as installation of an excavation support system (e.g., underpinning of buildings and of the existing viaduct) to reduce ground deformation, provide water tightness, and protect buildings adjacent to the tunnel from ground movements;
- The need for protection and relocation of existing utilities; and
- The need for temporary decking over areas of excavation to restore pedestrian, bicycle, and vehicular traffic.

It is anticipated that any tunnel alternative that is developed for further evaluation would correct all or most of the nonstandard and most nonconforming highway features within the I-81 viaduct priority area. The alternative would meet 60 MPH design standards, and the posted speed limit would be 55 MPH. The alternative also would include interchange modifications to provide the missing connections between I-81 and I-690 and to improve traffic circulation and safety on the highway segments that remain within the I-81 viaduct priority area.

Like tunnel alternatives that were previously considered, any new tunnel alternative(s) would potentially include surface street improvements, pedestrian and bicycle improvements, and context-sensitive design treatments. Measures to enhance bicycle and pedestrian safety could include, where possible:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
• Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
• Bollards and traffic islands to provide safe refuge for pedestrians; and
• “Bump-outs,” or extensions, of the sidewalk corners to narrow roadway crossing distance for pedestrians.

NYSDOT would also coordinate with Centro on potential street improvements (transit amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives. These local street improvements, context-sensitive design features, and aesthetic treatments would be examined further if FHWA and NYSDOT are able to develop a tunnel alternative that addresses the project’s needs and meets the project purpose and objectives, as well as the established screening criteria.

3-3 DEVELOPMENT AND EVALUATION OF ALTERNATIVES

As described in the Draft Scoping Report, NYSDOT is using a multiple-phase approach to alternative development and screening for the I-81 Viaduct Project. The initial steps in this approach facilitate development of the broader concepts for alternatives in the scoping phase of the EIS process and an evaluation to determine if these alternatives are reasonable. Reasonable alternatives are generally understood to mean technically feasible and economically practical alternatives that would satisfy the project’s purpose and objectives and address the stated needs.

The steps are:

• **Step 1—Development of Alternatives:** Building on the previous I-81 corridor planning study and the potential alternatives presented to the public at the Scoping Meeting in November 2013, NYSDOT identified a preliminary list of potential alternatives to be developed to a conceptual level and screened. These alternatives are presented in Section 3-3, Overview of the Alternatives, of the Draft Scoping Report and in Section 3-4 of this Scoping Report.

• **Step 2—Screening of the Alternatives:** The preliminary list of potential alternatives developed in Step 1 was screened based on available information. An alternative is advanced for further consideration based on its potential to meet four categories. The four broad categories are:
  - Consistency with the project’s *purpose and objectives, and stated needs*;
  - *Property* needs as defined by the number of buildings or acres of land that may need to be acquired;
  - *Constructability* considerations including difficulty and duration of construction and the ability to maintain adequate traffic flow during construction;
  - The estimated construction *cost*.
An alternative is considered reasonable if it satisfies all four categories under consideration (purpose, objectives, and stated needs; property; constructability; and cost). Alternatives that satisfy the four categories are being advanced for further consideration and will be presented in the Draft EIS. If an alternative is unlikely to meet one or more of the categories, it will be dismissed from further consideration. The screening of the alternatives was presented in the Draft Scoping Report, and NYSDOT and FHWA provided opportunities for agencies and the public to review and comment on the screening during the scoping comment period. The comments that were received are provided in Section 6 of this Scoping Report.

Following the scoping comment period, NYSDOT and FHWA considered the public and agency input on the potential alternatives that had been considered to date, the screening of the alternatives, and all other comments received. NYSDOT and FHWA identified the need to simplify the presentation of the Viaduct and Street-level Alternatives and to conduct additional engineering and further analysis to determine if there is a tunnel alternative that addresses the project need and meets the project purpose and objectives (see Section 3-2-4). NYSDOT and FHWA also identified the need to modify the project objectives; the potential alternatives were then reviewed in light of the modified objectives.

- **Step 3—Refinement of the Alternatives Advanced in the Draft EIS:** The alternatives will be further developed as necessary to allow for evaluation in the Draft EIS. Alternatives being considered, the potential social, economic, and environmental impacts resulting from implementation of the alternatives, and measures to avoid, minimize, or otherwise mitigate adverse impacts will be presented in the Draft EIS. Agency and stakeholder meetings will continue to be held during preparation of the Draft EIS, and refinements to the alternatives, as well as the evaluation of the alternatives, potential impacts, and potential mitigation measures, will be presented and discussed at these meetings.

- **Step 4—Evaluation of the Alternatives:** The evaluation of alternatives during development of the Draft EIS will focus on the relative benefits and adverse impacts of each alternative. The analyses conducted during the development of the Draft EIS will consider the social, economic, and environmental impacts that may be realized from the implementation of each alternative, as well as measures to avoid, minimize, or otherwise mitigate adverse impacts. Agencies and the public will be provided opportunities to review and comment on the analyses and conclusions presented in the Draft EIS.

- **Step 5—Identification of a Preferred Alternative:** A Preferred Alternative, the alternative that is recommended for construction, will be identified in the Final Environmental Impact Statement (Final EIS). In identifying the Preferred Alternative, NYSDOT and FHWA will consider the social, economic, and environmental benefits, adverse impacts, and mitigation measures, the engineering considerations, and costs identified in the Draft EIS as well as public input received on the information presented in the Draft EIS.
3-4 ALTERNATIVES THAT WERE PROPOSED FOR THE I-81 VIADUCT PROJECT

Initial alternative concepts were presented in the *Initial Scoping Packet*, at the Scoping Meeting held in November 2013, at the Project Update Presentation in May 2014, and at the Scoping Meeting in June 2014. Referring to the established project objectives, the alternative concepts were developed to address the identified deficiencies of the I-81 infrastructure within the established project area in addition to addressing the identified pedestrian and bicycle needs while maintaining and/or improving accessibility to and from the interstate system. NYSDOT and FHWA presented the following concepts.

3-4-1 NO BUILD ALTERNATIVE

The No Build Alternative is described in Section 3-2-1 of this Scoping Report.

3-4-2 VIADUCT ALTERNATIVES

The Viaduct Alternatives presented in the *Draft Scoping Report* were based on the Above Grade Alternative presented at the November 2013 Scoping Meeting. The viaduct alternatives would rehabilitate or reconstruct the I-81 viaduct on its current alignment or a geometrically improved alignment near its existing location, and implement other improvements within the project limits. The typical height and width of the viaduct are provided for each viaduct alternative. For comparative purposes, the typical section of the existing viaduct has two travel lanes in each direction (northbound and southbound) with two- to three-foot inside and outside shoulders. The viaduct is about 66 feet wide and 20 feet tall. The viaduct is wider as it approaches I-690. Including Almond Street, the existing highway and street right-of-way ("Almond Street right-of-way") is about 198 feet wide.

Under the viaduct alternatives, improvements to bicycle and pedestrian facilities and aesthetic treatments would be explored. Local street improvements would comprise pedestrian and bicycle safety and connectivity enhancements in the viaduct priority area, which would include:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
- Bollards and traffic islands to provide safe refuge for pedestrians; and
- “Bump-outs,” or extensions, of the sidewalk corners, to narrow roadway crossing distance for pedestrians.

In addition, NYSDOT would coordinate with Centro on potential street improvements (transit amenities such bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives. The specific
local street improvements, aesthetic treatments, and context-sensitive design features will be further investigated while developing the Draft EIS.

Five viaduct alternatives, described below, were considered.

ALTERNATIVE V-1: REHABILITATION

Alternative V-1 (Rehabilitation) would involve a long-term program to address the deterioration of I-81. This program would be implemented over a multi-year period as funding permits. The dimensions of the viaduct and operation of Almond Street would be the same as today with the exception of a wider ramp at Harrison Street. Thus, Alternative V-1 would not change the Almond Street right-of-way, and the viaduct would continue to be about 66 feet wide and 20 feet tall.

Alternative V-1 would reconfigure ramps to improve the existing connections between I-81 and I-690, but it would not provide a full directional interchange (i.e., no access between southbound I-81 and westbound I-690 or between eastbound I-690 and northbound I-81). It also would not address the insufficient distance between ramps north of the I-690 interchange. South of the I-690 interchange, Exit 18 (Harrison Street/Adams Street) would be modified with the addition of a southbound exit lane and a new left-turn lane from East Adams Street to the southbound I-81 on-ramp.

The rehabilitation of I-81 and I-690 in the I-81 viaduct priority area would address the existing structural deficiencies and may correct some nonstandard and nonconforming highway features. NYSDOT would not seek additional right-of-way for Alternative V-1, and therefore, it would not be possible to correct many of the 102 nonstandard and nonconforming features identified in Section 2-2 of this Scoping Report.

In Alternative V-1, a total of 42 bridges would be repaired or replaced. Alternative V-1 should correct the structural deficiencies on the I-81 viaduct and I-690 segments. Alternative V-1 would eliminate some nonstandard and nonconforming features, but many would remain. Remaining nonstandard and nonconforming features would include narrow shoulders, insufficient distance between on- and off-ramps, and sharp curves.

At this time, it is anticipated that Alternative V-1 would not require acquisition of any buildings. The estimated construction duration of Alternative V-1 would be from two to four years, and the estimated cost, which includes preliminary property acquisition costs, would be $800 million (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1 for further details).

ALTERNATIVE V-2: NEW VIADUCT FULLY IMPROVED TO CURRENT STANDARDS

Subsequent to the publication of the Draft Scoping Report, the three Viaduct Alternatives (Alternatives V-2, New Viaduct Fully Improved to Current Standards; V-3, New Viaduct with Substantial Design Improvements; and V-4, New Viaduct with Considerable Design Improvements), given their similarities, have been combined into a single alternative (the
“Viaduct Alternative”) with options for the design of seven curves within the I-81 and I-690 interchange. The Viaduct Alternative, including Option V-2, is depicted in Figure 3-1 and described in Section 3-2-2 of this Scoping Report.

ALTERNATIVE V-3: NEW VIADUCT WITH SUBSTANTIAL DESIGN IMPROVEMENTS

Subsequent to the publication of the Draft Scoping Report, the three Viaduct Alternatives (Alternatives V-2, New Viaduct Fully Improved to Current Standards; V-3, New Viaduct with Substantial Design Improvements; and V-4, New Viaduct with Considerable Design Improvements), given their similarities, have been combined into a single alternative (the “Viaduct Alternative”) with options for the design of seven curves within the I-81 and I-690 interchange. The Viaduct Alternative, including Option V-3, is depicted in Figure 3-3 and described in Section 3-2-2 of this Scoping Report.

ALTERNATIVE V-4: NEW VIADUCT WITH CONSIDERABLE DESIGN IMPROVEMENTS

Subsequent to the publication of the Draft Scoping Report, the three Viaduct Alternatives (Alternatives V-2, New Viaduct Fully Improved to Current Standards; V-3, New Viaduct with Substantial Design Improvements; and V-4, New Viaduct with Considerable Design Improvements), given their similarities, have been combined into a single alternative (the “Viaduct Alternative”) with options for the design of seven curves within the I-81 and I-690 interchange. The Viaduct Alternative, including Option V-4, is depicted in Figure 3-3 and described in Section 3-2-2 of this Scoping Report.

ALTERNATIVE V-5: NEW STACKED VIADUCT

Alternative V-5 (New Stacked Viaduct) was suggested by a member of the public. It would involve removal of the existing viaduct and construction of a new two-level viaduct above Almond Street to East Genesee Street. The top level of the stacked viaduct would carry northbound traffic, and the bottom level would carry southbound traffic. It is anticipated that Alternative V-5 would correct all or most nonstandard and nonconforming features within the I-81 viaduct priority area. Because Alternative V-5 would fully reconstruct I-81 and I-690 within the I-81 viaduct priority area, it would also address the structural deficiencies described in Section 2-2 of this Scoping Report.

Because northbound and southbound vehicles would travel on stacked decks, the Alternative V-5 viaduct would be narrower than the existing I-81 viaduct, but it would be taller. The current viaduct is 66 feet wide and 20 feet tall. Under Alternative V-5, the road deck would be 41 feet wide, which includes two 12-foot traffic lanes, shoulders, and safety barriers. In addition, support columns would be constructed next to the road deck, and these columns would be seven feet wide. The total width of the viaduct structure would be 55 feet. Thus, Alternative V-5 would be about 30 feet taller and about 11 feet narrower than the existing viaduct (see Figure 3-10).
Alternative V-5 would include interchange modifications to provide the missing connections between I-81 and I-690 and to improve traffic circulation and safety. The proposed interchange modifications would be the same as those described for the Viaduct Alternative Option V-2 (New Viaduct that Fully Meets Design Standards). Alternative V-5 would also provide new auxiliary lanes (new lanes between highway interchanges) to improve safety for motorists entering and exiting the highway.

The upper deck of the viaduct would be 50 feet above Almond Street. Ramps to and from Interchange 18 (Harrison/Adams Streets) would be very long, and therefore, the ramp from Harrison Street to northbound I-81 would eliminate east-west access on East Genesee Street beneath the new viaduct. Alternative V-5 would maintain all other existing local street access to Almond Street, including Madison and Monroe Streets, and Almond Street would be reconstructed. Turn bays or traffic signal modifications may be implemented on Almond Street and cross streets to improve traffic flow.

Based on current design plans, Alternative V-5 would require acquisition of between 20 and 40 buildings depending on the horizontal sight stopping distance design standard (60 MPH, 55 MPH, or 50 MPH) for the curves between East Genesee Street and Butternut Street. The estimated construction duration of Alternative V-5 is five to seven years, and the estimated cost, which includes preliminary property acquisition costs, is $1.6 billion (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A.1 for further details).

3-4-3 STREET-LEVEL ALTERNATIVES

The Street-level Alternatives were derived from the At-grade/Surface Alternative presented at the November 2013 Initial Scoping Meeting. Three Street-level Alternatives, described below, were considered.

ALTERNATIVE SL-1: BOULEVARD

Subsequent to publication of the Draft Scoping Report, NYSDOT combined the three Street-level Alternatives (SL-1, “Boulevard”; SL-2, “One-way Traffic on Almond Street and Other Local Street[s]”; and SL-3, “Two-way Traffic on Almond Street and Other Local Street[s]”) into one alternative, which has been renamed the Community Grid Alternative. The Community Grid Alternative, including Option CG-1 (formerly SL-1), is depicted in Figure 3-6 and described in Section 3-2-3 of this Scoping Report.

ALTERNATIVE SL-2: ONE-WAY TRAFFIC ON ALMOND STREET AND OTHER LOCAL STREET(S)

Subsequent to publication of the Draft Scoping Report, NYSDOT combined the three Street-level Alternatives (SL-1, “Boulevard”; SL-2, “One-way Traffic on Almond Street and Other Local Street[s]”; and SL-3, “Two-way Traffic on Almond Street and Other Local Street[s]”) into one alternative, which has been renamed the Community Grid Alternative. The Community
Grid Alternative, including Option CG-2 (formerly, SL-2 and SL-3), is depicted in Figure 3-8 and described in Section 3-2-3 of this Scoping Report.

Under Alternative SL-2, north of Harrison Street, the new Almond Street would be one-way northbound and one or more of the streets identified above would serve one-way, southbound traffic. At Adams Street, the southbound traffic would travel eastward to Almond Street and would turn to rejoin the former I-81 south segment at Monroe Street.

Southbound traffic exiting from I-690 would travel on either Townsend Street or State Street, and could head east on Adams Street to Almond Street and the former I-81 south segment. Alternatively, southbound traffic could continue on State Street or Townsend Street toward a newly constructed on-ramp either on Burt Street or MLK East.

**ALTERNATIVE SL-3: TWO-WAY TRAFFIC ON ALMOND STREET AND OTHER LOCAL STREET(S)**

Subsequent to publication of the Draft Scoping Report, NYSDOT combined the three Street-level Alternatives (SL-1, "Boulevard"; SL-2, "One-way Traffic on Almond Street and Other Local Street[s]"; and SL-3, "Two-way Traffic on Almond Street and Other Local Street[s]") into one alternative, which has been renamed the Community Grid Alternative. The Community Grid Alternative, including Option CG-2 (formerly, SL-2 and SL-3), is depicted in Figure 3-8 and described in Section 3-2-3 of this Scoping Report.

Alternative SL-3 (Two-way Traffic on Almond Street and Other Local Street(s)) would be the same as Alternative SL-2 (One-way Traffic on Almond Street and Other Local Street(s)) except that former interstate traffic would use two or more two-way streets between the former I-81 south segment and I-690 (see Figure 3-9). The viaduct would be removed and Almond Street would be reconstructed to serve two-way traffic. The new street would be located entirely within the Almond Street right-of-way. A second street (e.g., Townsend Street, State Street, Clinton Street, West Street, or University Avenue) would be designated to serve as an alternative two-way, north-south Street for former interstate traffic. The north-south traffic on the alternative street would be directed to the former I-81 south segment via Adams Street or Burt Street. Almond Street, the alternative two-way street, or other streets would provide access to I-690 and the former I-81 north segment.

### 3-4-4 TUNNEL ALTERNATIVES

The tunnel alternatives are derived from the Below Grade/Tunnel Alternative presented at the November 2013 Initial Scoping Meeting. In addition to the three tunnel alternatives (Alternatives T-1, T-2, and T-3) developed by NYSDOT and FHWA, a tunnel alternative (Alternative T-4) was proposed by a member of the public and was evaluated by NYSDOT and FHWA. The four tunnel alternatives are shown in Figure 3-11.

**ALTERNATIVE T-1: TUNNEL UNDER ALMOND STREET FROM MLK EAST TO BUTTERNUT STREET**

Alternative T-1 (Almond Street Tunnel from MLK East to Butternut Street) would result in a two-mile-long tunnel that would carry I-81 traffic beneath Almond Street (see Figure 3-12).
Underground conditions along Townsend St. are similar to those along Almond St.; tunnel would allow the existing viaduct to remain open during construction of the tunnel along Townsend St. The concept emerged through public input and would have the highest cost of construction. It would impact a potentially hazardous “superfund” site near I-81/Hiawatha Blvd. and high-tension power lines. Furthermore, it would impact Lincoln Park.

This alternative was explored to reduce the number of local streets that are disconnected. Many underground utilities would need to be relocated and the number of buildings acquired and demolished would be 25-35, depending on the number of necessary buildings.

I-81 and I-690 would fully meet federal and state design standards and would maintain north-south, interstate highway access to/from Downtown Syracuse. New ramps would provide access between I-81 and I-690 in all directions.

Maximizes area above tunnel and along Almond St. for economic development opportunities and urban design improvements. This map shows the one-mile tunnel from Martin Luther King East to Genesee St. along the current I-81 route:

EXIT 13 W. Genesee St.
EXIT 14 E. Fayette St.
EXIT 15 E. Adams St.
EXIT 16 S. S. Harrison St.
EXIT 17 E. Willow St.
EXIT 18 E. Water St.
EXIT 19 E. Genesee St.
Alternative T-1 (Almond Street Tunnel from MLK East to Butternut Street) and Alternative T-2 (Almond Street Tunnel from MLK East to Genesee Street)

Figure 3-12

Typical Section
The new tunnel and highway connections would be two lanes in each direction and would be approximately 80 feet wide, with the roof about 15 to 20 feet below the street. The tunnel would begin at MLK East and follow the existing I-81 property line under Almond Street to about East Fayette Street. The tunnel would curve and follow the existing I-81 property line to Butternut Street where it would end and join the existing elevated I-81 highway. Almond Street would be reconstructed atop the tunnel to serve local, north-south traffic. The new surface street would also provide accommodations for bicycles and pedestrians.

It is anticipated that Alternative T-1 would correct all of the nonstandard and most nonconforming highway features within the I-81 viaduct priority area. Alternative T-1 would meet 60 MPH design standards, and the posted speed limit would be 55 MPH. All structural elements would also meet current standards.

Alternative T-1 would include interchange modifications to provide the missing connections between I-81 and I-690 and to improve traffic circulation and safety on the highway segments that remain within the I-81 viaduct priority area. At this time, the following interchange modifications are proposed:

- **I-81/I-690 Interchange**: To complete the missing connections between I-81 and I-690, new ramps would be built to provide direct connections between eastbound I-690 and northbound I-81 and between southbound I-81 and westbound I-690. These new direct connections would facilitate interstate-to-interstate movement without unnecessary use of the local street system. Based on conceptual studies to date, an estimated two to five buildings may need to be acquired to construct the missing connections of the I-81/I-690 interchange.

- **I-81 Interchange 19 (Clinton Street/Salina Street) and Interchange 20 (Franklin Street/West Street)**: Interchanges 19 and 20 would be combined to accommodate the new connections between I-81 and I-690. This would involve replacing the existing off-ramps from southbound I-81 to West Street/Franklin Street (Interchange 20) and to Clinton Street/Salina Street (Interchange 19) with a single ramp that serves Clinton Street and Franklin Street. In addition, the existing on-ramps from Pearl Street (Interchange 19) and State Street (Interchange 20) would be reconfigured as a single ramp at Pearl Street, Willow Street, or a nearby street.

- **Butternut Street Overpass**: The bridge carrying Butternut Street over I-81 would be re-aligned to connect to Clinton and Franklin Streets in the Franklin Square neighborhood, providing better access into this area. This overpass must be rebuilt as part of the reconstruction of the I-81/I-690 interchange, due to shifts in interstate and ramp locations. Re-alignment of the bridge would allow the missing connection carrying traffic from eastbound I-690 to northbound I-81 to be constructed beneath the Butternut Street overpass.

- **I-81 from Interchange 20 to Interchange 23**: Based on needs identified from initial traffic data, a new travel lane in each direction would be provided on I-81 from I-690 to
Hiawatha Boulevard to improve operations. Several non-standard highway features, such as narrow shoulders and tight curves, also would be corrected. To accommodate this wider interstate and correct the non-standard and non-conforming features, Genant Drive would be closed from approximately Spencer Street to Bear Street. The Court Street interchange (Interchange 21) would be reconstructed, and possibly reconfigured, with longer entrance ramps and better merges. The Route 370 (Onondaga Lake Parkway) on-ramp and Old Liverpool Road on-ramp to southbound I-81 would be consolidated into a single ramp, and the on-ramp to southbound I-81 from Genant Drive (between Spencer and Butternut Streets) would be closed because of its proximity to Interchange 20.

- **I-690 Interchange 11 (West Street):** To improve safety on I-690 and the West Street ramps, NYSDOT would remove the existing, free-flow Interchange 11 and replace it with a new interchange, controlled by a traffic signal on West Street. An option to maintain the existing ramp configuration and slightly raise the elevation of West Street was considered but dismissed from further consideration because bringing the existing interchange to current design standards would enlarge its footprint, potentially requiring acquisition of property. Additionally, the new interchange would simplify connections to and from the interstate from West Street, as well as the connection to Genesee Street.

- **I-690 Interchange 13 (Townsend Street/Downtown Syracuse):** To allow for the reconstruction of the I-81/I-690 interchange, the westbound exit ramp from I-690, which is now on Townsend Street, would be relocated to Almond Street. The existing on-ramp to eastbound I-690 from McBride Street could be relocated to either Townsend Street or Almond Street. This ramp also would serve motorists who currently use the existing on-ramp from Harrison Street to access eastbound I-690, a movement that would not be possible in the newly constructed I-81/I-690 interchange.

To provide ramps between the new I-81 tunnel and I-690, it would be necessary to close several east-west local streets. Because of inadequate clearance, construction of the new ramps would require that East Fayette Street, Water Street, and Washington Street be closed to traffic between State Street and Almond Street and that McBride Street and Townsend Street be closed to traffic between East Genesee Street and Burnet Avenue. Similarly, to provide a new connection between the surface street and the existing highway section south of MLK East, Jackson Street would dead-end at Almond Street and not connect to the new surface street.

Interchange 18 (Adams Street/Harrison Street) would be eliminated. Access from northbound I-81 and access to southbound I-81 from Harrison and Adams Streets would be provided by the ramp connections between the new surface street and the highway section south of MLK East. Access to Adams Street and Harrison Street from southbound I-81 would be from a new off-ramp at Townsend Street, where traffic could travel south to Adams.
Street. Access to northbound I-81 would be from a new northbound on-ramp at the intersection of Almond Street and Erie Boulevard.

One or more ventilation structures as well as maintenance structures may be constructed along the tunnel alignment to support its operation. The specific locations and sizes of these structures would be identified if Alternative T-1 advances to DEIS.

Alternative T-1 would also include improvements to local streets to facilitate better traffic movement onto and off I-81. The new surface street atop the tunnel would serve northbound and southbound traffic with two lanes in each direction.

Local street improvements would comprise pedestrian and bicycle safety and connectivity enhancements in the viaduct priority area, which would include:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
- Bollards and traffic islands to provide safe refuge for pedestrians; and
- “Bump-outs,” or extensions, of the sidewalk corners, to narrow roadway crossing distance for pedestrians.

In addition, NYSDOT would coordinate with Centro on potential street improvements (transit amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives.

Based on preliminary designs, the construction of the Alternative T-1 would require acquisition of 35 to 40 buildings. The estimated construction duration of Alternative T-1 is seven to nine years, and the estimated cost, which includes preliminary property acquisition costs, is $2.7 billion (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1 for further details).

**ALTERNATIVE T-2: ALMOND STREET TUNNEL FROM MLK EAST TO GENESEE STREET**

Alternative T-2 (Almond Street Tunnel from MLK East to East Genesee Street) would result in a one-mile-long tunnel that would carry I-81 traffic through University Hill and Southside to East Genesee Street. The tunnel would begin at MLK East and follow the existing I-81 property line under Almond Street to just north of East Genesee Street. The new tunnel would be two lanes in each direction, and would be approximately 80 feet wide; with its roof would be about 15 to 20 feet below the street. Almond Street, which would include accommodations for pedestrians and bicycles, would be reconstructed atop the tunnel.

Alternative T-2 would correct all or most of the nonstandard and nonconforming highway features within the I-81 Viaduct priority area. Alternative T-2 would meet 60 MPH design...
standards, and the posted speed limit would be 55 MPH. All structural elements would also meet current standards.

Alternative T-2 would include interchange modifications to provide the missing connections between I-81 and I-690 and to improve traffic circulation. At this time, the following interchange modifications are proposed:

- **I-81/I-690 Interchange**: To complete the missing connections between I-81 and I-690, new ramps would be built to provide direct connections between eastbound I-690 and northbound I-81 and between southbound I-81 and westbound I-690. These new direct connections would facilitate interstate-to-interstate movement without unnecessary use of the local street system. Based on conceptual studies to date, an estimated two to five buildings may need to be acquired to construct the missing connections of the I-81/I-690 interchange.

- **I-81 Interchange 19 (Clinton Street/Salina Street) and Interchange 20 (Franklin Street/West Street)**: Interchanges 19 and 20 would be combined to accommodate the new connections between I-81 and I-690. This would involve replacing the existing off-ramps from southbound I-81 to West Street/Franklin Street (Interchange 20) and to Clinton Street/Salina Street (Interchange 19) with a single ramp that serves Clinton Street and Franklin Street. In addition, the existing on-ramps from Pearl Street (Interchange 19) and State Street (Interchange 20) would be reconfigured as a single ramp at Pearl Street, Willow Street, or a nearby street.

- **Butternut Street Overpass**: The bridge carrying Butternut Street over I-81 would be realigned to connect to Clinton and Franklin Streets in the Franklin Square neighborhood, providing better access into this area. This overpass must be rebuilt as part of the reconstruction of the I-81/I-690 interchange, due to shifts in interstate and ramp locations. Re-alignment of the bridge would allow the missing connection carrying traffic from eastbound I-690 to northbound I-81 to be constructed beneath the Butternut Street overpass.

- **I-81 from Interchange 20 to Interchange 23**: Based on needs identified from initial traffic data, a new travel lane in each direction would be provided on I-81 from I-690 to Hiawatha Boulevard to improve operations. Several non-standard highway features, such as narrow shoulders and tight curves, also would be corrected. To accommodate this wider interstate and correct the non-standard and non-conforming features, Genant Drive would be closed from approximately Spencer Street to Bear Street. The Court Street interchange (Interchange 21) would be reconstructed, and possibly reconfigured, with longer entrance ramps and better merges. The Route 370 (Onondaga Lake Parkway) on-ramp and Old Liverpool Road on-ramp to southbound I-81 would be consolidated into a single ramp, and the on-ramp to southbound I-81 from Genant Drive (between Spencer and Butternut Streets) would be closed because of its proximity to Interchange 20.
I-690 Interchange 11 (West Street): To improve safety on I-690 and the West Street ramps, NYSDOT would remove the existing, free-flow Interchange 11 and replace it with a new interchange, controlled by a traffic signal on West Street. An option to maintain the existing ramp configuration and slightly raise the elevation of West Street was considered but dismissed from further consideration because bringing the existing interchange to current design standards would enlarge its footprint, potentially requiring acquisition of property. Additionally, the new interchange would simplify connections to and from the interstate from West Street, as well as the connection to Genesee Street.

I-690 Interchange 13 (Townsend Street/Downtown Syracuse): To allow for the reconstruction of the I-81/I-690 interchange, the westbound exit ramp from I-690, which is now on Townsend Street, would be relocated to Almond Street. The existing on-ramp to eastbound I-690 from McBride Street could be relocated to either Townsend Street or Almond Street. This ramp also would serve motorists who currently use the existing on-ramp from Harrison Street to access eastbound I-690, a movement that would not be possible in the newly constructed I-81/I-690 interchange.

North of Genesee Street, I-81 would transition from a tunnel to an elevated highway. New ramps would connect I-81 and I-690. To provide adequate clearance for I-81 and these new ramps, State Street and Erie Boulevard would be reconstructed at a lower elevation. Because of inadequate clearance, construction of the new highway and ramps would require that East Fayette Street, Water Street, and Washington Street be closed to traffic between State Street and Almond Street and that McBride Street and Townsend Street be closed to traffic between East Genesee Street and Burnet Avenue.

Interchange 18 (Adams Street/Harrison Street) would be eliminated. Access from northbound I-81 and access to southbound I-81 from Harrison and Adams Streets would be provided by the ramp connections between the new surface street and the highway section south of MLK East. Access to Adams Street and Harrison Street from southbound I-81 would be from a new off-ramp at Townsend Street, where traffic could travel south to Adams Street. Access to northbound I-81 would be from a new northbound on-ramp at the intersection of Almond Street and Erie Boulevard.

One or more ventilation structures as well as maintenance structures may be constructed along the tunnel alignment to support its operation. The specific locations and sizes of these structures would be identified if Alternative T-2 advances to DEIS.

Local street improvements would comprise pedestrian and bicycle safety and connectivity enhancements in the viaduct priority area, which would include:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
Bollards and traffic islands to provide safe refuge for pedestrians; and
“Bump-outs,” or extensions, of the sidewalk corners, to narrow roadway crossing
distance for pedestrians.

In addition, NYSDOT would coordinate with Centro on potential street improvements (transit
amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in
the project limits to enhance and support access to Centro’s transit initiatives.

Construction of the Alternative T-2 is anticipated to require acquisition of 35 to 40 buildings.
The estimated construction duration of Alternative T-2 is five to seven years, and the
estimated cost, which includes preliminary property acquisition costs, is $1.8 billion (see the
“I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in
Appendix A-1 for further details).

**ALTERNATIVE T-3: TOWNSEND STREET TUNNEL**

Alternative T-3 (Townsend Street Tunnel) would remove the viaduct and replace it with a
surface street along the existing Almond Street right-of-way. A new tunnel would be
constructed under Oakwood Avenue and Townsend Street from about MLK East to Butternut
Street. At Butternut Street, the tunnel section would rejoin the existing I-81 alignment.
Townsend Street would be reconstructed atop the tunnel between about MLK East and East
Genesee Street. The existing viaduct could remain in operation until traffic is rerouted to the
new tunnel.

The new tunnel would be two lanes in each direction with shoulders and medians that meet
design standards. The tunnel would be approximately 80 feet wide, and its roof would be
about 15 to 20 feet below the street. One or more ventilation structures as well as
maintenance structures would be constructed along the tunnel alignment to support its
operation. The specific locations and sizes of these structures will be identified if Alternative
T-3 advances to the DEIS.

Alternative T-3 would include interchange modifications to provide the missing connections
between I-81 and I-690 and to improve traffic circulation. At this time, the following
interchange modifications are proposed.

- **I-81/I-690 Interchange:** To complete the missing connections between I-81 and I-690,
  new ramps would be built to provide direct connections between eastbound I-690 and
  northbound I-81 and between southbound I-81 and westbound I-690. These new direct
  connections would facilitate interstate-to-interstate movement without unnecessary use
  of the local street system. Based on conceptual studies to date, an estimated two to five
  buildings may need to be acquired to construct the missing connections of the I-81/I-
  690 interchange.

- **I-81 Interchange 19 (Clinton Street/Salina Street) and Interchange 20 (Franklin
  Street/West Street):** Interchanges 19 and 20 would be combined to accommodate the
new connections between I-81 and I-690. This would involve replacing the existing off-ramps from southbound I-81 to West Street/Franklin Street (Interchange 20) and to Clinton Street/Salina Street (Interchange 19) with a single ramp that serves Clinton Street and Franklin Street. In addition, the existing on-ramps from Pearl Street (Interchange 19) and State Street (Interchange 20) would be reconfigured as a single ramp at Pearl Street, Willow Street, or a nearby street.

- **Butternut Street Overpass:** The bridge carrying Butternut Street over I-81 would be realigned to connect to Clinton and Franklin Streets in the Franklin Square neighborhood, providing better access into this area. This overpass must be rebuilt as part of the reconstruction of the I-81/I-690 interchange, due to shifts in interstate and ramp locations. Re-alignment of the bridge would allow the missing connection carrying traffic from eastbound I-690 to northbound I-81 to be constructed beneath the Butternut Street overpass.

- **I-81 from Interchange 20 to Interchange 23:** Based on needs identified from initial traffic data, a new travel lane in each direction would be provided on I-81 from I-690 to Hiawatha Boulevard to improve operations. Several non-standard highway features, such as narrow shoulders and tight curves, also would be corrected. To accommodate this wider interstate and correct the non-standard and non-conforming features, Genant Drive would be closed from approximately Spencer Street to Bear Street. The Court Street interchange (Interchange 21) would be reconstructed, and possibly reconfigured, with longer entrance ramps and better merges. The Route 370 (Onondaga Lake Parkway) on-ramp and Old Liverpool Road on-ramp to southbound I-81 would be consolidated into a single ramp, and the on-ramp to southbound I-81 from Genant Drive (between Spencer and Butternut Streets) would be closed because of its proximity to Interchange 20.

- **I-690 Interchange 11 (West Street):** To improve safety on I-690 and the West Street ramps, NYSDOT would remove the existing, free-flow Interchange 11 and replace it with a new interchange, controlled by a traffic signal on West Street. An option to maintain the existing ramp configuration and slightly raise the elevation of West Street was considered but dismissed from further consideration because bringing the existing interchange to current design standards would enlarge its footprint, potentially requiring acquisition of property. Additionally, the new interchange would simplify connections to and from the interstate from West Street, as well as the connection to Genesee Street.

- **I-690 Interchange 13 (Townsend Street/Downtown Syracuse):** To allow for the reconstruction of the I-81/I-690 interchange, the westbound exit ramp from I-690, which is now on Townsend Street, would be relocated to Almond Street. The existing on-ramp to eastbound I-690 from McBride Street could be relocated to either Townsend Street or Almond Street. This ramp also would serve motorists who currently use the existing on-ramp from Harrison Street to access eastbound I-690, a movement that would not be possible in the newly constructed I-81/I-690 interchange.
North of Spencer Street, the Court Street interchange would be reconstructed with longer entrance ramps and better merges, and the Route 370 (Onondaga Lake Parkway) on-ramp and Old Liverpool Road on-ramp would be consolidated into a single ramp. Several non-standard highway features, such as narrow shoulders and tight curves, may need to be corrected, pending an investigation of the accident history along this stretch of I-81.

Alternative T-3 would correct all or most nonstandard and nonconforming highway features within the I-81 Viaduct priority area. Alternative T-3 would meet 60 MPH design standards, and the posted speed limit would be 55 MPH. Structural elements would also meet current standards.

To accommodate the transition from the tunnel section to the existing I-81 section at Butternut Street as well as ramps between the tunnel and I-690, it would be necessary to close several east-west streets. Water, Washington, and East Fayette Streets would not be able to cross the new I-81 property line. Erie Boulevard would travel under the new ramps, but it may need to be lowered to provide adequate clearance for traffic to pass beneath the new I-81.

Local street improvements would comprise pedestrian and bicycle safety and connectivity enhancements in the viaduct priority area, which would include:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
- Bollards and traffic islands to provide safe refuge for pedestrians; and
- “Bump-outs,” or extensions, of the sidewalk corners, to narrow roadway crossing distance for pedestrians.

In addition, NYSDOT would coordinate with Centro on potential street improvements (transit amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives.

Townsend Street is a wide street between Taylor Street and East Genesee Street, but the existing roadway property line is much narrower south of Taylor Street and north of East Genesee Street. Alternative T-3 would require about 80 feet of right-of-way for the full length of the tunnel, meaning that private and public property would be acquired on both sides of Townsend Street. It is estimated that Alternative T-3 would require that 55 to 75 buildings be acquired for the new right-of-way.

The estimated construction duration of Alternative T-3 is seven to nine years, and the estimated cost, which includes preliminary property acquisition costs, is $2.6 billion (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1 for further details).
ALTERNATIVE T-4: TUNNEL ON AN EASTERN ALIGNMENT (81’ BELOW SYRACUSE)

Alternative T-4 (Tunnel on an Eastern Alignment) was proposed by a member of the public during scoping. Alternative T-4 would reroute I-81 to its east via a combination of tunnel and highway sections, which would meet NYSDOT and FHWA highway design standards. From south to north, Alternative T-4 would begin at I-481. A tunnel section would carry I-81 northward from its interchange with I-481. The tunnel would be located deep below Comstock Avenue, traveling east of Morningside Cemetery, Oakwood Cemetery, and Syracuse University. The tunnel would consist of separate tubes for northbound and southbound traffic. Each tube would carry two or three traffic lanes. The tunnel roof would be located about 81 feet below the surface.

Near Genesee Street, vehicles would exit the tunnel and travel on a highway section. The highway section would include a new interchange with I-690 about one mile east of the existing interchange. Vehicles would enter a second tunnel just south of Lincoln Park. Vehicles would exit the second tunnel and rejoin the existing I-81 right-of-way just south of Bear Street near Destiny USA.

One or more ventilation structures as well as maintenance structures would be constructed along the tunnel alignment to support its operation. The specific locations and sizes of these structures will be identified if Alternative T-4 advances to the DEIS. It is also possible that additional interchanges could be provided along the tunnel segment, but feasible locations for these interchanges have not yet been identified.

It is anticipated that Alternative T-4 would correct all of the nonstandard and most nonconforming highway features within the I-81 Viaduct priority area. The existing viaduct would be removed and the section of I-81 between I-690 and Bear Street would be removed and re-designated as a new highway. Alternative T-4 would meet 60 MPH design standards, and the posted speed limit would be 55 MPH. All structural elements would also meet current standards. The existing ramp connections between I-81 and I-690 would also be removed, but a full directional interchange would be provided where Alternative T-4 would cross I-690.

Where the existing viaduct would be removed, it would be replaced with a surface street similar to the boulevard proposed for the Community Grid Alternative Option CG-1 (Boulevard), including all other improvements associated with Option CG-1. Local street improvements would comprise pedestrian and bicycle safety and connectivity enhancements in the viaduct priority area, which would include:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
- Bollards and traffic islands to provide safe refuge for pedestrians; and
“Bump-outs,” or extensions, of the sidewalk corners, to narrow roadway crossing distance for pedestrians.

In addition, NYSDOT would coordinate with Centro on potential street improvements (transit amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives.

The new alignment of I-81 under Alternative T-4 would require acquisition of more than 100 buildings. The estimated construction duration of Alternative T-4 is six to eight years, and the estimated cost, which includes preliminary property acquisition costs, is $3.3 billion (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1 for further details).

3-4-5 DEPRESSED HIGHWAY ALTERNATIVES

The depressed highway alternatives are derived from the Below Grade/Depressed Highway Alternative presented at the November 2013 Initial Scoping Meeting. Figure 3-13 shows an overview of the depressed highway alternatives.

ALTERNATIVE DH-1: DEPRESSED HIGHWAY FROM ADAMS STREET TO BUTTERNUT STREET

Alternative DH-1 (Depressed Highway from Adams Street to Butternut Street) would remove the viaduct and construct a highway in an open-cut trench (depressed highway) from Adams Street to Butternut Street. Alternative DH-1 would meet 60 MPH design standards and would remove or correct all or most nonconforming or nonstandard features within the I-81 Viaduct priority area. It would consist of two, 12-foot northbound lanes, two, 12-foot southbound lanes, 4-foot inside shoulders, and 10-foot outside shoulders. The highway would be about 25 feet below the existing street level.

After I-81 crosses the New York Susquehanna and Western Railroad on a bridge, it would descend and would reach the depressed highway section at Adams Street. The depressed highway would continue along the Almond Street corridor. North of East Genesee Street, it would curve northwesterly along the existing I-81 right-of-way and would rejoin the existing I-81 highway at Butternut Street. The interchange at Harrison/Adams Street (Interchange 18) and at I-690 would be reconstructed. Two, two- to three-lane service roads would be constructed on either side of the depressed highway section. The depressed highway would occupy the Almond Street right-of-way.

Alternative DH-1 would include interchange modifications to provide the missing connections between I-81 and I-690 and to improve traffic circulation and safety. At this time, the following interchange modifications are proposed.

- New interchange on I-81 at Dr. Martin Luther King, Jr. East (MLK East, formerly East Castle Street): To improve access to Southside and University Hill from the south, a new partial interchange with a northbound exit ramp and a southbound entrance ramp would be constructed at MLK East. The other ramp movements (a northbound entrance ramp
Alternative DH-1 (Depressed Highway from Adams Street to Butternut Street) and Alternative DH-2 (Depressed Highway from Adams Street to Genesee Street)
and a southbound exit ramp) could not be constructed because these ramps would be too close, according to highway design standards, to the ramps at Adams Street. The new interchange would provide direct access to the Southside and to University Hill via Renwick Avenue. Burt Street also was explored as a potential location for this new interchange but was dismissed from further consideration because Burt Street does not connect to Renwick Avenue, which provides direct access to University Hill. Initial traffic studies also showed higher usage of MLK East over Burt Street during the PM peak.

- **I-81 Interchange 18 (Harrison/Adams Streets):** To improve traffic flow at Interchange 18, a second exit lane to Harrison Street from southbound I-81 would be added.

- **I-81/I-690 Interchange:** To complete the missing connections between I-81 and I-690, new ramps would be built to provide direct connections between eastbound I-690 and northbound I-81 and between southbound I-81 and westbound I-690. These new direct connections would facilitate interstate-to-interstate movement without unnecessary use of the local street system. Based on conceptual studies to date, an estimated two to five buildings may need to be acquired to construct the missing connections of the I-81/I-690 interchange.

- **I-81 Interchange 19 (Clinton Street/Salina Street) and Interchange 20 (Franklin Street/West Street):** Interchanges 19 and 20 would be combined to accommodate the new connections between I-81 and I-690. This would involve replacing the existing off-ramps from southbound I-81 to West Street/Franklin Street (Interchange 20) and to Clinton Street/Salina Street (Interchange 19) with a single ramp that serves Clinton Street and Franklin Street. In addition, the existing on-ramps from Pearl Street (Interchange 19) and State Street (Interchange 20) would be reconfigured as a single ramp at Pearl Street, Willow Street, or a nearby street.

- **Butternut Street Overpass:** The bridge carrying Butternut Street over I-81 would be re-aligned to connect to Clinton and Franklin Streets in the Franklin Square neighborhood, providing better access into this area. This overpass must be rebuilt as part of the reconstruction of the I-81/I-690 interchange, due to shifts in interstate and ramp locations. Re-alignment of the bridge would allow the missing connection carrying traffic from eastbound I-690 to northbound I-81 to be constructed beneath the Butternut Street overpass.

- **I-81 from Interchange 20 to Interchange 23:** Based on needs identified from initial traffic data, a new travel lane in each direction would be provided on I-81 from I-690 to Hiawatha Boulevard to improve operations. Several non-standard highway features, such as narrow shoulders and tight curves, also would be corrected. To accommodate this wider interstate and correct the non-standard and non-conforming features, Genant Drive would be closed from approximately Spencer Street to Bear Street. The Court Street interchange (Interchange 21) would be reconstructed, and possibly reconfigured, with longer entrance ramps and better merges. The Route 370 (Onondaga Lake Parkway)
on-ramp and Old Liverpool Road on-ramp to southbound I-81 would be consolidated into a single ramp, and the on-ramp to southbound I-81 from Genant Drive (between Spencer and Butternut Streets) would be closed because of its proximity to Interchange 20.

- **I-690 Interchange 11 (West Street):** To improve safety on I-690 and the West Street ramps, NYSDOT would remove the existing, free-flow Interchange 11 and replace it with a new interchange, controlled by a traffic signal on West Street. An option to maintain the existing ramp configuration and slightly raise the elevation of West Street was considered but dismissed from further consideration because bringing the existing interchange to current design standards would enlarge its footprint, potentially requiring acquisition of property. Additionally, the new interchange would simplify connections to and from the interstate from West Street, as well as the connection to Genesee Street.

- **I-690 Interchange 13 (Townsend Street/Downtown Syracuse):** To allow for the reconstruction of the I-81/I-690 interchange, the westbound exit ramp from I-690, which is now on Townsend Street, would be relocated to Almond Street. The existing on-ramp to eastbound I-690 from McBride Street could be relocated to either Townsend Street or Almond Street. This ramp also would serve motorists who currently use the existing on-ramp from Harrison Street to access eastbound I-690, a movement that would not be possible once the ramp from northbound I-81 to eastbound I-690 became a left-side ramp.

North of Spencer Street, the Court Street interchange would be reconstructed with longer entrance ramps and better merges, and the Route 370 (Onondaga Lake Parkway) on-ramp and Old Liverpool Road on-ramp would be consolidated into a single ramp. Several non-standard highway features, such as narrow shoulders and tight curves, may need to be corrected, pending an investigation of the accident history along this stretch of I-81.

Alternative DH-1 would remove the viaduct and remaining highway segments within the I-81 Viaduct priority area would be rehabilitated or reconstructed. Thus, Alternative DH-1 should eliminate the existing structural deficiencies.

A new I-81 service road would be located on either side of the depressed highway. East-west traffic would cross the depressed highway on new bridges; however, it would not be possible or reasonable to allow all east-west streets to cross the highway. Overpasses would be provided at Adams Street, Harrison Street, East Genesee Street, Townsend Street, Erie Boulevard, State Street, James Street, and Salina Street.

To provide ramps between the depressed highway and I-690, it would be necessary to close several east-west local streets. Because of inadequate clearance, construction of the new ramps would require that East Fayette Street, Water Street, and Washington Street be closed to traffic between State Street and Almond Street and that McBride Street and Townsend Street be closed to traffic between East Genesee Street and Burnet Avenue. Similarly, to provide a new connection between the depressed highway and the existing highway section
south of the New York Susquehanna and Western Railroad, Jackson Street would be cut off at I-81 and Monroe Street would become a dead-end street. Because a portion of Water Street, which carries the Erie Canalway Trail, would be removed, the Erie Canalway would be rerouted.

The new overpasses at local streets would also provide an opportunity for enhanced east-west access and aesthetic treatments to the overpasses themselves. Local street improvements would comprise pedestrian and bicycle safety and connectivity enhancements in the viaduct priority area, which would include:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
- Bollards and traffic islands to provide safe refuge for pedestrians; and
- “Bump-outs,” or extensions, of the sidewalk corners, to narrow roadway crossing distance for pedestrians.

In addition, NYSDOT would coordinate with Centro on potential street improvements (transit amenities such as bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives.

Based on the preliminary design, NYSDOT would acquire 30 to 40 buildings to construct Alternative DH-1. The estimated construction duration of Alternative DH-1 is seven to nine years, and the estimated cost, which includes preliminary property acquisition costs, is $1.8 billion (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1 for further details).

**ALTERNATIVE DH-2: DEPRESSED HIGHWAY FROM ADAMS STREET TO GENESEE STREET**

Alternative DH-2 (Depressed Highway from Adams Street to East Genesee Street) would remove the viaduct and construct a highway in an open-cut trench (depressed highway) from Adams Street to East Genesee Street. After I-81 crosses the New York Susquehanna and Western Railroad on a bridge, it would descend and would reach the depressed highway section at Adams Street. The depressed highway would continue along the Almond Street corridor. At East Genesee Street, it would curve northwesterly and ascend to meet the elevated I-81 at its interchange with I-690. The depressed highway would consist of two, 12-foot northbound lanes, two, 12-foot southbound lanes, 4-foot inside shoulders, and 10-foot outside shoulders. The highway would be about 25 feet below the existing street level.

NYSDOT would reconstruct or rehabilitate the segments of I-81 north of the depressed highway section. NYSDOT would also implement interchanges improvements on I-81 and I-690. At this time, the following interchange modifications are proposed.
• New interchange on I-81 at Dr. Martin Luther King, Jr. East (MLK East, formerly East Castle Street): To improve access to Southside and University Hill from the south, a new partial interchange with a northbound exit ramp and a southbound entrance ramp would be constructed at MLK East. The other ramp movements (a northbound entrance ramp and a southbound exit ramp) could not be constructed because these ramps would be too close, according to highway design standards, to the ramps at Adams Street. The new interchange would provide direct access to the Southside and to University Hill via Renwick Avenue. Burt Street also was explored as a potential location for this new interchange but was dismissed from further consideration because Burt Street does not connect to Renwick Avenue, which provides direct access to University Hill. Initial traffic studies also showed higher usage of MLK East over Burt Street during the PM peak.

• I-81 Interchange 18 (Harrison/Adams Streets): To improve traffic flow at Interchange 18, a second exit lane to Harrison Street from southbound I-81 would be added.

• I-81/I-690 Interchange: To complete the missing connections between I-81 and I-690, new ramps would be built to provide direct connections between eastbound I-690 and northbound I-81 and between southbound I-81 and westbound I-690. These new direct connections would facilitate interstate-to-interstate movement without unnecessary use of the local street system. Based on conceptual studies to date, an estimated two to five buildings may need to be acquired to construct the missing connections of the I-81/I-690 interchange.

• I-81 Interchange 19 (Clinton Street/Salina Street) and Interchange 20 (Franklin Street/West Street): Interchanges 19 and 20 would be combined to accommodate the new connections between I-81 and I-690. This would involve replacing the existing off-ramps from southbound I-81 to West Street/Franklin Street (Interchange 20) and to Clinton Street/Salina Street (Interchange 19) with a single ramp that serves Clinton Street and Franklin Street. In addition, the existing on-ramps from Pearl Street (Interchange 19) and State Street (Interchange 20) would be reconfigured as a single ramp at Pearl Street, Willow Street, or a nearby street.

• Butternut Street Overpass: The bridge carrying Butternut Street over I-81 would be re-aligned to connect to Clinton and Franklin Streets in the Franklin Square neighborhood, providing better access into this area. This overpass must be rebuilt as part of the reconstruction of the I-81/I-690 interchange, due to shifts in interstate and ramp locations. Re-alignment of the bridge would allow the missing connection carrying traffic from eastbound I-690 to northbound I-81 to be constructed beneath the Butternut Street overpass.

• I-81 from Interchange 20 to Interchange 23: Based on needs identified from initial traffic data, a new travel lane in each direction would be provided on I-81 from I-690 to Hiawatha Boulevard to improve operations. Several non-standard highway features, such as narrow shoulders and tight curves, also would be corrected. To accommodate this
wider interstate and correct the non-standard and non-conforming features, Genant Drive would be closed from approximately Spencer Street to Bear Street. The Court Street interchange (Interchange 21) would be reconstructed, and possibly reconfigured, with longer entrance ramps and better merges. The Route 370 (Onondaga Lake Parkway) on-ramp and Old Liverpool Road on-ramp to southbound I-81 would be consolidated into a single ramp, and the on-ramp to southbound I-81 from Genant Drive (between Spencer and Butternut Streets) would be closed because of its proximity to Interchange 20.

- **I-690 Interchange 11 (West Street):** To improve safety on I-690 and the West Street ramps, NYSDOT would remove the existing, free-flow Interchange 11 and replace it with a new interchange, controlled by a traffic signal on West Street. An option to maintain the existing ramp configuration and slightly raise the elevation of West Street was considered but dismissed from further consideration because bringing the existing interchange to current design standards would enlarge its footprint, potentially requiring acquisition of property. Additionally, the new interchange would simplify connections to and from the interstate from West Street, as well as the connection to Genesee Street.

- **I-690 Interchange 13 (Townsend Street/Downtown Syracuse):** To allow for the reconstruction of the I-81/I-690 interchange, the westbound exit ramp from I-690, which is now on Townsend Street, would be relocated to Almond Street. The existing on-ramp to eastbound I-690 from McBride Street could be relocated to either Townsend Street or Almond Street. This ramp also would serve motorists who currently use the existing on-ramp from Harrison Street to access eastbound I-690, a movement that would not be possible once the ramp from northbound I-81 to eastbound I-690 became a left-side ramp.

Alternative DH-2 would meet NYSDOT and FHWA highway design standards. It would meet all 60 MPH design standards and would remove or correct most nonstandard and nonconforming features within the I-81 viaduct priority area. Alternative DH-2 should also eliminate the existing structural deficiencies in the I-81 Viaduct priority area.

As with Alternative DH-1, Alternative DH-2 would retain all of the existing highway interchanges. A new I-81 service road would be located on either side of the depressed highway. East-west traffic would cross the depressed highway on new bridges. Bridges would be provided at Adams, Harrison, and East Genesee Streets.

To provide the transition between the depressed highway section and the elevated section at about East Fayette Street, it would be necessary to close several east-west local streets. Because of inadequate clearance, construction of the new highway ramps would require that East Fayette Street, Water Street, and Washington Street be closed to traffic between State Street and Almond Street and that McBride Street and Townsend Street be closed to traffic between East Genesee Street and Burnet Avenue. Because a portion of Water Street, which carries the Erie Canalway Trail, would be removed, the trail would be rerouted. To provide a
new connection between the depressed highway and the existing highway section south of the New York Susquehanna and Western Railroad, Jackson Street would be cut-off at I-81 and Monroe Street would be dead-ended at I-81.

The new overpasses at local streets would also provide an opportunity for enhanced east-west access and aesthetic treatments to the overpasses themselves. Local street improvements would comprise pedestrian and bicycle safety and connectivity enhancements in the viaduct priority area, which would include:

- Distinctive pavement markings, materials, and/or color to define space for bicyclists and pedestrians and promote driver awareness;
- Space provided for bicycle crossings and signal heads synchronized with pedestrian crossing phases to encourage bicycle use;
- Bollards and traffic islands to provide safe refuge for pedestrians; and
- “Bump-outs,” or extensions, of the sidewalk corners, to narrow roadway crossing distance for pedestrians.

In addition, NYSDOT would coordinate with Centro on potential street improvements (transit amenities such bus stops and shelters, bus turnouts, and layover and turnaround places) in the project limits to enhance and support access to Centro’s transit initiatives.

NYSDOT would acquire about 30 to 40 buildings to construct Alternative DH-2. The estimated construction duration of Alternative DH-2 is five to seven years, and the estimated cost, which includes preliminary property acquisition costs, is $1.5 billion (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1 for further details).

3-4-6 OTHER ALTERNATIVES

The other alternatives consider new right-of-way to carry I-81 west of its current alignment (see **Figure 3-14**). A Western Bypass was proposed in the **I-81 Corridor Study** (NYSDOT, July 2013). A new highway along West Street was also proposed in the **I-81 Corridor Study** and by a member of the public.

**ALTERNATIVE O-1: WESTERN BYPASS**

Alternative O-1 would reroute I-81 on a new highway that would bypass Syracuse to its west from the I-481 south interchange (Exit 16A) to NY 481 or to an intermediate roadway (i.e., I-690 or Route 695). The western bypass, in combination with the existing I-481, would form a partial or full highway loop around the city. Portions of or the entire existing I-81 highway through Syracuse would be removed. Alternative O-1 would meet 60 MPH design standards and would remove or correct all or most nonconforming or nonstandard features within the I-81 viaduct priority area.
Figure 3-14

Alternative O-2: West Street

Alternative O-1: Western Bypass

Other Alternatives

SOURCE: Letter from Tim Louer (November 2013)

SOURCE: I-81 Corridor Study, July 2013
The new “Western Bypass” would typically be two, 12-foot lanes in each direction with inside and outside shoulders that meet NYSDOT and FHWA design standards. New interchanges would be constructed at key locations along the new highway alignment. Other existing roads would cross over or under the new highway.

Alternative O-1 would allow NYSDOT to abandon the I-81 right-of-way through Syracuse. The right-of-way could be replaced with a surface street that could accommodate pedestrian and bicycle enhancements much like those described for Community Grid Alternative. Portions of the former right-of-way could also be made available for development.

A number of alignment options were proposed in the I-81 Corridor Study. The shortest version of Alternative O-1 that was explored would be six miles long from the southerly I-81/I-481 interchange to Route 695 and Fairmont Avenue. The longest option that was explored would be 18 miles from I-81/I-481 southerly interchange to NY 481. The highway width would typically be about 100 feet, but to provide a sufficient buffer between the highway and adjacent uses, a 300-foot right-of-way was assumed. Thus, Alternative O-1 would require acquisition of about 220 acres of new right-of-way or could require upwards of about 655 acres of new right-of-way, not including the land needed for new interchanges. The right-of-way would cut through developed and undeveloped land, which is likely to include residences, businesses, and natural landscapes.

The estimated construction duration of Alternative O-1 is four to six years, and the estimated cost, which assumes the longer option for a western bypass and includes preliminary property acquisition costs, is $2.4 billion (see the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1 for further details).

**ALTERNATIVE O-2: WEST STREET**

Alternative O-2 would replace the I-81 viaduct with a boulevard from the New York Susquehanna and Western Railroad crossing to about Butternut Street. Alternative O-2 would meet 60 MPH design standards and should remove or correct all nonconforming or nonstandard features within the I-81 viaduct priority area. A new highway would then be constructed between I-81 near MLK East and I-690 at West Street. New ramps would connect the highway to I-690 and to I-81 just north of Butternut Street. This alternative was described in the I-81 Corridor study and was also proposed during scoping as the “Salt City Circuit” Alternative.

The new highway would typically be two, 12-foot lanes in each direction with inside and outside shoulders that meet NYSDOT and FHWA design standards. New interchanges would be constructed at key locations along the new highway alignment. Highway interchanges with local streets could be provided at some locations, but it would not be possible to maintain all of the existing intersections. Other existing roads would cross over or under the new highway.
The viaduct would be removed and Almond Street would be reconstructed. The new Almond Street could include accommodations for improved pedestrian and bicycle circulation. These accommodations would be much like those described for Community Grid and Alternative.

NYSDOT would acquire new right-of-way for Alternative O-2, comprising approximately 70 to 90 buildings. NYSDOT would procure all or portions of the properties that front West Street. It would also be necessary to eliminate all existing access between West Street and adjacent property. As feasible, driveways would be provided from an alternative street. Where a driveway cannot be feasibly relocated, NYSDOT would need to acquire that property. Alternative O-2 would also require the NYSDOT abandon its current traffic calming project on West Street.

The estimated construction duration of Alternative O-2 is four to six years, and the estimated cost, which includes preliminary property acquisition costs, is $1.3 billion (see the "I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative" chart in Appendix A-1 for further details).

### 3-5 SCREENING OF ALTERNATIVES

Table 3-1 presents the results of the alternatives screening from the Draft Scoping Report. Detailed screening tables are provided for each of the alternatives in Appendix A-2. As previously described, a total of seventeen alternatives were considered (one No Build Alternative and 16 build alternatives). Seven (7) alternatives were recommended for further study. Ten (10) alternatives were not considered reasonable and were not recommended for further study.

- The preliminary screening considered whether alternatives were or were not reasonable with respect to four categories. An alternative was considered reasonable if it would be consistent with the five objectives presented in the Draft Scoping Report.
  - Consistency with the project’s **purpose and objectives, and stated needs**;
  - **Property** needs as defined by the number of buildings or acres of land that may need to be acquired;
  - **Constructability** considerations including difficulty and duration of construction and the ability to maintain adequate traffic flow during construction;
- The estimated construction **cost**. An alternative was considered reasonable if the cost would be less than 2.5 times the estimated cost of Alternative V-1 (Rehabilitation), which was $800 million.

If an alternative was not consistent with one or more of these categories, it was not considered reasonable overall and did not advance for further consideration in the Draft EIS.
### Table 3-1

**Preliminary Screening Recommendations**

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<th>Alternative</th>
<th>Recommended/Pass (✓) or Not Recommend/Fail (X)</th>
<th>Purpose and Need</th>
<th>Property</th>
<th>Construct-ability</th>
<th>Cost</th>
<th>Overall</th>
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Table 3-1 (Continued)
Preliminary Screening Recommendations

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<td>Alternative DH-1 Depressed Highway from Adams Street to Butternut Street</td>
<td>X ✓ X ✓</td>
</tr>
<tr>
<td>Alternative DH-2 Depressed Highway from Adams Street to Genesee Street</td>
<td>X ✓ X ✓</td>
</tr>
<tr>
<td>Alternative O-1 Western Bypass</td>
<td>✓ X ✓</td>
</tr>
<tr>
<td>Alternative O-2 West Street (Salt City Circuit)</td>
<td>X X ✓</td>
</tr>
</tbody>
</table>

Note:
* The No Build Alternative does not address the project’s needs or meet the project’s purpose and objectives, but it passes the preliminary screening because NEPA requires an examination of a No Build Alternative in the EIS.

NEPA requires examination of a No Build Alternative, and therefore, the No Build Alternative will be presented in the DEIS to serve as a baseline against which the other alternatives can be compared. The following summarizes the screening results for the build alternatives.

- **Viaduct Alternatives**: Three of the five viaduct alternatives (Alternatives V-2, V-3, and V-4) passed the screening and will be advanced for further evaluation during the development of the Draft EIS. Please note that Alternatives V-2, V-3, and V-4 have been combined and refined and are now referred to as the Viaduct Alternative (see Section 3-2-2).

  Alternatives V-1 and V-5 would not address the project’s needs or meet the project’s purpose and objectives. Therefore, they failed the screening and are dismissed from further consideration in the Draft EIS.

  Alternative V-1 would not correct a number of nonstandard and nonconforming highway features, making it inconsistent with the objective to “address identified geometric and operational deficiencies in the I-81 viaduct priority area.”

  Alternative V-5 would eliminate east-west travel on East Genesee Street where it crosses Almond Street. East Genesee Street is an important east-west street between Downtown and University Hill. It is an arterial roadway and a designated New York State Route. East Genesee Street carries bike lanes that are part of the Connective Corridor between University Hill and Downtown, and it used by Centro Routes 62 and 262. Eliminating east-west access on East Genesee Street would be inconsistent with the objective to
“maintain the connections within the local street network within or adjacent to the I-81 viaduct priority area.”

- **Street-level Alternatives:** The Street-level Alternatives passed the screening, and therefore, all of them will be advanced for further evaluation during the development of the Draft EIS. Please note that Alternatives SL-1, SL-2, and SL-3 have been combined and refined and are now referred to as the Community Grid Alternative (see Section 3-2-3).

- **Tunnel Alternatives:** Alternatives T-1 and T-2 failed to address the project’s needs or meet the project’s purpose and objectives. Both alternatives would eliminate several local street connections between Downtown, Northside, and University Hill. Cutting off these streets would create about a three-block gap in north-south and east-west vehicular access, which is inconsistent with the objective to “maintain the connections within the local street network within or adjacent to the I-81 viaduct priority area.” The subsurface conditions along Almond Street, which include a high water table and difficult soil, are not favorable for construction of Alternatives T-1 and T-2. The water is saline, which requires special disposal methods, and all utilities would need to be relocated. Because of these subsurface conditions, cut-and-cover construction would be needed, extending the duration of construction. Therefore, Alternatives T-1 and T-2 pose difficult constructability considerations.

The cost of Alternative T-1 also is not reasonable, as it exceeds our established cost threshold of 2.5 times the estimated cost of Alternative V-1 (Rehabilitation), which was $800 million.

For these reasons, Alternatives T-1 and T-2 are dismissed from further consideration during the development of the Draft EIS.

Alternative T-3 was not recommended for further study in the Draft Scoping Report because it has many of the same deficiencies as Alternatives T-1 and T-2. Alternative T-3 failed to address the project’s needs or meet the project’s purpose and objectives, poses difficult constructability considerations, and has an unreasonable cost. In addition, Alternative T-3 would require acquisition of 55 to 70 buildings, which is not considered reasonable. Therefore Alternative T-3 is dismissed from further consideration.

Alternative T-4 would address the project’s needs and meet the project’s purpose and objectives and constructability considerations. However, Alternative T-4 would acquire more than 100 buildings, which is not considered reasonable. Alternative T-4 would also cost more than $3 billion, which is not reasonable. Therefore Alternative T-4 is dismissed from further consideration.

- **Depressed Highway Alternatives:** Alternatives DH-1 and DH-2 were not recommended for further study. Like Alternatives T-1 and T-2, Alternatives DH-1 and DH-2 would remove local street connections between Downtown and Northside, and furthermore, it may not be reasonable to provide connections across the highway at every east-west street. Construction of Alternatives DH-1 and DH-2 would face unfavorable subsurface
conditions, including a high water table and difficult soil. The water is saline, which requires special disposal methods, and all utilities would need to be relocated. Thus, Alternative DH-1 and DH-2 failed to address the project’s needs and to meet the project’s purpose and objectives and constructability considerations and are dismissed from further consideration.

- **Other Alternatives:** Alternatives O-1 would address the project’s needs, meet the project’s purpose and objectives, and constructability considerations. O-2 also would meet cost considerations. However, both alternatives would require a substantial amount of property acquisition, which is not reasonable. In addition, the cost of Alternative O-1 is not reasonable, and Alternative O-2 would substantially diminish local street connections in the West Street corridor, thereby failing to meet the project’s objective to “maintain the connections within the local street network within or adjacent to the I-81 viaduct priority area.” For these reasons, Alternatives O-1 and O-2 are dismissed from further consideration.

FHWA and NYSDOT reviewed the Viaduct and Street-level Alternatives, which passed the screening in the **Draft Scoping Report**, to determine their consistency with the modified project objectives presented in **Section 2-4** of this **Scoping Report**. FHWA and NYSDOT are advancing the Viaduct and Community Grid (Street-level) Alternatives for further consideration during the development of the Draft EIS as they would address the project’s need and meet the project’s purpose and modified objectives, as well as the screening criteria.

NYSDOT will continue the environmental review process by preparing a Draft EIS for public review and comment. The Draft EIS will present the potential social, economic, and environmental consequences that may be realized from the implementation of the Viaduct and Community Grid Alternatives, and measures considered to avoid, minimize, or otherwise mitigate adverse impacts.

In addition, based on public input received NYSDOT will conduct additional engineering and further analysis to determine if there is a tunnel alternative that addresses the project’s need and meets the project’s purpose and objectives, as well as the established screening criteria. If a tunnel alternative is determined to be reasonable based on these factors, it may be considered for further evaluation and analysis.
SECTION 4: ENVIRONMENTAL CONSIDERATIONS

- What Federal and state regulations and requirements are pertinent to this project?
- What are the proposed study areas for the environmental analysis?
- How will the EIS be organized?
- What environmental resources will be studied in the EIS and how will potential adverse impacts be identified?

4-1 INTRODUCTION

The potential social, economic, and environmental impacts (beneficial and adverse) of the Interstate 81 (I-81) Viaduct Project (the “project”) will be evaluated and presented in an Environmental Impact Statement (EIS). This section describes the analysis framework for the EIS, which will evaluate potential impacts of the reasonable project alternatives described in Section 3-2 of this Scoping Report. This section begins with a description of the environmental review process and anticipated permits and approvals needed for the project, followed by the framework for the analyses to be included in the EIS.

4-2 THE ENVIRONMENTAL REVIEW PROCESS

The New York State Department of Transportation (NYSDOT), in cooperation with the Federal Highway Administration (FHWA), will prepare the EIS in accordance with the National Environmental Policy Act (NEPA). FHWA is the Federal Lead Agency, and NYSDOT is a Joint Lead Agency for this project.

The EIS will be prepared in accordance with the NYSDOT Project Development Manual and FHWA Environmental Impact and Related Procedures (23 CFR [Code of Federal Regulations] 771). NYSDOT and other New York State agencies undertaking a discretionary action for this project have no obligation to prepare an additional EIS under SEQRA. NYSDOT will give full consideration to the Federal Final EIS (FEIS) and will prepare a Joint Record of Decision (ROD) with FHWA.

4-2-1 NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

The procedural provisions of NEPA (set forth in 40 CFR §§ 1500-1508) require Federal agencies to consider the environmental consequences of their actions, including not only direct and indirect effects but also cumulative effects with other projects.
The project is classified as a NEPA Class I action in accordance with 23 CFR Part 771.115, which requires preparation of an EIS to determine the likely impacts a project will have on the environment.

The steps in the NEPA process are described below.

- **Notice of Intent.** The EIS process began with publication of a Notice of Intent (NOI) in the *Federal Register* on August 26, 2013.

- **Scoping.** Scoping introduces the public to the project, including its purpose and need, its goals and objectives, alternatives to be considered, the framework of analysis for the EIS, and the public involvement and agency coordination plan.

  The project was presented in a *Scoping Initiation Packet* (November 2013) and during an Initial Scoping Meeting held on November 13, 2013. An informal Public Update Presentation was held on May 1, 2014 to inform the public on the progress of the project. Subsequently, a *Draft Scoping Report* was published in June 2014, which provided further details on the development and preliminary evaluation of project alternatives as well as the project’s environmental review process. A Scoping Meeting was held on June 26, 2014 to present information from the *Draft Scoping Report* and to provide an opportunity for public input. During the scoping meetings, the public has been invited to comment on the alternatives under consideration and the scope of analysis for the EIS.

  During the scoping meetings, the public was afforded an opportunity to provide verbal comments on the project. A public comment period for submitting written comments on the *Draft Scoping Report* extended through September 2, 2014. FHWA and NYSDOT have reviewed and considered all comments received, with responses to substantive comments provided in *Section 6, Responses to Comments* of this *Scoping Report*. This *Scoping Report* provides updated information related to the project and addresses public comments, as appropriate, and summarizes the project EIS process to date.

- **Draft Environmental Impact Statement.** Following publication of this *Scoping Report*, a Draft EIS will be prepared to assess the environmental effects of the project in accordance with NEPA and other appropriate regulations and requirements. NYSDOT will coordinate review by the project’s Cooperating Agencies during preparation of the Draft EIS. After FHWA and NYSDOT approve the Draft EIS, a Notice of Availability will be published in the *Federal Register* and local newspapers, establishing a public review period for the Draft EIS.

- **Public Review.** The Draft EIS will be made available to the public at local repositories and on the project website and will be distributed to the Cooperating and Participating Agencies and elected officials. FHWA will establish a public comment period for the Draft EIS. The public comment period will be a minimum of 45 days beginning with the Notice of Availability of the DEIS, and a public hearing will be held, at which members of the
The public can offer oral testimony on the findings of the Draft EIS. Comments will also be accepted in writing during the public comment period.

- **Final Environmental Impact Statement.** After the public comment period on the Draft EIS closes, a Final EIS will be prepared. The Final EIS will include the comments and responses on the Draft EIS and any necessary revisions to the Draft EIS based upon consideration of those comments. After it is reviewed by FHWA, the Final EIS will be published and a Notice of Availability will be printed in the *Federal Register* and local newspapers.

- **Record of Decision.** No sooner than 30 days after publishing the Final EIS, FHWA will prepare its decision document, known as the Record of Decision (ROD). The ROD will describe the preferred alternative for the project, its environmental impacts, and any required mitigation commitments. The ROD will conclude the NEPA process.

### 4-2-2 STATE ENVIRONMENTAL QUALITY REVIEW ACT (SEQRA)

Similar to and modeled after NEPA, the State Environmental Quality Review Act (SEQRA) was enacted by the New York State legislature in 1975. SEQRA requires New York governmental agencies to identify potential environmental effects that would result from their discretionary actions, and—to the extent that adverse impacts are identified—avoid or otherwise mitigate those impacts to the maximum extent practicable, consistent with social, economic, environmental, and other considerations. State agencies must review their discretionary actions in accordance with SEQRA, unless such actions fall within certain statutory or regulatory exemptions, before undertaking, funding, or approving the actions.

The project is classified as a SEQRA non-Type II action (17 NYCRR § 15.6), indicating that it has the potential for environmental impacts that should be evaluated under SEQRA. As previously noted, given the preparation of a Federal Final EIS (FEIS), NYSDOT and other New York State agencies undertaking a discretionary action for this project have no obligation to prepare an additional EIS under SEQRA. NYSDOT will give full consideration to the Federal FEIS and will prepare a Joint ROD with FHWA.

### 4-2-3 PERMITS AND APPROVALS

Implementation and construction of the I-81 Viaduct Project may be subject to a number of Federal and state permits and approvals. The list below is a summary of the applicable regulatory requirements identified thus far.

- **Clean Water Act (33 USC §§ 1251-1387 and 33 CFR 320-330).** The Clean Water Act (CWA), also known as the Federal Water Pollution Control Act, is intended to restore and maintain the chemical, physical, and biological integrity of U.S. waters. It regulates point sources of water pollution (i.e., discharges of municipal sewage, industrial wastewater, stormwater); non-point source pollution (i.e., runoff from streets, agricultural fields, construction sites, and mining that enter waterbodies, from other than the end of a
pipe); and the discharge of dredged or fill material into navigable waters and other waters of the U.S.

Section 404 of the CWA requires authorization from the Secretary of Army, acting through the U.S. Army Corps of Engineers (USACE), before dredged or fill material may be discharged into waters of the United States. Waters of the United States are defined by the USACE regulations, among other things, as: (1) all waters "which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide"; (2) tributaries of such waters; and (3) wetlands adjacent to such waters (33 CFR § 328.3[a]). Wetlands are defined by the USACE regulations as those areas "that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." (33 CFR § 328.3[b]). Activities authorized under Section 404 must comply with Section 401 of the CWA, which requires that applicants for Federal permits or licenses for an activity that may result in a discharge to navigable waters must provide to the Federal agency issuing a permit a certificate (either from the state where the discharge would occur or from an interstate water pollution control agency) that the discharge would comply with Sections 301, 302, 303, 306, 307, and 316 (b) of the CWA. However, certain nationwide permits from the USACE do not require Section 401 water quality certifications.

- **Eminent Domain Procedure Law** (N.Y. EDP. LAW Articles 1 through 7; §101-709). Any state action that results in property to be acquired through exercise of eminent domain in New York State must be executed in full compliance with the Eminent Domain Procedure Law (EDPL). This law requires the condemning agency to ensure that just compensation is paid for acquired property rights; provide an opportunity for public participation in the planning of public projects; encourage settlement of claims for just compensation, expedite payments to property owners, and establish rules to reduce litigation and ensure equal treatment of all property owners.

- **Endangered Species Act** (16 USC §§ 1531-1544; 50 CFR Part 402). Section 7 of the Endangered Species Act requires Federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) for actions for which they provide funding, issue permits, or grant approval that may jeopardize threatened or endangered species, or destroy or adversely modify their critical habitats.

- **Environmental Justice** (Executive Order 12898 of 1994, 59 CFR Part 7629, February 16, 1994; 1997 USDOT Order 5610.2[a], May 2, 2012; FHWA Order 6640.23A, June 14, 2012). These Orders require that adverse impacts and benefits from a Federal transportation project are equitably distributed among all population groups and that minority or low-income areas are not overburdened with the adverse aspects of project alternatives.
FHWA is responsible for complying with the Executive Order, including specific outreach efforts to affected communities.

- **Floodplains** (Executive Order 11988 of 1977; USDOT Order 5650-2, April 23, 1979). Federal and state agencies must regulate and limit the location of a project in a floodplain to avoid adverse impacts associated with the occupancy and modification of floodplains. FHWA will make a floodplain determination for the project in accordance with Executive Order 11988.

- **Freshwater Wetlands Law (ECL Article 24; 6 NYCRR 663).** Under the Freshwater Wetlands Act, the New York State Department of Environmental Conservation (NYSDEC) administers a permit program regulating activities in wetlands and their adjacent areas. NYSDEC requires a permit for almost any activity which will alter the wetlands or the adjacent areas.

- **Land & Water Conservation Fund Act—Section 6(f)** (54 USC §200301-200310; 36 CFR Part 59). Property protected under Section 6(f) (i.e., parkland that received funding under the Land & Water Conservation Fund Act [LWCFA]) requires approval for conversion of that park facility for any non-recreational purpose unless alternatives are assessed and steps are taken to identify, evaluate, and supply replacement parkland. The United States Department of the Interior (DOI), through the National Park Service (NPS), must grant prior approval for the conversion and replacement parkland. If any Section 6(f) properties would be affected by the project, FHWA will make a Section 6(f) finding for this project.

- **Section 106 of the National Historic Preservation Act** (54 USC §306108; 36 CFR Part 800). Federal agencies must take into account the effects of their undertakings on historic properties and provide the Advisory Council on Historic Preservation a reasonable opportunity to comment on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places. FHWA and NYSDOT are responsible for carrying out the Section 106 review for this project in consultation with the New York State Historic Preservation Officer (SHPO) at the New York State Office of Parks, Recreation and Historic Preservation (OPRHP). The Section 106 process will be conducted in consultation with the Advisory Council on Historic Preservation (ACHP), Native American Tribes, and Consulting Parties. Projects reviewed by the SHPO in accordance with Section 106 do not require a separate review under Section 14.09 of the NYS Historic Preservation Act (NYSHPA §14.09, Section 428.2.a).

- **Section 136 of the Federal-Aid Highway Act of 1970** (23 U.S.C. 109(i)), which required FHWA to develop noise regulations. The FHWA noise regulation (23 CFR Part 772) requires a highway agency to assess traffic noise impacts for projects classified as “Type I,” including the construction of a highway on a new location, the physical alteration of an existing highway where there is a substantial horizontal or vertical alteration (as defined in the noise regulation), or the addition of a through traffic lane(s). If the highway agency identifies impacts, it must consider abatement.
• Smart Growth Public Infrastructure Policy Act (ECL § 6-0101 et seq.). The Smart Growth Public Infrastructure Policy Act was enacted by the State of New York to maximize social, economic, and environmental benefits from public infrastructure development while minimizing adverse impacts related to sprawl. Under this act, no state infrastructure agency shall approve, undertake, support, or finance a public infrastructure project, unless, to the extent practicable, the public infrastructure project is consistent with 10 smart growth infrastructure criteria that are contained in §6-0105 of the Act.

• State Pollutant Discharge Elimination System (6 NYCRR Part 750). A NYSDEC State Pollutant Discharge Elimination System (SPDES) permit will be required since construction would involve land disturbance of more than one acre. The applicability of an individual SPDES permit for operation of the proposed project will be confirmed through consultation with NYSDEC.

• Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970 (42 USC § 4601 et seq.). Federally funded or Federally assisted projects that require property acquisition through eminent domain must comply with the Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970.

• U.S. Department of Transportation Act—Section 4(f) (49 USC § 303; 23 USC. § 138; 23 CFR Part 774). Before approving a project that requires the use of a Section 4(f) property, FHWA must determine that there is no feasible and prudent alternative to the use of such land and the project includes all possible planning to minimize harm to such land. A Section 4(f) property is defined as a publicly owned parkland, recreation area, or wildlife and waterfowl refuge of national, state, or local significance; or land from a publicly or privately owned historic site of national, state, or local significance, which are properties listed on or eligible for the National Register of Historic Places. If the I-81 Viaduct Project would result in the use of historic resources, parklands, or other properties protected by Section 4(f), FHWA will make a Section 4(f) finding for this project.

• Wetlands (Executive Order 11990 of 1977; USDOT Order 5660.1A, “Preservation of the Nation’s Wetlands,” August 24, 1978). Federal and state agencies must avoid adverse impacts from the destruction or modification of wetlands unless there is no practical alternative and all possible measures to minimize harm are taken. FHWA is required to make a formal wetland finding for this project.

4-3 ENVIRONMENTAL ANALYSIS FRAMEWORK

4-3-1 PROJECT LIMITS

As described in Section 1-2 and Section 2-2, of this Scoping Report, NYSDOT is proposing to reconstruct or replace I-81 from approximately Colvin Street to Spencer Street in the City of Syracuse (the “I-81 viaduct priority area”) and is investigating modifications to interchanges on I-81 between Spencer Street and Hiawatha Boulevard and on I-690 between approximately the West Street interchange (which extends to Leavenworth Street) and Lodi
The portion of I-81 between approximately Colvin Street and Hiawatha Boulevard and the portion of I-690 between approximately the West Street interchange and Lodi Street is referred to as the “project limits.”

The project limits include an approximately 3.75-mile section of I-81 and an approximately 1.7-mile section of I-690, as shown in Figure 4-1. Also shown in Figure 4-1 are potential expanded project limits, which include several local streets in Downtown Syracuse and adjacent neighborhoods, as well as sections of I-481. Some alternatives under consideration may also result in improvements along I-481, including its interchanges with I-81, and along I-690. These improvements would be necessitated by potentially relocating I-81 from its current location within the City of Syracuse to the current I-481. Figure 4-1 also shows potential additional analysis areas along I-81, I-481, and I-690 where physical improvements are not currently proposed, but changes in traffic related to the project may alter conditions. Therefore, NYSDOT will consider these highway sections in the EIS, as necessary.

4-3-2 ANALYSIS YEARS

The EIS will include both the short-term (construction) and long-term (operational) impacts of the project alternatives. The specific analysis years will be identified in the EIS.

- **Construction Years.** The short-term (construction) analysis will be undertaken for the period during which construction would occur. Where a quantified assessment is prepared for potential construction impacts, a peak period condition will be identified and assessed. For other construction impacts, the EIS will reflect potential effects throughout the construction period.

- **Estimated Time of Completion (ETC)/Opening Year.** The operational and permanent effects of the project alternatives (i.e., build year conditions) will be evaluated for the anticipated opening year of the new highway improvements.

- **Estimated Time of Completion +30 (ETC +30)/Long-Term Horizon Year.** Consistent with FHWA and NYSDOT guidance, the EIS will include an assessment of conditions well into the future (30 years) to determine the long-term impacts of the project on the built and natural environment. Note that the mesoscale air quality analysis will also evaluate ETC +10, as discussed further in Section 4-4-7, below.

4-3-3 ORGANIZATION OF THE ENVIRONMENTAL IMPACT STATEMENT

The EIS will be organized in two volumes. Volume 1 will consist of the environmental impact analyses with chapters that describe the purpose and need for the project, reasonable range of alternatives considered and evaluated, environmental considerations, public involvement activities, and supporting studies as required by NEPA and SEQRA. Volume 2 will comprise appendices that will consist of technical reports supporting the information provided in Volume 1.

The general format of the EIS chapters provided in Volume 1 will be as follows:
Project Limits

Figure 4-1

I-81 Viaduct Project • Scoping Report
• **Affected Environment**, which will describe existing conditions within the study area, as defined above or as defined specifically for each subject area. This will provide the baseline data on which potential project impacts will be determined. In some circumstances the environmental analysis requires the determination of future baseline conditions to evaluate the impacts of the project alternatives. The future baseline condition reflects anticipated changes in the affected environment without the project. Accepted analytical methodologies are used to project population, employment, traffic conditions, noise levels, and air quality concentrations to forecast future conditions in the study area.

• **Environmental Considerations**, which will provide an analysis of potential adverse impacts associated with each project alternative. In addition to the “build” alternatives, this section will consider a “no build” alternative, which describes future conditions without the project.

• **Mitigation**, which will identify proposed measures that would mitigate any adverse impacts that may be realized by the implementation of that action and identified in the “Environmental Considerations” section of the chapter. Mitigation includes the consideration of: the avoidance of the impact(s), the minimizing of the impacts that cannot be avoided, the rectifying of the impact by repairing or restoring the affected environment, the reducing or eliminating of impacts, and the compensation for those impacts that would result as the action is implemented or that which would result from the operation of the action.

At this time, the appendices provided in Volume 2 are anticipated to include the following technical reports:

• Transportation;
• Social Conditions, Economic Considerations, and Environmental Justice;
• Visual Resources and Aesthetic Considerations;
• Cultural Resources (historic and archaeological resources);
• Air Quality;
• Traffic Noise;
• Natural Resources (surface water and groundwater; stormwater runoff; plants and wildlife; and topography, geology, and soils);
• Hazardous Materials; and
• Construction Impacts.

Additional technical reports may be identified as the environmental analysis progresses.
ENVIRONMENTAL ANALYSIS METHODOLOGY

The environmental analysis will consider potential direct, indirect, and cumulative effects of the project on the social, economic, and environmental resources within the study areas. FHWA and NYSDOT have established specific methodologies and criteria to assess potential environmental effects under NEPA, which would be followed in completion of the technical analyses in the EIS. Where specific criteria are not provided by FHWA and NYSDOT, the EIS will rely on methodologies developed or adopted by other relevant Federal and state agencies.

The proposed analysis methodologies for the I-81 Viaduct Project are outlined below for the subject areas to be evaluated in the EIS. The methodologies herein summarize the study areas, regulatory requirements, analysis tools, and criteria for identifying potential environmental impacts in the EIS. Methodologies will be further detailed in the EIS.

Each chapter of the EIS will focus on potential impacts related to operation (i.e., the post-construction condition) of the project. The construction impacts chapter will identify the potential construction-period (i.e., temporary) impacts on relevant environmental resource areas in the construction analysis years.

TRANSPORTATION

The transportation analysis considers the system of moving people and goods from place to place. It includes various modes of travel (i.e., cars, buses, trucks, trains, bicycles, and walking) that work collectively to get people and goods to their destinations. The transportation analysis in the EIS will assess the individual modes of travel in the study area to determine whether project alternatives would hinder the safe and/or efficient movement of people and goods. The EIS will consider both the local and regional effects of project alternatives on transportation.

Regional travel patterns are important in understanding the needed capacity for highway and other transportation infrastructure and for projecting regional vehicle emissions and their resultant effects on air quality. Regional travel is projected using a software model, typically developed by the local Metropolitan Planning Organization (MPO), the Syracuse Metropolitan Transportation Council (SMTC) in this case.

Local travel patterns are important in understanding the effects of an undertaking on mobility in the surrounding area. The assessment of potential effects on local travel patterns focuses on individual intersections and their capacity to process a projected volume of vehicles (cars, buses, and trucks) as well as pedestrians and cyclists. Computer simulation is often employed for local traffic analysis using a methodology, known as the Highway Capacity Manual, developed by the Transportation Research Board.

As described in Section 2-2-1, I-81 has several locations where accident rates exceed statewide averages. The project would include design features aimed at reducing these
accident rates. In addition, the project will aspire to improve bicycle and pedestrian surface connections on streets across and along the I-81 viaduct.

Project alternatives may remove public parking that currently exists beneath the viaduct. These lots are used both as commuter parking and for special events. The EIS will explore the potential loss of parking, including the potential for any capacity shortfalls in peak periods. The EIS will also describe efforts by NYSDOT and Centro to provide transit amenities such as bus shelters within the project limits.

The following steps will be undertaken to prepare the transportation analysis in the EIS:

- Establish the regional and local transportation study areas: The regional study area will include areas under the jurisdiction of SMTC to provide inputs pertinent to the air quality analysis (see Section 4-4-7). The local traffic study area will include highway segments and local streets where modifications are proposed or where traffic may change as a result of a project alternative (see Figure 4-1);
- Coordinate with SMTC to project regional travel patterns and conditions in each analysis year;
- Collect traffic data (volumes, speeds, vehicle types, pedestrian and cyclist volumes, and highway geometric features) at key locations within the local study area, in consultation with SMTC and local transportation agencies;
- Assess existing parking capacity and usage under the I-81 viaduct;
- Assess traffic operations in the existing, no build, and future build (i.e., with one of the alternatives other than the no build) conditions for the analysis years;
- Assess existing pedestrian and bicycle facilities near the I-81 viaduct;
- Identify any locations where traffic impacts may occur as a result of project alternatives and develop reasonable measures to mitigate these impacts to the extent practicable;
- Assess potential displacement and replacement (if necessary) of existing parking under the I-81 viaduct;
- Identify safety enhancements of the build alternatives and describe their potential to reduce accident rates; and
- Identify connectivity and mobility enhancements of the build alternatives and describe their potential to improve vehicular, transit, pedestrian, and bicycle circulation.

4-4-2 LAND USE AND COMMUNITY CHARACTER

Following guidance from Technical Advisory document T6640.8A, the land use and community character evaluation will follow these steps:

- Establish study area: The study area for the analysis of land use and community character will encompass a ¼-mile radius from the project limits, or any additional areas that may be affected by changes in traffic, as needed;
• Identify existing land uses in the study area by categories such as residential, commercial, industrial, institutional (e.g., government, education, or religious uses), recreational, etc. Geographic information systems (GIS) resources and field surveys will be used to collect and verify land use data;
• Describe the overall character of the community and neighborhood cohesion;
• Identify existing zoning regulations;
• Identify existing public policy documents (e.g., local and regional comprehensive or master plans) that indicate community visions for the study area;
• Identify community facilities and services in the study area, including emergency service providers (e.g., fire, police, and emergency medical services [EMS]);
• Identify parklands and recreational resources and determine applicability of Section 4(f) and Section 6(f) evaluations (see further discussion below);
• Determine the potential impacts of the project on existing and proposed future land uses (i.e., planned development), zoning regulations, and public policy documents;
• Determine impacts of the project on parklands, recreational resources, and community facilities and services;
• Describe how the project would affect emergency service access both along the highway and on local streets;
• Describe any mitigation measures that would be implemented if adverse effects are identified.

4-4-3 SOCIOECONOMIC CONDITIONS

The consideration of demographic and employment characteristics is important for any large-scale transportation undertaking with the potential to affect citizens in a widespread area. The I-81 Viaduct Project’s potential effects on socioeconomic conditions, such as population, housing, and primary business sectors, will be evaluated in the EIS following guidance from Technical Advisory T6640.8A, as well as NYSDOT’s Project Development Manual (PDM). As part of the analysis, the following steps will be conducted:

• Establish study area: The analysis of socioeconomic conditions will consider potential regional effects of the project within the Syracuse metropolitan area (Onondaga, Madison, and Oswego Counties) and potential local effects within an area similar to the land use and community character study area (¼-mile radius).
• Characterize population, housing, employment, and other socioeconomic indicators in the study area using data from the most recent U.S. Census, the New York State Department of Labor (NYSDOL), and SMTC, as appropriate;
• Identify potential adverse and/or beneficial social and economic impacts of the project;
• Determine potential impacts to local businesses that may result from changes in travel patterns;
Discuss potential effects on tax revenues, particularly as a result of any land acquisitions or displacements; and

Describe any measures that would be implemented to mitigate adverse impacts, if appropriate.

4-4-4 LAND ACQUISITION, DISPLACEMENT, AND RELOCATION

The project may require acquisition or permanent easements of publicly or privately owned properties in the study area. While NYSDOT will strive to minimize the acquisition of developed land, necessary land acquisitions may displace existing residents, businesses, or community uses in the study area. The assessment of land acquisition, displacement, and relocation will consider provisions of the Federal Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601) and the New York State EDPL. The analysis will include:

- Establish study area: The study area will comprise any parcels that may require complete or partial takings, or permanent or temporary easements. The assessment of effects will include jurisdictions that currently receive tax revenues from these properties (i.e., city, school district, and county).

- Based on preliminary designs for the project alternatives, the number and type of any proposed acquisitions will be identified, including both partial and complete property takings. The analysis will identify the current use of each property, the number of residents or employees associated with each property, and its current value. GIS data will be used to the extent possible, with confirmations obtained through field verifications and through correspondence with local assessors' offices, as necessary.

- The potential impacts of relocating displaced land uses will be assessed.

- Efforts to avoid or minimize land acquisition will be described, and a discussion of mitigation measures will be provided, as appropriate.

4-4-5 VISUAL RESOURCES AND AESTHETIC CONSIDERATIONS

Aesthetics is defined as “the science or philosophy concerned with the quality of visual experience.”1 Aesthetics encompasses the design of a project itself, the relationship between the project and natural and built features nearby, and the overall human reaction to the project's influence on visual quality.

The aesthetic quality and character of I-81 and I-690 in Syracuse have been identified by the local community, including in local plans, as important considerations in project development. The existing I-81 viaduct is a prominent feature in the existing viewshed of

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Syracuse. Project alternatives may alter or remove the viaduct, which would change the visual and aesthetic character of the surrounding area.

In accordance with FHWA and NYSDOT guidelines, the existing visual character and quality of the affected environment, as well as the viewer response to those resources, will provide the framework for assessing the change in visual character that would occur as a result of the project. Major viewer groups and different levels of sensitivity will be evaluated, such as commuters from the highway and residents with views of the highway. A Visual Impacts Assessment (VIA) will be prepared based on NYSDOT’s Visual Resource Analysis Procedure (Engineering Instruction 02-025 and Engineering Bulletin 03-052). The VIA will be prepared under the guidance of a registered landscape architect experienced in the preparation of VIAs. It will provide the following:

- Identification of the study area, which will include the area within visual range of project elements, accounting for topography, vegetation, and obstructing structures;
- A description of the visual character of the project site and study area;
- Identification of aesthetic/visual resources and viewer groups;
- Identification of key views for the visual assessment;
- Evaluation of the visibility of the project site in the study area;
- A description of visible components of the project under the project alternatives, including any aesthetic design considerations being incorporated into the project;
- Assessment of the visual impacts of the project alternatives; and
- A description of any measures to be implemented to mitigate adverse impacts, if necessary.

### 4-4-6 CULTURAL RESOURCES

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties. For this project, the term “cultural resources” will be used to collectively refer to historic properties, including archaeological sites. As defined in the Section 106 regulations, historic properties include “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places” (36 CFR §800.16(l)(1)).

The cultural resources assessment for the EIS will be conducted in accordance with the requirements of Section 106 and will include consultation with SHPO, ACHP, Native American Tribes, and Consulting Parties. Consulting Parties were invited to participate as part of the scoping process, and Consulting Parties will be provided an opportunity to participate at specific points in the process through meetings, review of documents, and written comments. These points include the identification of historic properties, the assessment of effects, the consideration of measures to avoid, minimize, or mitigate adverse
effects, and the development of a Memorandum of Agreement, if adverse effects cannot be avoided.

The following steps in the Section 106 process will be carried out by FHWA in coordination with NYSDOT:

- Establish a Study Area and an Area of Potential Effect (APE) for the assessment of potential direct and indirect effects on archaeological and historic resources. The APE establishes the area for the identification of historic properties. Areas that may be subject to direct ground disturbance are broadly defined as the areas within approximately one block (or 400 feet) from the project limits along I-81 and I-690, and approximately 800 feet from the two I-81/I-481 interchanges. A potentially expanded assessment encompassing surface streets in Downtown Syracuse and portions of I-481 that would be improved under an option of the Community Grid Alternative would include areas within approximately 100 feet from any affected roadways. Any area where historic and archaeological resources may be indirectly affected through changes in setting or changes that would diminish their historic integrity will also be assessed.

- Establish Section 106 Consulting Parties for the project;

- Identify historic properties within the APE (e.g., properties listed in or eligible for listing in the National Register of Historic Places in consultation with the SHPO, Tribal Nations, and other Consulting Parties.);

- Identify potential direct (i.e., demolition, alteration, or damage from construction) or indirect (i.e., the introduction of visual, audible, or atmospheric elements that may alter the characteristics of the historic property that qualify it for inclusion in the National Register in a manner that would diminish the integrity of the property’s significant historic features) adverse effects of project alternatives on historic properties based on requirements of 36 CFR Part 800.5;

- Assess the project’s effects on identified historic properties in consultation with the SHPO, Tribal Nations, and other Consulting Parties;

- Where adverse effects are identified, develop measures to avoid, minimize, or mitigate these effects; and

- In the event that adverse effects cannot be avoided, develop a Memorandum of Agreement (MOA) that stipulates agreed-upon mitigation measures to resolve the project’s adverse effects on historic properties.

**AIR QUALITY**

Air quality studies evaluate the effect of a project on air quality. The quality of air is characterized by levels of certain pollutant gases or microscopic particles. The U.S. Environmental Protection Agency (USEPA) has set National Ambient Air Quality Standards (NAAQS) for six air pollutants (carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide) of concern to our nation’s air quality. The Syracuse area
(Onondaga County) is in attainment with the NAAQS for these criteria pollutants. The area was formerly in non-attainment for carbon monoxide (i.e., it did not meet the carbon monoxide NAAQS). In 1993, USEPA redesignated the area to maintenance (areas that meet the NAAQS but are required to have a plan in place to maintain the standard). Since that time, the area has completed two 10-year maintenance plans that were required by USEPA. In addition to NAAQS, emissions of other pollutants from vehicles (known as mobile source air toxics, or MSATs) are also often considered for large transportation projects.

The air quality analysis for the EIS will identify whether implementation of project alternatives would result in any potential exceedances of NAAQS or any substantial increases or decreases in air pollutant emissions. If any potential exceedances of the NAAQS are identified in the analysis, further investigation will be conducted.

The air quality analysis will include a mesoscale emission analysis for the affected project area and a microscale (local, or “hot-spot”) analysis. The mesoscale analysis will estimate the net change in emissions associated with the project alternatives, stemming from the projected changes in speed, vehicle miles traveled (VMT), and roadway type and configuration. The microscale analysis will be conducted to project future carbon monoxide (CO) and particulate matter (PM) levels at intersections where the greatest increase in traffic is projected and where sensitive uses, such as residences, are closest.

The air quality analysis in the EIS will consist of the following steps:

- Establish study area: The study area for the mesoscale analysis will conform to the transportation (traffic) study area. The study area for the microscale analysis will include up to three worst-case intersections that would be conservatively representative of the entire traffic study area, and will include locations of tunnel portals and ventilation systems, if needed.
- Identify the NAAQS and discuss Onondaga County’s attainment status;
- Describe existing pollutant concentrations based on data from NYSDEC air monitoring stations;
- [Mesoscale Analysis] Using the USEPA MOVES (Motor Vehicle Emission Simulator) model, estimate criteria pollutant and MSAT emissions with the project alternatives (i.e., no build and build alternatives), within the mesoscale study area, for ETC, ETC +10 and ETC +30;
- [Microscale Analysis] Following NYSDOT guidance, perform a CO and PM screening to determine where a detailed air quality analysis would be needed. For locations where a detailed analysis is required, CO and/or PM levels will be modeled using the MOVES model to calculate emissions. The CAL3QHC/CAL3QHCR model will be used to assess the dispersion of the pollutants. CAL3QHC/CAL3QHCR is a model accepted by USEPA for assessing air quality impacts resulting from the operation of highways. The critical analysis year (i.e., the year when the potential for the greatest impact is likely) will be...
modeled. Dispersion of pollutants from tunnel ventilation systems would be analyzed using the AERMOD model, as appropriate. Tunnel portal emissions would be projected based on the total emissions produced in the tunnel and the piston action of the cars moving in the tunnel’s exit and the dispersion of those emissions would be analyzed.

- Determine whether build alternatives would result in potential exceedances of the NAAQS;
- If potential adverse impacts on air quality are identified, further investigation will be conducted, as appropriate.

### 4-4-8 ENERGY AND CLIMATE CHANGE

Greenhouse gases (GHG) include a variety of chemical compounds in the earth’s atmosphere that absorb and re-emit heat, which warms the planet. However, an overabundance of these gases contributes to an over warming of the planet and to global climate change. New York State’s Executive Order 24 establishes a goal to reduce greenhouse gas emissions in the State by 80 percent from 1990 to 2050 and directs agencies to collaborate and develop a Climate Action Plan to offer strategies to meet the goal.\(^2\)

The energy and climate change analysis prepared for the EIS will include a quantified assessment of the project’s potential energy consumption and greenhouse gas emissions determined by the change in vehicle speeds and miles traveled due to each project alternative. Direct energy consumption and GHG emissions associated with vehicle operations will be estimated using the MOVES model, based on forecasts of vehicle miles traveled. Direct and indirect energy consumption during construction (i.e., energy required to produce and transport construction materials) will also be estimated. The analysis will be consistent with NYSDOT guidance.

### 4-4-9 TRAFFIC NOISE

Noise, or unwanted sound, is an important consideration for highway projects. Per FHWA’s implementing regulations (23 CFR Part 772) and NYSDOT Noise Policy, the project is classified as a “Type I” noise project and thus requires an analysis of traffic noise.

The following steps will be used to assess noise in the EIS:

- Establish study area: The areas and associated activities (i.e., land uses) in proximity to the project limits and other highway segments that could potentially be affected by changes in traffic will be identified;

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• Measure existing noise levels and perform simultaneous traffic counts at a representative sample of noise-sensitive receivers along the existing highway alignment and at other locations where roadway improvements may occur as part of the project;
• Establish future traffic noise levels for the build alternatives using FHWA’s Traffic Noise Model (TNM);
• Identify any sites where a noise impact would occur (based on criteria contained in the NYSDOT Noise Policy).
• Where traffic noise impacts would occur, evaluate abatement measures and determine if they are reasonable and feasible per NYSDOT Noise Policy.

4-4-10 NATURAL RESOURCES

43 CFR 11 defines a natural resource as “land, fish, wildlife, biota, air, water, ground water, drinking water supplies, and other such resources belonging to, managed by, held in trust by, appertaining to, or otherwise controlled by the United States (including the resources of the fishery conservation zone established by the Magnuson Fishery Conservation and Management Act of 1976), any State or local government, any foreign government, any Indian tribe, or, if such resources are subject to a trust restriction on alienation, any member of an Indian tribe. These natural resources have been categorized into the following five groups: surface water resources, ground water resources, air resources, geologic resources, and biological resources.”³ For the EIS, the natural resources chapter will collectively address aspects of the natural environment, including topography, geology, and soils; surface water and groundwater quality; stormwater management; floodplains; terrestrial and aquatic habitats; threatened and endangered species; and plants, wildlife, and organisms. The natural resources assessment will also provide the information necessary to satisfy requirements of Executive Order 11988 (floodplains protection) and Executive Order 11990 (wetlands protection).

The natural resources assessment will follow these steps:
• Establish study area: There are limited natural features within and near the project limits. The study area for the assessment of natural resources will comprise a 100-foot wide area around the project limits. With respect to Federally- and state-listed threatened and endangered species and significant ecological communities, a 1½-mile radius from the project limits would be evaluated.
• Identify natural features in the study area through consultation with resource agencies and field surveys;

• Characterize the existing natural features in the study area in terms of their location, extent, quality, and uniqueness or commonality within the environmental setting;
• Characterize existing water quality, stormwater management practices, and floodplains within the study area;
• Identify natural features that may be directly impacted (i.e., physically disturbed or removed) or indirectly impacted (i.e., the introduction of topographic, visual, audible, or atmospheric elements that may alter the characteristics of the natural feature in a manner that would diminish its integrity) by implementation of project alternatives.
• Identify any necessary environmental permits needed to implement project alternatives; and
• If adverse impacts are identified, describe measures that would mitigate the impacts.

4-4-11 HAZARDOUS WASTES AND CONTAMINATED MATERIALS

As defined by the Resource Conservation and Recovery Act (RCRA) of 1976 (42 USC § 1609 et seq.), a hazardous waste or contaminated material is a solid, liquid, or gas that, because of quantity, concentration, or physical, chemical, or infectious characteristics, may cause or significantly contribute to an increase in mortality or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed. Standards for identifying potential hazardous and contaminated materials concerns have been established in the American Society for Testing and Materials (ASTM) Standard E1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527), and ASTM E1903-97 (reapproved in 2002), Standard Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process.

Potential exposure to hazardous and contaminated materials is typically greatest during construction when ground disturbance and disturbance to structural materials are occurring. While the analysis in the hazardous wastes and contaminated materials chapter will consider potential exposure during the future operation of the project, the analysis will overlap with the construction analysis provided in the construction effects chapter (described below). In accordance with TEM Section 4.4.20, the hazardous and contaminated materials analysis will include the following:

• Establish study area: The study area for the analysis of hazardous wastes and contaminated material will include areas that may be subject to direct ground disturbance or structures that may be demolished (including highway structures and any acquired buildings).
• Summarize results of a database review and any previous studies or investigations within the proposed area of construction, including within the existing viaduct structure, to document any locations of potential hazardous or contaminated soils or substances (Phase I Environmental Site Assessment [ESA]);
Based on the results of the Phase I ESA, perform a Phase II ESA, as necessary, to confirm presence and type, extent and magnitude of hazardous/contaminated materials; and

Identify protocols and measures to be undertaken to avoid adverse effects on human health from project-related exposure to hazardous or contaminated materials.

**CONSTRUCTION EFFECTS**

Construction effects, though temporary, can result in a nuisance to nearby areas. The primary adverse effects related to construction activities typically involve traffic, noise, air quality, and contaminated materials. The EIS will identify appropriate measures to be implemented during construction to avoid and/or minimize potential temporary adverse effects and will take into consideration the unique characteristics of some of the sensitive facilities in the viaduct priority area, such as hospitals.

The construction chapter will evaluate the potential construction effects on all subject areas covered in the EIS, as applicable, including the following:

- **Transportation.** This assessment will consider traffic generated by the project’s construction workers and deliveries, taking into account the time of day that construction traffic would be greatest. Potential effects related to any road closures will also be evaluated. Measures to maintain efficient emergency vehicle access to medical facilities surrounding the I-81 viaduct priority area will be identified. This analysis will describe how interstate traffic will be accommodated during construction.

- **Land Use and Community Character.** This section will discuss potential temporary construction impacts related to land use, neighborhood character, community facilities, public policy, and parklands and recreational resources. As noted above, potential effects to emergency vehicle access will be assessed, and measures will be identified to maintain efficient emergency vehicle access to nearby medical facilities, as well as throughout the community, during construction.

- **Land Acquisition, Displacement, and Relocation.** This section will describe any potential temporary easements or acquisitions that would be required during construction and, if necessary, will outline mitigation measures consistent with FHWA’s requirements pursuant to the Federal-Aid Policy Guide (FAPG; 49 CFR 24C) and NYSDOT procedures and contract specifications.

- **Socioeconomic Conditions.** This section will evaluate potential economic impacts (both adverse and beneficial) that would result from construction. Economic impacts based on construction cost estimates will be assessed using the IMPLAN\(^4\) model. The analysis will

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\(^4\) IMPLAN (IMpact analysis for PLANning) is an input-output modeling system developed by the U.S. government and subsequently privatized by professors at the University of Minnesota that uses data (from U.S. agencies such as the...
include a discussion of potential employment during construction and potential impacts on local businesses, including potential impacts on business operations as well as potential patronage at local businesses from construction workers.

- **Visual Resources.** The potential for construction of the project to affect important views and visual resources in the study area will be evaluated in this section.

- **Cultural Resources.** The Section 106 process will document potential impacts to historic and archaeological resources during construction and any adverse effects would be resolved through the development of appropriate measures to avoid or minimize inadvertent impacts to historic properties during construction. The EIS will describe any adverse effects and measures developed to avoid or minimize inadvertent impacts during construction based on documentation prepared for the Section 106 consultation.

- **Air Quality.** The potential for air quality impacts due to construction activities for the project, including construction traffic (mobile sources) on local roadways, will be evaluated. Air pollutant sources include combustion exhaust associated with non-road engines (e.g., cranes) and on-road engines operating on-site (e.g., concrete delivery trucks), as well as on-site activities that generate fugitive dust (e.g., excavation and demolition). The pollutants of concern include carbon monoxide (CO), particulate matter (PM), and nitrogen dioxide (NO₂). The analysis will assess potential impacts on air quality at sensitive land uses in the project limits, including medical facilities that may have air intakes near the construction site, and will rely on methodologies set forth in NYSDOT’s TEM and other relevant guidance documents.

- **Energy and Climate Change.** Following NYSDOT guidance, this section will include an evaluation of energy consumed for construction and greenhouse gas production.

- **Noise and Vibration.** Noise generated from the construction activity on nearby sensitive receivers will be determined utilizing FHWA’s Roadway Construction Noise Model (RCNM). Based on a review of construction plans, sensitive receiver locations will be identified. Reasonable worst-case noise from construction activities will be determined. The analysis will also take into account the special needs of surrounding medical facilities to ensure that noise and vibration from construction activities do not affect precision-related medical procedures and research and do not adversely affect patients at these facilities. The assessment of potential vibration during construction will follow methodologies and procedures outlined in FHWA’s Construction Noise Handbook (FHWA-HEP-06-015).

- **Natural Resources.** Although the project is located in an urban environment, potential effects to any sensitive ecological resources will be addressed.

Bureau of Economic Analysis, the Bureau of Labor Statistics, and the Census Bureau) to predict effects on the local economy from changes in direct spending (e.g., during construction) or employment (e.g., during annual operation).
• **Hazardous Wastes and Contaminated Materials.** In coordination with the work performed for hazardous materials, actions to be taken during project construction (including deconstruction of the existing I-81 viaduct) to limit exposure of construction workers and the general public to potential contaminants will be summarized.

**4-4-13 INDIRECT AND CUMULATIVE EFFECTS**

Council on Environmental Quality regulations (40 CFR Part 1500-1508) define indirect impacts as those that are “caused by an action and are later in time or farther removed in distance, but are still reasonably foreseeable.” Generally, these impacts are induced by a project. Indirect effects can occur within the full range of impact areas, such as changes in land use, economic conditions, traffic congestion, air quality, noise, vibration, and natural resources. The EIS will include an evaluation of indirect effects, both adverse and beneficial, that may occur as a result of the project.

NEPA also requires consideration of cumulative effects of a project. Cumulative impacts may result from the incremental consequences of an action when added to other past and reasonably foreseeable future actions (40 CFR 1508.8). The analysis will address cumulative impacts to both environmental resources and socioeconomic conditions.

**4-4-14 ENVIRONMENTAL JUSTICE**

Pursuant to Executive Order 12898, an environmental justice analysis will be prepared to identify any disproportionately high and adverse impacts on minority or low-income populations that could result from the project. The analysis will follow methodologies and guidance established by the Council on Environmental Quality (CEQ), USDOT Order 5610.2(a), and FHWA Order 6640.23A. In accordance with USDOT policy, this analysis will help ensure that “positive corrective action can be taken” to avoid or minimize disproportionately high and adverse impacts.5

• Establish study area: In general, the environmental justice analysis study area will include block groups (consistent with 2010 U.S. Census geographies) within ¼-mile radius from the project limits. If the technical analyses for the subject areas described previously indicate potential for adverse impacts in areas outside this radius, the study area will be expanded accordingly.

• Environmental justice communities (i.e., minority or low-income populations) within the study area will be identified (as defined by FHWA Order 6640.23A) using data from the 2010 U.S. Census and the most recent American Community Survey (ACS).

• The analysis will examine the potential effects of the project for the full range of environmental topic areas addressed in the EIS and then determine whether the project

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5 USDOT, “Department of Transportation Updated Environmental Justice Order 5610.2(a).” May 2012.
would result in disproportionately high and adverse (direct or indirect) impacts on minority and low-income populations.

- If potential disproportionately high and adverse impacts are identified, potential measures to mitigate impacts on environmental justice communities will be discussed.
- This analysis will also identify and describe efforts to engage environmental justice communities in the project.

4-4-15 OTHER NEPA AND SEQRA CONSIDERATIONS

In addition to the technical areas discussed above, NEPA and SEQRA guidance stipulates the consideration of several more general or global aspects of a project. Such additional considerations to be discussed in the EIS will include:

- **Relationship between Short-Term Uses versus Long-Term Productivity**, which considers the potential short-term effects of a project necessary to realize its long-term public benefits;

- **Irreversible and Irretrievable Commitment of Resources**, which considers materials and resources—such as land, building materials, energy, human labor, and fiscal resources—that will be committed to the project, and therefore unavailable either during the lifetime of the project (e.g., irreversible use of land) or in perpetuity (e.g., irretrievable commitment of human labor);

- **Unavoidable Impacts**, which summarizes any adverse impacts identified in the technical chapters of the EIS for which there is no reasonable or practicable mitigation and therefore cannot be avoided; and

- **Smart Growth Assessment**, which evaluates consistency with the New York State Smart Growth Public Infrastructure Policy Act, aimed at ensuring that public infrastructure projects move forward in an environmentally and socially conscious manner, i.e., in the spirit of principles of smart growth.

4-4-16 RELATED DOCUMENTATION

Projects that involve NEPA may also be subject to Federal regulations with specific documentation requirements. Since these studies rely on analyses presented in the EIS, they are also documented as part of NEPA. In addition to including documentation demonstrating compliance with the Section 106 process, which would be incorporated into the cultural resources evaluation (see Section 4-4-6 above), the EIS would address requirements of Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966 and Section 6(f) of the Land and Water Conservation Fund Act (LWCFA), as needed:

- **Section 4(f)**. Section 4(f) prohibits USDOT (which includes FHWA) from approving any project that “uses” or has a constructive use of public parks, wildlife refuges, or historic resources unless there is no feasible and prudent alternative to that use and all measures to minimize harm have been implemented. If an alternative has the potential to use a
Section 4(f) resource(s), FHWA technical guidance will be used to determine the level of documentation that will be conducted (i.e., *de minimis* impact determination, individual evaluation, or programmatic evaluation). The Section 4(f) evaluation will incorporate information from the EIS as needed.

- **Section 6(f).** The U.S. Department of Interior provides funding under the LWCFA for state and local efforts to plan, acquire, or develop land to advance outdoor recreational activities. When a project may incorporate lands that may have received LWCFA improvement funds, the project sponsor must undertake a Section 6(f) evaluation. NYSDOT and FHWA will determine whether any such properties would be affected by the project and conduct a Section 6(f) evaluation if necessary. The National Park Service (NPS) is responsible for granting approval, provided that prior to any conversion of parkland, all practical alternatives have been evaluated, converted parkland would be replaced or substituted at a location of equal or better land value and usefulness, and any proposed conversion and substitution are in accordance with the applicable statewide comprehensive outdoor recreation plan (SCORP).
PUBLIC INVOLVEMENT

SECTION 5: AND AGENCY COORDINATION

- What is the purpose of the public involvement program?
- What are Cooperating and Participating Agencies?
- How will the public stay informed throughout the project?
- Who can be contacted for more information?

5-1 PURPOSE OF THE PUBLIC INVOLVEMENT PROGRAM

Public involvement is an integral part of the transportation planning process. Accordingly, the Federal Highway Administration (FHWA) and New York State Department of Transportation (NYSDOT) will provide continued opportunities for open, collaborative, and meaningful public and agency participation throughout the environmental review process for the I-81 Viaduct Project.

The public and agency participation efforts for this project have been developed in accordance with legislation and policies that guide public involvement in project development, including, but not limited to, the following:

- National Environmental Policy Act of 1969 (NEPA), which requires Federal agencies to conduct the environmental review process in coordination with the public and with other agencies;
- State Environmental Quality Review Act (SEQRA), which requires New York State agencies to conduct the environmental review process in coordination with the public and with other agencies;
- Moving Ahead for Progress in the 21st Century (MAP-21) of 2012, which carries forward the public involvement principles of Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) of 2005;
- Section 106 of the National Historic Preservation Act (NHPA) of 1966, which requires that Federal agencies carry out consultation with the State Historic Preservation Office, Tribal Nations, and agencies, individuals, and organizations with a demonstrated interest in the project and its potential effects on properties of historic interest (i.e., Consulting Parties) and seek public comment;
- Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”, which requires targeted outreach to environmental justice communities that may be impacted by a Federal undertaking.
• Title VI of the Civil Rights Act of 1964, Title VI regulations prohibiting discrimination based on national origin, and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency (LEP),” states that people with LEP should have meaningful access to Federally conducted and Federally funded programs and activities.
• Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970 and the New York State Eminent Domain Procedure Law, which require public notification of actions that may result in the condemnation and/or acquisition of property, including targeted outreach to affected property owners.
• Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966, which requires coordination with officials of jurisdiction if a transportation project would use properties protected under this Act, which include public parks, wildlife refuges, and historic resources; and
• Section 6(f) of the Land and Water Conservation Fund (LWCF) Act of 1965, which requires coordination with the state resource agency (Office of Parks, Recreation, and Historic Preservation, or OPRHP) and the National Park Service for the potential conversion of parklands funded, in whole or in part, by this Act if the project would convert these lands to non-park uses.

5-2 ENGAGING AGENCIES

5-2-1 COORDINATION PLAN

As noted above, MAP-21 carries forward the requirements of SAFETEA-LU, which increased opportunities for the public and federal, state, and local agencies to have active and early involvement in the NEPA process and to provide input into the project’s purpose and need, environmental study methodology, and alternatives under consideration.

Federal legislation requires the development of a Coordination Plan for all highway and transit projects for which an Environmental Impact Statement (EIS) is being prepared under NEPA. Accordingly, FHWA and NYSDOT have prepared a Coordination Plan to describe the process and communication methods they will follow to disseminate information about the project, as well as to provide opportunities for input from the public and other agencies. The Coordination Plan will be in effect throughout the environmental review process. The plan is a flexible, “living” document that will be amended, as needed, as the project progresses. The plan can be viewed on the project’s website (www.i81opportunities.com).

5-2-2 LEAD, COOPERATING, AND PARTICIPATING AGENCIES

For projects subject to NEPA and/or SEQRA, a lead agency (or agencies) is designated to ensure that a comprehensive environmental review process is conducted properly and in accordance with all applicable environmental regulations. The FHWA is the Federal Lead Agency, and NYSDOT is Joint Lead Agency for the purposes of NEPA. NYSDOT also serves as the Lead Agency pursuant to SEQRA.

5-2
FHWA and NYSDOT have identified and invited federal and state agencies to participate in the environmental review process by serving as Cooperating and/or Participating Agencies. According to Council on Environmental Quality (CEQ) regulations (40 CFR § 1508.5), Cooperating Agency means any Federal agency, other than a Lead Agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative. A state or local agency of similar qualifications or, when the effects are on a reservation, a Federally recognized Native American tribe, may also serve as a Cooperating Agency. Participating Agencies are those federal, state, or local agencies or federally recognized Native American tribes with an interest in the project. In accordance with SAFETEA-LU Section 6002, Cooperating Agencies are also Participating Agencies.

Cooperating and Participating Agencies are responsible for identifying, as early as practicable, any issues of concern regarding the project’s potential environmental or socioeconomic impacts that could substantially delay or prevent an agency from granting a permit or other approval. Meetings have and will continue to be held with the agencies throughout the environmental review process to update them on the status of the project and discuss other topics as appropriate. Agencies that have accepted their invitations to serve as Cooperating or Participating Agencies for the project, with their applicable area of jurisdiction or expertise, are identified in Table 5-1.

**Table 5-1**

<table>
<thead>
<tr>
<th>Agency</th>
<th>Role</th>
<th>Responsibilities</th>
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<tbody>
<tr>
<td>Federal Highway Administration (FHWA)</td>
<td>Federal Lead Agency</td>
<td>Oversee environmental review process</td>
</tr>
<tr>
<td>New York State Department of Transportation (NYSDOT)</td>
<td>State Lead Agency</td>
<td>Oversee environmental review process</td>
</tr>
<tr>
<td>Advisory Council on Historic Preservation (ACHP)</td>
<td>Cooperating Agency</td>
<td>Section 106, National Historic Preservation Act; Section 4(f), U.S. Department of Transportation Act</td>
</tr>
<tr>
<td>US Army Corps of Engineers (USACE)</td>
<td>Cooperating Agency</td>
<td>Section 404, Clean Water Act</td>
</tr>
<tr>
<td>US Environmental Protection Agency (USEPA)</td>
<td>Cooperating Agency</td>
<td>Section 309, Clean Air Act; Section 404, Clean Water Act, EO 11990</td>
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<tr>
<td>New York State Department of Environmental Conservation (NYSDEC)</td>
<td>Cooperating Agency</td>
<td>New York State environmental permits</td>
</tr>
<tr>
<td>New York State Office of Parks, Recreation and Historic Preservation (OPRHP)—State Historic Preservation Officer (SHPO)</td>
<td>Cooperating Agency</td>
<td>Section 106, National Historic Preservation Act; Section 4(f), U.S. Department of Transportation Act</td>
</tr>
<tr>
<td>Onondaga Nation</td>
<td>Participating Agency</td>
<td>Section 106, National Historic Preservation Act Consultation</td>
</tr>
<tr>
<td>Syracuse Metropolitan Transportation Council (SMTC)</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
</tbody>
</table>
The I-81 Viaduct Project
Section 5: Public Involvement and Agency Coordination

Table 5-1 (Continued)
Lead, Cooperating, and Participating Agencies

<table>
<thead>
<tr>
<th>Agency</th>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>CNY Centro, Inc.</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
<tr>
<td>New York, Susquehanna and Western Railway</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
<tr>
<td>Onondaga County</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
<tr>
<td>City of Syracuse</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
<tr>
<td>Town of Cicero</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
<tr>
<td>Town of DeWitt</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
<tr>
<td>Town of Salina</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
<tr>
<td>Village of East Syracuse</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
<tr>
<td>Village of North Syracuse</td>
<td>Participating Agency</td>
<td>Consultation</td>
</tr>
</tbody>
</table>

Note:
The U.S. Fish and Wildlife Service (USFWS) declined to serve as a Cooperating Agency.
CSX did not respond to an invitation to serve as a Participating Agency.

The first Cooperating Agency meeting was held in October 2013. In May 2014, FHWA and NYSDOT commenced monthly conference calls with the Cooperating Agencies, and these calls continue throughout the NEPA process.

Participating agencies held their first meeting on June 4, 2014. Future meetings will be held at key milestones during the NEPA process. NYSDOT also participates in regular coordination meetings with representatives of SMTC, Centro, Onondaga County, and the City of Syracuse.

5-3 ENGGANG THE PUBLIC

The I-81 Viaduct Project has and will continue to include an open, participatory environmental review process. The Lead Agencies have and will continue to inform and solicit early and continued feedback from the public and from agencies; encourage open discussion of project details and issues; and provide opportunities for comments and questions. Public participation is a fundamental part of the NEPA and SEQRA processes, as well as other parallel processes, such as Section 106, Section 4(f), and Executive Order 12898 (environmental justice) reviews, which are discussed further below. Public input received during the previous I-81 Corridor Study (see Section 2-2-4) also has and will continue to inform this project. Opportunities for public input will occur throughout the project and include the following:

- Public meetings, public hearing, and open houses, which have and will continue to occur at key milestones throughout the project and will be advertised in local media and social media outlets. To date, public meetings have included two scoping meetings (November 13, 2013 and June 26, 2014), and the Project Update Presentation (May 1, 2014). A public
hearing will be held to allow for formal comments on the project following publication of the Draft EIS.

- **Meetings with elected officials, community representatives, stakeholders, and special interest groups**, which have and will continue to occur as needed throughout the project. NYSDOT has provided project briefings to elected officials and held numerous one-on-one meetings with representatives of various advocacy, neighborhood, and other stakeholders’ groups.

- **Stakeholders’ Committee**: NYSDOT has formed a stakeholders’ committee, which includes a broad range of stakeholders, including members of the general public (who are able to sign up for the committee on the project website, at public meetings, and at the project’s outreach center), elected officials, and stakeholders who represent agencies, interest groups, and organizations. Its members include representatives of education, development and planning, health, housing, social justice, urban design, environmental, business and industry, and governmental groups, among others. Members of the I-81 Challenge planning study’s Study Advisory Committee, including representatives from the SMTC member agencies, are also included in the Stakeholders’ Committee. The committee meets at project milestones. The first Stakeholders’ Committee meeting took place on June 24, 2014.

- **Stakeholders’ Advisory Working Groups**: NYSDOT created two working groups with representatives from a wide cross-section of the community to provide in-depth feedback on issues and ideas. The Community and Economic Development Stakeholders’ Advisory Working Group and the Sustainability Stakeholders’ Advisory Working Group held their first meetings in April 2014, and they have and will continue to meet regularly throughout the environmental review process. Meeting summaries and presentation materials for the Stakeholders’ Advisory Working Group are available on the project website.

- **Neighborhood Meetings**: The neighborhood meetings are designed to give residents throughout the Syracuse region additional opportunities to learn about the ongoing environmental review process and voice their comments and opinions. Since September 2013, NYSDOT has held meetings periodically throughout Syracuse and its environs, including in the Southside, Northside, Downtown, and Westside neighborhoods, as well as the Eastern Suburbs.

- **Meetings with affected property owners (if needed)**: The NYS Eminent Domain Procedure Law (Articles 1 through 7) requires the condemning agency to ensure that just compensation is paid for acquired property rights; provides an opportunity for public participation in the planning of public projects; encourages settlement of claims for just compensation; expedites payments to property owners; and establishes rules to reduce litigation and ensure equal treatment of all property owners.
Notifications of the publication of pertinent environmental documents, such as the Draft EIS, will appear in the Federal Register. In addition, to assist agencies and the public in accessing project information, there are several locations where pertinent documents and data are available and where the public can get assistance. These locations and information sources include:

- **Project Outreach Center: Carnegie Building**, 335 Montgomery Street, Syracuse, New York;
- **Project Website**: [www.i81opportunities.com](http://www.i81opportunities.com);
- **Project Facebook Page**: [https://www.facebook.com/I81viaduct](https://www.facebook.com/I81viaduct);
- **Project Hot Line**: (855) I81-TALK ((855) 481-8255); and
- **Project Repositories**, which at present include the locations shown in **Table 5-2**.

### Table 5-2
**Project Repositories**

<table>
<thead>
<tr>
<th>Repository</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>New York State Department of Transportation - Region 3 Office</td>
<td>333 East Washington Street, Syracuse, New York</td>
</tr>
<tr>
<td>Onondaga County Clerk's Office</td>
<td>401 Montgomery Street, Syracuse, New York</td>
</tr>
<tr>
<td>City of Syracuse Clerk's Office</td>
<td>233 E. Washington Street, Syracuse, New York</td>
</tr>
<tr>
<td>Syracuse Housing Authority - Administration Office</td>
<td>516 Burt Street, Syracuse, New York</td>
</tr>
<tr>
<td>Syracuse Housing Authority - Pioneer Homes</td>
<td>924 S. McBride Street, Syracuse, New York</td>
</tr>
<tr>
<td>Syracuse Housing Authority - Toomey Abbott Towers</td>
<td>1207 Almond Street, Syracuse, New York</td>
</tr>
<tr>
<td>Syracuse Metropolitan Transportation Council</td>
<td>126 N. Salina Street, Syracuse, New York</td>
</tr>
<tr>
<td>Dunbar Center</td>
<td>1453 State Street, Syracuse, New York</td>
</tr>
<tr>
<td>Faith Hope Community Center</td>
<td>1029 Montgomery Street, Syracuse, New York</td>
</tr>
<tr>
<td>Fairmount Community Library</td>
<td>406 Chapel Drive, Syracuse, New York</td>
</tr>
<tr>
<td>Westcott Community Center</td>
<td>826 Euclid Avenue, Syracuse, New York</td>
</tr>
<tr>
<td>Northeast Community Center Library</td>
<td>716 Hawley Avenue, Syracuse, New York</td>
</tr>
<tr>
<td>Southwest Community Center Library</td>
<td>2111 S. Salina Street, Syracuse, New York</td>
</tr>
<tr>
<td>Onondaga County Public Library (OCPL) Beauchamp Branch Library</td>
<td>2111 S. Salina Street, Syracuse, New York</td>
</tr>
<tr>
<td>OCPL Betts Branch Library</td>
<td>4862 S. Salina Street, Syracuse, New York</td>
</tr>
<tr>
<td>OCPL Central Library</td>
<td>447 S. Salina Street, Syracuse, New York</td>
</tr>
<tr>
<td>OCPL White Branch Library</td>
<td>763 Butternut Street, Syracuse, New York</td>
</tr>
<tr>
<td>Onondaga Free Library</td>
<td>4840 West Seneca Turnpike, Syracuse, New York</td>
</tr>
<tr>
<td>Syracuse University - Bird Library</td>
<td>222 Waverly Avenue, Syracuse, New York</td>
</tr>
<tr>
<td>Town of Cicero</td>
<td>8236 Brewerton Road, Cicero, New York</td>
</tr>
<tr>
<td>Town of DeWitt</td>
<td>5400 Butternut Drive, East Syracuse, New York</td>
</tr>
<tr>
<td>DeWitt Community Library</td>
<td>3649 Erie Boulevard East, DeWitt, New York</td>
</tr>
<tr>
<td>Village of East Syracuse</td>
<td>207 N. Center Street, East Syracuse, New York</td>
</tr>
<tr>
<td>East Syracuse Free Library</td>
<td>4990 James Street, East Syracuse, New York</td>
</tr>
<tr>
<td>Town of Elbridge</td>
<td>Route 31W, Jordan, New York</td>
</tr>
<tr>
<td>Town of Fabius</td>
<td>Route 80, Fabius, New York</td>
</tr>
</tbody>
</table>
Table 5-2 (Continued)

<table>
<thead>
<tr>
<th>Repository</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fayetteville Free Library</td>
<td>Digital repository only: <a href="http://www.fflib.org">www.fflib.org</a></td>
</tr>
<tr>
<td>Town of Hastings</td>
<td>1134 US Rt. 11, Central Square, New York</td>
</tr>
<tr>
<td>LaFayette Public Library</td>
<td>2577 Rt. 11 North, LaFayette, New York</td>
</tr>
<tr>
<td>Village of Liverpool</td>
<td>310 Sycamore Street, Liverpool, New York</td>
</tr>
<tr>
<td>Liverpool Public Library</td>
<td>Digital repository only: /www.lpl.org</td>
</tr>
<tr>
<td>Town of Lysander</td>
<td>8220 Loop Road, Baldwinsville, New York</td>
</tr>
<tr>
<td>Town of Manlius</td>
<td>310 Brooklea Drive, Fayetteville, New York</td>
</tr>
<tr>
<td>Village of Manlius</td>
<td>1 Arkie Albanese Avenue, Manlius, New York</td>
</tr>
<tr>
<td>Manlius Library</td>
<td>1 Arkie Albanese Avenue, Manlius, New York</td>
</tr>
<tr>
<td>Town of Marcellus</td>
<td>24 East Main Street, Marcellus, New York</td>
</tr>
<tr>
<td>Marcellus Free Library</td>
<td>32 Maple Street, Marcellus, New York</td>
</tr>
<tr>
<td>Maxwell Memorial Library (Camillus)</td>
<td>14 Genesee Street, Camillus, New York</td>
</tr>
<tr>
<td>Village of Minoa</td>
<td>240 N. Main Street, Minoa, New York</td>
</tr>
<tr>
<td>Minoa Library</td>
<td>242 N. Main Street, Minoa, New York</td>
</tr>
<tr>
<td>Village of North Syracuse</td>
<td>600 South Bay Road, North Syracuse, New York</td>
</tr>
<tr>
<td>Town of Onondaga</td>
<td>5020 Ball Road, Syracuse, New York</td>
</tr>
<tr>
<td>Town of Salina</td>
<td>201 School Road, Liverpool, New York</td>
</tr>
<tr>
<td>Salina Library</td>
<td>100 Belmont Street, Mattydale, New York</td>
</tr>
<tr>
<td>Town of Skaneateles</td>
<td>24 Jordan Street, Skaneateles, New York</td>
</tr>
<tr>
<td>Skaneateles Library</td>
<td>49 E. Genesee Street, Skaneateles, New York</td>
</tr>
<tr>
<td>Solvay Public Library</td>
<td>615 Woods Road, Solvay, New York</td>
</tr>
<tr>
<td>Village of Tully</td>
<td>5833 Meetinghouse Road, Tully, New York</td>
</tr>
<tr>
<td>Town of Van Buren</td>
<td>7575 Van Buren Road, Baldwinsville, New York</td>
</tr>
</tbody>
</table>

The public is provided notice of major public meetings through advertisements in local newspapers, press releases, the project website and Facebook page, and meeting notices on Centro buses. A project mailing list has been created to distribute project notices. The list currently includes approximately 4,500 contacts and will be continually updated. Meeting notices also are distributed and posted throughout the Downtown, Eastside, Northside, Southside, and Westside neighborhoods. Public notices announcing public meetings provide instructions for requesting special services. Sign language services and Spanish language interpreters have and will continue to be available at public meetings. Interpreters (e.g., Spanish, Chinese), as appropriate, have also been available for neighborhood meetings.

5-3-1 SECTION 106 CONSULTATION

Section 106 of the National Historic Preservation Act (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties that are listed or determined eligible for listing in the National Register of Historic Places. Section 106 includes a public participation component. The process includes providing the public with
information about the project and its effects on historic properties and seeking public comment and input. This requirement will be satisfied in coordination with the public involvement requirements pursuant to NEPA.

Members of the public with a demonstrated interest in the project may participate as Consulting Parties. Parties may be interested due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking’s effects on historic properties. Parties express interest to participate and then FHWA approves their status as Consulting Parties.

For the I-81 Viaduct Project, NYSDOT wrote letters to invite the Federally recognized Native American tribe, public agencies, preservation groups, and other stakeholders to express interest in participating as Consulting Parties. A public notice, in English and Spanish, was published in local newspapers to solicit further interest. A Citizen’s Guide on the Section 106 Consultation Process was made available at the public meetings and project website. Through these means, parties expressed interest to serve as Consulting Parties. FHWA and NYSDOT have coordinated to identify, accept, and notify interested parties of their status as Section 106 Consulting Parties.

Meetings will be held with the Consulting Parties as needed. The Consulting Parties will have the opportunity to comment on the identification and evaluation of historic properties, as well as provide their views on effects to these properties and proposed strategies to avoid, minimize, or mitigate adverse effects.

5-3-2 SECTION 4(f) COORDINATION

In accordance with 23 CFR § 774.5, FHWA must provide opportunities for coordination and comment to the official(s) with jurisdiction over any Section 4(f) resource that may be affected by the project as well as to the U.S. Department of the Interior (DOI), and as appropriate, the Department of Agriculture and the Department of Housing and Urban Development. Resources protected under Section 4(f) include public parks, wildlife refuges, and historic resources. Section 4(f) historic sites will be identified through the Section 106 process, in consultation with the SHPO and other Consulting Parties. The public is provided an opportunity to review and comment when FHWA makes a de minimis impact finding for parks, recreation areas, or wildlife and waterfowl refuges.

5-3-3 ENVIRONMENTAL JUSTICE COORDINATION

As discussed in Section 4-2-3, Executive Order (EO) 12898 requires consideration of whether a proposed action that seeks Federal funding or approvals would disproportionately affect minority or low-income groups (i.e., environmental justice communities). The environmental justice process requires the agencies to evaluate and mitigate disproportionate adverse effects to these populations. EO 12898 also requires Federal agencies to ensure public participation from communities with substantial minority or low-income populations. NYSDOT has and will continue to hold neighborhood meetings, which are held in identified
environmental justice areas where possible, as part of this effort. In addition, FHWA and NYSDOT have and will continue to ensure that notices of public meetings and any other public outreach materials will be accessible to potentially affected environmental justice communities identified in the project area.

In addition to EO 12898, Federal concerns for nondiscrimination under Title VI of the Civil Rights Act of 1964 are applicable under the environmental justice process, and recipients of Federal aid must certify nondiscrimination on the basis of race, color, or national origin.

5-3-4 LIMITED ENGLISH PROFICIENCY (LEP) OUTREACH

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English may have limited English proficiency, or LEP. Pursuant to EO 13166, people with LEP should have meaningful access to Federally conducted and Federally funded programs and activities. Demographic data were reviewed to identify primary language(s) other than English spoken in the project area.

The I-81 Viaduct Project is taking steps to provide meaningful access to those LEP individuals expected to be most regularly encountered. Spanish interpreters and a “language line” service, which provides on-demand interpretation via telephone, were available at the scoping meetings. Spanish interpreters also were available at the scoping meetings and Project Update Presentation. Spanish interpreters (and in one neighborhood, a Chinese interpreter) were available at the neighborhood meetings. Meetings were advertised through translated flyers and e-fliers and translated advertisements published in CNY Latino, a local Spanish-language newspaper.

In addition, project staff attended the following classes to provide project-related information and answer questions:

- Syracuse City School District, English Language Learners’ Class – August 12, 2014; and
- Citizenship Class, Northside Catholic Youth Organization (CYO) – August 26, 2014.

5-4 CONTACT INFORMATION

For further information on the project, please visit the project website at www.i81opportunities.com or contact:

Michael Canavan
Federal Highway Administration
Leo W. O’Brien Federal Building,
11A Clinton Avenue, Suite 719
Albany, New York 12207
Telephone: (518) 431–4127

Mark Frechette, PE
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, New York 13202
Telephone: (315) 785-2333
SECTION 6: RESPONSES TO COMMENTS

6-1 INTRODUCTION

On August 26, 2013, the Federal Highway Administration (FHWA) and the New York State Department of Transportation (NYSDOT) issued a Notice of Intent (NOI) in the Federal Register to prepare an Environmental Impact Statement (EIS) for the I-81 Viaduct Project. Since that time, FHWA and NYSDOT have held a series of meetings to solicit agency and public involvement in the scoping phase of the I-81 Viaduct Project. During this time, the following agency and public meetings have been held:

- Five neighborhood meetings in September and October 2013 and eight neighborhood meetings in July and August 2014;
- Cooperating Agencies meeting (October 31, 2013) with monthly conference calls thereafter;
- A Scoping Meeting at the Oncenter on November 13, 2013;
- Community and Economic Development Stakeholders’ Advisory Working Group and Sustainability Stakeholders’ Advisory Working Group Meetings (six meetings of each group, as well as a joint walking tour) since the establishment of the groups in April 2014;
- A Project Update Presentation at the Everson Museum of Art on May 1, 2014;
- Participating Agencies meeting (June 4, 2014);
- A Stakeholders’ Committee meeting on June 24, 2014;
- A Scoping Meeting at the Oncenter on June 26, 2014;
- Elected Officials briefings; and
- One-on-one meetings with City and County officials, civic and community organizations, and other stakeholder groups.

FHWA and NYSDOT published a Scoping Initiation Packet on November 13, 2013, which provided preliminary information about the purpose and need for the project and concepts under consideration. FHWA and NYSDOT accepted comments on the Initial Scoping Packet through January 17, 2014.

On May 1, 2014, FHWA and NYSDOT hosted a project update presentation. The purpose of the presentation was to show the refinement of potential project alternatives and to solicit public input. FHWA and NYSDOT accepted public comments during and following the project update presentation.
FHWA and NYSDOT published a *Draft Scoping Report* on June 20, 2014. The *Draft Scoping Report* provided greater detail about the purpose and need for the project, the potential alternatives under consideration, a screening of the potential alternatives, methodologies for preparing the Draft EIS, and a plan for agency and public involvement. The *Draft Scoping Report* was available for public review on the project website and at the project repositories including the project’s outreach center at the Carnegie Building at 335 Montgomery Street in Downtown Syracuse. Copies were also available at the June 2014 Scoping Meeting and at the subsequent neighborhood meetings. FHWA and NYSDOT accepted comments on the *Draft Scoping Report* from June 20, 2014 to September 2, 2014.

This section of the *Scoping Report* summarizes and responds to substantive comments submitted during the scoping comment periods for the I-81 Viaduct Project. Comments were accepted in writing by letter, e-mail, comment forms, and electronic forms, and a stenographer was on hand at both public scoping meetings to record oral testimony. The written comments and transcripts of the public scoping meetings are provided in *Appendix B* of this *Scoping Report*.

Sections 6.2, 6.3, 6.4, and 6.5 below contain summaries of relevant comments and responses to each. Section 6.6 lists the public agencies, elected officials, organizations, and individuals that provided comments. The comment submissions are provided in *Appendix B* of this *Scoping Report*.

The summaries in Sections 6.2 through 6.5 convey the substance of the comments made but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the sections of the *Scoping Report*. Where more than one commenter expressed similar views, those comments have been grouped and addressed together.

Early in scoping, members of the public presented potential alternatives that FHWA and NYSDOT studied in the *Draft Scoping Report*. These are described as Alternatives V-5 (New Stacked Viaduct), T-4 (Tunnel on an Eastern Alignment), and O-2 (West Street/Salt City Circuit). The comment submissions containing these potential alternatives are provided in *Appendix B*, and the potential alternatives are described in *Section 3* of this Scoping Report. Since these alternatives were already presented in the *Draft Scoping Report*, a response is not provided in this *Scoping Report*.

### 6-2 PURPOSE AND NEED

#### 6-2-1 GENERAL

C 2-1: This project should focus on solutions that create development opportunities, promote urban planning best practices, and serve and connect the economic engines of urban core neighborhoods.
I-81 Viaduct Project
Section 6: Responses to Comments

R 2-1: A goal of the project is to "provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse."

C 2-2: The final outcome should be viable and should enhance the residential community, provide greater pedestrian access through the neighborhood, and afford the opportunity for further housing and economic development for those who live there.

R 2-2: Please see the response to Comment 2-1. As noted in the Scoping Report, one of the project objectives is to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations.”

C 2-3: FHWA and NYSDOT must consider the multiple perspectives provided by the University Hill area, Centerstate CEO, Destiny USA, and others even if they are at odds or differ with the options that they put forward in their Draft Scoping Report. The Draft EIS cannot simply focus on the pass/fail analysis of the alternatives presented in the Draft Scoping Report.

R 2-3: FHWA and NYSDOT have considered the comments submitted during the scoping comment periods, including those made on the potential alternatives. FHWA and NYSDOT have also reviewed proposals for new potential alternatives made by elected officials, stakeholder groups, and members of the public. A screening of potential alternatives (i.e., Alternative V-5: New Stacked Viaduct, Alternative T-4: Tunnel on Eastern Alignment, Alternative O-2: West Street/Salt City Circuit) was described in the Draft Scoping Report. FHWA and NYSDOT also considered potential alternatives (e.g., Rethink I-81 Plan [see Comment 3-120], Access Syracuse Plan [see Comment 3-121], and 81’ Below Syracuse rev1 [see Comment 3-160]) proposed by members of the public following the publication of the Draft Scoping Report, and responses to these proposals appear below.

The evaluation of alternatives in the Draft Scoping Report relied on engineering information and other data to determine whether alternatives were reasonable to carry forward, and this type of evaluation is typical for NEPA scoping. FHWA and NYSDOT will not use a pass/fail system for alternatives screening in the Draft EIS. Instead, the Draft EIS will include an assessment of the remaining alternatives in detail, allowing for a consideration of the potential benefits and impacts of each during the public review of the Draft EIS.

C 2-4: The Downtown Committee urges FHWA and NYSDOT to place a high value on the accessibility needs of the local population and ensure that these needs are paramount to decisions that will be made on the future of I-81.
R 2-4: FHWA and NYSDOT have identified the need to provide vehicular, bicycle, and pedestrian accessibility and improved infrastructure as part of the project. The project objectives reflect the importance of the accessibility needs of the local population.

C 2-5: FHWA and NYSDOT should focus on opportunities to improve the tax base, generate revenue, and generate long-term wealth for Syracuse, such as the opportunities for infill development presented by the Community Grid Alternative (formerly “Street-level Alternatives”).

R 2-5: One of the stated project goals is to “provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse” (see Section 2-3 of the Scoping Report). FHWA and NYSDOT will continue to coordinate with economic development interests to identify opportunities for new development, but the implementation of economic development plans is outside the scope of the I-81 Viaduct Project.

C 2-6: The primary objective of the project should be maintaining an interstate through the City to maintain efficient traffic flow on the highway and local streets and to continue to support travel and land use patterns that have been established based on the current viaduct.

R 2-6: A stated objective of the project is to “maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area” (see Section 2-4 of the Scoping Report). FHWA and NYSDOT intend to maintain Syracuse’s connections to the interstate highway system and to maintain efficient traffic flow in and through the city. FHWA and NYSDOT also intend to minimize potential adverse impacts to existing and proposed land uses within the I-81 viaduct priority area.

C 2-7: New and enhanced transit options and multi-modal opportunities should be contemplated as part of the project.

R 2-7: As stated in Section 2-3 of the Scoping Report, an objective of the project is to “maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.” These specific improvements would be identified as design for the I-81 Viaduct Project advances. The I-81 Viaduct Project would also not preclude transit improvements by others within the I-81 viaduct priority area or project limits.

C 2-8: The Centro Transit Study and the I-81 Project should be aligned so that comprehensive transportation solutions can be developed.
R 2-8: One of the project objectives is to “maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.” The I-81 Viaduct Project began in August 2013; however, the Centro study, which is known as the Syracuse Metropolitan Area Regional Transit Study, has not yet commenced. The basis for this study was the “Syracuse Transit System Analysis” completed in January 2014. While the studies are not being undertaken simultaneously, NYSDOT is and will continue to be in coordination with Centro throughout the I-81 Viaduct Project. NYSDOT and Centro have participated in numerous one-on-one meetings, and Centro is a Participating Agency and a member of one of the Stakeholders’ Advisory Working Groups for the project.

C 2-9: NYSDOT has referred to local benefits during construction, including construction jobs and opportunities for local businesses. NYSDOT should look beyond the construction phase and prioritize long-term community impacts (i.e., permanent jobs and residents for new buildings in areas that can be rebuilt). The people of Syracuse need a solution that will ensure long-term positive impacts for our community and is not solely focused on the construction period.

R 2-9: Consistent with NYSDOT policy, the project team is evaluating the potential alternatives based on a 2050 design year, and analyses performed for the Draft EIS will address long-term benefits and impacts of the project. One of the stated project goals is to “provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse.” FHWA and NYSDOT will continue to coordinate with economic development interests to identify opportunities for new development, but the implementation of such plans is outside the scope of the I-81 Viaduct Project. FHWA and NYSDOT will consider the consistency of alternatives with long-term land use and development plans in the Draft EIS. As required by NEPA, the Draft EIS will also include an assessment of social, economic, and environmental impacts of the project during construction.

6-2-2 PROJECT LIMITS

C 2-10: This project should explore and advance solutions that use and improve the transportation network beyond the viaduct corridor itself.

R 2-10: As part of the I-81 Viaduct Project, FHWA and NYSDOT are exploring opportunities to enhance the local street network within the project area, including vehicular, transit access, bicycle, and pedestrian elements.

In 2009, NYSDOT and the Syracuse Metropolitan Transportation Council (SMTC) initiated the I-81 Challenge study to investigate strategies for the long-term viability of the 12-mile I-81...
corridor between its southern and northern interchanges with Interstate 481 (I-481), including the I-81 viaduct and the I-81/I-690 interchange in downtown Syracuse. Guided by the traffic data, engineering information, and public input collected as part of the I-81 Challenge, NYSDOT and SMTC carefully examined a rehabilitation strategy for the corridor. NYSDOT and SMTC identified rehabilitation as a viable option for the segments of I-81 north and south of the I-81 viaduct priority area. NYSDOT proposes to undertake rehabilitation of these segments in the coming years as funding permits. In the viaduct segment, NYSDOT and SMTC identified 42 bridges in need of repair or replacement. For this project, FHWA and NYSDOT are investigating more appropriate strategies for the long-term viability of the viaduct segment; however, this project will not preclude additional improvements outside the I-81 viaduct priority area, which could be undertaken by NYSDOT at a later date.

C 2-11: The elevated section of I-690 in Downtown is nearing the end of its useful lifespan, and consideration needs to be given to how the I-81 Viaduct Project would affect future rebuild of that highway as well. Some I-690 bridges are outdated and should be incorporated into the project, and potentially replaced with a boulevard.

R 2-11: The portion of I-690 between West Street and Lodi Street is included in the I-81 Viaduct Project, and consistent with the project objectives, the project will address structural deficiencies in the I-81 viaduct priority area. NYSDOT has also identified a need to replace the section of I-690 between approximately Lodi Street and Teall Avenue. As this project has independent utility, it is advancing as a separate project as described in Section 2-2 of this Scoping Report.

C 2-12: Page 1-1 of the Draft Scoping Report states, "NYSDOT is also investigating modifications to interchanges on Interstate 690 (I-690) between West Street and Teall Avenue and potential improvements on Interstate 481 (I-481) from end to end." NYSDOT's "segmentation" of I-690 between Teall Avenue and West Street is incompatible with FHWA rules.

R 2-12: Proposed improvements on I-690 within the project limits are being considered as part of the I-81 Viaduct Project. Subsequent to publication of the Draft Scoping Report, inspections identified severe deficiencies on I-690 along the 1,500-foot segment of bridge that spans Beech Street, calling for its imminent replacement. Thus, NYSDOT is progressing the I-690 bridge replacement and upgrades to the adjacent interchange at Teall Avenue as a separate project. This separate project has independent utility; connects logical termini and is of sufficient length to address environmental matters on a broad scope; and will not restrict consideration of alternatives for other reasonably foreseeable transportation improvements. This separate project and the I-81 Viaduct Project are not dependent upon each other and each can proceed prior to, concurrently with, or subsequent to the completion of the other.
The project limits for the I-81 Viaduct Project have been modified to comprise I-690 from approximately the West Street interchange to Lodi Street.

C 2-13: Impacts from each of the alternatives on suburbs surrounding the corridor also need to be examined. NYSDOT needs to provide more detailed drawings and images of suggested changes to I-81 or I-481 and I-690 in the suburbs, or other parts of the city, where NYSDOT has suggested that there would be changes required by the various options.

R 2-13: FHWA and NYSDOT presented preliminary plans for improvements to I-481 and I-690 at the Scoping Meeting in June 2014 and at neighborhood meetings hosted in July and August 2014. Plans are also provided in Section 3 of this Scoping Report. FHWA and NYSDOT will continue to refine the plans, which will be provided in the Draft EIS. Impacts, including secondary and cumulative impacts, of the alternatives on highways and local streets within the project limits will be assessed in the Draft EIS.

6-2-3 THE NEED TO CORRECT TRANSPORTATION DEFICIENCIES

C 2-14: The scoping document should add a figure that shows the level of service (LOS) at the interchange of I-481 and NYS Route 5 (Genesee Street) in order to show the need to reconfigure the interchange.

R 2-14: Section 3-2-3 of the Scoping Report identifies the need to add an auxiliary lane on I-481 between Interchanges 4 and 5 based on preliminary analysis of potential traffic volumes under the Community Grid Alternative (formerly known as “Street-level Alternatives”), but other preliminary analysis has not yet identified a need for other improvements to Interchanges 4 and 5. Detailed traffic analysis, including level of service and an assessment of the need for auxiliary lanes and other modifications, will be undertaken during the development of the Draft EIS.

C 2-15: The main transportation problem facing Syracuse is improving east-west connections for non-automobile users across both the existing I-81 and existing I-481 corridors. It would be better to save all the money proposed for all the expensive improvements in the motor vehicle right-of-way and use it to pay for dedicated east-west crossings for pedestrians, bicyclists, and wheelchair users. These should go over the existing I-81, and under the existing I-481, so as to eliminate conflicts between entering and exiting interstate traffic and these non-vehicular users who are intimidated by the current interchanges.

R 2-15: As reflected in the project objectives (see Section 2-4 of this Scoping Report), the project will address pedestrian and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area and maintain or enhance the pedestrian and bicyclist connections in the local
street network within the project area to allow for connectivity between neighborhoods, the downtown business district and other key destinations. This effort is being coordinated with the City of Syracuse and in consideration of local plans, including the Syracuse Bicycle Plan, which is part of the city’s comprehensive plan.

**C 2-16:** The Moving People Transportation Coalition’s (MPTC’s) vision of a sustainable regional transportation system that focuses on moving people, not cars, highlights one of the glaring deficiencies in the process as it has been conducted so far. To date there has been no NYSDOT sponsored opportunity for the public or the stakeholders’ advisory working groups (SAWGs) to engage in dialogue with the project team, SMTC, and Centro about integrating long-term transit planning with planning for the I-81 Viaduct Project. Given the vision, goals and objectives of the “Syracuse Transit System Analysis,” prepared for the NYSDOT in coordination with SMTC and Centro in 2014, and their importance to the development of transportation in the I-81 corridor, the lack of public dialogue involving the NYSDOT, SMTC and Centro is disturbing. This issue and a plan for bringing SMTC and Centro into a public dialogue about the differential impact of various build alternatives and related mass transit issues should be addressed in the *Scoping Report*.

**R 2-16:** As stated in *Section 2-4* this *Scoping Report*, an objective of the project is to “Maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.” To that end, FHWA and NYSDOT would coordinate with Centro on potential street improvements in the project limits to enhance and support access to Centro’s transit initiatives. These specific improvements would be identified as the alternatives for the I-81 Viaduct Project are refined. Furthermore, Centro is a Participating Agency and a member of a Stakeholders’ Advisory Working Group for the I-81 Viaduct Project, and NYSDOT and Centro have participated in numerous one-on-one meetings. Coordination with Centro will continue as the I-81 Viaduct Project advances. Any pertinent information will be presented in the Draft EIS and available for public review. The public will have an opportunity to provide comments during the public review period of the Draft EIS, including at the public hearing.

**C 2-17:** The merging lanes at the I-81/I-690 interchange are dangerous and prone to congestion.

**R 2-17:** As stated in *Section 2-4* of the *Scoping Report*, an objective of the project is to “address vehicular, pedestrian, and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area.” The merging lanes within the existing I-81/I-690 interchange will be addressed during preliminary design as part of the I-81 Viaduct Project.
C 2-18: Should the viaduct remain, NYSDOT should explore the location of on- and off-ramps. For example, the poor ramp spacing between the I-81 / I-690 interchange and Interchange 18 (Harrison Street / Adams Street) results in bottlenecks and congestion.

R 2-18: As stated in Section 2-4 of the Scoping Report, an objective of the project is to "maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area." FHWA and NYSDOT are exploring ramp locations and potential modifications within the project limits. Some recommendations for potential ramp modifications have been included in the description of potential alternatives presented in Section 3-2 of this Scoping Report.

C 2-19: The project should improve capacity. As long as any work happens, it would be a shame not to make dramatic changes. We should end up with 4-lane interstates, 2-lane ramps, dedicated express lanes from outside the city to the University/hospital area, and a 3-lane I-481.

R 2-19: Regional travel demand modeling is being used to forecast future traffic volumes, which will be used to perform capacity analyses and assess future traffic operations and identify potential capacity deficiencies. The project would, however, include some capacity improvements at specific locations. Non-standard and non-conforming highway features will be minimize or brought to full standards to the extent practicable, which would improve incident management and traffic flow.

C 2-20: Traffic modeling for future options should be detailed, iterative, and look beyond just the viaduct or the Almond Street Corridor. There is concern from the public that infrastructure will be "overbuilt" to accommodate future vehicle traffic or that solutions will focus solely on the Almond Street corridor.

R 2-20: Future traffic volumes/patterns will be identified using SMTC’s Regional Model and will extend well beyond the viaduct/Almond Street corridor. Traffic operations will be modeled using a large simulation model developed for the project, which includes an area from I-481 on the north, south, and east and extends beyond Hiawatha Boulevard to the west. An iterative approach using both models will be employed to evaluate and refine the alternatives for the Draft EIS. To ensure that the design year (2050) traffic volumes can be accommodated without overbuilding the ultimate solution, this iterative approach will seek to improve other roadways in addition to the viaduct/Almond Street corridor to optimize use of the transportation network.
C 2-21: Providing the missing connections at the I-81/I-690 interchange is an important aspect of the project.

R 2-21: A fully directional interchange between I-81 and I-690 will continue to be explored as the project advances.

C 2-22: The residents of Syracuse have adapted to the missing connections of the I-81/I-690 interchange. The purpose and need should better justify the expense for and the potential properties associated with a fully directional interchange between I-81 and I-690, and a justification for these costs and property impacts should be provided based on a clear understanding of how many travelers would use it. This fully directional interchange has the potential to require land acquisition, could increase noise near existing residences, and could temper revitalization efforts in Franklin Square, Mission Landing, and Northside.

R 2-22: The changes to the interstate system that are being explored consider the recommendations of FHWA’s “Interstate System Access Informational Guide” (August 2010), which states, “Not providing for all movements violates driver expectation and may lead to ‘wrong-way’ movements on ramps. Therefore, alternatives for the construction of partial interchanges should generally be avoided. If partial interchanges are being considered, clear and detailed analysis must be conducted and documented as justification for their construction or retention....In the extreme and extraordinary circumstances where a partial interchange is being considered, a full interchange must be included as an alternative for comparison in the decision-making process.” Also, AASHTO’s “A Policy on Design Standards Interstate System” dated January 2005 states interchanges shall be provided between all interstate routes and all interchanges shall provide for all traffic movements. According to the initial estimate, during the peak hours in 2050, approximately 2,000 vehicles would use the missing connector between southbound I-81 and westbound I-690 or between northbound I-81 and eastbound I-690. FHWA and NYSDOT will consider the benefits and costs of these connectors, as well as potential adverse impacts that may result from the action, during the development of the Draft EIS.

C 2-23: There needs to be a better understanding of how traffic wants to flow to and through the center city.

R 2-23: Data regarding the origins and destinations of vehicle trips will be used to understand traffic patterns in the I-81 viaduct priority area. FHWA and NYSDOT will assemble the origin-destination (O-D) trip data from the Syracuse Metropolitan Transportation Council’s (SMTC’s) regional travel demand model. The SMTC recently updated the model using new O-D data. Additional O-D information will be provided in the Draft EIS.
I-81 Viaduct Project
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C 2-24: Please create an inventory list and graphic for all the I-81, I-690, and I-481 bridges, decks, exit and access ramps that are currently "deficient and/or will need to be demolished."

R 2-24: An inventory has been compiled by NYSDOT. The Draft EIS will identify the bridges within the project limits that should be replaced.

C 2-25: Shoulders are needed to improve safety.

R 2-25: As stated in Section 2-3 of the Scoping Report, an objective of the project is to “address vehicular, pedestrian, and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area.” The lack of shoulders is a non-standard feature of the existing highway and will be corrected to the extent practicable as part of the I-81 Viaduct Project.

C 2-26: I-81 was constructed to the detriment of the downtown street grid and traffic patterns. The I-81 redevelopment plan should make sure that downtown traffic is improved (more dispersed), that several downtown streets are returned to normal scale and 2-way, and that areas with broken street grid are reduced.

R 2-26: An objective of the project is to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations.”

C 2-27: The purpose and need should consider a broader definition of safety and use additional metrics to measure the safety impact of the resulting highway infrastructure. University Hill has facilities on both sides of I-81, and it is anticipated that additional facilities will be located on the west side of the interstate. This will lead to an increased number of pedestrian, bicycle, and auto crossings over or under whatever solution is adopted. FHWA and NYSDOT should address this anticipated increase in crossings.

R 2-27: The Draft EIS will study the potential impacts of the project on pedestrian safety accounting for potential future development in the area.

C 2-28: FHWA and NYSDOT should examine strategies to reduce the traffic flow through Downtown. Such strategies could include a more direct connection to University Hill from I-690 and/or I-481, taking advantage of the city’s existing street grid, enhancing the regional highway system, encouraging the greater use of mass transit, or encouraging development of housing and work options that might be less dependent on the highway system.

R 2-28: FHWA and NYSDOT are exploring improvements on I-81 and I-690 to enhance traffic flow to University Hill. FHWA and NYSDOT are also looking at the highway connections to the existing street grid and at the street grid itself to improve the efficiency of local access, and
NYSDOT will coordinate with Centro on potential street improvements in the project limits to support access to Centro’s transit initiatives. As identified in Section 2-4 of this Scoping Report, one of the project objectives is to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations.”

6-2-4 THE NEED FOR TRANSPORTATION TO SUPPORT LONG RANGE PLANS

C 2-29: The statement of purpose and need should carefully review the City of Syracuse Comprehensive Plan: 2040, and the I-81 project should be planned accordingly. Goals of particular interest include: 1) ensure that infrastructure for automobiles does not act as a barrier to other modes of travel; 2) explore the feasibility of alternative sustainable modes of mass transit; 3) enhance gateways and way-finding for visitors to the city; and 4) promote the development of trails and corridors that reflect local, regional, state, and national history.

R 2-29: NYSDOT has reviewed and is familiar with the City of Syracuse Comprehensive Plan: 2040, and the elements of the plan are described in Section 2-2 of this Scoping Report. FHWA and NYSDOT will consider the consistency of project alternatives with local plans within the project limits during the development of the Draft EIS.

C 2-30: True transformation could be accelerated by aligning the goals for I-81 with the economic goals outlined in the Central New York Regional Economic Development Council’s (CNY REDC) Five-Year Strategic Plan. This plan outlines three priority goals to guide the region’s collective actions:

- Strengthen Targeted Industry Concentrations that Leverage Unique Industry Assets
- Improve Competitiveness in, and Connections to, the Regional, National, and Global Economies
- Revitalize Our Region’s Urban Cores and Main Streets

The CNY REDC plan identifies seven regional priority industry concentrations: Clean Energy and Environmental Systems; Health, Biomedical Services and Biosciences; Financial Services; Agribusiness and Food Processing; Advanced Manufacturing; Tourism; and Data to Decisions. The segment of I-81 under study passes by critical elements of four of these seven sectors. FHWA and NYSDOT should specifically consider how this viaduct replacement project could link and enhance those assets. The current I-81 corridor could be used to demonstrate environmental and energy saving technologies and improvements to the visitor experience to the region.
The I-81 project is also critical to achieving the goal of greater global connectivity. Along the 14 mile stretch of I-81 between the interchange points with I-481, it passes Hancock International Airport, the CSX and NYS&W rail lines, the New York State Thruway, and via I-481, the Port of Oswego, the Great Lakes, and by extension from the port to the St. Lawrence Seaway. The I-81 project can be used to enhance all of those connections.

There is also significant opportunity for the I-81 corridor to contribute to the revitalization of our region’s urban cores, main streets and neighborhoods. The corridor is centered within the immediate neighborhoods of Downtown, University Hill, and Syracuse’s Northside all of which are experiencing investment equal to the cost of the highway project. At the same time, this highway segment also passes by some of the most economically challenged sections of the community. The opportunity exists to better connect these neighborhoods to the larger economy, create jobs for their residents, and assist in the upgrade of neighborhood housing.

R 2-30: NYSDOT has reviewed and is familiar with the CNY REDC Five-Year Strategic Plan, and elements of the plan are described in Section 2-2 of this Scoping Report. FHWA and NYSDOT will consider the consistency of project alternatives with local plans within the project limits during the development of the Draft EIS.

C 2-31: An important goal of the CNY REDC plan is to revitalize our urban cores and main streets. The current path of I-81 has done significant harm to the urban core. The Downtown Committee does not support any plan which will do more damage to our neighborhood fabric. The Downtown Committee believes there are significant opportunities for FHWA and NYSDOT to transform our urban center into a vibrant, accessible location.

R 2-31: NYSDOT has reviewed and is with the CNY REDC Five-Year Strategic Plan, and elements of the plan are described in Section 2-2 of this Scoping Report. NYSDOT will consider the consistency of project alternatives with local plans within the project limits during the development of the Draft EIS.

C 2-32: FHWA and NYSDOT should consider the Northside Urban Partnership’s guiding values as further plans are developed:

1) Connect neighborhoods, employment centers, emergency services, and businesses;
2) Preserve historic resources;
3) Develop a safe and attractive highway corridor, accommodating all transportation modes; and
4) Reduce the number of "dead zones" within the highway corridor.
This project presents a profound opportunity to enhance quality of life and further restore prosperity on the Northside and across the greater Syracuse community. These outcomes can only be achieved, however, when the project goals are aligned with the best interests of our greater community.

R 2-32: NYSDOT has considered and will continue to consider the goals of the Northside Urban Partnership plan, and elements of the plan are described in Section 2-2 of this Scoping Report. FHWA and NYSDOT will consider the consistency of project alternatives with local plans within the project limits during the development of the Draft EIS. In addition, the project will include a formal consultation process in accordance with Section 106 of the National Historic Preservation Act.

C 2-33: The statement of purpose and need should consider the Comprehensive Plan for the Town of DeWitt in its review of local plans. It presents a vision for the I-481 corridor, both as an important north/south ecological system within the Town, and to address the barrier it presents for the accommodation of bicycle and pedestrian facilities connecting the eastern and western sides of the corridor.

R 2-33: NYSDOT has reviewed and is familiar with the Comprehensive Plan for the Town of DeWitt, and the elements of the plan are described in Section 2-2 of this Scoping Report. FHWA and NYSDOT will consider the consistency of project alternatives with local plans within the project limits during the development of the Draft EIS.

C 2-34: Please be aware that the Syracuse Metropolitan Transportation Council (SMTC) is currently in the process of rewriting a completely new Long Range Transportation Plan (LRTP). The new LRTP will have a new set of goals and objectives, which will be based in large part on recent planning efforts, including the I-81 Challenge, in the community. Therefore, please give more consideration to the preliminary goals and objectives developed as part of the I-81 Challenge.

R 2-34: The comment regarding the rewriting of the LRTP is noted. The goals and objectives for the I-81 Challenge were reviewed and served as the basis to develop project goals and project objectives for the I-81 Viaduct Project. Section 2-2 of this Scoping Report includes a discussion of the goals of the I-81 Challenge.

C 2-35: Superior urban design will increase the economic and cultural vitality and the population of Syracuse. This trumps any of the economic concerns—real or perceived—so far voiced by business special interest groups, who will benefit vastly more from the resulting economic
growth generated by a thoughtful holistic I-81 redevelopment plan than from any of their proposals offered so far.

R 2-35: Consistent with NYSDOT policy, project alternatives will incorporate context-sensitive design features. FHWA and NYSDOT are committed to urban design improvements for each alternative considered.

C 2-36: The project team should consult the Onondaga County Settlement Plan, adopted by the County legislature and County Executive.

R 2-36: NYSDOT has reviewed and is familiar with the Onondaga County Settlement Plan, and the elements of the plan are described in Section 2-2 of this Scoping Report. FHWA and NYSDOT will consider the consistency of project alternatives with local plans within the project limits during the development of the Draft EIS.

6-2-5 PROJECT GOALS AND OBJECTIVES

C 2-37: Enhancing connectivity between the University Hill and Downtown areas, and throughout the urban core, should be a major goal of this project.

R 2-37: As identified in this Scoping Report, a stated goal of the project is to “enhance safety and create an efficient regional and local transportation system within and through greater Syracuse.” As noted in Section 2-4 of the Scoping Report, three of the project objectives relate to connectivity and mobility in and near Downtown Syracuse, as follows:

• Maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area;
• Maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations; and
• Maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.

C 2-38: The project should enhance walkability and bicycle access because it fosters neighborhood growth.

R 2-38: An objective of the project is to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations” (see Section 2-4 of this Scoping Report).
C 2-39: The project objectives should include a more broad-based objective to reduce car travel by offering effective transit solutions.

R 2-39: As stated in this Scoping Report (see Section 2-4), an objective of the project is to “maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.” NYSDOT would coordinate with Centro on potential street improvements in the project limits to enhance and support access to their transit initiatives. These specific improvements would be identified as the alternatives for the I-81 Viaduct Project are refined, but specific transit initiatives are considered outside the scope of the I-81 Viaduct Project.

C 2-40: Improving the economic vitality of the greater Syracuse region is a stated objective of the project. FHWA and NYSDOT should present more information on how this goal will be addressed.

R 2-40: As stated in Section 2-4 of the Draft Scoping Report and this Scoping Report, a goal of the project is to “provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse.” The Draft EIS will include an analysis of the economic impacts of the I-81 Viaduct Project.

C 2-41: The Draft Scoping Report promises a full consideration of Goal 2, but there are a deficient number of objectives for Goal 2 and little information is provided about what specific data will be gathered and how it will be utilized to evaluate the various criteria in reaching a final recommendation. The lack of a robust list of objectives and criteria related to “Project Goal #2” is a serious flaw that must be addressed. Objectives related to economic vitality, sustainability, and livability may lead to greater differentiation between the build alternatives carried into the Draft EIS process than the criteria related to Project Goal 1.

R 2-41: As reflected in Section 2-4 of this Scoping Report, FHWA and NYSDOT have refined the project objectives based on additional considerations, including public input. These refinements include new or modified objectives that support the overall project goal of livability, sustainability, and economic vitality. These objectives include:

- Address vehicular, pedestrian, and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area.
- Maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations; and
- Maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.
The project objectives should be revised in coordination with the two Stakeholders’ Advisory Working Groups in collaboration with the project team and consultants. Public forums could be conducted and an interactive internet platform could be employed to allow the community an opportunity to participate in evaluating each build alternative for each objective at critical junctures throughout the Draft EIS process. Such a process has the potential to provide a high level of transparency, facilitate informed dialogue, and build a foundation of public support for the final decision on the best build alternative.

The Draft Scoping Report presented the project objectives for public review and comment. The project objectives also were published on the project website and were part of the presentation materials at the June 2014 Scoping Meeting. The project objectives have been refined based on additional considerations, including public input, and are presented in Section 2-4 of this Scoping Report.

An important objective of the project should be to attract young families back to the city of Syracuse.

Such an objective is outside the scope of the I-81 Viaduct Project.

A project objective should be to provide redundancy in the transportation system to better prepare for security, weather events, and emergency response.

The Syracuse area is served by interstate highways (I-81, I-90, I-481, and I-690), U.S. highways, New York State highways, and a local street system. The combination of these roadways provides for redundancy throughout the region. A specific objective regarding redundancy is not warranted. New roadways would comply with applicable Federal and state design standards, which include features to address security, weather events, and emergency response.

The primary objective of this project should be to serve the physical needs of access to and around the City without detriment to the economic vitality of the downtown core of Syracuse.

A secondary, but equally important, objective should be regional planning to coordinate any proposed traffic modifications for avoidance of negative impact on the surrounding communities. The secondary objective should include a coordinated DOT strategy for cross-state commercial through-traffic.

A third objective must be to reduce congestion and foster alternatives to disperse the destination-traffic into the city street grid. This should offer enhanced safety for pedestrians and motorists as well as improved access to destination locations.
A proper solution to the traffic flow through Syracuse must be managed in conjunction with regional engineering to provide adequate, properly designed and designated routes for commercial traffic without detriment to any of our communities.

R 2-45: As described in the Draft Scoping Report and this Scoping Report, the project includes two goals. The first goal reflects the need to correct transportation deficiencies, and the second goal addresses the need to enhance livability, sustainability, and economic vitality in greater Syracuse. The Project includes five objectives, including an objective to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district and other key destinations.” The project also includes two objectives that relate to congestion, which are “address vehicular, pedestrian, and bicycle geometric and operational deficiencies in the I-81 viaduct priority area” and “maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area.”

C 2-46: In planning the I-81 Viaduct Project, FHWA and NYSDOT must consider the accessibility needs of people with disabilities. The approach must not be limited to mere compliance with minimal standards of accessibility; it should aim at going beyond compliance.

R 2-46: A stated objective of the project is “address vehicular, pedestrian, and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area.” As guided by this objective and compliance with the Americans with Disabilities Act (ADA), and consistent with NYSDOT design criteria, the project will address the accessibility and circulation needs of people with disabilities.

C 2-47: The primary goal of the project must be the efficient movement of traffic for the next 60 years to and from all points and directions in and around Syracuse.

R 2-47: NYSDOT’s Project Development Manual identifies a planning horizon year of estimated time of completion (ETC) plus 30 years for bridge projects. FHWA and NYSDOT are assessing design options based on traffic conditions in 2050. As noted in the Draft Scoping Report and this Scoping Report, a goal of the project is to “improve safety and create an efficient regional and local transportation system within and through greater Syracuse.”

C 2-48: The project should not have a heavy focus on cyclists since this is a small segment of the population.

R 2-48: Bicycles are considered part of the transportation system in Syracuse, and to that end, FHWA and NYSDOT have developed project objectives that aim to enhance access and circulation
for cyclists. FHWA and NYSDOT will consider a balanced approach for the safety, mobility, and accessibility needs for motorists, cyclists, and pedestrians.

**C 2-49:** Make your first, paramount objective under goal number one to reduce the amount of local traffic that uses the viaduct by 50 percent. The street grid and signal timing on local streets should be improved so that traffic using the highway for short trips is reduced. If the damage that was done to the street grid when the viaduct was built is not repaired, you will end up building something too big in place of what is there now.

**R 2-49:** The Syracuse Metropolitan Transportation Council (SMTC) regional travel demand model has been used to inform project area needs. This model projects traffic conditions in 2050, which, in accordance with NYSDOT’s Project Development Manual, is the design year for the I-81 Viaduct Project. Four of the project objectives (see Section 2-4 of the Scoping Report) aim to improve vehicular access and circulation:

- Address vehicular, pedestrian, and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area;
- Maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area;
- Address structural deficiencies in the I-81 viaduct priority area; and
- Maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations.

The I-81 Viaduct Project also includes the following objective related to transit services:

- Maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.

### 6-3 PROJECT ALTERNATIVES

#### 6-3-1 DEVELOPING AND EVALUATING ALTERNATIVES

**C 3-1:** The project should move to a smaller set of truly viable options quickly and keep the public informed about the progress. Public discussion needs to focus on options that are truly viable and the sooner this can happen, the better. There is frustration in the community with the slow pace of progress; at least as is visible to the public. Keeping people engaged in the process and maintaining their trust requires a high level of ongoing communication.

**R 3-1:** This Scoping Report presents the reasonable range of alternatives to be advanced for further evaluation and development in the Draft EIS. The Draft EIS will include an assessment of the
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social, economic, and environmental impacts of these alternatives. NYSDOT will continue to engage the public as it prepares the Draft EIS, and the public will have an opportunity to review and comment on the Draft EIS when it is published.

C 3-2: The public needs to see results that they can relate to, specifically impacts to their travel routes and travel time to key destinations in the future. Specific information about how potential solutions might change commuting patterns and how those changes might impact travel times are necessary for people to develop informed opinions about the project. Short commute times should not be a prime indicator of success in alternatives analysis. Getting to and from the urban core in a timely fashion is but one of many measures of successful design.

R 3-2: Potential changes in travel times and travel patterns will be assessed and presented in the Draft EIS.

C 3-3: The alternatives evaluation must have a finer graduation than pass or fail. A scale with at least three or five categories would allow for a much finer differentiation regarding the adequacy of each objective. The expansion and refinement of the decision making matrix utilized in the “Alternatives Screening” tables is critical because the “Goal 2” objectives will lead to greater differentiation between the build alternatives carried into the Draft EIS process than “Goal 1” issues related to safety and efficiency of automobile transportation.

R 3-3: The initial screening of potential alternatives in the Draft Scoping Report was developed to identify whether a potential alternative is practical and feasible (i.e., reasonable), and should be carried forward for analysis in the Draft EIS. The intent of the screening was to identify the options that would meet the project need, purpose, and objectives. The Draft EIS will include an assessment of the social, economic, and environmental considerations, such as community cohesion, land use, economic impacts, environmental justice, visual impacts, air quality, noise, cultural resources, and others, for the build alternatives.

C 3-4: Solutions that enhance the livability, visual quality, sustainability, and economic vitality of Greater Syracuse should be the primary criterion to judge alternatives for this project.

R 3-4: The mission of NYSDOT is to “ensure our customers—those who live, work and travel in New York State—have a safe, efficient, balanced and environmentally sound transportation system.” NYSDOT recognizes that livability, visual quality, sustainability, and economic vitality are important considerations in developing and evaluating alternatives for the I-81 Viaduct Project. As such, NYSDOT has identified the following two goals for the project (as presented in Section 2-3 of this Scoping Report):
- Improve safety and create an efficient regional and local transportation system within and through greater Syracuse; and
- Provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse.

C 3-5: The Downtown Committee identified a series of goals which are critical to ensuring Downtown’s revitalization and measured each proposed alternative against these goals. The Downtown Committee has provided these goals, along with an evaluation of each of the alternatives, for consideration by NYSDOT.

R 3-5: The Draft Scoping Report presented the project objectives for public input. The project objectives have been refined based on additional considerations, including public input, and are presented in this Scoping Report. The Downtown Committee’s submittal will be considered during the development of the Draft EIS.

C 3-6: Any option that increases commuting time by more than one minute from anywhere to anywhere around Syracuse should be eliminated.

R 3-6: Estimated travel times under each alternative, as well as accident data and other measures, will be evaluated and included in the Draft EIS.

C 3-7: The project should accommodate commercial through traffic, but should consider the actual amount of commercial through traffic when weighting the impact on system design.

R 3-7: The project would be designed to accommodate commercial through traffic as well as all other vehicles. FHWA and NYSDOT will consider traffic volumes when weighing the impacts on the system.

C 3-8: We believe it critical at this stage in the project for NYSDOT to significantly expand upon its evaluation criteria comparisons in the areas of 1) construction duration schedules; 2) impact on local businesses; 3) impact on housing and residential units, 4) urban design improvement strategies; 5) environmental impact strategies; 6) recycling plan for demolition materials, and 7) long-term economic growth.

R 3-8: The screening of potential alternatives in the Draft Scoping Report was undertaken to identify whether a potential alternative is practical and feasible (i.e., reasonable) and should be advanced for further evaluation and development in the Draft EIS. The intent of the screening was to identify the options that would meet the project need, purpose, and objectives. A pass/fail system was used to provide a reader-friendly means of identifying whether potential alternatives are reasonable. The Draft EIS will include an assessment of
social, economic, and environmental considerations, such as community cohesion, land use, economic impacts, environmental justice, visual impacts, air quality, noise, cultural resources, and others, for the build alternatives.

**C 3-9:** NYSDOT should determine which solution has the potential to generate long-term, permanent jobs for our community.

**R 3-9:** The Draft EIS will include an assessment of the social, economic, and environmental considerations, such as community cohesion, economic impacts, land use, and others, for the build alternatives.

**C 3-10:** A commenter stated that the scoping report cannot be a substitute for a robust alternatives analysis. Proper traffic, engineering, and regulatory analysis are needed to evaluate whether to make major changes to the interstate highway system. The scoping report is a NEPA tool, one which is used once FHWA and NYSDOT have established a short list of alternatives that they have analyzed from a traffic and engineering perspective and concluded, at least preliminarily, that the alternatives work and that, if selected, would meet interstate highway system requirements. That has not been done.

The commenter also stated that NEPA is being improperly used to complete that analysis to the exclusion of requirements applicable to the Interstate Highway System. The result is to impart non-engineering and non-traffic considerations into the initial screening of available options. That is not the purpose of NEPA (which is to identify and analyze environmental impacts relating to the short list of alternatives chosen). It violates the interstate highway system regulatory and deliberative requirements relating to making changes to the interstate highway system.

**R 3-10:** NEPA scoping begins with publication of a Notice of Intent and is used to identify a reasonable range of alternatives for evaluation in the Draft EIS and to determine the scope of issues to be addressed in the Draft EIS. The Draft Scoping Report and this Scoping Report present a preliminary evaluation of these potential alternatives based on engineering, traffic, property, and cost considerations. The Scoping Report describes the alternatives that will be advanced for further evaluation and development in the Draft EIS. The Draft EIS will include an assessment of social, economic, and environmental considerations.

**C 3-11:** The range of alternatives presented in the Draft Scoping Report is too narrow and has been prematurely narrowed as a result of the publication of the Draft Scoping Report. It is unclear how this decision relates to the Scoping Initiation Packet and how it comports to the
numerous FHWA/NYSDOT public statements that the Scoping Initiation Packet would be revised and republished for public review and comment.

**R 3-11:** The Scoping Initiation Packet presented three basic concepts for project alternatives: above grade, at grade/surface, and below grade. Following the November 2013 Scoping Meeting, these concepts were refined based on public input that was received, refined information on surface and subsurface conditions, and other considerations. In addition, NYSDOT explored options proposed by members of the public during the November 2013 Scoping Meeting and comment period.

In May 2014, NYSDOT presented refined potential alternatives for the I-81 Viaduct Project. Sixteen potential build alternatives were developed. These potential alternatives reflected various horizontal and vertical profiles for the transportation project, including proposals by members of the public. These potential alternatives were then presented in the *Draft Scoping Report* along with recommendations of alternatives to advance for further evaluation in the Draft EIS and alternatives to be dismissed from further consideration. Alternatives that will be evaluated in the Draft EIS are presented in this *Scoping Report*.

**C 3-12:** NYSDOT should consider using multi-criteria decision analysis (MCDA) tools to help evaluate complex problems such as this to balance competing attributes such as price and functionality, and to communicate with stakeholders. MCDA provides a framework that could help to make the analysis more transparent.

**R 3-12:** NEPA scoping is used to identify a reasonable range of alternatives for evaluation during the development of the Draft EIS. The *Draft Scoping Report* and this *Scoping Report* present an evaluation of these potential alternatives based on engineering, traffic, property, and cost considerations. Potential alternatives, determined to be “reasonable” (those that are feasible or practical), would remain under consideration. An assessment of the alternatives that advance will be performed during the development of the Draft EIS, in accordance with NEPA. The public will have opportunities to provide comments on the Draft EIS.

**C 3-13:** A well-constructed decision making matrix, with a robust representation of objectives that are developed with full public input and a clear method for evaluating these objectives, is the surest path to forming a strong public consensus. With a strong public consensus, the issue of who decides may even be rendered moot.

**R 3-13:** Project objectives were presented for public input in the *Draft Scoping Report* and have been refined based on additional considerations, including public input. Alternatives evaluation matrices were included in the *Draft Scoping Report* and in *Appendix A-2* of this *Scoping Report*. 
Report, and public comments on these matrices have been considered in this Scoping Report. NYSDOT will provide further opportunities for public input on the Draft EIS.

C 3-14: On page 3-2 of the Draft Scoping Report, the fifth screening bullet should read, “Will the alternative provide enhanced bicycle and pedestrian surface connections on streets across and along the I-81 viaduct, or the I-481 corridor in the case of the Community Grid Alternative (previously known as the “Street-level Alternatives”)."

R 3-14: Enhanced bicycle and pedestrian connections in the vicinity of I-481 are outside the scope of the I-81 Viaduct Project.

C 3-15: The analysis should consider the long-term life-cycle costs of the proposed infrastructure. While there is information on capital costs, there is very little information about long-term maintenance, operation, and repair costs. These expenses must be minimized for a solution to be truly sustainable.

R 3-15: Initial cost estimates were developed for the purposes of the scoping-level evaluation and screening of alternatives. These estimates, which are provided in the “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart in Appendix A-1, include the cost of utility relocations, temporary construction of roads and maintenance of traffic, demolition and mass excavation, elevated structures and retaining walls, highways and local streets, lighting and signage, intelligent transportation systems, landscaping/streetscaping, and a contingency cost. The Draft EIS will provide information on long-term maintenance and operation costs including repairs.

C 3-16: The Community Grid Alternative (formerly “Street-level Alternatives”) would change current traffic flow and patterns and may result in adjustments to the street grid system after project completion. This could create a financial burden that could fall on the City of Syracuse. The I-81 project should consider budgeting and escrowing funding to address this. Costs associated with the design, repair, and maintenance of the de-designated stretch of I-81 could fall to the local municipalities or Onondaga County, and FHWA and NYSDOT must explain how this project will be funded and provide a commitment that costs will not be pushed down to the local level.

R 3-16: Potential impacts to traffic flows and patterns will be investigated and presented in the Draft EIS. NYSDOT is in discussions with the City of Syracuse and Onondaga County about project developments and to understand their concerns and needs. These discussions will continue as the project advances. The degree of impact the project would have on local streets will influence remedial actions to be included in the project. Furthermore, if the project results in
the removal of I-81, there will be discussion of what entity will own what is built in its place. The results of this discussion will be presented in the Draft EIS. If the City or the County become the owners of the new roadway, they would be responsible for its maintenance costs.

C 3-17: Cost must be weighed in terms of the potential long-term benefits and impacts. NYSDOT’s cost-benefit analysis must factor in such long-term costs (pollution, noise, inaccessibility, etc.), in addition to monetary expenses, in evaluating each of the options.

R 3-17: The Draft EIS will include an assessment of the potential social, economic, and environmental considerations of the I-81 Viaduct Project, including potential effects on air quality, noise, and transportation.

C 3-18: There is no basis to support the establishment of a cost ceiling of 2.5x the cost of the rehabilitation alternative. This precludes meaningful public input and is arbitrary. The $800,000,000 figure is not substantiated and the fact that rehabilitation implementation would be over a “multi-year period as funding permits” adds doubt to the validity of this number. There are many factors beyond cost which must be considered for a project of this scope and magnitude including engineering feasibility and performance (which is not discussed as a criterion). Further, the agencies have not made known what resources are available for this project.

R 3-18: A cost ceiling using the cost of the Rehabilitation Alternative was established to provide an order-of-magnitude estimate used in the screening of potential alternatives. The evaluation and screening results were presented to the public for input in the Draft Scoping Report and at several public meetings, including the June 2014 Scoping Meeting. The “I-81 Viaduct Rough Order of Magnitude Construction Cost Estimate by Alternative” chart is presented in Appendix A-1 of this Scoping Report. The potential alternatives were screened to determine whether they were “reasonable” (those that are feasible or practical). The alternatives determined to be reasonable are being advanced for further evaluation in the Draft EIS. The Draft EIS will include an assessment of social, economic, and environmental considerations, in accordance with NEPA. Funding to implement the project will be identified prior to the Record of Decision for the I-81 Viaduct Project.

C 3-19: The Draft Scoping Report should not treat cost as a determinative factor. Moreover, all cost projections are unsupported conclusions, as no basis is provided for the cost estimates, rendering it impossible to determine to what extent, if any, costs of maintenance and operation are included, as well as how the options compare to each other, including but not limited to long-term economic development and life-cycle costs. FHWA and NYSDOT have
not identified what costs have been considered in their estimates. This lack of information forecloses any meaningful review.

**R 3-19:** The Council on Environmental Quality (CEQ) has defined reasonable alternatives as those that are practical or feasible from a technical and economic standpoint and using common sense. NYSDOT deems it appropriate to advance only those alternatives that are practical.

Cost estimates were prepared by licensed professional engineers in accordance with standard NYSDOT practices. NYSDOT staff reviewed and approved the estimates before they were made public. The initial cost estimates include pre-construction costs (i.e., design, subsurface remediation, and building acquisitions), demolition costs, and construction costs. The initial estimates are provided in Appendix A-1 of this Scoping Report.

**C 3-20:** The evaluation should consider the duration of construction, including the time to design and finance the alternative, and its potential impacts of construction disruption on the community and economic activity.

**R 3-20:** The duration of construction under each of the potential alternatives was estimated and presented at the June 2014 scoping meeting and other public meetings. The Draft EIS will further evaluate the construction impacts of each alternative.

**C 3-21:** The analysis of alternatives should consider access to the medical facilities by emergency vehicles, patients, and staff both during and after construction. No alternatives should be eliminated from consideration prior to this analysis. I-81 is the primary north-south route for many emergency service entities, including the Onondaga County Sheriff’s Office and the North Area Volunteer Ambulance Corps. This corridor is important for maintaining efficient access to the local and regional hospitals. There are important concerns that some options would impact the timeliness of emergency response, and these impacts should be considered in the alternatives analysis.

**R 3-21:** Access to medical and other facilities has been a consideration during the development of the potential alternatives and will continue to be assessed. The Draft EIS will include consideration of access to medical facilities and emergency response times during and after construction of the project for each of the project alternatives.

**C 3-22:** NYSDOT should consider economic factors, including the tax base, when looking at all aspects of the project alternatives. This includes real estate affected, real estate acquisition, materials, construction costs, construction schedule, maintenance, jobs to construct, replacement costs, business interrupted during construction, jobs created in new development, and mixed use development opportunities.
R 3-22: Preliminary capital cost estimates, including real estate acquisition, construction materials, and labor, have been considered in the evaluation of the potential alternatives, and these costs were identified in aggregate in the Draft Scoping Report. The Draft EIS will include an assessment of social, economic, and environmental considerations, including property acquisitions, economic impacts, and land use, for the build alternatives.

C 3-23: Clarify whether NYSDOT will be using the federally accepted design standards manual called “Designing Walkable Urban Thoroughfares: A Context Sensitive Approach” by the Institute of Transportation Engineers and Congress for the New Urbanism, funded by the Federal Highway Administration. Also, clarify whether NYSDOT will be using the “Urban Street Guide” by the National Association of City Transportation Officials.

R 3-23: “Designing Walkable Urban Thoroughfares: A Context Sensitive Approach” and the “Urban Street Guide” supplement and expand on commonly used policies, guides, and standards and will be considered for this project.

6-3-2 OVERVIEW OF ALTERNATIVES

GENERAL

C 3-24: Please present the advantages and disadvantages of each alternative with respect to snow removal.

R 3-24: The Draft EIS will describe the snow removal considerations for each build alternative.

C 3-25: Please describe how seismic considerations are being incorporated into the project.

R 3-25: Bridge structures would be designed and evaluated in accordance with NYSDOT, American Association of State Highway and Transportation Officials (AASHTO), and FHWA seismic design guidelines and standards. Based on the bridge geometry, seismic sensitivity, site location, and geotechnical data, components of bridge structures (e.g., bearings, bridge seat, bridge joints, foundation) would be designed or retrofitted to meet capacity demand and performance-level requirements.

C 3-26: The structure and source of funding should be made clearer.

R 3-26: NYSDOT is committed to funding the project; however, the specific funding sources have not yet been identified. As per FHWA requirements, a detailed financial plan would be prepared prior to issuing a Record of Decision for the I-81 Viaduct Project.
C 3-27: Figure 3-5 should be amended with additional call-outs to identify interchange improvements as well as other state-owned facilities crossing I-481 to improve accommodation for bicycle and pedestrian mobility.

R 3-27: Bicycle and pedestrian improvements along I-481 are outside the scope of the I-81 Viaduct Project. Therefore, Figure 3-5 was not changed.

C 3-28: The third bullet on the top of page 3-14 should be amended to include mention of the residential neighborhoods in the southern portion of the Town of Dewitt that are adjacent to the I-481 corridor.

R 3-28: As necessary, new or rehabilitated noise walls would be provided along I-481 and at other locations within the project limits based on further analysis of the potential changes in interstate traffic.

C 3-29: The word “boulevard” has been used since the earlier I-81 Challenge study and it has negative connotations. The term should be dropped in describing the Community Grid Alternative (formerly “Street-level Alternatives”).

R 3-29: FHWA defines a boulevard as a “walkable, low-speed (35 mph or less) divided arterial thoroughfare in urban environments designed to carry both through and local traffic, pedestrians and bicyclists.” The term boulevard is considered an appropriate description of the street configuration for this option of the Community Grid Alternative.

C 3-30: Include a design that facilitates regular roadside mowing and cleanup.

R 3-30: Comment noted.

C 3-31: It is critical to include a well-designed and comprehensive signage system that provides directions from the interstate to specific destinations and neighborhoods.

R 3-31: The project alternatives will include directional, safety, and informational signage in accordance with FHWA and NYSDOT design guidelines.

C 3-32: Thought should be given as to how more traffic might be moved by using the traditional grid, as well as how to enhance non-highway connections between the city and suburbs along streets such as Salina Street, Erie Boulevard, and other major connecting roadways.

R 3-32: The project objectives are stated in Section 2-4 of this Scoping Report. Two of the project objectives demonstrate the desire to implement a holistic approach to addressing traffic circulation: “address vehicular, pedestrian, and bicycle geometric and operational deficiencies in the I-81 viaduct priority area,” and “maintain or enhance the vehicular,
pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations.” An analysis of how to best use the city street grid will be conducted in coordination with the City of Syracuse and Onondaga County and presented in the Draft EIS. Improvements to streets that would carry new traffic would also be identified and considered. Improvements to non-highway connections within the study area will be considered.

TEALL AVENUE INTERCHANGE

C 3-33: The Single Point Urban Interchange (SPUI) is proposed for the Teall Avenue interchange and at some of the other access points along the highways. These appear to be an efficient means for moving vehicles on and off the highway but also seem to sever movement between neighborhoods. We need to better understand how a SPUI works to determine if it appropriately meets our connectivity goal.

R 3-33: A single-point urban interchange (SPUI) is one of numerous interchange designs that has been considered during the preliminary design phase of the I-81 Viaduct Project and would continue to be considered for the Teall Avenue interchange project, which as described in Section 2-2 of this Scoping Report, will be advanced as a separate, independent project. The Teall Avenue interchange improvements will be presented in a separate Design Report. The potential impacts of any interchange design on vehicular, pedestrian, and bicycle movements would be analyzed and described in the I-81 Viaduct Project’s Draft EIS. In general, a SPUI design does not preclude through moments; however, to maintain intersection efficiency and to achieve a desired level of service, it may be necessary to restrict some movements. NYSDOT will continue to investigate the SPUI design to minimize disruptions to local street connections to the extent feasible.

C 3-34: Please provide more information on the proposed modifications to the Teall Avenue interchange. Please consider the replacement of the stop-sign to enter I-690 East.

R 3-34: The potential impacts to the Teall Avenue interchange are now being studied under a separate, independent project as discussed in Section 2-2 of the Scoping Report. Additional information on the proposed modifications to the Teall Avenue interchange will be presented in the Design Report prepared for the Teall Avenue interchange project.

C 3-35: Improvements to the Teall Avenue interchange may adversely affect traffic flow on Teall Avenue, diverting traffic to Beech Street or Peat Street, which are not realistic options.
R 3-35: The potential impacts to the Teall Avenue interchange are now being studied under a separate, independent project as discussed in Section 2-2 of the Scoping Report. Additional information on the proposed modifications to the Teall Avenue interchange will be presented in the Design Report prepared for the Teall Avenue interchange project.

I-81 / I-690 INTERCHANGE IMPROVEMENTS

C 3-36: While the missing links of the I-81/I-690 interchange could be an important part of an enhanced system, they also have significant impacts on property acquisition and demolition. It is possible that the overall impact could be reduced by improving the street-level connections between highways or with other alternatives for the interchange.

R 3-36: Based on conceptual studies to date, an estimated two to five buildings may need to be acquired to construct the missing links of the I-81/I-690 interchange. Further refinements will be made to the alternatives during preparation of the Draft EIS with the intent of avoiding or minimizing property impacts. The number of potential acquisitions will be included in the Draft EIS.

C 3-37: Consider the Hiawatha Boulevard corridor for the missing I-81/I-690 connections.

R 3-37: Locations for the missing I-81/I-690 connections will be further investigated during preparation of the Draft EIS.

C 3-38: Relocate the entire I-81/I-690 interchange to Bear Street, which would avoid impacts to historic properties in the Northside, avoid the loss of property value and other impacts on Franklin Square, potentially rehab/address brownfield properties along the Bear Street corridor, keep I-81 running past Destiny USA, offer the potential to put an interchange directly servicing Destiny USA, and make use of land already owned by the State around the existing Bear Street/I-690 interchange.

R 3-38: Locations for the missing I-81/I-690 connections will be further investigated during preparation of the Draft EIS.

VIADUCT ALTERNATIVES

C 3-39: Commenters expressed support for Alternative V-1: Rehabilitation. Reasons cited for this support include: it is the most cost-effective alternative; it would maintain the current footprint, thereby lessening effects on the community; existing structural components could be repaired, extending the highway’s design life; and traffic flow could be maintained through the City.
R 3-39: As described in Section 3-6 of this Scoping Report, the Rehabilitation Alternative would not correct the geometric and operational deficiencies within the project limits. Thus, Alternative V-1 does not meet the project’s purpose, objectives, and need and has been dismissed from further evaluation in the Draft EIS.

C 3-40: Alternative V-1: Rehabilitation should not be advanced.

R 3-40: Alternative V-1 does not meet the project’s purpose, objectives, and need, and therefore, Alternative V-1 has been dismissed from further evaluation in the Draft EIS.

C 3-41: Clarify why rehabilitation of the existing viaduct would not improve the highway to current standards.

R 3-41: Alternative V-1 would involve the rehabilitation of existing bridges within the existing right-of-way. The existing right-of-way is not of sufficient size to increase the roadway width to correct geometric deficiencies (i.e., inadequate lane widths, sight distances, the lack of inside and outside shoulders, etc.), and therefore, Alternative V-1 would not meet current design standards. As such, Alternative V-1 does not meet the project’s purpose, objectives, and need and has been dismissed from further evaluation in the Draft EIS. Viaduct Alternative Options V-2, V-3, and V-4, which would meet all or most current design standards, will be advanced for further evaluation in the Draft EIS.

C 3-42: Commenters expressed support for the Viaduct Alternatives and maintaining the existing alignment of I-81. Reasons cited for this support include: would permit high-speed travel to and through the City; would maximize fuel efficiency; would keep vehicles off local streets and minimize traffic noise; would maintain connectivity between points north and south of the City; would maintain highway redundancy; would support existing land use and economic development patterns and maintain efficient access to important destinations (e.g., airport, Destiny USA, University Hill, and medical centers); would maintain efficient connectivity within the transportation network; would maintain efficient emergency vehicle access to hospitals; would result in less air pollution; would be cost-effective; would not make previous maintenance costs in vain; the elevated highway provides views of the City and surrounding area; would provide greater safety for pedestrians and bicyclists by minimizing conflicts with traffic; would foster pedestrian and bicyclist connectivity between neighborhoods; viaducts do not necessarily act as barriers; and viaducts can be aesthetically pleasing.

R 3-42: The Viaduct Alternative (with V-2, V-3, and V-4 as options) is being advanced for further evaluation in the Draft EIS.
Commenters expressed opposition to the Viaduct Alternatives. Reasons cited for this opposition included: the viaduct acts as a barrier and divides neighborhoods; would not foster pedestrian and bicycle activity; would require substantial land and building acquisitions; would diminish economic vitality; would result in loss of property taxes and decreased property values; would not be cost-effective; would result in pollution to adjacent residences; and would be visually unappealing.

The Viaduct Alternative (with V-2, V-3, and V-4 as options) is being advanced for further evaluation in the Draft EIS. The Draft EIS will include an assessment of the social, economic, and environmental considerations, including land use, economic impacts, property acquisition, air quality, and visual impacts, for the build alternatives. The public will have an opportunity to review the Draft EIS and provide comments on its findings. After a balanced consideration of the Draft EIS findings and public comments on those findings, FHWA and NYSDOT will identify a preferred alternative, which will be presented in the Final EIS.

The Viaduct Alternatives are inconsistent with goals of the Northside Urban Partnership because a viaduct acts as a barrier and reinforced divisions between neighborhoods; it does not preserve historic properties; it does not develop a safe and attractive highway corridor that is accommodating to all transportation modes, such as transit; and it would not enhance economic vitality and could result in loss of property tax revenue.

The project goals, presented in Section 2-3 of this Scoping Report, consider local transportation connectivity, as well as livability, sustainability, and economic vitality. The Draft EIS will include an assessment of the social, economic, and environmental considerations, including land use, community cohesion, cultural resources, economic impacts, and visual impacts, for the build alternatives.

Under the Viaduct Alternatives, from I-81 southbound, consolidation of the West/Franklin/Clinton/Salina exits into a single exit on Clinton Street is a mistake. That in itself takes a very efficient way of dividing traffic across four streets onto a single street, which will increase commuting time and congestion. The more efficient design that exists today should remain in place.

The closure of the Franklin/Butternut Street southbound I-81 exit may be necessitated by the provision of a ramp from southbound I-81 to westbound I-690, which is currently a missing connection. Potential impacts to traffic including commuting times will be assessed and presented in the Draft EIS.
Commenters expressed support for Alternative V-2: New Viaduct Fully Improved to Current Standards. Reasons cited for this support included: it would bring I-81 up to current standards; would add missing I-81/I-690 interchange connections; would be cost-effective and provide the best value for the amount of impacts and cost; and land acquisition is reasonable and displaced businesses could relocate within the City and remain on the tax rolls.

The Viaduct Alternative (with V-2 as an option) is being advanced for further evaluation in the Draft EIS.

Commenters expressed support for Alternative V-4: New Viaduct with Considerable Design Improvements. Reasons cited for this support included: it would be cost-effective; provide safe crossings for pedestrians and bicyclists; and would minimize property impacts.

The Viaduct Alternative (with V-4 as an option) is being advanced for further evaluation in the Draft EIS.

Commenters expressed support for Alternative V-5: New Stacked Viaduct. Reasons cited for this support included: it would maintain I-81 through the City; would reduce the footprint of the viaduct; would require less property and building acquisitions; and would provide the space needed for travel lanes, shoulders, and emergency vehicle access.

Due to physical constraints, Alternative V-5 would eliminate east-west travel on East Genesee Street where it crosses Almond Street. East Genesee Street is an important east-west street between Downtown and University Hill. An arterial roadway and designated New York State Touring Route, East Genesee Street carries Connective Corridor bike lanes between University Hill and Downtown and is used by Centro Routes 62 and 262. Eliminating east-west access on East Genesee Street would be inconsistent with the objective to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations” (see Section 2-4 of this Scoping Report, which identifies the project objectives). Therefore, Alternative V-5 has been dismissed from further consideration.

Alternative V-5: New Stacked Viaduct should not be advanced.

Alternative V-5 is not being advanced for further evaluation in the Draft EIS.

Rebuild the viaduct but improve the street-level environment and pedestrian and bicycle access along the viaduct.
R 3-50: The project’s five objectives are stated in Section 2-4 of this Scoping Report. The following two project objectives address the need to improve the street-level environment below the viaduct:

- Address vehicular, pedestrian, and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area; and
- Maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area.

The Viaduct Alternative would include reconstruction of Almond Street, including enhancements for cyclists and pedestrians, and therefore, would meet the project’s purpose and need and its objectives.

C 3-51: The proposed 55 mph speed limit is too high for the curves under the Viaduct Alternatives.

R 3-51: As described in Section 3-2 of this Scoping Report, each of the build alternatives, including the Viaduct Alternative options (V-2, V-3, and V-4), will be designed to ensure safety for the traveling public.

C 3-52: Since Alternative V-4 would have fewer property takings than Alternatives V-2 and V-3, Alternatives V-2 and V-3 should be eliminated.

R 3-52: The Viaduct Alternative (with V-2, V-3, and V-4 as options) is being advanced for further evaluation in the Draft EIS. The Draft EIS will include an assessment of the social, economic, and environmental considerations, including property acquisition, for the build alternatives.

C 3-53: The viaduct should be rebuilt with an additional lane in either direction.

R 3-53: Long-range transportation models have not identified a lack of capacity within the highway network through 2050. NYSDOT has reviewed the needed capacity on alternative interstate routes. Auxiliary lanes have been identified at locations where capacity may be needed based on future traffic volumes.

C 3-54: The Draft Scoping Report notes that the cost estimates for the Community Grid Alternative (formerly “Street-level Alternatives”) includes demolition costs, but it does not identify whether demolition costs are included for the viaduct alternatives.

R 3-54: The initial cost estimates for all of the potential alternatives in the Draft Scoping Report included demolition costs. This has been clarified in Appendix A-1 of the Scoping Report.
C 3-55: Currently, you can access I-690 eastbound directly from the Harrison Street on-ramp of I-81. The viaduct plans remove this connection, and it should be maintained.

R 3-55: The existing connection from northbound I-81 at Harrison Street to eastbound I-690 includes a non-conforming weave section. This condition would be addressed during preliminary design. The conceptual design for the Viaduct Alternative at this time would relocate this connection to the west side of northbound I-81 as a left-hand exit, thereby eliminating the option to travel from the Harrison Street entrance ramp to eastbound I-690. That movement would then be provided at a different location, such as McBride, Townsend, or Almond Street, or another nearby street.

C 3-56: A new viaduct should be constructed at a higher elevation and with a more open structural design to allow more light underneath. This would also allow a boulevard to be incorporated under the viaduct.

R 3-56: As described in Section 3-2-2 of this Scoping Report, the new viaduct under the Viaduct Alternative could be the same height as or up to 10 feet higher than the existing viaduct. The Viaduct Alternative would also include improvements to Almond Street.

C 3-57: The new viaduct should be unique or iconic.

R 3-57: Consistent with NYSDOT policy and the project goals stated in Section 2-3 of this Scoping Report, project alternatives will incorporate context-sensitive design features. FHWA and NYSDOT are committed to urban design enhancements for each alternative considered.

C 3-58: Consider a more aesthetically pleasing viaduct that uses a single column support design instead of a double column, which would allow a two-way boulevard under the highway without it being shrouded by the overpass. In addition, the viaduct could be smooth concrete, adding to its modern look.

R 3-58: Structural designs of the alternatives, including the Viaduct Alternative, will be investigated during the development of the Draft EIS. As described in the response to Comment 3-57 and consistent with the project goals identified in Section 2-3 of this Scoping Report, FHWA and NYSDOT are committed to urban design enhancements for each alternative considered.

C 3-59: Consider a suspension or cable stay bridge to replace the I-81 viaduct, which could have less ground-level support structures and be an attribute to the skyline.

R 3-59: Structural designs of the alternatives, including the Viaduct Alternative, will be investigated during the development of the Draft EIS. As described in the response to Comment 3-57,
FHWA and NYSDOT are committed to urban design enhancements for each alternative considered.

C 3-60: The area under the viaduct should be well lit and could have kiosks and sitting areas to make it more of a tourist feature.

R 3-60: Consistent with the project goals identified in Section 2-3 of this Scoping Report, aesthetic treatments and pedestrian furnishings will be investigated for each alternative as the design advances. As described in the response to Comment 3-57, FHWA and NYSDOT are committed to urban design enhancements for each alternative considered.

C 3-61: The land under the viaduct should be activated with new uses, similar to the Queensboro Bridge in New York City.

R 3-61: Potential design precedents for the areas beneath the viaduct have been investigated and will continue to be examined as the design advances. FHWA and NYSDOT are committed to urban design enhancements for each alternative considered.

COMMUNITY GRID ALTERNATIVE

C 3-62: Commenters expressed support for the Community Grid Alternative (formerly “Street-level Alternatives”). Reasons cited for this support included: they would enhance economic vitality, livability, and sustainability; would improve pedestrian and bicycle access; would be the most cost-effective option, both in the near- and long-term; would reduce property acquisitions; would reduce impacts to historic buildings; would allow avoidance of the new I-690 to I-81 interchanges; would enhance connectivity and community cohesion; would provide opportunities for improving the local street grid; would route through traffic along I-481 while traffic destined for Downtown would use the boulevard; would have minimal increases in travel time; and would enhance vehicle safety.

R 3-62: The Draft Scoping Report presented three Street-level Alternatives (Alternatives SL-1, SL-2, and SL-3). The Street-level Alternatives have been refined and combined as one alternative (the “Community Grid Alternative”). As described in Section 3-2 of the Scoping Report, the Community Grid Alternative is being advanced for further evaluation in the Draft EIS, and the Draft EIS will include an assessment of the social, economic, and environmental impacts of the build alternatives.

C 3-63: Commenters expressed opposition to the Community Grid Alternative (formerly “Street-level Alternatives”) and the re-routing of I-81 along I-481. Reasons cited for this opposition included: it would diminish access to businesses in Downtown and the west side; would send
vehicles on city streets and through residential neighborhoods; would increase travel times and fuel consumption for through travelers and commercial truck traffic; would result in greater air pollution; would compromise commercial and industrial development in outlying areas; would reduce the number of passers-by stopping in or experiencing the City; would create sprawl along the newly designated I-81, contrary to smart growth initiatives; investment will be reduced in Downtown and focused more along the re-routed I-81; would result in congestion along the new boulevard; would not be able to accommodate Carrier Dome traffic; would be dangerous raceways in an urban area; surrounding highways (e.g., I-481 and I-690) and interchanges cannot accommodate re-routed I-81 traffic; re-routing traffic to I-481 would ruin surrounding suburbs; wide boulevards would be difficult for pedestrians and bicyclists to cross and would not improve connectivity; and would reduce highway redundancy.

R 3-63: The Community Grid Alternative (formerly “Street-level Alternatives”) is being advanced for further evaluation in the Draft EIS. The Draft EIS will include an assessment of the social, economic, and environmental considerations, including land use, economic impacts, air quality, traffic, and community cohesion, for the build alternatives. The public will have an opportunity to review the Draft EIS and provide comments on its findings. After a balanced consideration of the Draft EIS findings and public comments on those findings, FHWA and NYSDOT will identify a preferred alternative, which will be presented in the Final EIS.

C 3-64: Resolutions in opposition of the Community Grid Alternative (formerly “Street-level Alternatives”) were submitted by the City of Auburn; Village of Aurora; the Towns of Dewitt, Fleming, Geddes, Moravia, Otisco, Owasco, Salina, Skaneateles, Sennett; Onondaga and Cayuga Counties, members of the New York State Legislature; and Central New York Area Labor Federation, AFL-CIO and Central and Northern New York Building and Construction Trades Council.

R 3-64: The Community Grid Alternative (formerly “Street-level Alternatives”) is being advanced for further evaluation in the Draft EIS. The Draft EIS will include an assessment of the social, economic, and environmental considerations, including land use, economic impacts, air quality, traffic, and community cohesion, for the build alternatives. The public will have an opportunity to review the Draft EIS and provide comments on its findings. After a balanced consideration of the Draft EIS findings and public comments on those findings, FHWA and NYSDOT will identify a preferred alternative, which will be presented in the Final EIS.

C 3-65: Provide additional detail about the project in the area south of Adams Street. The alternatives show new or modified ramps and interchanges. These features will dramatically impact the community. Such a ramp will keep almost 1/3 of the viaduct above-grade and
continue to be a greater barrier to the neighborhood, its livability and its walkability. This ramp solution also does not address how the current Almond Street traffic south of Adams Street will access University Hill. The Draft Scoping Report references traffic coming down McBride and Burt Streets, but this would direct traffic through the residential neighborhood. Consider moving the ramps further south and perhaps going under the railroad tracks.

R 3-65: The Draft EIS will include an assessment of the social, economic, and environmental considerations, including the potential impacts to affected neighborhoods, schools, and recreation centers, of each build alternative.

C 3-66: Commenters expressed support for the Boulevard option of the Community Grid Alternative (formerly Street-level Alternative [SL-1]: Boulevard Alternative). Reasons cited for this support include: accessibility to green space; accessibility for bicyclists; and flexibility to accommodate future changes in type and volume of traffic.

R 3-66: The Community Grid Alternative (with the Boulevard as an option) is being advanced for further evaluation in the Draft EIS.

C 3-67: Alternative SL-1: Boulevard should be revised to eliminate the wide 60-foot green center median, which offers no added benefit because it is devoid of any true purpose for pedestrians or city life. It would be better to put the trees and pedestrian amenities at the outer edges and sidewalks to improve the pedestrian and commercial spaces. Vehicle movements are pushed to the center. Eastern Parkway in Brooklyn is a good example of a complete street that minimizes the footprint of the roadway and allows more dedication of space human-oriented zones and higher quality spaces.

R 3-67: Design options for the Community Grid Alternative (including Option CG-1, Boulevard), including the width of medians, bicycle/pedestrian amenities, and number of lanes, will be explored further during preparation of the Draft EIS. Generally, medians provide traffic calming, pedestrian refuge, and other urban design and environmental benefits. The design will be undertaken consistent with the project goals (see Section 2-3) and project objectives (see Section 2-4).

C 3-68: The Draft Scoping Report states that 3 lanes of traffic in each direction are needed for Alternative SL-1. The report should consider whether this is adequate to meet demand 20, 30, or 40 years from now.

R 3-68: A preliminary examination of traffic data indicates that three traffic lanes in each direction are adequate to meet demand in the future. The Draft EIS will include an assessment of traffic in the existing condition, build year condition (2020), and future condition (2050).
NYSDOT will use the assessment to provide the proper number of lanes to maintain a desirable level of service for future traffic operations.

**C 3-69:** To identify the best solutions to improve connectivity for the Community Grid Alternative (formerly “Street-level Alternatives”), it is necessary to examine the entire street grid. NYSDOT should review and share with the community information on traffic counts for the local street grid to determine capacity, and improvements that can be made to the existing system to more efficiently handle traffic. This will allow for a systemic approach to traffic operations rather than relying on a single-road solution.

**R 3-69:** Consistent with the project objective to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations,” NYSDOT is examining the future operation of local streets. NYSDOT is preparing a micro simulation traffic model using the VISSIM simulation tool. The study area for the VISSIM traffic simulation model is I-81, I-690, I-481, and I-90 interstate system and surface streets that could be affected by the project, including Downtown Syracuse and University Hill, extending south to East Castle/Stratford Streets, north to Hiawatha Boulevard, west to South West Street, and east to Westcott Street. Traffic data, including counts, will be provided in the Draft EIS.

**C 3-70:** There should be a U-turn capability under Alternative SL-1 in the Almond Street area.

**R 3-70:** Specifics such as the need for and location of turning lanes, U-turns, and others would be determined in the future as the alternatives are refined during the preparation of the Draft EIS.

**C 3-71:** Under Alternative SL-1: Boulevard, buildings and off-street parking that are demolished should be offset with new buildings and parking.

**R 3-71:** The Draft EIS will present potential property acquisition needs for each of the alternatives that are analyzed. NYSDOT will undertake property acquisitions in accordance with the Uniform Relocation Act and the New York State Eminent Domain Procedure Law. In accordance with these laws, NYSDOT does not replace buildings. The Draft EIS will include an assessment of the potential loss of parking, and mitigation measures for the loss of parking will be identified, if necessary.

**C 3-72:** The distribution on multiple streets would be the best options. This will “feather” traffic into as many streets as possible, a benefit for local businesses. Syracuse will be better served by increased connectivity between the highway and the city street system, and it will be less
disruptive with the least amount of physical and functional change. A single wide boulevard will be a ground-level barrier, could be very congested, and could make it difficult for people to reach their destinations. The boulevard would also do little to rejoin the splintered Pioneer Homes.

R 3-72: The Community Grid Alternative (formerly “Street-level Alternatives”) is being advanced for further evaluation in the Draft EIS. The Community Grid Alternative includes an option that would provide a boulevard on Almond Street, which would function as a primary thoroughfare, as well as an option that would distribute traffic lanes on Almond Street in combination with one or more local street(s). The Draft EIS will include an assessment of the potential social, economic, and environmental impacts of the build alternatives.

C 3-73: Better connections and links to the street system north of I-690 must be included in the project.

R 3-73: Consistent with the project objective to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations,” the area north of I-690 is included in the traffic study area and improvements to the local street grid will be explored.

C 3-74: Alternative SL-3 is the best alternative, but consider a better connection from the current I-81 to Townsend Street via a new street south of the railroad.

R 3-74: The proposed connection, which was explored during the investigation of Alternative O-2, would necessitate acquisition of buildings in the Pioneer Homes. Therefore, Alternative O-2 was dismissed from further consideration. Moreover, a potential connection from the current I-81 to Townsend Street via a new street south of the railroad was dismissed from further consideration.

C 3-75: Under the Community Grid Alternative (formerly “Street-level Alternatives”), the crisscrossing ramps at the intersection with I-690 would be dangerous, especially with fast-moving traffic exiting I-690 westbound immediately encountering a traffic light where boulevard traffic is trying to enter I-690 westbound.

R 3-75: Intersection designs will be explored and evaluated for safety, operations, and other considerations and presented in the Draft EIS.

C 3-76: Under the Community Grid Alternative (formerly “Street-level Alternatives”), ensure smooth connections from the boulevard to the highway at either end.
R 3-76: Connections between the local streets and the highway would be designed to meet applicable state and federal standards, taking into account traffic volumes and safety considerations.

C 3-77: The Community Grid Alternative (formerly “Street-level Alternatives”) would bring truck traffic through Downtown, which would present safety concerns for pedestrians.

R 3-77: A project objective is to “address vehicular, pedestrian, and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area.” Signage would direct through truck traffic to use the interstate route. The Draft EIS will include an evaluation of pedestrian safety for the build alternatives.

C 3-78: With a boulevard and separated bike path, consider safety and minimize conflicts between turning vehicles and cyclists.

R 3-78: A project objective is to “address vehicular, pedestrian, and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area.” Signage would direct through truck traffic to use the interstate route. The Draft EIS will include an evaluation of pedestrian safety for the build alternatives.

C 3-79: The Community Grid Alternative (formerly “Street-level Alternatives”) would boost traffic on South Townsend Street and would adversely affect a historic area of town. Park Central Church would be separated from the park as would the Teall Carriage House and the Hamilton White House.

R 3-79: The Community Grid Alternative would rehabilitate or reconstruct streets generally within the existing public right-of-way. The identification and determination of eligibility of National Register Listed and Eligible properties will be conducted in accordance with Section 106 of the National Historic Preservation Act. An assessment of potential direct and indirect adverse effects to historic resources will be undertaken for each build alternative, including the Community Grid Alternative, and presented in the Draft EIS. If potential adverse effects are identified, this analysis will include measures to avoid, minimize, or mitigate those adverse effects, which will be conducted in consultation with the project’s Section 106 Consulting Parties.

C 3-80: Under the Community Grid Alternative (formerly “Street-level Alternatives”), the area around Interchange 17 would be completely cut off from services that are located to the north and east. Construction impacts should be limited at Interchange 17 to avoid impacts to businesses.
R 3-80: No changes to Interchange 17 are anticipated under the Community Grid Alternative at this time. The existing limited access highway would remain in the area of Interchange 17 and would descend to street-level near Monroe Street. From this point, traffic would use City streets for approximately one mile, then rejoin I-690 or the former I-81 north segment, which would remain a limited access highway. The potential construction impacts of the project alternatives will be evaluated during the development of the Draft EIS.

C 3-81: The concern that the Community Grid Alternative (formerly “Street-level Alternatives”) would hurt mall and hotel interests at the north end of Syracuse if there were no through I-81 seems unfounded. Mall seekers will know where they are going and hotel customers have access to GPS and are already on roads such as I-90 and overall travelers from the south will have very little extra travel time.

R 3-81: Comment noted.

C 3-82: Glen Avenue is an access road to the Loretto campus and is used extensively. While not specifically mentioned in the scoping report, the potential reconfiguration of Interchange 16A could impact the Glen Avenue bridge. It is important for Loretto for the bridge to stay in its present location and, hopefully, be improved.

R 3-82: The current design for the potential project alternatives would not impact the Glen Avenue bridge.

C 3-83: If a street-level option is chosen, a beltway around the west side of Syracuse is needed before the I-81 Viaduct Project moves forward to prevent traffic impacts on I-481, which would also adversely affect international commerce as heavy commercial truck traffic travels to and from Canada through New York State.

R 3-83: This Scoping Report identifies potential improvements along I-481 under the Community Grid Alternative to manage traffic flow. Including a western bypass around the west side of Syracuse is similar to options examined under Alternative O-1. As stated in Section 3-6 of this Scoping Report, the proposed western bypass does not meet the project’s purpose and objectives and therefore has been eliminated from further consideration.

C 3-84: Consider a Community Grid Alternative (formerly “Street-level Alternatives”) that distributes traffic onto various streets rather than channeling traffic into one boulevard.

R 3-84: FHWA and NYSDOT will consider options to disperse traffic rather than channel it onto a single street under the Community Grid Alternative.
C 3-85: Consider an alternative that extends a boulevard farther south than proposed in the Community Grid Alternative (formerly “Street-level Alternatives”), for example, to Brighton Avenue, Colvin Street, or the southern I-81/I-481 interchange. Traffic could be dispersed into City streets, such as Salina Street, with an eventual connection to a two-way South Clinton Street and to West Street, redeveloped to be more pedestrian-friendly and crossable than at present. There would be no ramp at Burt Street, as the at-grade solution would reduce speed, which would afford the ability to route the road under the railroad tracks at Van Buren Street and Burt Street.

R 3-85: A southward extension of the boulevard under the Community Grid Alternative is not under consideration at this time, as it is outside the I-81 viaduct priority area and outside the scope of the I-81 Viaduct Project.

C 3-86: If the viaduct is removed, consider using the West Street and Townsend Street corridors as primary connecting northbound and southbound corridors. This would minimize adverse impacts on pedestrian (and even vehicular) movements in and across the Almond Street corridor.

R 3-86: FHWA and NYSDOT are examining multiple streets, including Townsend and West Streets, to redirect traffic under the Community Grid Alternative.

TUNNEL ALTERNATIVES

C 3-87: Commenters expressed support of the Tunnel Alternatives. Reasons cited for this support include: would maintain I-81 through the City; would remove the viaduct; would allow for a boulevard above; would allow for green space above; would have the best value for the cost; and would reduce traffic noise.

R 3-87: FHWA and NYSDOT explored four potential tunnel alternatives that were presented in the Draft Scoping Report and in Section 3-5-4 of this Scoping Report: two along the existing alignment of I-81 (Alternatives T-1 and T-2), one to the west (Alternative T-3), and one to the east (Alternative T-4). Subsequently, FHWA and NYSDOT considered 81’ Below Syracuse rev1 (see response to Comment 3-160) and the Access Syracuse Plan (see response to Comment 3-121), which were presented by the public following publication of the Draft Scoping Report. Alternatives T-1, T-2, and T-3 would require construction within difficult soil conditions, which would extend construction duration and increase impacts to travelers, businesses, utilities, and residents during construction, and the costs of Alternatives T-1, T-3, and T-4 were not considered reasonable. Alternatives T-3 and T-4 would require acquisition of substantially more buildings than other alternatives. Based on the results of the screening of alternatives, FHWA and NYSDOT are not advancing these Tunnel Alternatives for further
evaluation in the Draft EIS. However, based on public input, FHWA and NYSDOT are conducting further engineering analysis to determine if there is a tunnel alternative that addresses the project’s needs and meets the project purpose and objectives, as well as the established screening criteria. Based on these factors, FHWA and NYSDOT will determine whether a new tunnel alternative will be further evaluated and presented as a reasonable alternative in the Draft EIS.

C 3-88: Commenters expressed opposition of the Tunnel Alternatives. Reasons cited for this opposition include: high construction and maintenance costs; lengthy duration of construction; high water table and inadequate subsurface conditions; air ventilation considerations; potential flooding; accident-related congestion and emergency vehicle access; substantial land acquisition; severing of streets; would not support future transit initiatives; and it would be illogical to put traffic under the City when most traffic is destined Downtown.

R 3-88: Based on the results of the alternatives screening, FHWA and NYSDOT are not advancing Tunnel Alternatives T-1, T-2, T-3, and T-4 for further evaluation in the Draft EIS. However, FHWA and NYSDOT are exploring additional tunnel alternative(s) based on public input as described in Section 3-3 of this Scoping Report.

C 3-89: Commenters wrote in support of Alternative T-1: Almond Street Tunnel from MLK East to Butternut Street.

R 3-89: Please see the response to Comment 3-87 above.

C 3-90: Alternative T-3: Townsend Street Tunnel is the best alternative.

R 3-90: Please see the response to Comment 3-87 above.

C 3-91: Alternative T-4: Tunnel on an Eastern Alignment (81’ Below Syracuse) is the best alternative.

R 3-91: Please see the response to Comment 3-87 above.

DEPRESSED HIGHWAY ALTERNATIVES

C 3-92: Commenters expressed support of the Depressed Highway Alternatives. Reasons cited for this support include: would enhance pedestrian and bicycle facilities; would be the best solution for local traffic on Genesee Street and Adams Street; would require fewer property takings; would allow for opportunities to improve aesthetics, such as unique designs on walls and controlled vines; would allow I-81 to remain in its current alignment and footprint; would be a permanent solution that would not have to be replaced; could have park-like
overpasses; bridges/walkways could have “greenhouses” to protect/enliven pedestrians; utilities could be run via piping along the overpasses; would be a less expensive alternative; would be the easiest to maintain and snow removal plans could be put in place; overpasses would allow the project to maintain existing streets and neighborhoods; depressed highways have been successful in other places, such as Buffalo, New York City/Long Island, and Rochester (inner loop); and depressed highways can foster urban revitalization, such as in Detroit and Cincinnati.

**R 3-92:** FHWA and NYSDOT explored two Depressed Highway Alternatives along the existing alignment of I-81. The Depressed Highway Alternatives would require construction within difficult soil conditions and would remove local street connections between Downtown and Northside. Based on the results of the screening of alternatives, FHWA and NYSDOT are not advancing the Depressed Highway Alternatives for further evaluation in the Draft EIS.

**C 3-93:** Commenters expressed opposition to the Depressed Highway Alternatives. Reasons cited for this opposition include: would create maintenance challenges associated with snow removal, stormwater management, and litter; there is high groundwater in the area; would require substantial land takings; would sever streets and diminish connectivity; would require longer construction period and higher cost; would not foster a cohesive visual urban environment; would not be of an appropriate scale for a small City; and would not support future transit initiatives.

**R 3-93:** FHWA and NYSDOT explored two Depressed Highway Alternatives along the existing alignment of I-81. The Depressed Highway Alternatives would require construction within difficult soil conditions and would remove local street connections between Downtown and Northside. Based on the results of the screening of alternatives, FHWA and NYSDOT are not advancing the Depressed Highway Alternatives for further evaluation in the Draft EIS.

**OTHER ALTERNATIVES**

**C 3-94:** Commenters expressed support of Alternative O-1: Western Bypass, or suggested that a western bypass around the City be constructed in combination with other alternatives.

**R 3-94:** As described in Section 3-6 of this Scoping Report, Alternative O-1 would require substantial property acquisition and would be considerably more costly than other alternatives. Therefore, FHWA and NYSDOT do not consider this alternative reasonable and has dismissed Alternative O-1 from further consideration.

**C 3-95:** Commenters expressed opposition to Alternative O-1: Western Bypass.

**R 3-95:** FHWA and NYSDOT are not advancing Alternative O-1 for further evaluation in the Draft EIS.
Section 6: Responses to Comments

C 3-96: Commenters expressed support of Alternative O-2: West Street.

R 3-96: As described in Section 3-5-6 of this Scoping Report, Alternative O-2 would sever many local street connections, would require substantial property acquisition, and would be difficult to construct. Therefore, FHWA and NYSDOT do not consider this alternative reasonable and has dismissed Alternative O-2 from further consideration.

C 3-97: Commenters expressed opposition to Alternative O-2: West Street.

R 3-97: FHWA and NYSDOT are not advancing Alternative O-2 for further evaluation in the Draft EIS.

6-3-3 SCREENING RESULTS AND RECOMMENDATIONS

C 3-98: The analysis and recommendations presented in the 16 "Alternatives Screening" tables of "Appendix A" are appropriate for this stage of the project. Furthermore, the Draft Scoping Report, along with the other support materials provided, forms an adequate basis for public response to the I-81 Viaduct Project Team’s recommendations at this stage of the process.

R 3-98: Comment noted.

C 3-99: The Draft EIS will contain analyses of only those options that make it past the scoping phase, but the Draft EIS will contain a far greater level of detail than the scoping phase. The concern is that alternatives may be eliminated in scoping even though they may have a greater benefit to public health than alternatives that have been advanced. The worst case scenario would be elimination of the healthiest options during the scoping phase.

R 3-99: Potential alternatives are evaluated during the scoping process to determine whether they are reasonable (feasible and practical). A reasonable range of alternatives is then further evaluated in the Draft EIS. The Draft EIS will include an assessment of the potential social, economic, and environmental considerations, including air quality and noise, for the build alternatives. The potential impacts of the build alternatives will be identified based on a comparison to the No Build Alternative.

C 3-100: NYSDOT has not provided enough traffic data or details on future bicycle lanes or transit services for the public to fully understand and support the Community Grid Alternative (formerly "Street-level Alternatives").

R 3-100: The appropriate data and details on bicycle and transit services will be provided in the Draft EIS, which will be available for public review.

C 3-101: Centro concurs with the initial vetting of the various alternatives. From a transit perspective, Centro can readily identify ways in which transit can integrate with either a street-level or
enhanced viaduct solution. The other options, which were not selected, were generally less conducive to transit interface.

R 3-101: FHWA and NYSDOT will continue to coordinate with Centro during the Draft EIS process. In addition, FHWA and NYSDOT have modified the project objectives to incorporate access to existing transit and enhancing transit amenities within and adjacent to the I-81 viaduct priority area.

C 3-102: Many buildings in the path of the viaduct alternatives are historic. The Preservation Association of Central New York encourages NYSDOT to select a replacement option for the viaduct that will allow the city to rebuild around what is left of Downtown's architectural heritage.

R 3-102: The identification and determination of eligibility of National Register Listed and Eligible properties will be conducted in accordance with Section 106 of the National Historic Preservation Act. An assessment of potential adverse effects to historic resources will be undertaken for each build alternative and presented in the Draft EIS. If potential adverse effects are identified, this analysis will include measures to avoid, minimize, or mitigate those adverse effects, which will be conducted in consultation with the project’s Section 106 Consulting Parties.

C 3-103: Alternative V-5 is eliminated from consideration because it severs east-west access on East Genesee Street beneath the new viaduct (though no effort is made to explore any potential rerouting of the street). The Community Grid Alternative (formerly “Street-level Alternatives”) also requires the closing of intersections, but it is recommended to carry forward.

R 3-103: Due to physical constraints, Alternative V-5 would eliminate east-west travel on East Genesee Street where it crosses Almond Street. An arterial roadway and designated New York State Route, East Genesee Street carries Connective Corridor bike lanes between University Hill and Downtown and is used by Centro Routes 62 and 262. Eliminating east-west access on East Genesee Street would be inconsistent with the project objective to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations.” Therefore Alternative V-5 has been dismissed from further evaluation.

C 3-104: The elimination of the various options does not include the positive effect of their construction cost, nor the potential economic costs, of changing the designated I-81 route
location. Unless those costs are properly included, it is not reasonable to eliminate certain alternatives.

R 3-104: Consistent with the Council on Environmental Quality’s NEPA guidance, agencies may screen alternatives based on the reasonableness (feasibility and practicality) of their cost and ability to fund the cost. As such, the evaluation of potential alternatives considered the reasonableness of construction costs. Due to funding constraints, costly alternatives were determined to be unreasonable and were dismissed from further consideration. The Draft EIS will include an assessment of economic benefits and impacts of project alternatives, including construction expenditures and the potential long-term effects on businesses from anticipated traffic diversions of the build alternatives.

C 3-105: The Draft Scoping Report identifies the number of properties that would be acquired for the tunnel and depressed highway options, and these options failed the screening. The right-of-way estimates provided in this analysis suggest a project design that is far more advanced than what exists now, or than has been shared with the public. The report does not provide the same information for the viaduct alternatives, and these alternatives pass the screening. To use this analysis as a determinative factor is premature. Even assuming the estimated takings are accurate, the pass/fail threshold established is subjective and arbitrary.

R 3-105: The Draft Scoping Report and materials presented at the June 2014 Scoping Meeting identified a potential range of property impacts for the project alternatives. The potential for substantial property acquisition was identified for Alternatives T-3, T-4, O-1, and O-2; thus, the estimated number of properties to be acquired was presented for these alternatives. However, property impacts were not the sole reason for eliminating these alternatives. Alternative T-4 failed on all four criteria (purpose and need, property, constructability, and cost). Alternatives T-4 and O-1 failed on property and cost, and Alternative O-2 failed on purpose and need, property, and constructability considerations.

C 3-106: The screening process presented in the Draft Scoping Report is flawed because it inconsistently applies the criteria by which the alternatives are evaluated. The Community Grid Alternative (formerly “Street-level Alternatives”) has been identified and passed the screening evaluation even though FHWA and NYSDOT have not determined that they can work from a traffic operations/capacity perspective. Local planning issues, which are driving the process to date, cannot form the basis for the decision before the agencies, nor can it be used to screen alternatives. Rather, the requirements of the Interstate Highway System as set forth in federal laws and regulations must be paramount. Alternatives may not be eliminated or selected until those factors are determined, at least preliminarily. NYSDOT does not know what design elements may be needed, what property may be acquired, or what the costs
might be. Nevertheless, it “passed” each alternative in its screening. Such a conclusion is wholly unsupported and renders the entire screening process suspect and arbitrary.

R 3-106: The screening criteria were applied to each of the potential alternatives consistently and those that have been determined to be reasonable and which meet the project’s purpose and objectives are being advanced for further evaluation and development in the Draft EIS. As stated in FHWA’s *A Guide to Transportation Decisionmaking*, “transportation planning must reflect the desires of communities, and take into account the impacts on both the natural and human environment. Moreover, transportation plans should help communities and regions reach their goals.” In developing the Community Grid Alternative, NYSDOT reviewed the needed capacity on an alternative interstate route (i.e., I-481). Auxiliary lanes have been identified at locations where capacity may be needed based on future traffic volumes. Planning issues, along with many other factors, are being considered as the informed decision-making process continues. NYSDOT will develop and analyze alternatives through a balanced approach in accordance with NEPA and consider local planning as it relates to the transportation system.

C 3-107: The commenter stated that FHWA and NYSDOT insist the lanes on Almond Street can be reduced (from 8 to 6) and that the smaller road will be able to accommodate all of the added former I-81 traffic for Alternative SL-1. A report prepared by Maser Consulting indicated that the lanes will need to increase from 8 to 10, 11, or 12 lanes to accommodate the added traffic. The scoping report also states that preliminary traffic analysis will be undertaken for Alternative SL-2 and SL-3 and that it is possible that some options for the southbound local streets will be dismissed because they fail to result in reasonable traffic operation.

R 3-107: NYSDOT has reviewed the Maser report, which makes conclusions without sufficient supporting data, and does not agree with its findings. The Community Grid Alternative presented in Section 3-2-3 of this *Scoping Report* would disperse traffic along multiple routes (i.e., I-481, Almond Street, and other local streets). The initial six-lane configuration of Alternative SL-1 presented in the *Draft Scoping Report* was based on preliminary information derived from the 2007 Syracuse Metropolitan Transportation Council travel demand forecast model and a data collection program conducted in fall 2013. Data will be further refined as design advances and will be presented in the Draft EIS. Also note that Alternatives SL-1, SL-2, and SL-3 have been combined into a single alternative (Community Grid Alternative).

C 3-108: A commenter stated that the screening process applied to date is flawed in that FHWA and NYSDOT have not “weighted” the criteria so as to do a meaningful screening. Placing the same weight on “property acquisition” as “purpose and need” is absurd. The public need to
maintain and enhance the interstate highway system far outweighs the number or cost of property acquisitions. It should be given far greater weight. Moreover, an alternative which meets to a greater degree all of the various objectives, even if it is more expensive, should not be discarded because it exceeds a single arbitrary threshold.

For example, the Access Syracuse Plan effectively combines retaining the existing highway alignment and establishment of an accessible surface level boulevard. It should not be summarily discarded because it will potentially take longer or be more expensive to build than the Community Grid Alternative (formerly “Street-level Alternatives”). The Access Syracuse Plan better achieves the desired objectives of downtown revival and sustained long-term local and regional economic growth than would any of the Community Grid Alternative. This reasoning applies to other alternatives as well. There needs to be appropriate weight given to the various evaluation criteria.

R 3-108: All of the considerations for the alternatives evaluation are permissible for alternatives screening under NEPA and it is not required to weight these considerations. Please see the response to Comment 3-121 regarding the Access Syracuse Plan.

C 3-109: A commenter stated that the analysis of the street-level options is flawed because the street-level options do not “maintain or enhance vehicle access to the interstate highway network.” In fact, access is hindered in that vehicles will have to make longer trips around the City on re-designated I-481 or experience the slower travel times through the city.

R 3-109: The Draft EIS will identify any changes in travel time for each of the alternatives. Under the Community Grid Alternative, there would continue be a north-south interstate through the greater Syracuse area, potentially re-designating I-481 as I-81. Existing east-west interstate (i.e., I-690) connections would be maintained. The Community Grid Alternative would also provide interstate exit and entrance ramps that meet current design standards.

C 3-110: The Draft Scoping Report concludes that the Community Grid Alternative (formerly “Street-level Alternatives”) would provide enhanced bicycle and pedestrian surface connections on streets across and along the I-81 viaduct. These enhancements would be dangerous. Pedestrian/bicycle conflict with vehicles would be created where none currently exist. Only the grade separation options would permit enhanced bicycle and pedestrian surface connections while minimizing the chance for conflict.

R 3-110: Consistent with the project objectives to “address vehicular, pedestrian, and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area” and “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown area..."
business district, and other key destinations,” NYSDOT will design alternatives to assure safe travel by bicyclists, pedestrians, and motorists.

C 3-111: A commenter stated that the analysis of the street-level options is flawed because they do not address the identified geometric and operational deficiencies or the structural deficiencies in the I-81 viaduct priority area. Rather, the deficiencies are avoided by removing the roads from the interstate highway system. In place of these requirements, FHWA and NYSDOT have stated that all of the “de-designated” stretches of road will be classified as “urban arterial roadways.” However, aspects that are purported to support the Community Grid Alternative (formerly “Street-level Alternatives”) violate FHWA and NYSDOT classification/planning requirements and are inconsistent with the existing downtown traffic network as it exists today.

R 3-111: Under the Community Grid Alternative, the geometric and operational deficiencies in the viaduct priority area would be removed with removal of the highway or would be corrected, as feasible, where the highway remains. FHWA and NYSDOT highway and urban arterial roadway requirements would be met, as appropriate.

C 3-112: A commenter stated that the screening process presented in the Draft Scoping Report is flawed because it inconsistently applies the criteria by which the alternatives are evaluated. For example, the Draft Scoping Report concludes that the rehabilitation alternative would be implemented “over a multi-year period as funding permits.” These comments evidence a prejudice against the rehabilitation option as the report does not indicate an implementation window or funding contingency language for any other proposed alternative. Further, this language is inconsistent with what has been presented in neighborhood meetings, as slides presented at those meetings indicate the construction duration of the rehabilitation alternative to be 2 to 3 years. It makes no sense that the most limited alternative with the lowest cost (other than the no-build) is subject to a funding contingency while the other options are not.

R 3-112: The Rehabilitation Alternative is not reasonable because it would not meet the project’s need, purpose, and objectives; thus, the alternative has been eliminated from further consideration. The two- to three-year construction duration stated at public meetings assumed a continuous funding stream, which would be the best-case scenario.

C 3-113: The analysis of the street-level options is flawed because the negative impacts on access to key regional destinations by de-designation of I-81 through the City are not considered.
R 3-113: Under the Community Grid Alternative (formerly “Street-level Alternatives”), there would continue to be a north-south interstate through greater Syracuse, potential re-designating I-481 as I-81. Existing east-west interstate (i.e., I-690) connections would be maintained. The interstates would be supported by the local street network. Access to key destinations would be maintained. The Community Grid Alternative is consistent with the project objective to “maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area.”

C 3-114: The Community Grid Alternative (formerly “Street-level Alternatives”) may disrupt the street grid by severing streets such as Fayette, Water, Washington, and McBride Streets, the connection between Almond Street to Catherine Street, etc. This could negatively impact residents and businesses in this area, as well as existing and proposed bike routes.

R 3-114: The Draft Scoping Report identified the potential for the Community Grid Alternative to disconnect streets within the project limits. The streets that would be potentially closed under the Community Grid Alternative have been refined since the publication of the Draft Scoping Report. As described in Section 3-2-3 of this Scoping Report, the Community Grid Alternative would involve potentially severing McBride and Jackson Streets, and one option (Option CG-1, Boulevard, of the Community Grid Alternative) would involve interrupting the connection between Almond and Catherine Streets. Efforts to avoid and minimize these street disconnections will continue as the design advances. Potential impacts to adjacent residents and businesses would be analyzed and described in the Draft EIS.

C 3-115: Related to improvements at the I-81 and I-690 interchange under the Community Grid Alternative (formerly “Street-level Alternatives”), NYSDOT should further study and share information about potential dead ending of streets, looking to leave the street grid in place as much as possible. NYSDOT should review design opportunities to connect the Community Grid Alternative to I-690 using existing on-ramp locations, such as Teall Avenue, to avoid dead-ending of existing through streets.

R 3-115: Consistent with the project objective to “maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations,” efforts will be made to minimize local street disconnections wherever possible as the alternatives are refined during the development of the Draft EIS.

C 3-116: It is unclear whether the alternatives provide a transformational path for the community in terms of design and aesthetics. NYSDOT must consider design and aesthetic issues, enhance
the visual connection between downtown and University Hill, identify the amount of blockage of sunlight attributed to the various solutions, and find a solution that is sustainable. Better and more imaginative solutions should be identified. A specific maintenance plan for any improvements should be developed, and commitments to fund them identified.

R 3-116: Consistent with NYSDOT policy, project alternatives will incorporate context-sensitive design features. FHWA and NYSDOT are committed to urban design enhancements for each alternative considered.

C 3-117: Cost should not be the main determinant when selecting an alternative. A higher cost might also result in the greatest near- and long-term benefits.

R 3-117: Cost is one of several considerations for the alternatives selection. Consistent with the Council on Environmental Quality’s NEPA guidance, agencies may screen alternatives based on the reasonableness (feasibility and practicality) of their cost and ability to fund the cost.

C 3-118: Evaluation criteria for “economic growth impact” for this project have not been addressed sufficiently in the NYSDOT study. As this is an urban impact project, the Draft EIS process needs to evaluate the economic impact to real property for the City’s future. ReThink81 has prepared and submitted a white paper, “Impacts of the DOT Viaduct and Boulevard Alternatives on Tax Parcels and Values.”

R 3-118: The Draft EIS will include an assessment of the potential economic impacts, including the potential effects on the local tax base, of the build alternatives.

C 3-119: A commenter stated that the agencies cannot conclude that the Community Grid Alternative (formerly “Street-level Alternatives”) would “maintain the local street connections within or adjacent to the I-81 viaduct priority area.” Tables A-7 and A-8 are inaccurate in that they fail to identify the closure of Jackson Street.

R 3-119: The closure of Jackson Street was inadvertently omitted in Tables A-7 and A-8 of the Draft Scoping Report, and the tables have been revised in this Scoping Report (see Appendix A-2). As Jackson Street has a low functional street classification, its closure is not considered a fatal flaw. The inadvertent omission of Jackson Street does not change the evaluation of the Community Grid Alternative.

6-3-4 OTHER

C 3-120: The ReThink81 Alternative should advance. The ReThink81 Alternative would involve the designation of I-481 as I-81 from Exit 16A to I-690 (existing Interchange 4 on I-481). I-690
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would be designated as I-81 from the existing I-690/I-481 interchange to the existing I-81/I-690 interchange. I-81 would travel its existing alignment north of I-690, passing Destiny USA and Syracuse Hancock International Airport. The existing viaduct would be removed south of I-690 and would be replaced with a street-level option (boulevard or combination of Almond Street and other local streets).

R 3-120: More detailed engineering and traffic analyses will be undertaken to support the potential de-designation of interstates. Interstate re-designation and associated numbering will need to meet AASHTO naming protocols and receive approval from FHWA. The proposed routing of a portion of I-81 on I-690 would not be a typical scheme based on interstate highway numbering conventions. However, NYSDOT and FHWA will consider the proposal as part of the designation studies.

C 3-121: The Access Syracuse Plan should be studied in the EIS. Under the Access Syracuse Plan, the tunnel structure would be located approximately along the existing alignment of I-81 from about Jackson Street to Butternut Street, with Almond Street reconstructed above the tunnel to serve local north-south traffic. The Access Syracuse Plan would eliminate existing and proposed ramp connections between I-81 and I-690 to minimize potential building acquisitions and to reduce the number of required road closures associated with Alternative T-1.

R 3-121: The Access Syracuse Plan was provided to NYSDOT on June 24, 2014. The conceptual plan presents a variation of Tunnel Alternative T-1, which was considered and recommended for elimination in the Draft Scoping Report. Like Alternatives T-1, T-2, and T-3, the Access Syracuse Plan proposed a “hybrid concept,” including a boulevard above the tunnel (see Section 3-5-4 of this Scoping Report).

Based on an initial evaluation, the proposed Access Syracuse Plan fails to meet the project’s need, purpose, and objectives. Its efforts to reduce the property acquisition and road closure requirements associated with Alternative T-1 create deficiencies in terms of its design.

Two of the stated needs for the I-81 Viaduct Project are the need to improve traffic flow and safety and the need to correct non-standard and non-conforming design features of the existing roadway. The Access Syracuse Plan fails to address many of the non-standard and non-conforming features that are present on I-81 today. Some of these features include minimum radius of curvature, horizontal stopping sight distance, and ramp spacing. Moreover, the plan introduces new non-standard features at several locations, including elimination of existing interstate-to-interstate ramp connections, grades that are too steep, and insufficient ramp lengths. Correcting these non-standard features as proposed in the Access Syracuse Plan would result in a design similar to Alternative T-1, severing Jackson,
Townsend, McBride, Fayette, Washington, Water, and Willow Streets where they cross the highway.

Furthermore, the proposed plan impedes regional mobility by eliminating four of the existing direct connector ramps between I-81 and I-690 (both eastbound and westbound I-690 to southbound I-81, and northbound I-81 to both eastbound and westbound I-690). Combined, these four ramps currently accommodate approximately 3,300 vehicles during the AM peak hour and 4,000 vehicles during the PM peak hour. Eliminating existing interstate-to-interstate ramp connections is considered a fatal flaw by the American Association of State Highway and Transportation Official's (AASHTO's), “A Policy on Design Standards Interstate System,” dated January 2005, which states that interchanges shall be provided between intersecting interstate routes and that all interchanges shall provide for all traffic movements. Given the importance of these ramp connections for maintaining local and regional mobility including access to University Hill, hospitals, and Downtown, the elimination of these existing interstate-to-interstate connections is considered unreasonable.

As noted above, the Access Syracuse Plan would also have the same constructability challenges as Alternative T-1. The subsurface conditions along Almond Street are not favorable for tunnel construction. There is a high water table and difficult soil. The water is saline, which requires special treatment and disposal methods and environmental permits. Extensive relocation of subsurface utilities would be required. Due to these subsurface conditions, cut-and-cover construction would be needed, requiring a wider construction footprint and extending the duration of construction activities compared to other alternatives. Therefore the viaduct and Almond Street would need to be closed for much of the duration of construction.

Tunnels are typically associated with high operations and maintenance costs for the life of the facility. Moreover, due to the nature of tunnel construction, there are greater schedule and cost risks associated with environmental permitting, unforeseen geotechnical issues, groundwater control, utilities, and construction engineering.

The Access Syracuse Plan would have many of the same constructability and cost challenges associated with Alternative T-1. In addition, the plan would reduce regional mobility by eliminating existing interstate-to-interstate connections, would not address identified accident deficiencies as many of the existing non-standard and non-conforming features would be retained, and would introduce new non-standard and non-conforming features. Therefore, the Access Syracuse Plan is not being advanced for further evaluation in the Draft EIS.
While the Access Syracuse Plan is not being advanced, based on public input, NYSDOT is conducting further engineering analysis to determine if there is a tunnel alternative that addresses the project’s needs and meets the project purpose and objectives, as well as the established screening criteria. Based on these factors, FHWA and NYSDOT will determine whether a new tunnel alternative will be further evaluated and presented as a reasonable alternative in the Draft EIS.

C 3-122: Commenters expressed opposition to the Access Syracuse Plan. Reasons cited for this opposition include: would have similar impacts as Alternatives T-1 and T-2 presented in the Draft Scoping Report; may reduce connectivity between neighborhoods due to severing of streets; and would be costly.

R 3-122: The Access Syracuse Plan has been dismissed from further consideration and will not be advanced for further evaluation in the Draft EIS. Based on public input, NYSDOT is conducting further engineering analysis to determine if there is a tunnel alternative that addresses the project’s needs and meets the project purpose and objectives, as well as the established screening criteria. Based on these factors, FHWA and NYSDOT will determine whether a new tunnel alternative will be further evaluated and presented as a reasonable alternative in the Draft EIS.

C 3-123: Consider an alternative that includes a boulevard with three depressed areas (underpasses) and two park areas above. By using ramps and the underpasses, there should be space to accommodate utility relocations. Connection to I-690 can be made similar to that described in Alternative SL-1. The elimination of the physical barrier (existing viaduct) would link the University Hill, Downtown, and Armory Square areas, thereby enhancing the establishment of a viable downtown community core.

The interconnection between north and south interstate spur roads would not need to be designated as an interstate highway, and as such can be constructed to different standards and at less cost. Local traffic that wants to cross the downtown area can be accommodated, without stops, by constructing a boulevard with select underpasses along the alignment of Almond Street and current I-81.

It is suggested that the I-690 connection to a north spur be moved westerly using the space available between Butternut Street and current I-81. This interchange would be simplified as a “tee interchange,” and would likely require re-configuring the West Street interchange, possibly combining the two.

R 3-123: This concept is similar to the depressed highways that would be constructed under Alternatives DH-1 and DH-2, which both failed to meet the project’s need, purpose,
objectives, as well as constructability considerations (see Section 3-5-5 of this Scoping Report). Like Alternatives DH-1 and DH-2, the proposed alternative would encounter subsurface conditions along Almond Street that are not favorable for construction of a depressed roadway and require extensive utility relocations as well as treatment and disposal of saline groundwater. In addition, Washington Street and Fayette Street would be severed under this scheme, and the proposed shifting of the I-81/I-690 interchange would have substantial impacts to the Franklin Square neighborhood and future developments in this area. A depressed roadway with service roads to accommodate north-south traffic also would provide limited room for improved pedestrian or bicycle connections. Therefore, like the Depressed Highway Alternatives, this concept was not advanced for further evaluation in the Draft EIS.

C 3-124: Regardless of which alternative is approved, through traffic should be directed around the City along I-481. The I-81/I-481 interchange should be reconstructed to redirect through traffic.

R 3-124: I-81 would only be re-designated on another alignment under the Community Grid Alternative. For that alternative, interstate re-designation options, including the designation of I-481 as I-81, will be considered and will be presented in the Draft EIS. The Community Grid Alternative would include the reconstruction of both the north and south I-81/I-481 interchanges. It should be noted that through traffic is currently directed to I-481 through existing signage.

C 3-125: Under the Viaduct Alternatives, extend the curb from I-81 northbound to I-690 westbound and eliminate a left-hand merge. Do not provide an exit to West Street from I-81 northbound. Traffic should use Geddes Street.

R 3-125: The non-conforming acceleration lane to the ramp connecting northbound I-81 to westbound I-690 would be brought to standard under the Viaduct Alternative, thereby eliminating the left-hand merge. The movement from northbound I-81 to West Street would be eliminated, requiring that traffic to use Geddes Street.

C 3-126: From I-81 southbound at Harrison Street, eliminate the merge to Almond Street and have traffic cross Harrison Street south to Adams Street. Then vehicles would turn left to access the hospitals and Syracuse University.

R 3-126: FHWA and NYSDOT are assessing potential connections to and from the interstate and will present the findings in the Draft EIS.
C 3-127: On- and off-ramps should be relocated to improve traffic flow. Consider an exit at or near Colvin Street, MLK East, or McKinley Avenue. This would improve access to University Hill and relieve congestion in Downtown.

R 3-127: FHWA and NYSDOT will investigate access points to and from the highway within the project limits to improve operations and safety as well as traffic flow, including a potential new interchange at MLK East or modifications to the existing partial interchange at Colvin Street. As described in Section 2-4, one of the project objectives is to maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area.

C 3-128: Consider a higher viaduct with two or three pedestrian crossings over Almond Street but under the viaduct.

R 3-128: Pedestrian and bicyclist safety are important elements of the I-81 Viaduct Project, as indicated in Section 2-4, in which one of the stated project objectives is to maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations. Similar to Alternative V-5, the viaduct would be too high under this proposal to accommodate ramps to local streets without severing major thoroughfares (e.g., Genesee Street).

C 3-129: Consider a dedicated pedestrian/bike connection between Syracuse University and Downtown, such as an elevated vegetated walkway/bikeway that goes over the viaduct or a skyway that could include commercial space.

R 3-129: Please see the response to Comment 3-128 regarding elevated pedestrian crossings.

C 3-130: Consider transforming the viaduct into a series of “gateways” that invite you from one area of the city to another. For example, the one at Erie Boulevard could focus on the Erie Canal, and the ones at Harrison or Adams Streets could tie in with Syracuse University, the hospital, or the city skyline in some ornamental manner.

R 3-130: Gateways will be considered as design advances.

C 3-131: Under the Viaduct Alternatives, to relieve congestion and improve pedestrian crossings at the Almond Street/Adams Street intersection, relocate the on-ramp to I-81 southbound to Burt Street.

R 3-131: Improved pedestrian safety and connectivity is an important element of the I-81 Viaduct Project. As stated in Section 2-4 of this Scoping Report, one of the project objectives is to
maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations. Relocation of the southbound I-81 entrance ramp at Adams Street to Burt Street would likely result in increased traffic through a residential area. However, a new ramp at MLK East (formerly Castle Street) is under consideration.

**C 3-132:** There should be a civic design specialist brought on board or a national competition to design the viaduct as an architectural feature and attraction.

**R 3-132:** Visual quality is an important consideration of the I-81 Viaduct Project. One of the goals of the project, as discussed in Section 2-3 of the Scoping Report, is to provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse.

**C 3-133:** Under the Viaduct Alternative, I-81 northbound through Syracuse should be reduced to one lane, with northbound through traffic routed along I-481.

**R 3-133:** This proposal would not meet federal interstate highway standards, which require a minimum of two lanes in each direction.

**C 3-134:** Consider an alternative with one direction of traffic on a viaduct and the opposing direction of traffic on the surface below to reduce its width and reduce property and building acquisitions, as well as maintain efficient emergency vehicle access to hospitals.

**R 3-134:** To meet federal interstate highway standards, both directions of travel must be served as a full access controlled facility. A surface-level interstate would sever numerous east-west streets, which is inconsistent with the project’s need, purpose, and objectives.

**C 3-135:** Construct a roof, possibly a roof with solar panels, over the viaduct to reduce snow removal and salt use, which would also reduce structural deterioration of the roadway.

**R 3-135:** A roof would require substantial additional structural support to accommodate the increased load associated with the new roof and snow accumulation. This would increase cost, and additional structural supports would preclude some of the viaduct roadway and local street improvements along Almond Street. Therefore, this proposal is not considered practical.

**C 3-136:** Build a new viaduct over the existing viaduct, with no on/off ramps from the upper-level viaduct for through traffic, and with on/off ramps from the lower level viaduct for local traffic.
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**R 3-136:** Traffic analyses have not indicated that an upper-level viaduct for through traffic is warranted. Most traffic is destined for the Syracuse area. Through traffic has the option to use either I-81 or I-481 to traverse Syracuse.

**C 3-137:** In addition to improving the Teall Avenue interchange, consider adding an exit at Lodi Street (possibly a left exit), which would improve access to the University from I-690.

**R 3-137:** As discussed in Section 2-4 of this Scoping Report, one of the project objectives is to maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area. However, a new interchange at Lodi Street is not reasonable because of the need to maintain appropriate distances between ramps in accordance with federal and state standards. Left-side exits to local streets also violate these standards.

**C 3-138:** Access should be improved to University Hill to alleviate congestion at other interchanges and streets. For instance, provide direct access to University Hill from I-481, which could reduce traffic on I-81. This could also facilitate park-and-ride services and Carrier Dome access at Syracuse University. Ensure that the local street network is also improved, as needed, to facilitate access from the highway to the institutions on University Hill.

**R 3-138:** As discussed in Section 2-4 of this Scoping Report, one of the project objectives is to maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area. An exit from I-481 to Syracuse University is not under consideration at this time. However, FHWA and NYSDOT are exploring enhanced access to University Hill.

**C 3-139:** Access should be improved to University Hill to alleviate congestion at other interchanges and streets. For instance, provide a dedicated interchange to University Hill from I-690 or improve existing ones, which could reduce traffic on I-81. Ensure that the local street network is also improved, as needed, to facilitate access from the highway to the institutions on University Hill.

**R 3-139:** As discussed in Section 2-4 of this Scoping Report, two of the project objectives are to: maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area; and maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations.
Consistent with these objectives, FHWA and NYSDOT are exploring improvements along I-81 and I-690 to enhance access to University Hill from points east. FHWA and NYSDOT are also exploring enhancements to the local street network, as appropriate.

C 3-140: Reduce the number of exits Downtown to direct traffic away from the immediate city center and reduce traffic on roads such as Almond Street. Eliminate the I-81 off-ramps at Adams Street/Harrison Street (but retain the on-ramps) and create a new exit from I-81 northbound at MLK East and Renwick Avenue to provide access to the hospitals and Syracuse University.

North of the I-81/I-690 interchange, maintain access to Destiny USA, but re-route I-81 southbound farther west to connect to I-690 at a point near Van Rensselaer Street. The decommissioned portion of the former I-81 South could become a long boulevard (e.g., “Syracuse Boulevard”) leading into Clinton Street alone (eliminate the Franklin Street and Salina Street exits). Salina Street would be one-way north from Onondaga Street up to Butternut Street. I-690 from the west, along with I-81 from the north, would utilize West Street to access Downtown as the Harrison Street off-ramp would be removed. In addition, create a one-way loop using Almond Street, Van Buren Street, Irving Avenue, and E. Adams Street to provide access to the hospitals and Syracuse University.

R 3-140: This proposal, which would reroute southbound I-81 from the vicinity of Hiawatha Boulevard to approximately Van Rensselaer Street where it would be combined with eastbound I-690, is not considered reasonable because it would eliminate many local street connections to and from the interstate system, sever Genant Drive and Bear Street, and result in substantial property acquisitions and impacts to the Lakefront Development District. FHWA and NYSDOT are exploring the addition of a new access point, at MLK East, to the current I-81 corridor under all alternatives that are being advanced for further evaluation in the Draft EIS (see Sections 3-2-2 and 3-2-3). FHWA and NYSDOT will investigate improvements to interstate access points within the I-81 viaduct priority area, including the Adams/Harrison Street interchange, in the Draft EIS.

C 3-141: Roundabouts should be implemented to encourage slower, continuous vehicle progression. A six-lane boulevard would encourage high vehicle speeds and diminish pedestrian safety whereas a boulevard with roundabouts would only require four travel lanes, leaving additional room for sidewalks, bike lanes, and a park-like setting.

The boulevard should have a roundabout at Colvin Street to improve access to the South Campus and the street grid south of downtown. If possible, the boulevard should pass under the railroad. A roundabout at the intersection with Genesee Street should also be considered. Erie Boulevard and Burnet Avenue should be carried on bridges over the
boulevard. The northern end of the boulevard should have a roundabout at the intersection with Green Street.

**R 3-141:** Section 5.9.1 of the NYSDOT Highway Design Manual states, “...when a project includes reconstructing or constructing new intersections, a roundabout alternative is to be analyzed to determine if it is a feasible solution based on site constraints” and “when the analysis shows that a roundabout is a feasible alternative, it should be considered the Department’s preferred alternative due to the proven substantial safety benefits and other operational benefits.” In accordance with guidance, FHWA and NYSDOT will investigate the potential for roundabouts at the affected intersections, including Genesee Street. Green Street and areas south of Colvin Street are outside the I-81 viaduct priority area.

A bridge to carry Erie Boulevard over Almond Street is being considered under the Community Grid Alternative. An overpass carrying Burnet Avenue is not being considered.

**C 3-142:** To address traffic issues northbound between Syracuse University and 7th North Street, construct a stacked viaduct starting at the university to allow traffic a choice to travel over the city or exit at Syracuse University and also allow travel on a boulevard through the city. Syracuse University and the hospitals would have an exit to service their needs. The next exit of the stacked viaduct would be 7th North Street and I-81 would continue as-is with I-90 as the next exit. This still allows good flow to the Destiny Mall.

To address traffic issues southbound from the Mall to the University, construct a stacked viaduct starting at the mall to allow traffic a choice to travel over the city and allow exit for the mall and also allow exit to the boulevard to travel through the city. The next exit of this stacked viaduct would be the university.

**R 3-142:** This proposal would result in a viaduct that would be as high as, and twice as wide as, the stacked viaduct that would be constructed under Alternative V-5. The proposed four-mile-long stacked viaduct would sever Butternut Street, Spencer Street, Court Street, Bear Street, and Hiawatha Boulevard and would result in substantial property acquisitions in the vicinity of the I-690 interchange. Like Alternative V-5 (discussed in Section 3-5-2 of this Scoping Report), the proposed stacked viaduct would not meet the project’s need, purpose, and objectives and has been dismissed from further consideration. 7th North Street is outside the project limits.

**C 3-143:** Convert the existing viaduct to public space or parkland, which would have many benefits for the City of Syracuse.

**R 3-143:** This proposal is outside the scope of the I-81 Viaduct Project.
C 3-144: Consider directing Onondaga Lake Parkway traffic onto Park Street in lieu of the current practice of directing this traffic onto what might be considered an extended I-81 two-mile on-and-off ramp between the parkway and downtown Syracuse.

R 3-144: FHWA and NYSDOT will continue to evaluate the placement and potential consolidation of entrance and exit ramps as design advances, in line with the project’s objective to maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area (see Section 2-4 of this Scoping Report).

C 3-145: Consider laying fiber-optic conduit and cables along all the roads to be built or rebuilt, which is needed for the future prosperity of Syracuse and is least expensive to implement during road construction.

R 3-145: This recommendation is beyond the scope of this project and is outside the authority of NYSDOT.

C 3-146: Consider a hybrid option. A tunnel section could be constructed between I-690 and 7th North Street with a spur at Hiawatha Boulevard that provides the missing links within the I-81 and I-690 interchange. The section of I-81 between I-690 and Brighton could be removed and replaced with a boulevard.

R 3-146: As described in Section 3-3 of this Scoping Report, FHWA and NYSDOT are exploring additional tunnel alternatives, but constructing a tunnel from I-690 to 7th North Street (and building the connectors along Hiawatha Boulevard) would not address identified project needs. In addition, this concept would have constructability issues like the Tunnel Alternatives described in Section 3-5-4 of the Scoping Report. The Community Grid Alternative includes consideration of a boulevard on the section of I-81 between I-690 and Monroe Street.

C 3-147: Consider a Community Grid Alternative (formerly “Street-level Alternatives”) that minimizes the width of the right-of-way to increase available land for potential new development and to better facilitate pedestrian and bicycle movements.

R 3-147: Right-of-way requirements for each of the alternatives, including the Community Grid Alternative, will be further evaluated in the Draft EIS.

C 3-148: The two-way boulevard option (Alternative SL-1) is too wide to function as an effective city street and pedestrians should not have to cross eight lanes of traffic. A boulevard should be limited to a 140-foot right-of-way, with three lanes of traffic in each direction, parking lane,
sidewalk, and a 15-foot median with ample space to accommodate pedestrians. This will handle a lot of traffic, be easy to cross for pedestrians and be friendly for commercial and residential development. It would allow a sidewalk on each side with an intermittent tree planting zone, a striped bike lane between the sidewalk and first traffic lane, and a wide landscaped median that could also include a partial rain garden. At 190 feet, NYSDOT’s boulevard is too wide, worse than Erie Boulevard. The reduced width would also allow up to 6 acres for valuable commercial development.

R 3-148: The Draft Scoping Report presented a representative concept for the Community Grid Alternative (Option CG-1, Boulevard [formerly referred to as Alternatives SL-1]). The specifics of the design of the alternative—including roadway width, number of lanes, and pedestrian and bicycle facilities—will be determined as the project advances and will be presented in the Draft EIS.

C 3-149: Illustrations of Alternative SL-1 show Almond Street as seven lanes wide, and for the sake of pedestrians these lanes should be broken up. Consider four lanes (two in either direction) with turning lanes at the major intersections. There should not be a separate local traffic lane as all traffic using this road should be local and no parking should be provided.

R 3-149: Please see the response to Comment 3-148.

C 3-150: AIA Central New York I-81 Task Force has submitted a detailed design study with suggestions for the north and south sectors of the Community Grid Alternative (formerly “Street-level Alternatives”). These suggestions look at locations where the highways (I-81/I-690, and I-481) interface with the street grid or key interchanges and how the street grid can be upgraded to meet needs. The realignment returns a total of 20 acres that would be available for new development including along Almond Avenue. The suggestions also eliminate the need for certain interchange improvements and flyovers and would save properties from having to be acquired.

R 3-150: Please see the response to Comment 3-148. A detailed traffic analysis will be conducted for the project and presented in the Draft EIS, which will evaluate potential impacts on the local street grid and identify potential measures to effectively distribute vehicles through the street grid.

C 3-151: For the Community Grid Alternative (formerly “Street-level Alternatives”), consider overpasses for all, or at least the most-traveled, east-west cross streets to increase north-south travel efficiency. Provide new ramps to east-west streets.
R 3-151: Overpasses carrying east-west traffic would not meet the project’s objective to maintain pedestrian, bicycle, and vehicle connectivity to the local street grid. Vehicles would not be able to connect from the north-south boulevard to the east-west cross streets. In addition, construction of the overpasses would impact access to properties along the east-west cross streets. Moreover, pedestrians generally prefer at-grade crossings to under- or overpasses, as at-grade crossings provide a quicker and more direct route. At-grade crossings are also highly visible, whereas tunnels and other separated crossings can be perceived to have security concerns because they are removed from the roadway. For these reasons, even when under- or overpasses are provided, many pedestrians continue to cross at-grade and need to be accommodated safely. Accessibility is also most easily accommodated in at-grade crossings.

C 3-152: Consider a Community Grid Alternative (formerly “Street-level Alternatives”) with pedestrian tunnels under the roadway.

R 3-152: Please see the response to Comment 3-151.

C 3-153: Under the Community Grid Alternative (formerly “Street-level Alternatives”), through truck traffic should not be allowed in the City. If the I-81 viaduct is kept in place, then I-481 should be used as a mandatory truck route to reduce wear and tear of the viaduct and to eliminate unnecessary traffic through Downtown. This should be enforced with strict fines or tolls.

R 3-153: Signage would be installed to direct through truck traffic to use the interstate route. The Viaduct Alternative would be designed to meet NYSDOT structural design standards. Enforcement of fines and tolls is outside the scope of the I-81 Viaduct Project.

C 3-154: The new streets under the Community Grid Alternative (formerly “Street-level Alternatives”) are all wide and straight; we should consider adding gentle curves or roundabouts. While we cannot afford a Big Dig, consider using mini tunnels for some of the cross streets.

R 3-154: Traffic calming measures, including the use of roundabouts and gentle curves, will be explored in the preliminary design stage of the project. Underpasses beneath Almond Street would likely result in property acquisition, impacts to utilities, and constructability concerns associated with poor soils and saline groundwater.

C 3-155: Public art should be incorporated into the boulevard.

R 3-155: Aesthetic considerations will be an aspect of the I-81 Viaduct Project, as indicated by one of the project goals, which is to provide transportation solutions that enhance the livability, visual quality, sustainability, and economic vitality of greater Syracuse (see Section 2-3 of
I-81 Viaduct Project
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this Scoping Report). Aesthetic treatments, potentially including public art, will be investigated as the design advances.

C 3-156: With the Community Grid Alternative (formerly “Street-level Alternatives”), access to the hospitals could be maintained with special lanes with minimal crossings by pedestrians.

R 3-156: Consistent with the project objectives (see Section 2-4 of this Scoping Report), FHWA and NYSDOT would seek to maintain or improve access for emergency vehicles, including ambulances and fire trucks, under the I-81 Viaduct Project. Additional information concerning emergency access will be provided in the Draft EIS.

C 3-157: Under the Community Grid Alternative (formerly “Street-level Alternatives”), there is more than enough space on the roof and top level of the two big Upstate garages to hold all the cars in the lots now used by the NYS Psych Center and Upstate scattered facilities. A city garage could replace any remaining needed spaces.

R 3-157: These parking facilities are not under NYSDOT jurisdiction. However, a parking study, which includes consideration of the loss of parking beneath and adjacent to the viaduct, is being conducted. The results of this study will be presented in the Draft EIS.

C 3-158: Consider creating separate lanes for lightweight vehicles and heavy vehicles to save costs on materials and maintenance.

R 3-158: A need to provide separate lanes for lightweight and heavy vehicles has not been identified, and thus, separate lanes are outside the scope of this project. Further, this proposal would require a wider roadway than is needed, adding undue cost to the project.

C 3-159: In combination with Alternative T-3, consider tunneling I-690 through Downtown to improve interchanges and reduce property acquisition.

R 3-159: Placing I-690 underground through Downtown would not reduce building acquisitions under Alternative T-3. The potential acquisitions were associated with construction under Townsend Street. Alternative T-3 was dismissed from further consideration because it failed to meet the project’s need, purpose, and objectives, and due to constructability considerations, property acquisitions, and cost criteria.

C 3-160: Consider a revised Alternative T-4: Tunnel on an Eastern Alignment (81’ Below Syracuse). The proposal, which is called 81’ Below Syracuse rev1, would result in a tunnel that is two miles long, extending from Colvin Street to the former Kennedy Square public housing. The tunnel would be constructed in bedrock under University Hill. On the surface would be a boulevard.
in the existing I-81 alignment. The tunnel would serve as traffic reliever for the boulevard and would keep I-81 through the center of the city.

**R 3-160:** FHWA and NYSDOT investigated the 81’ Below Syracuse rev1. Similar to the original proposal for 81’ Below Syracuse (also known as Alternative T-4), the modified concept would result in acquisition of 55 to 75 buildings. This option would also sever six streets (Washington, Fayette, Water, and McBride Streets, and Crouse and Irving Avenues), which is inconsistent with the project’s need, purpose, and objectives. In addition, the tunnel would require subterranean easements under Oakwood Cemetery, portions of the Syracuse University campus, and Thornden Park. Thus, FHWA and NYSDOT have dismissed this option from further consideration.

**C 3-161:** Consider a tunnel between I-481 and I-690 with the section of I-690 between the tunnel exit and the current I-81 becoming the new I-81. The tunnel exit could also have a north-west orientation to reduce the sharpness of the curve for the primary traffic flow on I-81 as the traffic flow to and from I-690 east of the tunnel would be relatively low. This modification to Alternative T-4 would mean that the Lincoln Park area north of I-690 would not be disturbed.

**R 3-161:** Similar to Alternative T-4, this proposal would result in 65 to 75 building acquisitions to implement the connection from the tunnel to I-690. Therefore, this option is not considered reasonable and has been dismissed from further consideration.

**C 3-162:** Consider a shortened version of Alternative T-4. I-81 would be on viaduct over the railroad tracks. At Colvin Street it would descend to tunnel in bedrock. The tunnel would end at I-690. I-81 would have a concurrent alignment with I-690 from Teall Avenue to the current split near Salina Street. The existing viaduct would be removed and replaced with a local, surface street. This modified Alternative T-4 should be less expensive than other tunnel alternatives.

**R 3-162:** Please see response to Comments 3-159, 3-160, and 3-161.

**C 3-163:** Consider a 4-mile tunnel extending from the land behind the Regional Transportation Center to Rosewood Cemetery. Construction could take advantage of existing rail infrastructure near the Regional Transportation Center for transporting construction material and excavated earth material. This would also allow the existing I-81 to remain in operation until construction is complete.

**R 3-163:** The concept proposed is similar to Alternative T-4, which was discussed in Section 3-5-4 of this Scoping Report. The concept would encounter the same constructability and property
issues as Alternative T-4 and would also be costly. Therefore, the proposed concept is not considered reasonable and has been dismissed from further consideration.

**C 3-164:** Consider a secant pile (slurry) wall with a stacked tunnel as an option to reduce at-grade disturbance and clearances for a tunnel alternative. The roof of the tunnel could be constructed first and all cut-and-cover work could be done below the active roadway.

**R 3-164:** Whether or not a secant pile wall is used, the proposed concept, which is similar to Alternatives T-1 and T-2, would fail to meet the project’s need, purpose, and objectives. The concept would sever several local streets and not meet constructability considerations because of the unfavorable ground conditions beneath Almond Street, the need to relocate substantial utilities, and the need to treat and dispose of saline groundwater. Thus, this concept was dismissed from further consideration.

**C 3-165:** The tight jug-handle when exiting from I-81 southbound to I-481 prevents traffic from taking I-481. Eliminate this jug-handle to encourage more traffic to use I-481 around the City.

**R 3-165:** Under the Community Grid Alternative, I-81 would be re-routed along the existing I-481. Under this option, the “jug handle,” or loop ramp, would be eliminated. Improvements to the interchange would not be part of the Viaduct Alternative unless they are needed to mitigate impacts of the Viaduct Alternative.

**C 3-166:** The Town of DeWitt's Comprehensive Plan (2002) identifies the I-481 corridor as a significant barrier within the Town. This is especially true at the interchange of East Genesee Street (Route 5) and I-481, but problems exist at the Jamesville Road interchange as well as where Kinne Road passes over I-481. The interchange covers approximately 74 acres and presents difficulties for pedestrian and bicycle mobility due to the lack of adequate facilities, vehicular travel speeds, and the scale of the facility itself. The Syracuse Metropolitan Transportation Council (SMTC) completed a “Bicycle Commuter Corridor Study” in 2013 that identifies Route 5 as a “possible bike corridor” and recommended the consideration of a protected contraflow bike lane down the center lane from Wellington Road to Maple Drive. The Comprehensive Plan is supportive of the development of a Town-wide interconnected system of pedestrian and bike ways, including the Butternut Creek corridor which runs adjacent to I-481 and which was identified by the Town as a conservation area by the Town of DeWitt Comprehensive Plan. The Town requests that NYSDOT consider the redesign of the I-481 and East Genesee Street interchange to adequately and safely accommodate pedestrians and bicyclists, including the Butternut Creek corridor which runs adjacent to I-
481 and which was identified by the Town as a conservation area by the Town of DeWitt Comprehensive Plan (2002).

**R 3-166:** This proposal is outside the scope of the I-81 Viaduct Project.

**C 3-167:** The cloverleaf interchange of Route 5 at I-481 should be modified to better facilitate traffic flow and pedestrian and bicycle access.

**R 3-167:** This proposal is outside the scope of the I-81 Viaduct Project.

**C 3-168:** The Town of DeWitt is working along with adjacent communities to close the prominent gap in the Erie Canalway Trail system that exists between DeWitt and Camillus. Currently the trail ends where the Old Erie Canal Historical Park meets Butternut Drive, where trail users need to progress southward along Butternut Drive before crossing a vehicular bridge over I-481 on Kinne Drive and then following Towpath Road toward Erie Boulevard. The state-owned Kinne Road bridge is not wide enough to accommodate adequate bicycle and pedestrian infrastructure and as such is a barrier to the successful closure of the Canalway Trail gap. The Town requests that provisions be made for the development of adequate accommodations over I-481 at Kinne Road to accommodate the Erie Canalway Trail.

**R 3-168:** This proposal is outside the scope of the I-81 Viaduct Project.

**C 3-169:** Design solutions that continue to be too heavily focused on directing highway traffic at a single/major point of exit at the Harrison/Adams area should be discarded. Consider fully loading and using the entire street grid system in the City of Syracuse to facilitate an efficient flow of traffic in the community.

**R 3-169:** NYSDOT will explore options to disperse traffic onto Almond Street in combination with other streets in the local street grid under the Community Grid Alternative (Option CG-2). The location of entrance and exit ramps will be explored further during the development of the Draft EIS.

**C 3-170:** Consider a modern "complete-street" upgrade in downtown Syracuse that would include such streets as West, Clinton, Salina, Warren, and State Streets along with Erie Boulevard and Water, Washington, Fayette, and Harrison Streets.

**R 3-170:** “Complete street” designs are being considered as part of the project, where appropriate.

**C 3-171:** Consider an exit around West Seneca Turnpike to provide access to the Onondaga Hills area and Onondaga Community College.
**R 3-171:** An interchange at West Seneca Turnpike is not reasonable due to its proximity to Interchange 16A, and is outside the scope of the I-81 Viaduct Project. However, as noted in Section 2-4 of this Scoping Report, one of the project objectives is to maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., downtown business district, hospitals, and institutions) within neighborhoods along the I-81 viaduct priority area.

**C 3-172:** Consider improving sections of the New York State Thruway (I-90) or providing toll-free sections of the Thruway to alleviate traffic on I-81, I-481, and I-690.

**R 3-172:** This is outside the scope of the I-81 Viaduct Project.

**C 3-173:** Consider a new interchange on the New York State Thruway (I-90) near Chittenango. There is a 15-mile stretch on the Thruway from I-481 to Canastota with no interchanges. As a result, traffic from the rapidly growing areas of northeast Madison County and eastern Onondaga County is routed to I-481 and I-81 along Routes 5 and 92 and Manlius Center Road. A new I-90 interchange near Chittenango would likely take much of that traffic and redistribute it in Onondaga County from the numerous interchanges between I-481 and I-690 instead of concentrating it into the stretch of I-481 from Route 5 to I-90. This interchange would likely pay for itself from the tolls collected.

**R 3-173:** This is outside the scope of the I-81 Viaduct Project.

**C 3-174:** As a mitigation measure, be sure that steps can be taken by NYSDOT to ensure that contract provisions which are currently in place with NYC private waste haulers to utilize the interstate highway system for shipments to Seneca Meadows will continue to be "in-force" if a boulevard or tunnel solution is chosen — to minimize trucks traveling north on I-81 and exiting in the Cortland/Homer area and taking alternate state/local roads routes to points west of Syracuse.

**R 3-174:** NYSDOT will coordinate with Seneca Meadows, as necessary, as design of the I-81 Viaduct Project advances.

**C 3-175:** Give additional consideration to alternative design solutions which have been successfully utilized by other communities both nationally and internationally.

**R 3-175:** NYSDOT has investigated and will continue to investigate alternative design solutions that have been successfully implemented elsewhere.

**C 3-176:** A commenter proposed a concept (“Two Boulevards and a Bridge I-81 Boulevard Option: Using Roundabouts [Ver. 2.1]”) that would replace I-81 through the City of Syracuse with two
four-lane boulevards. The first boulevard (“Almond Boulevard”) would extend from approximately the southern I-81/I-481 interchange to I-690, and the second boulevard (“Genant Boulevard”) would extend from approximately I-690 to Onondaga Lake Parkway. The boulevards would incorporate a series of roundabouts at key intersections to disperse traffic and better integrate with the street grid. The portion of I-690 between Almond Boulevard and Genant Boulevard would be reconstructed as an iconic curving suspension bridge. This would eliminate the existing I-81/I-690 interchange and would allow traffic to be dispersed throughout the City grid. Suggestions provided in the proposal included new public housing at Taylor Street; elevating the existing rail tracks over Almond Boulevard at Van Buren Street; creating a gateway to the SUNY ESF campus; reconstructing the I-690/West Street interchange using roundabouts; enhancing access to Franklin Square via Genant Boulevard and Clinton Street; and reestablishing historical connections within the local street grid.

This plan is informed by Syracuse’s street grid of the 1950s (before I-81 or I-690 existed). It is projected that the cost of this plan will be far less than all other current proposals due to the elimination of viaducts and bridges that will no longer need to be built or rebuilt. Similarly, the long-term maintenance costs will be far less. See Appendix B for the full proposal.

R 3-176: The changes to the transportation network outlined in the proposed “Two Boulevards and a Bridge I-81 Boulevard Option: Using Roundabouts (Ver. 2.1)” would result in major shifts in travel patterns throughout Onondaga County. A traffic analysis was undertaken to determine how the proposed modifications would impact traffic in the Syracuse metropolitan area.

The findings indicate that replacement of the 2.7-mile section of I-81 between Onondaga Lake Parkway and I-690 with a four-lane facility including a center turn lane (“Genant Boulevard”) would roughly double travel times through the corridor and create chronic congestion during peak commuting hours. Currently, a total of nine lanes come from I-81, Onondaga Parkway, Old Liverpool Road, and Buckley Road from the north and converge near Destiny USA. From nine lanes, traffic merges into three free-flow lanes and two service roads. In the proposed concept, these nine lanes would merge into two boulevard lanes. This would not have sufficient capacity to accommodate traffic, resulting in unacceptable congestion and failing levels of service.

Since large parts of Liverpool are bounded to the south by the northern shore of Onondaga Lake, motorists originating in this area lack alternative routes to the City of Syracuse and are therefore unable to disperse as intended in the proposed plan. The former I-81, Buckley Road, Old Liverpool Road, and Onondaga Lake Parkway would converge onto a four-lane roadway and Park Street, which could not accommodate the traffic demand and would form
a critical bottleneck. These anticipated operational failures could be lessened only by the provision of three or more turn bays servicing single movements, as well as three or more through lanes at multiple signalized intersections on Genant Boulevard. Such modifications would result in a facility that is much larger and is not in keeping with the proposed design concept and its intended benefits.

To avoid the resulting increased travel times on Genant Boulevard, motorists traveling longer distances between the outer-suburban communities north of Syracuse and the City of Syracuse would divert onto the remaining interstates of I-690 and I-481. These facilities do not provide adequate capacity to serve additional motorists and would require major modifications (for example, to I-481 between the northern interchange with I-81 and I-690, and to I-690 from S.R. 695 through downtown Syracuse). Improvements to the I-690/I-481 interchange also would be required. Many of these modifications would fall outside of the scope of the project and require substantial additional costs.

The southern boulevard (similar to the proposed “Almond Boulevard”) is similar to Option CG-1 of the Community Grid Alternative (see Section 3-2-3 of this Scoping Report). A southward extension of the boulevard under the Community Grid Alternative is not under consideration at this time, as it is outside the I-81 viaduct priority area and outside the scope of the I-81 Viaduct Project. Other suggestions in the proposed plan, such as new public housing and elevating the rail tracks over Almond Boulevard, are not within the scope of the I-81 Viaduct Project.

Several concepts and solutions, and the guiding principles behind them, presented in the proposed plan are consistent with the project’s goals and objectives and will be considered. These include, but are not limited to, the following:

- Reducing the scale of urban arterials and providing a safe walkable environment for pedestrians and all modes of travel;
- Increasing access between what is currently I-81 and adjacent local streets in the area between the southern I-481 interchange and Adams Street;
- Converting blocks that are currently one-way to two-way when appropriate, including locations on Harrison and Adams Streets;
- Reconnecting streets that had been severed when I-81 was originally constructed;
- Considering the use of roundabouts where advantageous;
- Exploration of civic gateways or landmarks that indicate a sense of arrival;
- Emphasizing the importance of aesthetics on bridges and elevated structures;
- Realigning the Butternut Street Bridge, as proposed in this concept;
• Realigning Evans Street and establishing a connection between Evans Street and West Street, which would enhance access to Franklin Square; and
• Simplifying the West Street interchange.

C 3-177: A system of “park and ride” options to mitigate traffic volume and thus reduce size of required at grade boulevard (or even viaduct) capacity needs to be considered. Such a system deserves consideration—and requires inclusion—as an important component of any of the alternatives analysis.

R 3-177: As stated in Section 2-4 of this Scoping Report, potential effects on transit are an important consideration of the I-81 Viaduct Project, as demonstrated by its project objective to “maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.” While park and rides are not currently part of the I-81 Viaduct Project, the project would not preclude transit enhancements by others. However, park and rides may be considered as a mitigation measure used to alleviate potential traffic impacts during the construction period.

C 3-178: Remove the I-81 viaduct and use Route 11 and I-481 and turn affected areas into a well-lighted pedestrian/bicycle boulevard. Route 11 runs parallel to I-81. In lieu of I-81, use Route 11 going through the City.

R 3-178: Route 11, which travels along State and Salina Streets, is one of the traffic routes considered under the Community Grid Alternative (Option CG-2). Pedestrian and bicycle improvements along Almond Street in the existing I-81 corridor are also being considered under this alternative.

C 3-179: Consider a new alignment of I-81 to the west of the City.

R 3-179: This proposal is outside the scope of the I-81 Viaduct Project. Furthermore, the proposal would have many of the same property and cost considerations as Alternative O-1 discussed further in Section 3-5-6 of this Scoping Report. Thus, the proposal was dismissed from further consideration.

C 3-180: Build an alternate I-81 from Binghamton-Utica-Watertown.

R 3-180: This proposal is outside the scope of the I-81 Viaduct Project, and it would have many of the same property and cost considerations as Alternative O-1. Please refer to Section 3-5-6 of this Scoping Report for a description of Alternative O-1.
C 3-181: To minimize traffic impacts during construction, consider the use of prefabricated deck. With this system, the basic idea is to remove and replace the deck and small strips from underneath while traffic moves over a plate above.

R 3-181: The repair and replacement of the deck would have been a part of the Rehabilitation Alternative, which does not meet the project’s need, purpose, and objectives and therefore is not being advanced for further consideration in the Draft EIS. Methods for minimizing construction-related traffic impacts for the alternatives recommended for further study will be evaluated in the Draft EIS and during detailed design.

C 3-182: Given local conditions, consider long-lasting and weather proofing construction technologies.

R 3-182: Construction materials and technologies will be investigated as design progresses.

C 3-183: Re-align the Butternut Street bridge on the southern side. Instead of connecting at Franklin Street (with the associated odd intersection), have Butternut Street connect into Genant Drive, making for a shorter bridge and allowing for the “missing links” to go under it. This would also allow for an off-ramp to stay at Franklin Street (if desired). The bridge could also have buildings on either side creating an inviting pedestrian connection between Franklin Square and North Salina/Little Italy.

R 3-183: FHWA and NYSDOT are considering the realignment of the Butternut Street bridge as part of the project and are investigating the location of interchanges. The above proposal for the bridge’s redesign is outside the scope of the I-81 Viaduct Project.

C 3-184: In addition to removing the I-81 viaduct, consider removing the interstate all the way from Hiawatha Boulevard to the I-481 Interchange.

R 3-184: The I-81 Corridor Study, which identified areas of the interstate that needed to be addressed in the near term, did not specify a need to remove this portion of I-81. This area is therefore outside the scope of the I-81 Viaduct Project.

C 3-185: In addition to making the I-81 viaduct a boulevard, consider making I-690 a boulevard. Through east-west traffic is already on I-90.

R 3-185: The I-81 Corridor Study did not identify a need to remove this portion of I-690. Thus, the recommendation is considered outside the scope of the current project.
C 3-186: Maintain the viaduct as is, but if necessary, downgrade its designation and reroute interstate traffic to I-481. Encourage the hospitals to build mixed-use buildings with connections that straddle and cover the highway, protecting it from snow.

R 3-186: This concept would not meet the project’s need, purpose, and objectives, and therefore, it is not being considered further.

C 3-187: Substantial upgrades should be made to both I-481 and I-690 to create a beltway around the urban center of Syracuse.

R 3-187: This proposal would be similar to alignments explored under Alternative O-1, which was dismissed from further consideration due to substantial property acquisition and cost (see further discussion in Section 3-5-6 of this Scoping Report). Interstate routes using I-481 will be investigated as part of the Community Grid Alternative during development of the Draft EIS.

C 3-188: Interstates typically go around or near cities, with a spur entering the City. Under the Viaduct Alternatives, consider making the existing I-81 an "inner loop" or switching I-81 and I-481.

R 3-188: Interstate route designations will be considered under the Community Grid Alternative.

C 3-189: Keep the viaduct and consider making Washington and Fayette Streets one-way from West Street to beyond University Avenue (where Adams/Harrison end one-way).

R 3-189: FHWA and NYSDOT are exploring improvements to the local street grid as part of the Viaduct and Community Grid Alternatives.

C 3-190: Consider separating northbound and southbound interstate traffic with one direction as an elevated viaduct and the other direction as a tunnel or depressed highway. A surface street could serve local traffic. A related approach could be that the elevated structure would be on Almond Street with the tunnel on Townsend Street corridor.

R 3-190: Alternatives T-1, T-2, T-3, DH-1, and DH-2 included below-grade structures (i.e., tunnels or depressed highways) along Almond and Townsend Streets. These alternatives were dismissed from further consideration due to difficult constructability considerations as well as the potential to eliminate east-west access on several streets. The proposed concept identified in the comment would present similar difficulties and thus has been dismissed from further consideration.

C 3-191: Consider a tunnel alternative with a “Central Park” above.
R 3-191: Based on public input, FHWA and NYSDOT are conducting further engineering analysis to determine if there is a tunnel alternative that would meet the project’s need, purpose, and objectives and screening criteria. The potential use of the right-of-way above the tunnel will also be explored.

C 3-192: Consider a surface-level interstate with underground roundabouts at cross streets.

R 3-192: This proposal would encounter the same difficult subsurface conditions that resulted in the elimination of Alternatives T-1, T-2, T-3, DH-1, and DH-2, as discussed in Section 3-5 of this Scoping Report. In addition, the short distance between City blocks (i.e., Adams Street to Harrison Street, or Genesee Street to Fayette Street) would prevent connections between the underground roundabouts and adjacent streets. Thus, the proposed concept has been dismissed from further consideration.

C 3-193: Consider re-routing part of I-81 on an upgraded Townsend Boulevard. Consider depressed sections of Townsend Boulevard to allow East Adams Street and Harrison Street to cross over via bridges and limit noise to public housing. Once it reaches the inner core of Downtown, Townsend Boulevard could transition to a street-level, six-lane boulevard with ramps to I-690 and then transition back into the existing segment of I-81.

R 3-193: The use of Townsend Street to carry some traffic is under consideration under the Community Grid Alternative. However, placing a direct connection from the current I-81 to Townsend Street, with a depressed section from approximately MLK East to Harrison Street and a six-lane boulevard to I-690, would require substantial property acquisitions in the Southside. Moreover, this underground construction concept would encounter difficult subsurface conditions and require open-cut construction, similar to Alternative T-3, which is discussed in Section 3-5-4 of this Scoping Report. Thus, the proposed concept has been dismissed from further consideration.

C 3-194: Consider a new alignment for I-81 along Onondaga Creek from Nedrow to Destiny. Build a two-lane highway with a bike lane on each side with green areas along the route.

R 3-194: This proposal is outside the project limits of the I-81 Viaduct Project and would not meet its purpose and need.

C 3-195: Consider an above ground tunnel (i.e., concrete tube) with park areas above and below. This would maintain traffic flow, reduce noise levels, and create ‘green’ transportation infrastructure in Downtown.
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R 3-195: A concrete tube would require substantial additional structural support to accommodate the increased load. This would increase cost, and additional structural supports would preclude some of the viaduct roadway and local street improvements along Almond Street. Additionally, emergency access to and from the interstate would be hindered. As such, this concept is not considered reasonable and has been dismissed from further consideration.

C 3-196: Consider a surface-level interstate that would remove Almond Street and provide overpasses for the major cross streets. Building 5 or 6 bridges over the highway would be more cost effective than building a 1.5-mile bridge.

R 3-196: This concept would not be consistent with the project's need, purpose, and objectives, as discussed in Section 2-4 of the Scoping Report. The concept would necessitate construction of bridges over any streets crossing the proposed alignment or would sever these streets, substantially diminishing local connectivity. Furthermore, the concept would adversely impact accessibility to Pioneer Homes, Forman Park, Crowne Plaza Hotel, and other major destinations in this area. As such, this concept has been dismissed from further consideration.

C 3-197: Consider underground parking under the highway, as well as shops and restaurants or lit-up parks under the highway.

R 3-197: The potential impacts of the project on parking will be considered in the EIS. If the project would result in adverse impacts on parking supply, then FHWA and NYSDOT will explore options for replacement parking.

C 3-198: Consider keeping the viaduct but eliminate some of the parallel and cross streets to create a more pedestrian-friendly environment below I-81.

R 3-198: The project would seek to improve pedestrian and bicycle access and connectivity under all build alternatives. As noted in Section 2-4 of the Scoping Report, a project objective is to maintain or enhance the vehicular, pedestrian, and bicyclist connections in the local street network within the project area to allow for connectivity between neighborhoods, the downtown business district, and other key destinations. The elimination of parallel and cross streets would be inconsistent with this project objective.

C 3-199: Consider parking garages above and around the elevated highway. This could open more space for development, connect with elevated walkways, and have a park on top and retail below.
R 3-199: If the project would result in an adverse impact on parking, then options for replacement parking will be explored in the Draft EIS.

C 3-200: Replace I-81 with a rail system.

R 3-200: This concept is outside of the scope of the I-81 Viaduct Project.

C 3-201: Consider a modified street-level option, as follows:

- Add one lane to the existing junction of I-481, one north and one south, near Brighton Avenue. Re-route any traffic not going to the downtown or university area to I-481 south. The added lanes would allow efficient flow of traffic and transition to and from I-481 to I-81 South. For traffic going to and from the western area of the city and county, the exit to I-690 already exists.
- Change the direction of State Street to "One Way" north from the Brighton I-81 North exit through to James Street
- Change the direction of Warren Street to "Two Way" - North/South.
- Change the direction of Salina Street to "One Way" south from James Street through to the Brighton Street on-ramp to I-81 South.
- Change the direction of Clinton Street to "Two Way" - North/South from James Street to Adams Street
- Remove the I-690 exit to I-81 South. Remove the I-690 exit to I-81 North.

R 3-201: As part of the Community Grid Alternative, NYSDOT and FHWA will explore existing interchanges and streets within the project limits to determine any necessary modifications.

6-4 ENVIRONMENTAL CONSIDERATIONS

6-4-1 GENERAL

C 4-1: The EIS for this project should include the following:

- A full discussion of the purpose and need of the proposed project.
- An evaluation of the alternatives to the proposed project, including reasonable alternatives not within the jurisdiction of the lead agency.
- A comprehensive evaluation of cumulative, indirect, and secondary impacts.
- Descriptions of the aquatic and terrestrial environments to be impacted by each alternative during construction and operation. These descriptions should include appropriate air quality data, water quality data (ground water and runoff), traffic analysis during construction, the identification of flood plains and cultural resources, and the identification of other significant environmental resources adjacent to the project.
• In 1993, Council of Environmental Quality guidance, Pollution Prevention and the National Environmental Policy Act, encouraged Federal agencies to include the concepts of pollution prevention in EISs during the scoping alternatives analysis, mitigation measure development, and decision-making processes. We suggest that all pollution prevention practices for highway construction and operations be discussed within the EIS.

• Environmental Justice concerns should be analyzed and discussed in the Draft EIS regarding the neighborhoods adjacent to the highway.

• Several schools and hospitals are located within a mile of the I-81 Viaduct Project. The Draft EIS should consider exposure and impacts to children and sensitive sources from mobile source air pollutants from construction and operations of each alternative.

R 4-1: The EIS will be prepared in accordance with the National Environmental Policy Act (NEPA; 42 USC § 4321 et seq.), the Council on Environmental Quality regulations implementing NEPA (40 CFR Parts 1500 to 1508), FHWA’s regulations implementing NEPA (23 CFR Part 771), and NYSDOT’s Procedures for the Implementation of SEQRA (17 NYCRR Part 15).

C 4-2: This project must be sensitive to community impacts. This process must be one of broad community inclusion. Analysis of alternatives should be mindful of neighborhood impacts, social justice issues, economic opportunity, environmental justice considerations and other associated concerns. Property takings and building demolitions that fracture neighborhoods and annihilate historic character and local heritage are unacceptable. This project must be about rebuilding communities and uniting neighborhoods.

R 4-2: The Draft EIS will include an assessment of the potential social, economic, and environmental considerations of the project alternatives consistent with the requirements of NEPA, SEQRA, and relevant Federal and state environmental laws, rules, and regulations.

C 4-3: The Town of DeWitt requests that the Potential Expanded Project Limits for the Community Grid Alternative (formerly “Street-level Alternatives”) include those areas identified in yellow in Figure 4-1 of the Draft Scoping Report as these additional areas will clearly be impacted by rerouting of traffic from the current I-81 corridor to the I-481 corridor.

R 4-3: The Draft EIS will include an assessment of potential direct, indirect, and secondary impacts of each project alternative, including impacts in areas where traffic may be diverted. The areas indicated in yellow in Figure 4-1 will be part of this analysis.

C 4-4: The project should follow the Federal Highway Standards when considering the environmental impact on the City and County.
The EIS will be prepared in accordance with the National Environmental Policy Act (NEPA; 42 USC § 4321 et seq.), the Council on Environmental Quality regulations implementing NEPA (40 CFR Parts 1500 to 1508), FHWA’s regulations implementing NEPA (23 CFR Part 771), and NYSDOT’s Procedures for the Implementation of SEQRA (17 NYCRR Part 15).

The project should reduce the impact, in as much as possible, of traffic on the air, land, and water in and around the affected areas. The Draft EIS being prepared by the DOT needs to recognize environmental considerations in the design and selection phases. The status quo is not an acceptable condition as a starting point.

The Draft EIS will include an assessment of the social, economic, and environmental impacts of the project alternatives. Where potential adverse impacts are identified, FHWA and NYSDOT will explore measures to avoid, minimize, eliminate, rectify, or compensate for the potential adverse impacts.

The Draft EIS must consider the construction-period and long-term impacts of the project on Mission Landing and Franklin Square. This should include a study of potential impacts on property values, visual impacts, and quality of life impacts.

The Draft EIS will include an assessment of the short-term and long-term social, economic, and environmental impacts of the project alternatives within the project limits, which include Mission Landing and Franklin Square.

FHWA guidance points out that there are usually multiple arterial routes serving a particular urban area, radiating out from the urban center to serve the surrounding region. The removal of I-81 from the center of the city would destroy the existing higher arterial system, not augment it. Re-designating I-481 as I-81 flies in the face of that purpose – it moves I-81 (the current core) several miles away and will require that the classification and therefore design of roadways along and near the re-designated interstate, be changed. This change would undoubtedly have significant adverse environmental impacts, including traffic, socioeconomic and community impacts in areas located miles away from the Community Grid Alternative. Relocating traffic to I-481 is contrary to the intended purpose of minimizing travel time and distance. FHWA guidance also notes that a basic tenet of the functional classification system is continuity – a roadway of higher classification should not connect to a single roadway of lower classification. Terminating the interstate system to the north and south of the downtown area and funneling the traffic to a roadway of lower classification – or around the city entirely - would violate this basic tenet, creating the potential for devastating consequences.
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R 4-7: Comment noted.

C 4-8: The Draft EIS must discuss mitigation techniques and opportunities required for this project by looking at this as an entire transportation system. The community must understand what tools are available, either from a regulatory lens, transportation funding, or other sources, to mitigate impacts such as pollution, construction disruption, noise, relocation of businesses and residents, and economic impacts. FHWA and NYSDOT should explore best efforts to mitigate traffic by using projects such as the proposed Inland Port project. Best practices to limit dirt, noise, and vibration during construction should be outlined.

R 4-8: The Draft EIS will include an assessment of the potential social, economic, and environmental impacts of the project alternatives, including impacts to the transportation system within the project limits. Potential adverse impacts will be identified based on NYSDOT’s *Environmental Manual* (TEM) and other relevant Federal and state guidance. Where adverse impacts are identified, the Draft EIS will include an assessment of measures to mitigate the impacts, including potential construction impacts. Agencies and members of the public will have the opportunity to review and comment on the potential impacts and proposed mitigation measures during public review of the Draft EIS.

C 4-9: Since project alternatives will compare to the No Build Alternative, the No Build Alternative has to be clearly defined. This is a different type of project; there is not really a No Build Alternative because something is there. If nothing is done, there are still going to be environmental impacts. The comparison of alternatives to a no build has to be clearly understood.

R 4-9: The No Build, or No Action, Alternative will be included in the Draft EIS and serve as a baseline for the analysis of potential impacts resulting from the build alternatives. The No Build Alternative will reflect the continuation of the existing I-81. For the No Build Alternative, it will be assumed that FHWA and NYSDOT would maintain the structural integrity of I-81 as long as is practicable and feasible; however, geometric deficiencies would remain. With the No Build Alternative, FHWA and NYSDOT would also not implement local roadway, bicycle, pedestrian, or transit improvements in the I-81 viaduct priority area.

6-4-2 TRANSPORTATION

C 4-10: The transportation model should consider increased transit ridership and alternative transportation over the course of the project to follow national trends toward lower vehicle ownership and lower VMT.
R 4-10: The Syracuse Metropolitan Transportation Council (SMTC) regional travel demand forecast model will be used to project future trips within the project limits. The travel demand forecast model includes a transit module and takes into account the trends that are forecasted for the region, which are based on planned economic development, land use, and other information.

C 4-11: The evaluation must describe the differences in traffic congestion with all the options considered. The existing highway, or any limited access replacement, can handle many more vehicles per hour than the boulevard or similar non-limited access options. If the boulevard cannot handle the traffic, there will be increased travel time and a safety issue because the traffic will likely back up at the exits to the highways.

R 4-11: A traffic analysis, including travel time and delay calculations, will be performed for the project alternatives, and the results will be presented in the Draft EIS.

C 4-12: Accidents are often located at intersections and potential increases in accidents as a result of creating new intersections along this main artery should be considered.

R 4-12: An accident analysis will be performed for the project alternatives, and the results will be presented in the Draft EIS.

C 4-13: It appears that the current analysis of the street grid will account for only 2-3 blocks on either side of the I-81 corridor, which is inadequate. By nature, the grid allows numerous options for traffic to flow or be rerouted. FHWA and NYSDOT should expand the study area to determine how the City's entire street grid, or at least a significant portion of it, would impact traffic flow, especially as it relates to the Community Grid Alternative (formerly “Street-level Alternatives”).

R 4-13: The traffic study area is much larger than indicated in the comment. FHWA and NYSDOT are preparing a micro simulation traffic model using the VISSIM simulation tool. The study area for the VISSIM traffic simulation model is I-81, I-690, I-481, and I-90 interstate system and surface streets that could be affected by the project, including Downtown Syracuse and University Hill, extending south to East Castle/Stratford Streets, north to Hiawatha Boulevard, west to West Street, and east to Westcott Street. Traffic data, including counts, will be provided in the Draft EIS.

C 4-14: Construction and operation of the project may divert traffic to West Street, which is a busy roadway and presents safety concerns for pedestrians. Potential impacts on West Street and Near West Side communities need to be considered.
R 4-14: As stated in the response to Comment 4-13, the traffic model will include West Street, and the effects of any changes in traffic on West Street will be presented in the Draft EIS.

C 4-15: Many approaches to managing traffic should be modeled to identify the best solution.

R 4-15: The travel demand forecast and simulation models will be used to explore several scenarios, in both the existing and future conditions, under each alternative. These scenarios will include mitigation measures.

C 4-16: FHWA and NYSDOT should provide a regional traffic analysis and master plan to address through-traffic needs for this corridor, incentives for waste haulers to remain on the interstate—which we know to be a concern of suburban communities—and emergency access routing from I-690 to the hospitals. Included with that should be coordination with Syracuse University for a new campus entrance off I-481 and other dispersion techniques to alleviate congestion at Adams Street. The Downtown Committee requests that FHWA and NYSDOT undertake further investigation on regional dispersion strategies to maximize use of our transportation system.

R 4-16: FHWA and NYSDOT conducted a Syracuse Pass-through Study in 2010 to determine how many vehicles over a 24-hour period bypass Syracuse using I-81, I-481, and I-81/I-690, and this study will help inform the detailed traffic analysis that will be prepared during development of the Draft EIS. Various traffic dispersion strategies will be investigated and evaluated to determine the degree to which each strategy maximizes the use of the existing transportation system, as well as achieves the project goals and objectives. FHWA and NYSDOT have been coordinating and will continue to coordinate with Syracuse University and other institutions and stakeholders as part of the I-81 Viaduct Project.

C 4-17: An off-ramp from I-690 westbound to University Hill will improve access to the universities and hospitals, but it will also increase traffic on Catherine Street, which is already a busy street. Further study is needed looking at safety at the intersection of Catherine, Hawley, and Green Streets; at safety of the curve on Catherine Street between Green and James Streets; and the intersection of Catherine and James Street should be considered. Current traffic patterns create a bottleneck on northbound Catherine at James. If the ramp must be part of the project, please carefully consider the improvements necessary to maintain public safety in the Hawley-Green Neighborhood.

R 4-17: Travel patterns, potential traffic issues, and safety will be investigated during the development of the Draft EIS.
C 4-18: The roads of Outer Comstock would be impacted by a boulevard alternative. The Community Grid Alternative will diminish access to Downtown and other destinations for Outer Comstock and Valley residents, who use I-81 to access all City locations on the north and west sides as well as the western suburbs. To sever this link would force additional traffic onto Comstock Avenue (a 2-lane street), which is already heavily used as a commuter and bicycle route. The Draft EIS should examine Ainsley Drive, Thurber Street, East Colvin, and Comstock Avenue, and it should be done when the universities are in session and when an event takes place at the stadium or Carrier Dome.

R 4-18: A traffic analysis will be prepared for the project alternatives during the development of the Draft EIS, and the study area will include Ainsley Drive, Thurber Street, East Colvin, and Comstock Avenue. The results of the traffic analysis will be presented in the Draft EIS. Traffic data have been collected while the universities were in session. NYSDOT does not plan to conduct a traffic study during an event at the stadium or Carrier Dome. For planning and design of roadways, design hour (or peak hour) traffic volumes are used as the basis to develop roadway capacity needs. Designing for such an event would result in an over-designed roadway system, and increased footprint and cost of the facilities. In addition, the interstate system and primary roads typically are not the bottlenecks under event conditions, but rather the secondary roads and access/egress points at the parking facilities. These locations typically are managed by police/traffic control agents to facilitate safe and efficient traffic flow under event conditions.

C 4-19: There is a lot of misinformation about traffic impacts. FHWA and NYSDOT should present real numbers on changes in travel time under the various alternatives. People need to understand the real effects of the removal of I-81.

R 4-19: A traffic analysis will be performed for the project alternatives, and the results of this analysis, including travel times, will be presented in the Draft EIS.

C 4-20: NYSDOT has presented morning commute times but not evening commute times. The afternoon commute times must be presented because the travel patterns will be different and longer than they are today.

R 4-20: A traffic analysis will be conducted for the project alternatives for the morning and afternoon peak periods, and the results of the analysis will be presented in the Draft EIS.

C 4-21: Almond and State Streets are classified as “principal arterial roadways.” That means they are designed to serve a large percentage of travel to minimize travel time and distance. For principal arterials, the concept of service to abutting land should be subordinate to the
provision of travel service to major traffic movements. Changing any of these classifications would have deleterious traffic and related impacts throughout the local network, all of which would need to be thoroughly evaluated, including dislocation and disruption to existing residents and businesses. Retaining these classifications would require that design and operation be focused on the efficient movement of vehicles, and any consideration of local accessibility, pedestrian and bicycle movements and connectivity must be subordinate to that. Design cannot be driven by efforts to create such conflicts, all of which are at cross-purposes to the mobility function of a “principal arterial.” The entire arterial system in the City and Region would need to be re-examined as part of this process, including the environmental impact review.

R 4-21: FHWA and NYSDOT will design alternatives to assure safe travel by bicyclists, pedestrians, and motorists consistent with its design criteria for the appropriate roadway classification. The Draft EIS will include an assessment of the potential social, economic, and environmental considerations of the project alternatives.

C 4-22: The Draft EIS should assess traffic conditions when there is a special event at the Carrier Dome.

R 4-22: Consistent with FHWA and NYSDOT guidance, the AM and PM peak commuter hours will be evaluated during the development of the Draft EIS.

C 4-23: Traffic from events at the Carrier Dome is currently directed to the I-81 northbound entrance on East Colvin Street, allowing efficient connection to I-690 and points north and west, which would not be maintained if I-81 is removed through the City.

R 4-23: Please see the response to Comment 4-22.

C 4-24: The designation of I-481 as I-81 and the removal of I-81 through Downtown will divert trucks destined for the landfill to Routes 41 and 20 through Skaneateles and Auburn. Route 41 is probably not designed to handle that much traffic and will likely require increased maintenance and potentially structural changes. In addition, all residents living along the route will be subjected to the increased hazards of the higher traffic. These trucks are more appropriately carried by a limited access highway.

R 4-24: The Draft EIS will examine the potential secondary and cumulative impacts of the project.

C 4-25: The simulation modeling underestimates that traffic will continue to choose the shortest route possible and that the I-81 diversion is unlikely to carry the proposed flow. Other cities
that have removed urban freeways (like Milwaukee) also have complete loops around the urban core.

**R 4-25:** The travel demand model defines the shortest route as the one with a minimum of travel time or cost (rather than travel distance). If the I-81 viaduct is removed and replaced with a street-level roadway, the model would determine the traveler’s route choice based on his or her trip destination and time (or cost) differences between alternative routes to arrive at the destination. The travel demand model results will be validated using the simulation model to ensure that the roadway network can accommodate the expected travel pattern changes that may occur due to the implementation of the project alternatives.

Based on the traffic analysis to be conducted for each alternative during the development of the Draft EIS, FHWA and NYSDOT will determine the potential effects on the local street network. This analysis will lead to a determination of the ability of the local network to accommodate changes in traffic patterns and any mitigation that is needed to achieve this.

**C 4-26:** There are concerns of redirecting traffic on to I-481. This includes highway design considerations: transition lanes, capacity to handle larger volumes at key interchanges, turns that are too sharp. There is also a likelihood that Genesee Street will increase in use as primary thoroughfare which has capacity issues, would need new traffic lights. There would be increased noise pollution, increase in debris and litter for the eastern suburbs. There would be high environmental impact and cost with the I-481 highway improvements.

**R 4-26:** The Draft EIS will include an assessment of social, economic, and environmental considerations of the project alternatives. The analysis of the Community Grid Alternative will also address the redesignation of I-481 as I-81 and any associated diverted or redirected traffic.

**C 4-27:** The Community Grid Alternative (formerly “Street-level Alternatives”) results in traffic from I-81 and I-690 using Catherine/Almond Street. Lodi Street or State Street are more arterial and seem better equipped to handle north side traffic. On- and off-ramps at I-690, while allowing access south to key attractions (Universities Carrier Dome Events, and Hospitals), will also increase northbound traffic on Catherine Street. Further study on increasing traffic and pedestrian safety at the intersection of Catherine, Hawley, and Green should be considered. Current traffic patterns create a bottleneck on northbound Catherine at James, and the slight curve in Catherine between Green and James Streets already creates a hazardous loss in line of sight. If an off-ramp must be put at Almond and Catherine Streets, please consider the improvements necessary to maintain public safety in the Hawley-Green
Neighborhood and how traffic will connect to James Street, State/Salina Street, and Lodi Street.

**R 4-27:** As stated in **Section 2-4** of this Scoping Report, an objective of the project is to “address vehicular, pedestrian, and bicycle geometric and operational deficiencies in the I-81 viaduct priority area.” The Draft EIS will include an assessment of potential impacts to traffic and pedestrian safety.

**C 4-28:** People have expressed concern about the impacts of a boulevard alternative on ambulance access to hospitals. Most ambulances probably do not reach the hospitals via I-81; they come from various directions via city streets and access Upstate as well as St. Joseph’s and Community General Hospitals that are not directly on I-81. This concern seems unfounded. In any case, the boulevards will be fairly fast, and their better connection to the street grid may well reduce ambulance travel times.

**R 4-28:** A traffic analysis will be conducted, and the results will be presented in the Draft EIS. FHWA and NYSDOT will continue to coordinate with local hospitals and emergency responders throughout development of the project.

**C 4-29:** The Draft EIS must consider the potential loss of parking that is currently located beneath and adjacent to the viaduct.

**R 4-29:** A parking study, which includes consideration of the loss of parking beneath and adjacent to the viaduct, is being conducted. The results of this study will be presented in the Draft EIS.

**C 4-30:** This fall, Centro will commission a study of transit alternatives not currently present in this region, including, but not limited to, what is referred to as “Bus Rapid Transit,” a form of limited-access higher speed service which is growing in popularity nationwide. With the anticipated large-scale investment which will be made on behalf of motorists and commercial traffic, we will advocate for the financial resources required to similarly improve mobility within the project area for transit users, both the elective and non-elective riders. A notable example of this comes from Milwaukee, where the Wisconsin DOT has recently agreed to financially support improved transit as a component of a similar reconstruction of a limited-access highway.

**R 4-30:** As stated in **Section 2-4** of this Scoping Report, an objective of the project is to “maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.” The Draft EIS will include an assessment of potential impacts of project alternatives on existing and proposed transit services in the project limits. If adverse
impacts are identified, FHWA and NYSDOT will identify mitigation measures, developed in consultation with Centro, in the Draft EIS.

C 4-31: The Draft EIS should address the safety of pedestrian activity along Almond Street. There is a substantial population of disabled people, as well as students and hospital staff that crosses this street on a regular basis.

R 4-31: As stated in Section 2-4 of this Scoping Report, an objective of the project is to “address vehicular, pedestrian and bicyclist geometric and operational deficiencies in the I-81 viaduct priority area.” FHWA and NYSDOT will assess pedestrian safety during the development of the Draft EIS.

6-4-3 LAND USE AND COMMUNITY CHARACTER

C 4-32: The assessment of alternatives must consider new projects that are being advanced in the community, such as the major expansion plans being completed by Upstate Medical University and St. Joseph’s Hospital, along with the commercial mixed-use project under construction in the Syracuse Inner Harbor, and the proposal to develop a new sports stadium arena in the University Hill area.

R 4-32: The Draft EIS will include identification of known and reasonably foreseeable development projects within the project limits, and the analysis in the Draft EIS will consider these projects as part of the No Build condition. The Draft EIS will document potential impacts on these known development projects.

C 4-33: All options should incorporate incentives for infill development near/along Almond Street.

R 4-33: Development incentives are outside the scope of the I-81 Viaduct Project. However, the project would not preclude development incentives implemented by the City of Syracuse or another entity with appropriate jurisdiction.

C 4-34: To create the opportunity to transform the current land area near the viaduct into a vibrant new neighborhood, the Downtown Committee urges the City/County Planning Agency to encourage zoning/planning for the appropriate scale development. This includes allowance for dense, mixed commercial and residential uses, installation of sidewalks, and other amenities that will support further tourism and residential growth. As part of this process, FHWA and NYSDOT should identify ways in which it can support the municipality in providing long-term maintenance support of this area, which will help it to thrive.
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**R 4-34:** Maintenance responsibilities and support will be explored, as appropriate, as part of the project’s financial plan. The financial plan will be prepared by NYSDOT prior to FHWA’s issuance of a Record of Decision for the I-81 Viaduct Project.

**C 4-35:** The Community Center and Pool at Wilson Park should not be removed as a result of the project.

**R 4-35:** Comment noted.

**C 4-36:** The Draft EIS must examine the potential impacts of rerouting traffic on Interstate 481, including its effects on the planned Butternut Creek Trail system and the completion of the Erie Canalway Trail through DeWitt to Syracuse.

**R 4-36:** The Draft EIS will include identification of known and reasonably foreseeable development and infrastructure projects within the project limits, including areas that might realize changes in traffic under the Community Grid Alternative. The analysis in the Draft EIS will consider these projects as part of the No Build condition. The Draft EIS will document potential impacts on these known development projects.

**C 4-37:** FHWA and NYSDOT should provide information on the impact of the options on the land available in the city for institutional needs and for economic development.

**R 4-37:** The acquisition of land (with or without buildings) that would be required to implement each of the alternatives will be examined during the development of the Draft EIS. The ownership and current uses of each affected parcel will be identified. The change in land use resulting from this land acquisition (e.g., from commercial to transportation infrastructure) would be assessed for compatibility or impact on existing planning and economic development policies.

**C 4-38:** Any option that is put in place should respect and work with the changing nature of the Near West Side and West Street corridor area. West Street should not be made more of a barrier to the surrounding community as a side effect of this project, and the neighborhood around it should not be disproportionally impacted.

**R 4-38:** Potential impacts on the West Street corridor will be considered during the development of the Draft EIS.

6-4-4 **SOCIOECONOMIC CONDITIONS**

**C 4-39:** The Draft EIS must consider the long-term impacts of alternatives on the tax base.
R 4-39: The loss of tax revenues associated with land acquisition will be estimated on a per parcel basis for each alternative and presented in the Draft EIS.

C 4-40: FHWA and NYSDOT should undertake a competitive analysis of the land values adjacent to the current I-81 and compare these values to other communities who have removed elevated highways to determine the effects on the tax base of a community. FHWA and NYSDOT should review and share information from case studies to demonstrate the potential economic and land use effects of removing an elevated viaduct.

R 4-40: Existing land values adjacent to the current I-81 corridor will be identified in the Draft EIS and benchmarked against other urban land values in Syracuse. The Draft EIS also will identify and describe appropriate case study examples of how a highway removal or other reconstruction scenario affected adjacent properties in other cities. In addition, using case study precedence combined with local Syracuse property data and analysis, the Draft EIS will include an estimate of land valuation changes in the project limits for each of the alternatives.

C 4-41: The Draft EIS should consider the potential changes in property value that may result from project alternatives along with any strain that increased property values might place on existing residents.

R 4-41: The Draft EIS will provide an estimate of potential changes in property value for each of the alternatives. The Draft EIS will also provide demographic and housing profiles for the existing residents. The potential impact associated with changes in property values would then be assessed for each alternative.

C 4-42: No information has been provided to support the conclusion that the boulevard will spur additional development on Almond Street and elsewhere in Downtown. Other analyses conclude that the re-designation I-481 and I-81 would induce sprawl and result in a 10 percent job loss.

R 4-42: The Draft EIS will include an evaluation of the potential socioeconomic impacts of each alternative. The Draft EIS will include an assessment of the potential displacement of businesses and an estimate of the number of associated jobs resulting from any identified land acquisition necessary for each alternative. In addition, through an analysis of the likely secondary effects, the potential for indirect displacement will be identified. This information will be based on available data, including the evaluation of information contained in technical information provided by the public to date (e.g., the Market Feasibility Study submitted by Save I-81, which is the sole source of the projection of a 10 percent job loss),
available studies and reports conducted by others in Syracuse, and from information obtained through relevant case study analyses.

**C 4-43:** The Draft EIS must consider the impacts of alternatives on residents and businesses. There is not enough detail in the Draft Scoping Report regarding the level and types of analysis that will be prepared.

**R 4-43:** The Draft EIS will provide an assessment of potential socioeconomic impacts on residents and businesses. The Draft Scoping Report and this Scoping Report present a preliminary description of the methodology for this analysis.

**C 4-44:** The owners of Destiny Mall and other businesses around the Seventh North Street exit of I-81 claim that they will be negatively impacted if the Community Grid Alternative (formerly “Street-level Alternatives”) is chosen. Describe how the Draft EIS will address this claim.

**R 4-44:** FHWA and NYSDOT will use results of the traffic analysis to identify potential changes in traffic flow that could affect access to Destiny or other key economic anchors of the City and region.

**C 4-45:** The potential loss of economic vitality must also be addressed. Proposed options that may require more land than presently dedicated, force the relocation of businesses, result in the demolition of recently accomplished projects, or result in a significant rise in ongoing operation and maintenance costs and subsequent taxation could undermine the region’s fragile economic recovery from the recession and the progress reflected in new investment recently accomplished in the central city. The economic benefits and costs of each option considered should be clearly identified and calculated.

**R 4-45:** The Draft EIS will provide a detailed assessment of the potential benefits and impacts of the I-81 Viaduct Project. This will include an analysis of the direct displacement impacts on residents and jobs for each of the project alternatives as well as ongoing costs associated with operations and maintenance. The indirect effects will also be evaluated based on the changes to land use patterns, traffic flow, and consistency with underlying economic development policies and initiatives.

**C 4-46:** FHWA and NYSDOT should minimize the demands for additional land for highway solutions and seek solutions that could increase the amount of land for development to contribute to the City’s fiscal sustainability.

**R 4-46:** Comment noted.
For the Community Grid Alternative (formerly “Street-level Alternatives”), FHWA and NYSDOT should work with key institutions and governments to address what is the best use of lands freed up by removing the viaduct. More underground parking should be envisioned below the new structures near the boulevard district or below any new open spaces. Removal of the viaduct will enable the recapturing of real estate and generate tax revenues to the City and County. The opportunity exists to create a roadway that encourages the types of mixed-use developments that have so successfully spurred Downtown’s revitalization. With the right zoning, the surrounding area can be prettier and have more retail and service shops. Proper zoning could lead to an enhanced corridor through the city center. Engagement with stakeholders is required to meet the community’s social, environmental, and economic development needs.

FHWA and NYSDOT have coordinated and will continue to coordinate with the City and County as the project advances. In addition, NYSDOT has met and will continue to meet with key institutions, organizations, and elected officials. Moreover, NYSDOT has formed a Community and Economic Development Stakeholders’ Advisory Working Group (SAWG), which includes representatives from public and private economic development agencies, companies, and groups. NYSDOT will continue to meet with the SAWG, as well as other stakeholders, throughout the EIS process, specifically to share information and seek their input in project planning efforts.

The Crouse Marshall Business Improvement District (CMBID) area will be considered in the socioeconomic conditions analysis conducted during development of the Draft EIS.

The need to acquire property must be carefully considered, and this information should be made public. The acquisition of substantial private property would be harmful to the City of Syracuse and its tax base, and FHWA AND NYSDOT should minimize the need to acquire
property to the maximum extent feasible. The public cannot fully weigh the benefits and
detriments of alternatives without an understanding of the property impacts.

R 4-49: FHWA and NYSDOT are carefully considering property needs for the project. The Draft EIS
will identify any displacements required to construct the project alternatives as well as
procedures to be undertaken to compensate and relocate residents or businesses. The Draft
EIS will also identify the impacts of property acquisition on tax revenues.

C 4-50: The Draft EIS should identify the process for reimbursement of owners if their property is
acquired.

R 4-50: FHWA AND NYSDOT would acquire property in accordance with the Uniform Relocation
Assistance and Real Property Acquisition Policies Act (Uniform Act) and New York State
Eminent Domain Procedure Law. The Draft EIS will identify any property acquisitions that
might be required to construct the project as well as procedures to be undertaken to
compensate and relocate residents or businesses.

C 4-51: An agreement must be reached with the Syracuse Housing Authority regarding
comprehensive mitigation measures that can be taken if requested by the Authority to fully
replace the existing public housing units, which are currently too proximate to the viaduct
area, in a more appropriate location in the community.

R 4-51: The Draft EIS will include an assessment of the potential social, economic, and environmental
impacts of the project on the Syracuse Housing Authority properties within the project limits,
and FHWA and NYSDOT will recommend mitigation measures for any identified adverse
impacts. The Draft EIS will also identify any property acquisitions that could be required to
construct the project as well as procedures to be undertaken to compensate and relocate
residents. FHWA and NYSDOT will not relocate residents unless the project requires the
temporary or permanent acquisition of their property.

6-4-6 AIR QUALITY

C 4-52: There are concerns about air quality and public health, including asthma and other illness,
for residents adjacent to the I-81 viaduct. This Draft EIS must include a full assessment of air
quality and other health factors to address this issue.

R 4-52: The Draft EIS will include a detailed assessment of potential changes in regional (mesoscale)
air quality emissions and local (microscale) air quality concentrations as a result of the
project alternatives. The analysis will be performed using U.S. Environmental Protection
Agency (USEPA) procedures and EPA-approved models. The ambient air quality
concentrations resulting from the local (microscale) air quality analysis will be compared to
the National Ambient Air Quality Standards (NAAQS) to identify the potential for exceedances. The NAAQS were established by the USEPA to protect human health and welfare. The results of the analyses will be presented in the Draft EIS.

C 4-53: The Draft EIS must address the potential for the Community Grid Alternative (formerly “Street-level Alternatives”) to degrade air quality.

R 4-53: Please see the response to Comment 4-52.

C 4-54: A solution that could generate an improvement in air quality and avoid any adverse regulatory impacts that could be created if air quality in proximity to the project is degraded is preferred.

R 4-54: Comment noted.

C 4-55: If the project would result in reconstruction of the I-81/I-481 Interchange (Exit 16A), then the Draft EIS must carefully consider the potential impacts of air pollution on the residents of the Loretto Main Campus, including outdoor recreational space and the building’s HVAC systems.

R 4-55: Please see the response to Comment 4-52.

6-4-7 ENERGY AND CLIMATE CHANGE

C 4-56: Clarify if the Draft EIS will address the differential impact of energy consumption and impact on climate change. Also clarify if this will include an analysis of the differential impacts on micro-environments like the heat exchange and related issues in the area around the Adams Street interchange which will vary for the different build alternatives.

R 4-56: The Draft EIS will include an assessment of the change in energy use and greenhouse gas emissions generated by the project alternatives, based on methodologies set forth in NYSDOT’s Environmental Manual (TEM) and using a model developed by USEPA.

6-4-8 TRAFFIC NOISE

C 4-57: The Draft EIS should address noise and vibration impacts on adjacent buildings.

R 4-57: The Draft EIS will include a traffic noise analysis consistent with the requirements of 23 CFR 772 and NYSDOT’s Noise Analysis and Abatement Policy. The noise analysis will use the methodology identified in NYSDOT’s Noise Analysis and Abatement Policy.

“All studies that highway agencies have done to assess the impact of operational traffic induced vibrations have shown that both measured and predicted vibration levels are less
than any known criteria for structural damage to buildings.” (www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_ and_abatement _guidance/polguide09.cfm, Access on December 23, 2014). Generally, ground-borne vibration from highway traffic is not an environmental concern unless there is a substantial discontinuity in the roadway surface. Therefore, an assessment of vibration related to traffic for this project is not warranted.

As described in Section 4-4-12 of this Scoping Report, potential vibration impacts during construction will be assessed in the Draft EIS.

C 4-58: The Draft EIS must address the potential for the Community Grid Alternative (formerly “Street-level Alternatives”) to increase noise.

R 4-58: The Draft EIS will include a noise analysis consistent with FHWA’s Procedures for Abatement of Highway Traffic Noise and Construction Noise, as described the Code of Federal Regulations (CFR; 23 CFR Part 772) and NYSDOT’s Noise Analysis and Abatement Policy. The analysis will determine the potential noise impacts of each alternative.

C 4-59: The Draft EIS must consider the potential changes in noise levels for homes near the intersection of I-481 and I-690. The noise decibel level already exceeds acceptable levels. It is hoped that noise abatement will be considered for this area.

R 4-59: The Draft EIS will include a noise analysis consistent with the requirements of 23 CFR 772 and NYSDOT’s Noise Analysis and Abatement Policy.

C 4-60: The Draft EIS must consider the potential noise levels associated with a viaduct, including any increases in noise levels that may result from a higher structure.

R 4-60: The Draft EIS will include a noise analysis consistent with the requirements of 23 CFR 772 and NYSDOT’s Noise Analysis and Abatement Policy.

C 4-61: If the project would result in reconstruction of the I-81/I-481 Interchange (Exit 16A), then the Draft EIS must carefully consider the potential impacts of noise pollution on the residents of the Loretto Main Campus, including outdoor recreational space.

R 4-61: The Draft EIS will include a noise analysis consistent with the requirements of 23 CFR 772 and NYSDOT’s Noise Analysis and Abatement Policy. The analysis will consider noise impacts on the Loretto Main Campus.
6-4-9  NATURAL RESOURCES

C 4-62: The Draft EIS must address the potential for increased stormwater drainage to Meadow Brook.

R 4-62: The Draft EIS will include an assessment of impacts associated with potential increases in stormwater to watersheds within and adjacent to the project limits, which may include Meadow Brook. The project will comply with Federal and state stormwater permit requirements.

C 4-63: Describe what is planned for water drainage, retention, and usage from newly constructed roadways. All green areas in the boulevard should showcase public educational opportunities on stormwater infiltration, rain gardens, and green infrastructure practices along with habitat for bees, birds, and other pollinators.

R 4-63: FHWA and NYSDOT will investigate and assess stormwater management as design advances, including consideration of potential green infrastructure and sustainable design elements.

C 4-64: FHWA and NYSDOT should implement appropriate landscaping with native plants. There could also be an emphasis on educating the public about the benefits of the native plants used in terms of their value to wildlife as well as the ecosystem services they provide.

R 4-64: FHWA AND NYSDOT will investigate and assess landscaping and the use of native plantings as design advances.

6-4-10  HAZARDOUS WASTES AND CONTAMINATED MATERIALS

C 4-65: A former railroad used to run where the highway is located. After the railroad stopped being used in the 1950s, a mandate was issued that required the railroad tracks to be covered with tarvia because they were a slippery hazard. In addition, the railroad had years of oil and fuel dripping on the tracks prior to being covered. Please describe how these hazardous materials will be addressed and who will pay for the added expenses.

R 4-65: The Draft EIS will include an assessment of hazardous wastes and contaminated materials in areas where construction activities for project alternatives may occur. Remediation and handling costs will be included in the project’s detailed cost estimates. A financial plan, detailing funding sources for construction and remediation costs, will be developed prior to FHWA’s Record of Decision for the project.
CONSTRUCTION IMPACTS

C 4-66: Construction activities, and particularly nighttime construction, could be disruptive to the hospitals and sensitive facilities near the I-81 viaduct and as far south as I-481. The Draft EIS must examine these potential impacts and offer mitigation measures to address these concerns.

R 4-66: The Draft EIS will include an assessment of construction activities, including potential impacts on access and circulation, land use, air quality, and noise. The analysis will rely on methodologies set forth in NYSDOT’s *Environmental Manual* (TEM) and other relevant guidance documents. Where adverse impacts are identified, the Draft EIS will identify measures to avoid, minimize, or otherwise mitigate these potential adverse impacts.

C 4-67: The Draft EIS must assess impacts on local roadway access, interstate traffic, and emergency access during construction.

R 4-67: Potential construction-related impacts to interstate and local traffic, including emergency access, will be investigated and presented in the Draft EIS. If adverse impacts are identified, the Draft EIS will present measures to avoid, minimize, or otherwise mitigate these impacts, as appropriate.

C 4-68: Transit options (e.g., park and ride lots) could be used to mitigate potential traffic impacts during construction, also providing the opportunity to substantially increase transit in the long term. FHWA and NYSDOT should convene a committee to plan for reasonable transit options.

R 4-68: As stated in Section 2-4 of this Scoping Report, one of the objectives of the I-81 Viaduct Project is to “maintain access to existing local bus service and enhance transit amenities within and adjacent to the I-81 viaduct priority area.” While park and rides are not currently part of the I-81 Viaduct Project, the project would not preclude transit enhancements by others. The Draft EIS will consider mitigation measures to alleviate potential traffic impacts during the construction period.

C 4-69: The Draft EIS must address access to Toomey Abbott Tower and adjacent family housing during construction.

R 4-69: Potential construction-related impacts to traffic, buses, bicycles, and pedestrians, including access to Toomey Abbott Tower, will be investigated and presented in the Draft EIS. The Draft EIS will consider measures to mitigate construction-related adverse impacts as appropriate to maintain access to these properties during construction.
C 4-70: The Draft EIS must address temporary displacement during construction. If temporary displacement is required, significant lead time, funding for temporary housing, and funding for restoration of housing after temporary vacancy are needed. FHWA and NYSDOT should provide a minimum of a year's notice for any temporary displacements, and it should immediately engage all of the relevant public and private leaders to devise a workable relocation scenario. FHWA and NYSDOT should build into project funding sufficient funds to restore units that had to be temporarily closed to facilitate construction.

R 4-70: The Draft EIS will identify temporary displacement that may be required during construction. If the project would require temporary displacement, the Draft EIS will outline mitigation measures consistent with FHWA's requirements pursuant to the Federal-Aid Policy Guide (49 CFR 24C) and NYSDOT procedures and contract specifications, including timelines for advance coordination with affected property owners and tenants.

C 4-71: It is critical that FHWA and NYSDOT implement a mitigation strategy to support businesses through the construction period. FHWA and NYSDOT should assemble working groups to make recommendations as to the contents of a mitigation plan.

R 4-71: The Draft EIS will include an evaluation of potential construction impacts of the project alternatives. If potential adverse impacts are identified, mitigation measures will be recommended in the Draft EIS. The public will have the opportunity to review and comment on any mitigation measures identified in the Draft EIS. NYSDOT also meets regularly with two Stakeholders’ Advisory Working Groups (SAWGs) to exchange information, discuss issues, and solicit feedback on the I-81 Viaduct Project, which will discuss potential project impacts as project plans move forward.

C 4-72: Air intakes for the hospitals are close to I-81, and many are oriented toward the highway. This will be a concern with the likelihood of increased dust and particulate matter created during construction, which should be specifically addressed in the EIS.

R 4-72: The Draft EIS will include an assessment of construction activities, including potential impacts on air quality at sensitive receptors in the project limits. The analysis will rely on methodologies set forth in NYSDOT’s Environmental Manual (TEM) and other relevant guidance documents. Where adverse impacts are anticipated, the Draft EIS will recommend measures to avoid, minimize, or otherwise mitigate these adverse impacts.

C 4-73: The Draft EIS must address the effects of construction vibration on nearby uses, including vibration-sensitive medical facilities.
R 4-73: The Draft EIS will include an assessment of potential vibration during construction using methodologies and procedures outlined in FHWA’s Construction Noise Handbook (FHWA-HEP-06-015).

C 4-74: The site of the Loretto Main Campus is geologically sensitive and the integrity of the campus could be compromised by any construction activities at the I-81/I-481 Interchange (Interchange 16A).

R 4-74: FHWA and NYSDOT will continue to consider geological conditions and is working to avoid or minimize impacts to the extent feasible. The Draft EIS will include an assessment of potential vibration during construction using methodologies and procedures outlined in FHWA’s Construction Noise Handbook (FHWA-HEP-06-015).

C 4-75: FHWA and NYSDOT should soundproof apartments to reduce construction noise impacts.

R 4-75: The Draft EIS will include an assessment of construction noise using methodologies and procedures outlined in FHWA’s Construction Noise Handbook (FHWA-HEP-06-015) and NYSDOT’s Noise Analysis and Abatement Policy. Mitigation measures will be recommended, as necessary.

C 4-76: Many of University Hill’s institutions are dependent on the steam plant, located on the west side of I-81, for heat, steam, and chilled water. This facility must operate continuously and must be protected during construction and after completion of the project.

R 4-76: FHWA and NYSDOT will continue to consider utility impacts and is working to avoid or minimize impacts to the extent feasible. The Draft EIS will include an assessment of the potential utility impacts of the project alternatives.

C 4-77: FHWA and NYSDOT should consider a construction plan that would close only half of the highway at one time. Traffic in one direction would remain along the current alignment and traffic in the opposite direction would be diverted.

R 4-77: FHWA and NYSDOT will develop its construction plans as design advances, including considerations for the maintenance and protection of traffic.

6-4-12 ENVIRONMENTAL JUSTICE

C 4-78: The project must address the needs of the vulnerable populations that live in close proximity to the highway.

R 4-78: FHWA and NYSDOT will consider the impacts of the project on adjacent communities throughout project development, and the Draft EIS will include an environmental justice
analysis consistent with Federal and state requirements. The analysis will determine whether the project would result in any disproportionately high and adverse impacts on environmental justice communities and, if identified, will outline measures to mitigate the impacts. As part of its commitment to engage environmental justice communities, NYSDOT will continue to hold neighborhood meetings to inform and engage residents of the area.

C 4-79: FHWA and NYSDOT must commit to hiring African Americans for the project’s construction.

R 4-79: Consistent with NYSDOT’s procurement policies, construction contracts for the I-81 Viaduct Project will include goals for the participation by Minority-owned Business Enterprises (MBEs).

6-5 PUBLIC INVOLVEMENT AND AGENCY COORDINATION

6-5-1 STAKEHOLDER COORDINATION

C 5-1: FHWA and NYSDOT should establish an Almond Street Corridor Review Committee to govern proper design of future development.

R 5-1: The design of future development is considered outside the scope of the I-81 Viaduct Project. However, the project would not preclude the future establishment of such a committee by the City of Syracuse or another entity with jurisdiction.

C 5-2: Syracuse University encourages NYSDOT to participate in its Chancellor’s Workgroup.

R 5-2: NYSDOT is in communication with Syracuse University and will participate in its workgroup.

C 5-3: The I-81 Viaduct Project has a major flaw—there is no client. Commissioner McDonald should send a letter to the Mayor, the Common Council, the County Executive, and the County Legislature requesting that they form a representative group authorized to speak and act as the local client for the I-81 Viaduct Project.

R 5-3: Consistent with NEPA, FHWA is the Federal Lead Agency. NYSDOT is the Joint Lead Agency. The elected officials cited above are considered stakeholders and have been informed as part of the project’s public participation program.

C 5-4: The two Stakeholders’ Advisory Working Groups were convened to provide local knowledge to inform project development. However, these groups have been underutilized. They need to meet on a regular basis and be given a greater range of play as the project moves forward.
R 5-4: The two Stakeholders’ Advisory Working Groups (SAWGs) commenced in spring 2014. As of this publication date, each of the groups has met six times. NYSDOT plans to convene meetings on an approximately monthly basis throughout the development of the Draft EIS although meetings may not be held in certain months.

C 5-5: The Syracuse Common Council has adopted a resolution memorializing the Governor, the New York State Legislature, and the Federal Government to provide that Syracuse have a seat at the decision-making table regarding the future of Interstate 81. It is imperative that the City of Syracuse play a direct role in the decision about the future of I-81.

R 5-5: FHWA and NYSDOT have been coordinating and will continue to coordinate with the City of Syracuse. The City of Syracuse is a Participating Agency in the project, meetings have been held regularly with City planners and engineers, and City officials participate in the Stakeholders’ Advisory Working Groups.

C 5-6: Consider engaging the School of Landscape Architecture at SUNY ESF and the School of Architecture at Syracuse University in developing recommendations for the public space adjacent to the highway.

R 5-6: FHWA and NYSDOT will consider engaging the institutions as design progresses.

6-5-2 PUBLIC OUTREACH

C 5-7: The scoping meetings and the visuals have been very helpful. Please continue to keep the community informed as the project progresses.

R 5-7: Comment noted.

C 5-8: The information from the scoping meetings should be available on the website. Having access to the images helps better understand the different options and have more meaningful conversations.

R 5-8: Materials from the Scoping Meetings are posted to the project website.

C 5-9: Please make the public comments available to read on-line.

R 5-9: Written comment submissions as well as transcripts of the public meetings are provided in Appendix B of this Scoping Report, which is available on the project website.

C 5-10: FHWA and NYSDOT should present examples of project alternatives from other cities.
R 5-10: Project boards presented at the Scoping Meetings included examples of projects and project elements from other locations. These boards may be reviewed on the project’s website or at the project’s outreach center at the Carnegie Building at 335 Montgomery Street.

C 5-11: NYSDOT must ensure access to project information by seniors and other citizens with limited access to the website.

R 5-11: In addition to publicizing project information on its website, NYSDOT makes materials available at public meetings, neighborhood meetings, and project repositories (viewing sites). The project repositories include the project’s outreach center at the Carnegie Building at 335 Montgomery Street; Federal, state, and city offices; libraries; and the management offices of the Syracuse Housing Authority.

C 5-12: NYSDOT should provide transportation for residents of the Pioneer Homes and Toomey Abbott to public meetings to better encourage their participation in the process.

R 5-12: NYSDOT provided free transport on Centro to the Scoping Meetings, and NYSDOT coordinated with the Syracuse Housing Authority to ensure that its shuttle service was available to residents for these meetings. NYSDOT also hosted neighborhood meetings on September 25, 2013 and July 29, 2014 at Toomey Abbott and on July 16, 2014 at the Southwest Community Center, which is very close to the Pioneer Homes.

C 5-13: Project graphics would be more meaningful if overlaid atop existing streets and properties. People would gain a better understanding of what is being proposed and how it would differ from current conditions.

R 5-13: Aerial photography and existing land use maps have been and will continue to be used in project graphics.

C 5-14: Please provide advance publicity about the Scoping Report and public presentation.

R 5-14: Consistent with previous outreach efforts for the I-81 Viaduct Project, NYSDOT has announced the release of this Scoping Report in advance. Also, NYSDOT has announced and will continue to announce public presentations in advance.

C 5-15: NYSDOT should have a table at the New York State Fair for the duration of the fair. The fair is before the end of the scoping process and would allow you access to a wider perspective. The information is important and needs to get out to the greater public.
R 5-15: It was not possible to include an I-81 Viaduct Project exhibit at the 2014 New York State Fair. However, the comment will be taken under advisement for forthcoming events at the State Fairgrounds.

C 5-16: The Syracuse Housing Authority and residents near the project must be included in the planning process.

R 5-16: As described in Section 5-3 of this Scoping Report, FHWA and NYSDOT have made targeted outreach efforts to Syracuse Housing Authority residents. NYSDOT hosted two neighborhood meetings at Toomey Abbott Towers (a Syracuse Housing Authority property) and meetings at other locations close to Syracuse Housing Authority properties to maximize the participation by the residents. Efforts were made to advertise the public meetings at the Syracuse Housing Authority properties. NYSDOT coordinated with the Syracuse Housing Authority to ensure that its shuttle service was available for residents to attend these meetings. In addition, three Syracuse Housing Authority properties (Pioneer Homes, Toomey Abbott Towers, and the Syracuse Housing Authority Administrative Office) serve as document repositories for the I-81 Viaduct Project. The Syracuse Housing Authority is also represented on the project’s Stakeholders’ Advisory Working Groups and Stakeholders’ Committee, and the organization has been selected as a Section 106 Consulting Party; NYSDOT has also held one-on-one meetings with Syracuse Housing Authority representatives. NYSDOT will continue to engage with Syracuse Housing Authority residents to encourage their participation and input throughout the NEPA process.

6-5-3 OTHER

C 5-17: Thirty-nine (39) Southside residents completed a survey of environmental issues of concern by postcard. The issues identified on the postcard were noise, traffic congestion, effects on places of worship, pedestrian safety, commute times, effects on employment, air quality, and infrastructure. Most participants checked all areas of concern.

R 5-17: The Draft EIS will include an assessment of the social, economic, and environmental consequences of the project alternatives, including the considerations identified in the comment.

C 5-18: In a survey of more than 1,500 constituents of the 50th Senate District, more than 80 percent support maintaining a north-south interstate highway through Downtown Syracuse; 56 percent support reconstruction of the viaduct; 17 percent support a boulevard; 3 percent support a tunnel only; and 24 percent support a tunnel with a boulevard on top of it.

R 5-18: FHWA and NYSDOT are considering all comments provided during scoping.
C 5-19: The survey provided by Senator John DeFrancisco offers limited value as written. It fails to recognize that even if I-481 is designated I-81, there will still be a north-south limited-access highway in the Syracuse area.

R 5-19: FHWA and NYSDOT did not participate in the development of the survey. FHWA and NYSDOT are considering all comments provided during scoping.

C 5-20: The prime consultant has very few employees of color attending these presentations and does not have sub-consultants of African-American descent working on the project. This is another missed opportunity by our government to provide opportunities to local African-American owned firms.

R 5-20: The Consultant Team includes Minority- and Woman-owned (MBE/WBE) firms consistent with NYSDOT’s 20 percent participation goal for this project. These subconsultants are involved in several aspects of the project and will continue to participate throughout the EIS process.

C 5-21: Consider holding meetings outside of Syracuse, such as in Oswego County where many commuters live.

R 5-21: Meetings are held at locations in and around the Syracuse metropolitan area to accommodate those who live, work, and commute within the project limits. Furthermore, project materials have been made available at 51 repositories located throughout the Syracuse area, and project information is available on the project website.

C 5-22: It is important to include a community benefit agreement in any alternative rebuild that would be negotiated with an organization like the Urban Justice -- Urban Jobs Task Force or some other entity which is collaborative which represents all of the economic interest of the residents of Syracuse.

R 5-22: Comment noted.

C 5-23: In searching the project website there are no references to the SEQR process. The state SEQR process has as much importance as NEPA in this instance. While much of the documentation being developed can serve for compliance with both NEPA and SEQR, they are distinctly different in some aspects. The public needs to be able to review both processes. In addition, there is a link to the Notice of Intent for the NEPA process so that it can be viewed. However, there is no indication that a lead agency letter under SEQR was issued by NYSDOT, nor of the circulation list for that letter.
NYSDOT, in cooperation with FHWA, is preparing an EIS for the I-81 Viaduct Project in accordance with the requirements of the Council on Environmental Quality’s regulations for implementing the procedural provisions of the National Environmental Policy Act (NEPA) (40 CFR §1500-1508 and the FHWA’s Environmental Impact and Related Procedures; Final Rule (23 CFR §771), and the NYSDOT Procedures for Implementation of the State Environmental Quality Review Act (17 NYCRR [New York Codes, Rules and Regulations] Part 15). FHWA, serving as the Federal Lead Agency, and NYSDOT, serving as Joint Lead Agency, are progressing the development of the EIS. The project is classified as a SEQRA non-Type II action, indicating that it has the potential for significant environmental impacts or substantial controversy on environmental grounds that should be evaluated, and an EIS shall be prepared. However, given that a Federal EIS is being prepared, NYSDOT and other New York State agencies undertaking a discretionary action for this project have no obligation to prepare an additional EIS under SEQRA. NYSDOT will give full consideration to the Federal Final EIS and will prepare a Joint Record of Decision with FHWA.

The project provides an opportunity to engage the local research community. There are concepts of using highways to generate electricity or heat that would be relevant to local research and the reduction in global warming. The project could be a test bed for engineering advancements. This type of research could greatly contribute to advances in environmental, energy, and safety technologies, which would lead to new knowledge to apply to future projects.

Comment noted.

**LIST OF COMMENTERS**

Abraham, Sasha: Written comments dated July 22, 2014, Comment No. 3-62
Adams, John: Written comments dated November 13, 2013, Comment Nos. 3-42
Adams, Marianne: Written comments dated September 2, 2014, Comment No. 3-42
Adjemian, John: Written comments dated August 27, 2014, Comment No. 3-42
AFL-CIO, CNY Area Labor Federation: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-63, 3-64
Alexander, Robert: Written comments dated August 27, 2014, Comment No. 3-62
Allen, Janet: Written comments dated June 26, 2014, Comment Nos. 3-66, 4-64
Alpeter, James Jr.: Written comments dated September 1, 2014, Comment No. 3-88
Amato, Wayne: Oral comments dated November 13, 2013, Comment No.3-64
Amber, Farell: Written comments dated August 28, 2014, Comment No. 3-42
Amodio, James: Written comments dated August 27, 2014, Comment Nos. 3-42, 3-88
Ancone, Leonard: Written comments dated August 28, 2014, Comment No. 3-63
Anderson, Garrett: Written comments dated November 13, 2013, Comment Nos. 5-22
Andrews, Russ: Written comments dated January 1, 2014 and February 14, 2014, Comment Nos. 3-43, 3-87, 4-49
Angier, Christopher: Written comments dated September 1, 2014, Comment No. 3-62
Antonacci, Robert: Written comments dated August 31, 2014, Comment Nos. 3-117, 3-121
Apalovich, Teri: Written comments dated December 26, 2013, Comment Nos. 3-42
Armstrong, Glenn: Written comments dated January 14, 2014, Comment Nos. 3-43, 3-62
Arnold, Brian: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-182
Arnold, Dave, et al: Written comments dated January 17, 2014, Comment Nos. 2-38, 3-15, 3-18, 3-63, 3-64, 3-107, 4-11, 4-42, 4-53
Arnold, Earl: Written comments dated January 15, 2014 and May 1, 2014, Comment Nos. 2-7, 4-10, 4-70
Ayling, William: Written comments dated August 19, 2014, Comment Nos. 3-12, 3-43, 3-63, 3-87
Bahny, Robert: Written comments dated March 19, 2014, Comment Nos. 3-62
Balbuena, Miguel: Written comments dated January 13, 2014, Comment Nos. 3-87
Balloni, John: Oral comments dated November 13, 2013 and written comments dated January 17, 2014, Comment Nos. 3-21, 4-12
Barlin, Raymond: Written comments dated August 27, 2014, Comment Nos. 2-21, 3-42, 3-53, 3-63
Barnes, Christopher: Written comments dated August 20, 2014, August 27, 2014, and August 29, 2014, Comment Nos. 3-62, 4-19, 4-49, 5-19
Bartholdt, Michael: Written comments dated July 10, 2014, Comment No. 3-42
Barrett, Sandra: Written comments dated November 6, 2013, November 13, 2013, and January 17, 2014, Comment Nos. 3-62
Barrow, Robert: Written comments dated August 26, 2014, Comment No. 3-62

Becker, M. James: Written comments dated September 1, 2014, Comment Nos. 3-48 and 3-88

Becker, Zachary: Written comments dated January 15, 2014, Comment Nos. 3-188

Beckman, Marc: Written comments dated January 13, 2014 and August 26, 2014, Comment Nos. 3-87

Beckworth, Russell: Written comments dated August 27, 2014, Comment Nos. 3-42 and 3-63

Beecher, Dan: Written comments dated July 31, 2014, Comment No. 3-42

Belfort-Chalat, Jacqueline: Written comments dated January 14, 2014 and July 22, 2014, Comment Nos. 3-42, 3-48, and 3-60

Bell, Ronnie: Written comments dated January 17, 2014 and September 2, 2014, Comment No. 3-143

Bello, Mark: Written comments dated November 13, 2013, Comment Nos. 3-43

Bench, Valerie: Written comments dated August 28, 2014, Comment No. 3-63

Bennett, Janet: Written comments dated September 2, 2014, Comment No. 3-39

Benz, Patrick: Written comments dated January 14, 2014, Comment Nos. 3-21, 3-96, 3-172

Berg, Sara: Written comments dated September 2, 2014, Comment Nos. 3-43, and 3-62

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Bergen, William and Dessa: Written comments dated January 15, 2014, Comment Nos. 4-32

Biancavilla, Dean: Written comments dated August 27, 2014, Comment No. 3-23

Bidwell, Mark: Written comments dated August 86, 2014, Comment Nos. 3-42, and 3-56

Biesemeyer, Carol: Written comments dated January 17, 2014, Comment Nos. 3-153

Billinson, Craig: Written comments dated August 27, 2014, Comment Nos. 3-42, and 3-63

Bingham, Tim: Written comments dated September 2, 2014, Comment No. 3-42

Black, Felicia: Written comments dated July 29, 2014, Comment No. 4-31

Blak, Peter: Oral comments dated June 26, 2014, Comment No. 4-62

Blanch, Tom: Written comments dated August 29, 2014, Comment Nos. 3-42, 3-93, 3-128

Blazak, Michael: Written comments dated September 2, 2014, Comment No. 4-41

Blum, Andy: Written comments dated August 22, 2014, Comment No. 3-89
Blumer, Suan: Written comments dated September 1, 2014, Comment No. 3-62
Bobis, Kenneth: Oral comments dated November 13, 2013, Comment Nos. 2-5, 4-39, 4-40
Body, Pat: Written comments dated July 31, 2014, Comment Nos. 3-120, 4-39
Bogdan, Joseph: Written comments dated November 13, 2013 and June 26, 2014, Comment Nos. 3-20, 3-56, 3-151, 3-153, 4-22, 4-52, 4-57, and 4-58
Bolt, Richard: Written comments dated January 13, 2014, Comment Nos. 3-42
Bonney, Martha: Written comments dated July 31, 2014, Comment Nos. 2-7, 2-38, 3-43, 3-62, 3-73, and 3-93
Boomhower, Dustin: Written comments dated June 26, 2014, Comment No. 3-66
Bossert, Philip: Written comments dated November 20, 2013, Comment Nos. 3-43
Bottar, David: Written comments dated January 17, 2014 and September 2, 2014, Comment Nos. 2-7, 2-38, 3-15, 3-20, 3-67, 3-85, 3-116, 3-144, 3-169, 3-170, 3-172, 3-174, 3-175, 4-32, 4-51, 4-67, and 4-68
Bottorff, Kyle: Written comments dated September 2, 2014, Comment Nos. 3-48, 3-91
Bowen, John: Written comments dated September 3, 2014, Comment No. 3-89
Bowes, Diane: Written comments dated November 13, 2013, Comment No. 3-42, 3-60, 3-61, 3-63, 3-88, 3-92
Bowser, Margery: Written comments dated August 26, 2014, Comment No. 3-62
Boyer, Greg: Oral comments dated November 13, 2013, Comment Nos. 3-42, 3-63
Brace, Constance: Written comments dated September 2, 2014, Comment No. 2-45
Brady, Jerome: Written comments dated September 2, 2014, Comment No. 3-42
Braga, Christopher: Written comments dated August 24, 2014, Comment Nos. 3-83, 3-135
Braiman, Mark: Oral comments dated November 13, 2013 and June 26, 2014, Comment Nos. 2-15, 3-129, 3-151, 3-186, and 4-49
Brenner, Jay: Written comments dated June 27, 2014, Comment No. 5-24
Brickman, Diane: Written comments dated January 1, 2014, Comment Nos. 2-7, 3-177
Brickman, Mitch: Oral comments dated November 13, 2013, Comment Nos. 4-11
Brickwedde, Richard: Written comments dated November 13, 2013 and July 11, 2014, Comment Nos. 3-85, 3-87, and 3-120
Briggs, Dick: Written comments dated September 24, 2013, Comment Nos. 2-1 and 3-87
Bright, Jim: Oral comments dated November 13, 2013 and June 26, 2014, Comment Nos. 3-63, 3-80

Brisk, Suzanne: Written comments dated August 27, 2014, Comment No. 3-42

Brown, Amanda: Written comments dated August 28, 2014, Comment Nos. 3-43, 3-62, 3-122

Brown, Edward: Written comments dated June 26, 2014, Comment No. 3-62

Brown, James: Written comments dated August 8, 2014, Comment No. 3-121

Brown, Mary Alice: Written comments dated August 2, 2014, Comment No. 3-39

Bruni, David: Written comments dated January 14, 2014, Comment Nos. 3-43, 3-62

Bryant, Joseph II: Written comments dated July 29, 2014, Comment No. 5-20

Buchko, Todd: Oral comments dated November 13, 2013, Comment Nos. 3-63

Buck, Brad: Written comments dated September 2, 2014, Comment No. 3-39

Buechner, Stephen: Written and oral comments dated November 13, 2013, Comment Nos. 3-87, 3-191

Bunce, Robert: Written comments dated August 1, 2014, Comment No. 3-59

Burgwin, Michael: Written comments dated August 7, 2014 and September 2, 2014, Comment Nos. 3-42, 3-63, 3-88, 3-133, 3-141, 3-182

Burke, Neil: Written comments dated June 26, 2014, Comment Nos. 2-8, 3-148, 4-33

Burns, Bill: Written comments dated July 31, 2014, Comment No. 3-172

Burns, Lisa: Written comments dated September 2, 2014, Comment No. 3-42

Burns, Sehl: Oral comments dated November 13, 2013, Comment Nos. 3-87

Busa, Kevan: Written comments dated January 14, 2014, Comment Nos. 3-43, 3-62

Byrnes, Brian: Written comments dated June 26, 2014, Comment Nos. 3-90, 3-137, 3-164

Byrnes, Lawrence: Written comments dated September 2, 2014, Comment No. 3-42

C.E.: Written comments dated August 24, 2014, Comment No. 3-42

Caiazza, Roger: Written comments dated August 22, 2014, Comment Nos. 3-63, 3-128, 3-129, and 4-11

Cain, David: Written comments dated August 29, 2014, Comment Nos. 3-42, and 3-63

Calkins, Dennis: Written comments dated November 13, 2013 and November 26, 2013, Comment No. 3-192

Campbell, Patricia: Written comments dated June 19, 2014, Comment Nos. 3-62, 3-152
Capone, Ronald: Written comments dated March 6, 2014, August 10, 2014, and August 28, 2014, Comment Nos. 3-42, 3-63, 3-88

Cardoso, Laura: Written comments dated January 7, 2014, Comment Nos. 3-87

Carey-Moore, Lisa: Written comments dated January 15, 2014, Comment Nos. 3-62, 4-63

Cargen, Henry: Written comments dated August 27, 2014, Comment No. 3-42

Carlton, Diane: Written comments dated June 26, 2014, Comment Nos. 3-34, 3-51

Carman, Lyndon and Sandra Yingling: Written comments dated January 18, 2014, Comment Nos. 3-63, 4-11, 4-13, 4-29, 4-53

Carmen Emmi, Anthony Mangano: Written comments dated August 27, 2014, Comment No. 3-63

Carrigan, Beverly: Written comments dated July 18, 2014, Comment Nos. 3-93, 3-134

Carter, Deborah: Written comments dated August 31, 2014, Comment Nos. 3-62, 3-88

Carter, Priscilla: Written comments dated June 22, 2014 and August 31, 2014, Comment Nos. 3-43, 3-62, 3-88, 3-93

Cass, Mark: Oral comments dated November 13, 2013 and written comments dated January 2, 2014, May 1, 2014, and June 14, 2014, Comment Nos. 2-7, 2-46, 3-85, 4-5, 4-31, 4-39, 4-40, and 4-78

Catsimatides, Anthony: Written comments dated January 17, 2014, Comment Nos. 2-7, 3-15, 4-39, 4-40, 4-41, 5-3, and 5-6

Chajka, Chajka: Written comments dated September 2, 2014, Comment No. 4-52

Chappell, Eugene: Written comments dated August 24, 2014, Comment No. 3-62

Chellis, Michael: Written comments dated August 11, 2014 and August 27, 2014, Comment Nos. 3-42, 3-63, 3-88, and 3-93

Chistolini, John and Sharon: Written comments dated November 13, 2013, Comment Nos. 4-59

Chistolini, John: Written comments dated November 11, 2013, January 24, 2014, and June 26, 2014 and oral comments dated November 13, 2013, Comment Nos. 4-59

Chorney, Nicole: Written comments dated September 2, 2014, Comment No. 3-39

Cincotta, Matthew: Written comments dated September 2, 2014, Comment Nos. 3-42 and 3-63

Ciotti, Nicholas: Written comments dated September 2, 2014 and July 23, 2014, Comment No. 3-62
Clark, G.: Oral comments dated November 13, 2013, Comment Nos. 4-43, 4-45, 4-52, and 4-57
Clark, Scott: Written comments dated January 16, 2014, Comment Nos. 3-43 and 3-62
Clarry, Cherlynn: Written comments dated August 27, 2014, Comment No. 3-63
Clifford, David: Written comments dated August 25, 2014, Comment No. 3-43
Cohen, Dave: Written comments dated November 13, 2013, Comment Nos. 3-43
Colucci, Wendy: Written comments dated October 10, 2013, Comment Nos. 3-63
Conners, Bruce: Written comments dated August 18, 2014, Comment No. 4-78
Conway, Patrick: Written comments dated August 27, 2014, Comment Nos. 3-42, 3-63, 3-87
Cook, David: Written comments dated September 26, 2014, Comment No. 3-179
Cook, George: Written comments dated November 13, 2013, Comment No. 3-64
Cook, Joyce: Written comments dated August 1, 2014, Comment No. 3-120
Cook, Judy: Written comments dated January 12, 2014, Comment Nos. 3-43 and 3-62
Cooper, John: Oral comments dated June 26, 2014, Comment No. 3-136
Cooper, Robert: Written comments dated September 1, 2014, Comment No. 3-62
Copanas, John: Written comments dated October 22, 2013, Comment Nos. 5-5
Corcoran, Sharon: Written comments dated August 31, 2014, Comment Nos. 3-62 and 3-124
Cottrell, Anita: Written comments dated June 26, 2014, Comment Nos. 3-42, 3-63, 3-88, and 3-93
Coviello, Carrie: Written comments dated November 13, 2013, Comment Nos. 3-43 and 3-87
Coviello, Garth: Written comments dated September 2, 2014, Comment No. 3-62
Coviello, Michael: Written comments dated November 13, 2013, Comment Nos. 3-87 and 3-92
Coyne, Gerald: Written comments dated January 12, 2014, Comment Nos. 3-42
Crouse, Robert: Written comments dated November 13, 2013, Comment Nos. 2-7, 3-48, and 3-63
Crysler, Robert: Oral comments dated June 26, 2014, Comment No. 3-17
Curran, Daniel: Written comments dated January 14, 2014, Comment Nos. 3-63
D’Agostino, James (Syracuse Metropolitan Transportation Council), Comment Nos. 2-20, 2-21, 2-23, 2-34, 2-40, 2-41, 3-1, 3-2, 4-38, and 4-49
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Dalal, Frank: Written comments dated September 2, 2014, Comment No. 3-120
Dan, Green: Written comments dated September 3, 2014, Comment Nos. 3-39 and 3-63
Darlington, James: Oral comments dated June 26, 2014 and written comments dated September 1, 2014, Comment Nos. 3-42 and 3-63
Dauphin, Cory: Written comments dated January 17, 2014, Comment No. 3-92
Davis, Ryedell: Written comments dated August 29, 2014, Comment No. 3-42
Day, Betty: Written comments dated June 26, 2014, Comment Nos. 3-42 and 3-63
DeCarlo, Mark: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-58, 3-59, and 3-63
DeFazio, Betty: Written comments dated July 21, 2014, Comment No. 3-25, 4-10, and 4-52
DeFrancisco, Senator John: Written comments dated July 24, 2014 and September 2, 2014, Comment Nos. 557 and 558
DeFrancisco, Senator John et al: Written comments dated July 3, 2014 and August 4, 2014, Comment Nos. 582 and 583
Delaney, Linda: Written comments dated September 2, 2014, Comment No. 3-42, 3-63, and 4-49
Delucia, Mike: Written comments dated January 12, 2014, Comment No. 3-43
Dellas, Jerry: Comment No. 4-48
Demott, John: Written comments dated November 13, 2013, Comment Nos. 3-43 and 3-62
Dermott, John: Written comments dated September 2, 2014 and June 26, 2014, Comment No. 3-62
Derusso, Richard: Written comments dated January 24, 2014, Comment Nos. 3-42
Desjardins, Zachary: Written comments dated November 12, 2013 and January 16, 2014, Comment Nos. 3-43, 3-193, 4-57, 4-58, 4-60, and 4-67
DeStefano, Linda: Written comments dated July 9, 2014, Comment Nos. 3-88 and 3-93
DeValk, John: Written comments dated August 26, 2014, Comment Nos. 2-6, 3-42, and 3-46
Dewey, Laura: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-63, and 3-88
Diamond-Walls, Lawrence D.: Written comments dated November 13, 2013, Comment Nos. 4-78 and 5-16

DiCaprio, Gilda: Written comments dated May 1, 2014, Comment No. 3-88

Diehl, Margrit: Written comments dated January 15, 2014 and August 28, 2014, Comment Nos. 3-43 and 3-62

Dodge, Lisa: Written comments dated August 24, 2014, Comment No. 3-42

Doherty, Teresa: Written comments dated November 13, 2013, Comment Nos. 3-87 and 3-191

Don, Reeve: Written comments dated February 6, 2014, Comment Nos. 3-42 and 3-94

Donald, Colon: Written comments dated January 13, 2014, Comment Nos. 3-15, 3-88 and 3-93

Donnally, Starke: Written comments dated January 17, 2014, Comment Nos. 2-7, 3-43, and 4-10

Donofrio, Christa: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-63, and 3-88

Dore, Doug: Written comments dated January 15, 2014, Comment No. 3-42

Doss, Robert: Written comments dated September 2, 2014, Comment Nos. 3-42 and 3-63

Doswell, Willard: Written comments dated May 1, 2014, August 22, 2014, and September 2, 2014, Comment Nos. 2-7, 3-43, 3-62, and 4-10

Doucette, Robert: Oral comments dated November 13, 2013, Comment No. 3-43


Dougherty, Bob: Written comments dated November 25, 2013 and August 31, 2014, Comment Nos. 3-62 and 3-88

Dougherty, Theresa: Written comments dated July 23, 2014, Comment Nos. 2-7, 2-38, 3-43, 3-62, 3-73, and 4-63

Douglas, James: Written comments dated September 2, 2014, Comment No. 3-62

Douglas, Karen: Written comments dated June 26, 2014, Comment Nos. 3-63 and 4-49

Doupe, Ronald: Written comments dated August 1, 2014, Comment No. 3-43

Downing, Kathryn: Written comments dated November 13, 2013 and August 24, 2014, Comment Nos. 2-7, 2-37, 2-38, 3-35, 3-73, 3-78, 3-85, 3-114, and 3-147

Duda, Richard: Written comments dated October 10, 2013, Comment Nos. 3-42 and 3-57
Dune, Michael: Written comments dated August 29, 2014, Comment No. 3-121
Dygert, George: Written comments dated August 27, 2014, Comment No. 3-42
Earle, Dennis: Written comments dated November 13, 2013 and August 31, 2014, Comment Nos. 3-43 and 3-62
Eastwood, Gregory: Written comments dated August 20, 2014, Comment Nos. 3-21, 3-138, 3-139, 4-31, 4-68, 4-72, and 4-73
Egan, John: Written comments dated July 31, 2014, Comment Nos. 3-42 and 3-63
Ellsworth, Brian: Written comments dated September 2, 2014, Comment Nos. 3-42 and 3-63
Emmi, Joe: Written comments dated January 16, 2014, Comment Nos. 3-42 and 3-63
Emmi, Marc: Written comments dated September 1, 2014, Comment No. 3-121
Ennis, Eric: Written comments dated December 30, 2013, Comment Nos. 2-7 and 3-62
Eppolito, John: Written comments dated November 10, 2013, Comment No. 3-96
Evancheck, Wayne: Written comments dated September 3, 2014, Comment No. 3-153
Evans, Jason: Written comments dated September 2, 2014, Comment Nos. 2-7, 3-8, and 4-68
F.W.: Written comments dated June 26, 2014, Comment No. 3-63
Falso, Mark: Written comments dated July 16, 2014, Comment No. 3-42 and 3-63
Fazio, Thomas: Written comments dated November 1, 2013 and August 24, 2014, Comment Nos. 3-42, 3-63, and 5-21
Fenner, Dan: Written comments dated August 27, 2014, Comment No. 3-63
Ferlito, Timothy: Written comments dated July 9, 2014, Comment Nos. 3-62 and 3-88
Ficarra, Anthony: Written comments dated August 29, 2014, Comment No. 3-41
Fisher, Steve: Written comments dated August 17, 2014 and August 27, 2014, Comment Nos. 3-42, 3-88, and 3-123
Fitch, Christina: Written comments dated January 16, 2014, Comment Nos. 2-1, 2-38, and 3-155
Fleury, Cindy: Written comments dated July 29, 2014, Comment No. 4-52
Fluck, Robert: Written comments dated January 3, 2014, Comment No. 3-42
Follett, Antoinette: Written comments dated November 14, 2013, Comment No. 3-42
Follett, Newell: Written comments dated September 2, 2014, Comment No. 3-42
Follett, Timothy: Written comments dated November 14, 2013 and August 14, 2014, Comment Nos. 3-42, 3-63, and 3-121
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Frasier, Andrew: Written comments dated June 26, 2014, Comment No. 3-62
Freid, Jim: Written comments dated August 28, 2014, Comment No. 3-42
French, Susan: Written comments dated May 1, 2014, Comment Nos. 3-62, 3-88, and 3-93
Fritz, Arthur: Written comments dated January 17, 2014 and August 30, 2014, Comment Nos. 2-7, 3-43, 3-62, 3-92, 3-154, and 4-47
Fuller, Margaret: Written comments dated August 28, 2014, Comment No. 3-41
Gaffey, Jim: Written comments dated July 28, 2014, Comment Nos. 2-48, 3-47
Gallagher, Debra: Oral comments dated November 13, 2013 and written comments dated January 14, 2014, Comment Nos. 3-21
Gallagher, Jim: Written comments dated January 14, 2014, Comment Nos. 3-63
Gallagher, Tiffany: Written comments dated January 16, 2014 and September 2, 2014, Comment Nos. 3-63, 3-87, and 3-121
Gamba, Debra: Written comments dated September 2, 2014, Comment No. 3-39
Ganotis, Ann: Written comments dated September 1, 2014, Comment No. 3-62
Gaonkar, Ramesh: Written comments dated November 15, 2013, Comment Nos. 3-62
Garavuso, Emily: Written comments dated September 2, 2014, Comment Nos. 4-17, 4-27, and 4-49
Garriques, Tim: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-63, 3-88, and 3-94
Gates, Kelly: Written comments dated September 1, 2014, Comment No. 3-42
Gelfuso, Margaret: Written comments dated January 17, 2014, Comment Nos. 3-43, 3-62, and 3-87
Ger, Felix: Written comments dated October 10, 2013, Comment No. 3-48
Gera, Paul: Written comments dated September 2, 2014, Comment No. 3-56
Germain, Carl: Written comments dated May 1, 2014, Comment No. 3-96
Gewanter, Barrie: Written comments dated July 31, 2014, Comment Nos. 2-7, 2-46, 3-56, 3-63, and 4-78

Giarrusso, Michael: Written comments dated August 13, 2014, Comment Nos. 3-46, 3-48, 3-63, 3-92, and 3-93

Gilhooley, Thomas: Written comments dated August 26, 2014, Comment Nos. 3-62 and 3-88

Gillette, Cindy: Oral comments dated November 13, 2013, Comment Nos. 3-42

Ginn, Jeffrey: Written comments dated October 10, 2013, Comment Nos. 3-87

Ginn, WM Douglas: Written comments dated November 13, 2013, Comment No. 3-92

Gleisner, Jeanie: Written comments dated November 13, 2013, Comment Nos. 3-43, 3-62, and 3-67

Gleisner, Stig: Written comments dated August 25, 2014, Comment Nos. 3-62 and 4-47

Goettel, Karen: Written comments dated July 31, 2014 and August 1, 2014, Comment Nos. 3-182, 4-49, and 5-13

Goldblatt, Brian: Written comments dated January 14, 2014, Comment Nos. 3-62 and 3-88

Goodwin, William j.: Written comments dated November 13, 2013, Comment Nos. 3-42, 3-63, 3-88, and 3-93

Gotham, Brian: Written comments dated February 13, 2014, Comment No. 3-1

Gould, Murray F.: Written comments dated September 2, 2014, Comment No. 3-102

Goulet, Donald: Written comments dated November 13, 2013, Comment Nos. 3-42 and 3-63

Gowing, Charles a.: Written comments dated January 6, 2014, Comment Nos. 3-43 and 3-62

Gowing, Sandra j: Written comments dated January 6, 2014, Comment Nos. 2-1

Gray, Kenneth: Written comments dated January 30, 2014, Comment No. 3-181

Gray, Thomas: Written comments dated January 130, 2014, Comment No. 3-64

Greco, Gretchen: Written comments dated August 21, 2014, Comment No. 3-42

Greyczyn, Jared: Written comments dated September 24, 2013, Comment Nos. 3-196

Greenfield, Eric: Written comments dated August 31, 2014, Comment No. 3-62

Griffin, Edward: Written comments dated November 13, 2013, Comment Nos. 3-14 and 3-38

Griffith, Rick: Written comments dated September 24, 2013, Comment Nos. 3-201

Grimm, Karen: Written comments dated May 1, 2014, Comment Nos. 2-11, 3-62, and 3-185

Groves, A. Lindsay: Written comments dated January 17, 2014, Comment Nos. 3-92
Growing, Charlie: Written comments dated August 27, 2014 and June 26, 2014, Comment No. 3-62
Gruber, Samuel: Written comments dated September 2, 2014, Comment Nos. 2-39, 3-15, 3-62, and 3-66
Gula, Silvia: Written comments dated September 2, 2014, Comment Nos. 3-42 and 3-63
Haas, David: Written comments dated September 2, 2014, Comment Nos. 3-43 and 3-62
Haendle, Peter: Written comments dated August 28, 2014, Comment Nos. 3-42 and 3-63
Haley, Robert: Oral comments dated November 13, 2013 and written comments dated November 26, 2013, January 17, 2014, June 26, 2014, July 31, 2014, and August 29, 2014, Comment Nos. 2-7, 2-8, 2-24, 2-35, 2-36, 2-37, 3-7, 3-8, 3-15, 3-20, 3-22, 3-29, 3-36, 3-43, 3-62, 3-85, 3-88, 3-93, 3-147, 3-148, 3-150, 3-157, 3-159, 4-4, 4-5, 4-11, 4-40, 4-45, 4-49, 4-67, 5-3, 5-6
Hall, Jr., Franklin D.: Written comments dated November 13, 2013, Comment No. 3-63
Hall, Randy: Written comments dated September 2, 2014, Comment No. 3-121
Hallock, Gregg: Written comments dated November 13, 2013, Comment No. 3-48
Hamilton, Susan: Written comments dated November 13, 2013, May 1, 2014, and June 26, 2014, Comment Nos. 2-7, 3-43, 3-62, 3-66, 3-88, 3-93, 3-97, 4-14
Hand, Bryce: Written comments dated September 24, 2013 and November 13, 2013, Comment Nos. 3-42 and 3-62
Hanlon, Jeffrey: Written comments dated August 28, 2014, Comment Nos. 3-42, 3-129
Harp, Dan: Written comments dated February 20, 2014, Comment Nos. 2-21
Harvey, Clint: Written comments dated September 24, 2013, Comment Nos. 3-42
Hastings, Anita: Written comments dated September 2, 2014, Comment Nos. 2-22, 3-38, 3-88, and 3-93
Hawkins, Howie: Oral comments dated November 13, 2013, Comment Nos. 2-7 and 4-78
Hayes, Jordan: Written comments dated May 1, 2014, Comment Nos. 3-21 and 4-67
Heffron, Susan: Written comments dated July 29, 2014, Comment No. 3-42
Hermans, Mark: Written comments dated August 27, 2014, Comment No. 3-42
Heymann, David m.: Written comments dated November 14, 2013, Comment Nos. 3-42, 3-57, and 3-63
Hicks, Ernest: Written comments dated July 29, 2014, Comment No. 4-52
Hidek, Melissa: Written comments dated January 17, 2014, Comment No. 3-62
Higgins, Marilyn: Written comments dated October 22, 2013 and oral comments dated November 13, 2013, Comment Nos. 2-38, 2-49, 4-14
Higgins, Robert: Written comments dated December 31, 2013, Comment No. 3-87
Higgs, Bernice: Written comments dated July 29, 2014, Comment No. 4-49
Hile, Carol: Written comments dated November 13, 2013, Comment No. 3-42
Hile, Raymond: Written comments dated November 13, 2013, Comment No. 3-42
Hole, Deborah: Written comments dated January 23, 2014, Comment No. 3-43 and 3-62
Holeck, Paul: Written comments dated August 31, 2014 and August 12, 2014, Comment Nos. 2-6, 2-21, 2-47, and 3-46
Holmes, Cheryl: Written comments dated November 13, 2013, Comment No. 3-62
Holtsberry, Laurie: Written comments dated September 6, 2014, Comment No. 3-43
Hoogs, Kenneth: Oral comments dated November 13, 2013, Comment Nos. 3-63 and 3-87
Hoover, Ronald: Written comments dated September 1, 2014, Comment No. 3-89
House, Thomas: Written comments dated August 7, 2014, Comment No. 3-121
Hudson, John: Written comments dated August 29, 2014, Comment Nos. 3-62 and 3-66
Hughes, Brian: Written comments dated August 29, 2014, Comment Nos. 3-42 and 3-63
Humenn, Paul: Written comments dated September 2, 2014, Comment Nos. 2-7, 2-38, 3-43, 3-73, 3-84, 3-120, 3-156, and 4-47
Humphrey, Barbara: Written comments dated January 14, 2014, Comment Nos. 2-7 and 3-62
Hutson, Doug: Written comments dated September 2, 2014, Comment Nos. 3-30 and 3-62
Ihle, Mary: Written comments dated September 1, 2014, Comment No. 3-63
Ilacqua, Celia: Written comments dated June 13, 2014 and August 27, 2014, Comment Nos. 3-38, 3-43, and 3-62
Infantine, Patricia: Written comments dated July 30, 2014, Comment No. 3-120
Isham, Raymond: Written comments dated September 2, 2014, Comment No. 3-42
Ivison, Creg: Written comments dated January 17, 2014, Comment Nos. 3-188
Jackson, Derek: Written comments dated August 29, 2014, Comment No. 4-49
Jackson, Janet: Written comments dated June 26, 2014, Comment No. 3-42 and 3-63
Jakes-Johnson, Philip: Oral comments dated November 13, 2013 and written comments dated September 1, 2014, Comment Nos. 3-42, 3-47, 3-63, and 3-125
Jenkins, Faith: Written comments dated September 3, 2014, Comment No. 3-42

Jensen, David Louis: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-63, 3-88, 3-93, and 3-134

Jereb, Susan: Written comments dated November 14, 2013, Comment No. 3-197

Jerry, Dellas: Written comments dated January 17, 2014, Comment No. 4-48

Jetty, William: Written comments dated September 2, 2014, Comment No. 3-42

John, Craddock: Written comments dated September 2, 2014, Comment No. 3-43

Johnson, Edward: Written comments dated May 1, 2014 and June 26, 2014, Comment Nos. 2-11, 3-43, 3-62, 4-39, and 4-40

Johnson, Iver: Written comments dated November 14, 2013, Comment Nos. 2-7, 3-62, 4-14, 4-38


Johnston, Dana: Written comments dated August 27, 2014, Comment No. 3-61

Johnston, Deanne: Written comments dated September 2, 2014, Comment Nos. 3-43, 3-62, and 3-87

Jones, Ms.: Oral comments dated November 13, 2013, Comment No. 4-52

Jurison, Alan: Oral comments dated November 13, 2013 and written comments dated August 28, 2014, Comment Nos. 3-42, 3-45, 3-55, 3-56, 3-63, 3-88, 3-92, 4-20, and 4-22

Keller, Meridy: Written comments dated July 18, 2014, Comment No. 3-88

Kelly, Laura: Written comments dated September 2, 2014, Comment No. 3-62

Kenan, Bruce: Written comments dated September 2, 2014, Comment Nos. 3-42 and 3-63

Kesel, Brian: Written comments dated January 11, 2014, Comment Nos. 2-21, 3-43, 3-62, and 3-139

Kesseleing, P.: Written comments dated June 26, 2014, Comment Nos. 3-43 and 3-62

Kessner, Jean: Oral comments dated November 13, 2013, Comment No. 5-5

King Food LLC: Written comments dated September 3, 2014, Comment No. 4-43

King, Maren and John: Written comments dated August 30, 2014, Comment Nos. 3-36, 4-6, and 4-49

King, Peter: Oral comments dated November 13, 2013 and written comments dated January 17, 2013, June 26, 2014, and September 3, 2014, Comment Nos. 2-7, 3-43, 3-62, 4-10, 4-52, 4-56, 4-68, 4-78, and 5-22
Kingston, Karl: Written comments dated August 30, 2014, Comment Nos. 3-57, 3-63, 3-87, 3-91, and 3-121

Kinslow, Tom: Oral comments dated November 13, 2013, Comment Nos. 3-88, 4-67, and 5-3

Kirby, Lucas: Written comments dated August 24, 2014, Comment No. 3-66

Kirk, Philip: Written comments dated July 23, 2014, Comment No. 3-94

Kisselstein, Jr, F. D.: Written comments dated January 17, 2014, Comment Nos. 3-43 and 3-62

Klees, Dee: Written comments dated January 15, 2014, Comment Nos. 4-78 and 5-16

Kline, Kathy: Written comments dated August 21, 2014, Comment Nos. 3-42 and 3-63

Knight, Aaron: Written comments dated June 26, 2014 and September 2, 2014, Comment Nos. 3-43, and 3-62

Kobliski, Frank: Written comments dated August 26, 2014, Comment Nos. 2-39, 3-101, and 4-30

Kochan, Nick: Oral comments dated June 26, 2014, Comment No. 3-172

Kolts, Dean: Written comments dated January 14, 2014, Comment No. 3-61

Korba, Katherine: Written comments dated September 2, 2014, Comment Nos. 3-43 and 3-62

Kosty, Matt: Written comments dated July 8, 2014, Comment No. 3-88

Kotz, Robert: Written comments dated July 2, 2014, Comment Nos. 3-63 and 3-87

Kralovic, Theodore: Written comments dated January 16, 2014, Comment No. 3-43 and 3-62

Krigbaum, Paula: Written comments dated July 29, 2014, Comment No. 4-49

Krohl, Kelly: Written comments dated January 17, 2014 and September 2, 2014, Comment Nos. 3-43, 3-62, and 3-87

Kroll, Erick: Written comments dated July 29, 2014, Comment Nos. 3-66 and 3-70

Kronenberg, Paul: Written comments dated September 2, 2014, Comment Nos. 2-23, 2-27, 2-29, 3-15, 3-20, 3-120, 3-138, 4-37, 4-46, 4-66, 4-67, 4-68, 4-70, 4-72, 4-73, and 4-76

Krupke, Bruce: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-63, and 3-88

Lacey, John: Written comments dated August 29, 2014, Comment No. 3-62

Lacy, Marsha: Written comments dated May 1, 2014, Comment Nos. 3-88 and 3-93

Lacy, Marsha: Written comments dated May 1, 2014, Comment No. 3-88

Lancette, Greg: Written comments dated August 28, 2014, Comment No. 3-91
Landers, John: Written comments dated August 24, 2014, Comment No. 3-59
Landry, Joyce: Written comments dated September 2, 2014, Comment No. 3-39
Lane, Aggie: Written comments dated June 26, 2014, Comment Nos. 3-62 and 4-79
Lang, Rev. Msjr. James P.: Written comments dated November 13, 2013, Comment No. 3-63
Large, Robert: Written comments, Comment Nos. 3-42, 3-56, and 3-63
Laspino, James: Oral comments dated June 26, 2014, Comment Nos. 3-42 and 3-63
Lavalas, Romana: Written comments dated November 13, 2013, Comment Nos. 3-88 and 3-93
Law, Tom: Oral comments dated November 13, 2013 and June 26, 2014, Comment Nos. 2-7, 3-26, 3-158, 4-10, 4-13, and 4-39
Lawrence, George: Written comments dated January 17, 2014, Comment No. 3-96
Lawson, Alex: Written comments dated November 13, 2013 and May 1, 2014, Comment Nos. 2-29, 2-38, and 3-114
Lawson, Robert: Written comments dated January 15, 2014, Comment No. 3-92
Leach, Ramon: Written comments dated August 27, 2014, Comment Nos. 3-46, 3-63, and 3-88
Leblanc, Emma: Written comments dated November 13, 2013, Comment Nos. 3-42, 3-53, and 3-63
LeBlanc, Emmit: Written comments dated May 1, 2014, Comment Nos. 3-88 and 3-92
Lee, William: Oral comments dated June 26, 2014, Comment Nos. 3-42 and 3-50
Leeman, Karen: Written comments dated August 31, 2014, Comment No. 3-42
Lentz, Barry: Written comments dated November 13, 2013, June 26, 2014 and September 2, 2014; and oral comments dated November 13, 2013 and June 26, 2014, Comment Nos. 2-7, 2-16, 2-38, 2-40, 2-41, 2-42, 3-3, 3-13, 3-29, 3-43, 3-62, 3-98, 3-116, 3-120, 3-122, 4-43, 4-44, 4-47, 4-52, 4-56, 4-57, 4-68, 4-78, 5-4, and 5-22
Lenweaver, Joanne: Written comments dated August 31, 2014, Comment Nos. 3-43, 3-91, and 3-92
Lescenski, Clifford: Written comments dated August 27, 2014, Comment No. 3-42
Lespino, James: Written comments dated June 26, 2014, Comment Nos. 3-38, 3-127, and 4-22
Lewis, Minch: Oral comments dated November 13, 2013 and written comments dated January 8, 2014, January 17, 2014, and September 1, 2014, Comment Nos. 2-6, 3-63, 3-121, 3-190, 4-39, 4-40, 4-41, 3-42, and 4-43

Liuzzi, Peggy: Written comments dated September 1, 2014, Comment No. 3-24

Lochner, Nancy: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-63, and 3-88

Logan, Jonathan: Written comments dated January 13, 2014, July 31, 2014, August 29, 2014, and September 2, 2014, Comment Nos. 2-22, 2-32, 3-21, 3-33, 3-38, 3-44, 3-69, 3-88, 3-93, 3-95, 3-97, 3-120, 3-121, 3-122, 4-13, and 5-8

LoPiccolo, John: Written comments dated August 27, 2014, Comment No. 3-89

Lorenz, David: Oral comments dated November 13, 2013 and written comments dated September 24, 2013, Comment No. 3-96

Lorenz, Josef: Oral comments dated November 13, 2013 and written comments dated November 19, 2013, and August 19, 2014, Comment Nos. 3-43, 3-62, and 4-47

Loucks, Pat: Written comments dated June 26, 2014, Comment Nos. 3-143 and 4-60

Louer, Tim: Written comments dated November 12, 2013 and oral comments dated November 13, 2013, Comment No. 3-96

Macfarlane, Scott: Written comments dated November 13, 2013 and September 2, 2014, Comment Nos. 3-65 and 3-96

Madden, Kyle: Oral comments dated June 26, 2014, Comment No. 3-100

Mahoney, Margaret: Written comments dated August 30, 2014, Comment Nos. 3-42, 3-63, and 3-93

Malandra, Joseph: Written comments dated January 16, 2014, Comment No. 3-87

Malecki, Tamara: Written comments dated September 2, 2014, Comment Nos. 3-42 and 3-88

Malerba, G.: Written comments dated August 29, 2014, Comment No. 3-42

Malowany, Joyce: Written comments dated September 2, 2014, Comment No. 3-171

Mangano, Anthony: Oral comments dated November 13, 2013 and written comments dated September 2, 2014, Comment Nos. 3-10, 3-11, 3-15, 3-16, 3-18, 3-19, 3-21, 3-42, 3-63, 3-103, 3-105, 3-106, 3-107, 3-108, 3-109, 3-110, 3-111, 3-112, 3-113, 3-119, 3-121, 4-7, 4-21, and 4-42

Mangano, Anthony, and Carmen Emmi: Written comments dated November 13, 2013 and August 29, 2014, Comment Nos. 3-42, 3-63, 3-87, and 3-92
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Mankiewicz, Dave: Oral comments dated November 13, 2013 and written comments dated January 13, 2014, Comment Nos. 2-1, 2-2, 2-7, 2-27, 2-29, 2-37, 2-38, 3-21, 3-62, 3-88, 3-93, 3-127, 3-138, 3-139, 4-40, 4-49, 4-66, 4-67, 4-73, and 5-6

Manning, Robert: Written comments dated September 2, 2014, Comment Nos. 2-43 and 2-44

Mannion, Kerry: Written comments dated January 16, 2014, Comment Nos. 3-42, 3-57, and 3-63

Mantis, Jordan: Written comments dated May 1, 2014, Comment Nos. 2-11, 3-96, 3-97, and 4-11

Manzella, Lorraine: Written comments dated September 3, 2014, Comment Nos. 3-43, 3-62, and 3-88

Manzi, Cynthia: Written comments dated September 2, 2014, Comment No. 3-42

Manzi, Richard: Written comments dated September 2, 2014, Comment No. 3-63

Money, Charles: Written comments dated August 28, 2014, Comment Nos. 3-43, 3-66


Marie, Rothbaler: Written comments dated January 12, 2014, Comment No. 3-92

Marks, Lorraine: Written comments dated May 1, 2014, Comment Nos. 3-62 and 3-92

Maroney, Richard: Written comments dated August 29, 2014, Comment No. 3-142

Marquis, David: Written comments dated September 1, 2014, Comment No. 3-42

Martin, Douglas: Written comments dated November 13, 2013, Comment Nos. 3-43, 3-62, 4-14, and 4-38

Martin, Joan: Written comments dated January 18, 2014 and August 1, 2014, Comment Nos. 3-42 and 3-48

Marvel, Matthew: Written comments dated August 24, 2014, Comment Nos. 3-62 and 3-66

Massey, David: Written comments dated June 26, 2014, Comment Nos. 3-88, 3-120, and 3-165

Masursky, Daniella: Written comments dated June 26, 2014, Comment No. 3-62

May, Rachel: Written comments dated November 13, 2013, May 1, 2014, and August 23, 2014, Comment Nos. 2-7, 2-38, 3-62, 3-73, 4-52, and 4-78
Mayer, Douglas: Oral comments dated November 13, 2013, Comment No. 4-9
Maywalt, Martha: Written comments dated August 31, 2014 Comment Nos. 3-43, 3-69, and 3-120
Mazzaroppi, Jacqueline: Written comments dated August 27, 2014, Comment Nos. 3-42 and 3-63
McCampbell, J.B: Written comments dated August 30, 2014, Comment No. 3-172
McCarthy, Matthew: Written comments dated September 2, 2014, Comment No. 3-42
McDonald, Karen: Written comments dated August 30, 2014, Comment No. 3-62
McDougall, Donna: Written comments dated September 1, 2014, Comment Nos. 3-42, 3-63, and 3-88
McFarlane, Scott: Written comments dated September 2, 2014, Comment Nos. 2-7, 2-38, and 3-73
McGivney, George: Written comments dated November 14, 2013, Comment Nos. 3-42 and 3-63
McGrath, Mike: Written comments dated October 10, 2013, Comment No. 3-59
McGuigan, William: Written comments dated November 13, 2013 and August 31, 2014, Comment No. 3-43
McKay, Thomas: Written comments dated June 26, 2014, Comment Nos. 3-92 and 3-129
McPhilmy, Thomas: Written comments dated June 27, 2014, Comment Nos. 3-56, 3-88, and 3-182
McTyre, Andrew: Written comments dated January 13, 2014 and August 20, 2014, Comment Nos. 3-62, 3-87
Mead, Berton: Written comments dated January 20, 2014, Comment Nos. 3-43, 3-62, and 3-93
Meldrum, Marianne: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-63, and 3-88
Melfi, Eric: Written comments dated November 13, 2013, Comment Nos. 4-59
Meltzer, Stanley: Written comments dated August 24, 2014, Comment No. 3-62
Merriam, Robert: Written comments dated September 1, 2014, Comment No. 3-42
Messina, Vince: Written comments dated January 15, 2014, Comment Nos. 3-92 and 3-96
Messina-Yauchzy, Michael: Written comments dated June 26, 2014, Comment Nos. 2-41 and 3-3

Michael, David S.: Written comments dated November 13, 2013, Comment Nos. 2-7, 2-29, and 4-78

Michaels, William and Diane: Written comments dated September 1, 2014, Comment Nos. 3-42, 3-88, 3-93, and 4-24

Michaels, William: Written comments dated August 28, 2014, Comment Nos. 3-42 and 3-63

Michalenko, Edward: Oral comments dated November 13, 2013 and written comments dated January 14, 2014 and September 2, 2014, Comment Nos. 2-7, 2-14, 2-33, 3-14, 3-27, 3-28, 3-63, 3-64, 3-166, 3-168, 4-3, 4-10, 4-36, 4-59

Michel, David: Written comments dated June 27, 2014, Comment Nos. 2-7, 3-62, and 5-7

Mike, Novakowski: Written comments dated January 15, 2014, Comment No. 3-198

Miles, Christopher: Written comments dated February 18, 2014, Comment No. 3-43

Miller, Paula: Written comments dated September 2, 2014, Comment Nos. 3-37, 3-42, and 3-63

Miner, Hon. Stephanie A.: Written comments dated January 17, 2014 and September 2, 2014, Comment Nos. 2-1, 2-7, 2-10, 2-29, 2-37, 3-2, 3-4, 3-40, 3-49, 3-88, 3-93, 3-95, 3-97, 4-2, and 4-78

Mitchell, Myron: Written comments dated August 10, 2014, Comment No. 3-62

Mix, David: Written comments dated August 8, 2014, Comment No. 3-42

Molldrem, B.: Written comments dated May 1, 2014, Comment Nos. 3-15 and 3-26

Molldrem, Bernhard Jr.: Written comments dated May 1, 2014, June 26, 2014, and August 29, 2014, Comment No. 3-162

Molldrem, Leslie: Written comments dated August 20, 2014, Comment No. 3-62

Monday, Patti: Oral comments dated November 13, 2013, Comment No. 3-63

Moneti, Carlo: Written comments dated November 13, 2013 and August 29, 2014, Comment Nos. 2-26, 2-35, 3-62, 3-81, 3-139, 3-141, 3-145, 3-176, 3-185, 4-28

Monto, Kate: Written comments dated November 13, 2013, Comment No. 3-42

Morris, Karen: Written comments dated August 1, 2014, Comment Nos. 3-48 and 3-63

Mosure, Greg: Written comments dated November 13, 2013, Comment Nos. 3-42, 4-67

Mudrick, Nancy: Written comments dated November 13, 2013 and September 2, 2014, Comment Nos. 3-43, 3-62, 3-66, 3-105, and 3-120
Murphy, Thomas Jr.: Written comments dated July 8, 2014 and August 20, 2014, Comment Nos. 3-87 and 3-121
Muscarella, Steve: Written comments dated August 27, 2014 and September 2, 2014, Comment Nos. 3-42, 3-63
Musumeci, Grace (U.S. Environmental Protection Agency): Written comments dated December 11, 2013, Comment No. 4-1
Nabewaniec, Glenda: Written comments dated September 2, 2014, Comment No. 3-42
Neil, Burke: Written comments dated November 15, 2013, Comment Nos. 2-2 and 2-38
Nellis, Patrick: Written comments dated August 25, 2014, Comment No. 3-62
Nerode, Nathanael: Written comments dated April 15, 2014, Comment No. 3-62
Nevin, Nancy: Written comments dated January 13, 2014, Comment No. 3-87
New York State Legislature: Written comments dated January 14, 2014, Comment No. 3-63
Newhart, Linda: Written comments dated January 16, 2014, Comment Nos. 3-42 and 3-63
Nicotra, Mark: Written comments dated November 13, 2013, November 14, 2013, January 6, 2014, and August 29, 2014 and oral comments dated November 13, 2013, Comment Nos. 3-63 and 3-64
Nicotra, Mark, Ed Michalenko, and Ed Wagner: Written comments dated August 4, 2014, Comment No. 3-64
Noble, Stefanie: Written comments dated August 31, 2014, Comment Nos. 3-62 and 3-88
Nojaim, Paul: Written comments dated November 13, 2013, Comment No. 4-14
Norman, Mark: Oral comments dated November 13, 2013, Comment No. 4-40
Nortz, Monica: Written comments dated January 17, 2014, Comment No. 2-1
O’Conner, Robert: Written comments dated May 1, 2014 and September 1, 2014, Comment Nos. 3-62, 3-138, 3-139, 3-171, 5-7, and 5-14
O’Connor, Patrick: Written comments dated August 25, 2014, Comment No. 4-29
O’Keefe, Marie: Written comments dated August 30, 2014, Comment No. 3-62
O’Neill, Thomas J: Written comments dated November 13, 2013, Comment Nos. 2-11, 3-87, and 3-92
O’Brien, Michael: Written comments dated January 17, 2014, Comment Nos. 3-48, 3-63, and 3-88
O’Connor, Robert: Written comments dated May 1, 2014, Comment Nos. 3-171 and 5-14
Ogilbbie, Frances: Written comments dated November 13, 2013, Comment Nos. 3-62 and 4-49
Oldfield, Juliet: Oral comments dated November 13, 2013, Comment No. 2-1
Oley, Buzzy: Written comments dated February 26, 2014, Comment No. 3-135
Onondaga County Legislature: Written comments dated January 16, 2014 and September 2, 2014, Comment Nos. 3-64, 3-121
Orlando, Jim: Written comments dated September 2, 2014, Comment No. 3-43
Osborne, Gary: Written comments dated August 24, 2014, Comment Nos. 3-62 and 3-120
Osmun, Andrew: Written comments dated August 7, 2014, Comment No. 3-63
Otis, Walter: Written comments dated September 3, 2013, Comment No. 3-194
Ott, Edward I.: Oral comments dated November 13, 2013, Comment Nos. 3-42, 3-63, and 3-88
Overend, Donald: Written comments dated September 2, 2014, Comment Nos. 3-43 and 3-62
Owens, G.: Written comments dated November 19, 2013, Comment Nos. 2-1 and 2-41
Paccone, David: Written comments dated November 13, 2013 and August 28, 2014, Comment Nos. 2-1, 2-2, 2-38, 3-65, and 3-85
Packard, Joyce: Oral comments dated November 13, 2013 and written comments dated August 31, 2014, Comment Nos. 2-22, 3-37, 3-38, 3-42, 3-63, 3-131, 4-22, 4-29, and 4-49
Packard, Thomas: Oral comments dated November 13, 2013 and written comments dated September 1, 2014, Comment Nos. 3-42, 3-63, 3-79, 3-88, 3-130 and 3-182
Page, Liz: Written comments dated August 31, 2014, Comment No. 4-79
Paikin, Jacqui: Written comments dated September 1, 2014, Comment No. 3-42
Pallo, Sarah: Written comments dated January 14, 2014, Comment No. 4-13
Paolini, Edward: Written comments dated September 2, 2014, Comment No. 3-42
Papa, Joe: Written comments dated November 13, 2013, Comment No. 3-136
Papelino, Amy: Written comments dated January 12, 2014, Comment No. 3-63
Parsons, Carole: Written comments dated August 27, 2014, Comment Nos. 3-42, 3-63, and 3-88
Parzych, Michael: Written comments dated May 1, 2014 and September 2, 2014, Comment Nos. 3-20, 3-91, 3-161, and 3-162
Patterson, Ernestine: Oral comments dated June 26, 2014, Comment No. 4-49
Pelis, Thomas: Oral comments dated November 13, 2013 and written comments dated May 1, 2014, Comment Nos. 2-7 and 4-66, 4-68, and 4-73
Pellingra, Justin: Written comments dated June 26, 2014, Comment No. 3-62
Pellow, David: Written comments dated November 13, 2013, Comment Nos. 3-60, 3-61
Pelow, Jennifer: Written comments dated November 13, 2013, Comment Nos. 3-14, 4-14, and 4-38
Penizotto, Peter: Written comments dated November 12, 2013, Comment No. 3-43
Perkins, Bernard: Written comments dated September 2, 2014, Comment No. 3-62
Peters, Christine Capella: Written comments dated September 1, 2014, Comment Nos. 2-7, 2-38, 3-31, 3-43, 3-62, 3-72, 3-73, 3-88, and 3-93
Peters, George: Written comments dated July 8, 2014, Comment No. 3-179
Peters, Robert: Written comments dated September 2, 2014, Comment No. 3-87
Peterson, Craig: Written comments dated January 16, 2014, Comment Nos. 3-63
Phelan, John: Written comments dated August 28, 2014, Comment No. 3-120
Phillips, Jim: Written comments dated February 6, 2014, Comment No. 3-96
Phillips, Kevin: Written comments dated August 6, 2014, Comment No. 3-180
Pierce-el, Charles: Oral comments dated November 13, 2013, Comment No. 2-7
Plumley, Peter: Written comments dated August 18, 2014 and August 25, 2014, Comment No. 2-7
Polech, Janet: Written comments dated August 25, 2014, Comment No. 3-62
Pompo, Jim: Written comments dated January 13, 2014, Comment Nos. 2-6, 3-42, and 3-63
Powell, Dean: Written comments dated January 16, 2014, Comment Nos. 3-63 and 3-92
Pravato, Walter: Written comments dated August 1, 2014, Comment No. 3-42
Press, Tina: Written comments dated August 23, 2014, Comment Nos. 3-43 and 3-62
Price, Elizabeth: Written comments dated September 2, 2014, Comment Nos. 3-43 and 3-62
Prosonic, Jerry: Oral comments dated November 13, 2013, Comment Nos. 3-39 and 3-42
Pruth, Fransisco: Written comments dated June 26, 2014, Comment No. 3-62
Przepiora, John: Written comments dated January 16, 2014 and September 2, 2014, Comment Nos. 2-7, 2-22, 2-38, 3-73, 3-86, 3-88, 3-96, 3-127, 3-148, 3-177, 4-47

Qadir, Yusuf Abdul: Oral comments dated November 13, 2013, Comment No. 3-43

Ramer, Kyle: Written comments dated August 24, 2014, Comment No. 3-62

Ranaldi, Alexander: Written comments dated January 13, 2014 and August 29, 2014, Comment Nos. 3-43, 3-62

Ranieri, Kim: Written comments dated August 7, 2014, Comment No. 3-88

Ranlet, Ken: Written comments dated June 26, 2014, Comment Nos. 3-46, 3-63, 3-75, 3-88, and 3-93

Rath, Walter: Written comments dated October 10, 2013, Comment Nos. 3-42 and 3-63

Reagan, Lance: Written comments dated January 13, 2014 and September 2, 2014, Comment Nos. 3-42 and 3-56

Reddy, Vince: Written comments dated September 2, 2014, Comment Nos. 3-43, 3-62, 3-76, 3-84, 3-91, and 3-120

Reed, David: Written comments dated May 1, 2014, Comment Nos. 3-43, 3-62, and 4-10

Reeves, Nicholas: Written comments dated November 13, 2013, Comment No. 3-48

Reichert, Paula: Written comments dated September 1, 2014, Comment No. 3-87

Reid, Webster: Written comments dated August 26, 2014, Comment Nos. 3-42, 3-63, and 3-88

Reiners, Charlie: Written comments dated May 1, 2014, Comment Nos. 5-8

Reitz, Elliott: Oral comments dated June 26, 2014, Comment No. 4-15

Reitz, Teresa: Written comments dated July 15, 2014, Comment No. 3-21

Reney, Kevin: Written comments dated January 12, 2014, Comment No. 3-63

Resch, Kathleen: Written comments dated September 2, 2014, Comment Nos. 3-43 and 3-62

Reynolds, Michael: Written comments dated September 2, 2014, Comment No. 3-62

Rezak, David: Written comments dated August 27, 2014, Comment Nos. 3-43, 3-62, 3-87, and 3-92

Rezak, Louis: Written comments dated January 16, 2014, Comment Nos. 3-43, 3-62, and 3-172

Riccelli, Richard: Written comments dated January 17, 2014 and June 26, 2014 and oral comments dated June 26, 2014, Comment Nos. 3-87 and 3-91
Riccioli, Friar Richard: Written comments dated January 14, 2014, Comment Nos. 2-1, 2-40, 2-41

Riesen, Brenda: Written comments dated September 2, 2014, Comment No. 3-46

Riley, Michael: Written comments dated September 2, 2014, Comment No. 3-172

Robert, Simpson: Written comments dated January 17, 2014, Comment Nos. 2-7, 2-37, 2-38, 3-15, 4-11, 4-39, 4-40, 4-41, 4-49, 4-51, and 4-52

Robert, Thousand: Written comments dated September 2, 2014, Comment No. 3-87

Roberts, Peter: Written comments dated September 2, 2014, Comment No. 3-179

Robinson, Christine: Written comments dated July 29, 2014, Comment Nos. 2-7 and 3-102

Robinson, Garrett: Written comments dated January 14, 2014, Comment No. 3-63

Robinson, John: Written comments dated January 17, 2014, Comment Nos. 3-63

Robinson, Steve: Written comments dated September 2, 2014, Comment Nos. 2-11 and 3-16

Robinson, Thomas: Written comments dated August 1, 2014, Comment No. 3-62

Robinson, Van: Oral comments dated November 13, 2013 and June 26, 2014, Comment Nos. 3-8, 3-43, and 3-62

Romano, Donna: Written comments dated September 2, 2014, Comment Nos. 3-42, 3-63, and 3-88

Romano, Thomas: Written comments dated January 16, 2014, Comment No. 3-199

Romeo, Robert: Oral comments dated November 13, 2013, Comment No. 3-42

Ron, Esce: Written comments dated August 30, 2014, Comment No. 3-42

Rose, Brendan: Written comments dated July 30, 2014, Comment Nos. 3-62 and 3-155

Ross, Marguerite: Written comments dated September 2, 2014, Comment No. 3-120

Rothbaler, Marie: Written comments dated January 12, 2014, Comment Nos. 3-87 and 3-92

Rothwell, Karaline: Oral comments dated November 13, 2013 and written comments dated January 16, 2014 and May 1, 2014, Comment Nos. 2-7, 3-88, 3-97, and 4-14

Rudd, Timothy: Written comments dated August 14, 2014, Comment Nos. 3-43 and 4-50

Rufus, David: Written comments dated September 2, 2014, Comment No. 3-62

Runge, Ellen: Written comments dated January 7, 2014, Comment Nos. 3-43 and 3-62

Ryan, Michele: Written comments dated January 15, 2014, Comment No. 3-43

Sabene, John: Written comments dated June 30, 2014, Comment No. 3-120
Sabene, Judy: Written comments dated September 2, 2014, Comment No. 3-42
Sage, Gloria: Written comments dated November 13, 2013, July 17, 2014 and September 2, 2014, Comment Nos. 3-42, 3-63, 3-88, and 4-18
Salomone, Paul: Written comments dated July 16, 2014, Comment No. 3-56
Sanford, Clark: Written comments dated January 17, 2014, Comment Nos. 2-21 and 3-42
Sapdafore, Mark: Written comments dated November 13, 2013, Comment Nos. 3-43, 3-87, and 3-92
Sarver, Peter: Oral comments dated November 13, 2013 and June 26, 2014, Comment Nos. 2-7, 2-8, 3-120, 4-78, and 5-22
Scaccia, Ronald: Written comments dated September 2, 2014, Comment No. 3-96
Schechter, Virginia: Written comments dated September 2, 2014, Comment No. 3-120
Scheibe, Peter: Written comments dated January 17, 2014, Comment Nos. 3-43 and 3-62
Schlueter, Laura: Written comments dated January 17, 2014, Comment Nos. 3-42 and 3-63
Schmarder, Will: Written comments dated November 13, 2013, Comment Nos. 3-37, 3-38, 3-42, and 3-189
Scholes, Doug: Written comments dated September 2, 2014, Comment Nos. 3-42 and 3-48
Schroeder, Heather: Written comments dated May 1, 2014 and September 2, 2014, Comment Nos. 2-7, 3-17, and 3-87
Schroeder, Steven: Written comments dated January 16, 2014, Comment Nos. 3-166 and 4-26
Schuls, Joan: Written comments dated September 1, 2014, Comment No. 3-62
Schuls, Phil: Oral comments dated November 13, 2013, Comment Nos. 3-15 and 3-22
Schuls, Philip: Written comments dated September 1, 2014, Comment Nos. 2-17, 3-62
Schuster, Andrew: Written comments dated November 13, 2013, Comment No. 3-8
Schwab, Kevin: Written comments dated May 1, 2014, Comment Nos. 2-22, 4-6, and 4-49
Sciscioli, Vito: Written comments dated August 25, 2014, Comment Nos. 2-3, 2-18, 2-22, and 3-34
Scott, Thomas: Written comments dated August 28, 2014, Comment Nos. 3-43 and 3-62
Scuweaver, Joanne: Written comments dated May 1, 2014, Comment Nos. 3-92 and 3-96
Seigler, Reggie: Written comments dated May 1, 2014, Comment Nos. 3-63 and 3-80
Selby, Douglas: Written comments dated January 9, 2014, Comment No. 3-64
Seleway, Susan: Written comments dated January 16, 2014 and September 2, 2014, Comment Nos. 3-42, 3-39, and 3-88

Shafer, Paul: Written comments dated September 2, 2014, Comment No. 3-163

Share, Carle: Written comments dated August 30, 2014, Comment No. 3-42

Shaw, Kari: Written comments dated August 25, 2014, Comment No. 3-63

Shepard, Nancy: Written comments dated June 26, 2014, Comment No. 3-62

Shippers, Cindy: Written comments dated November 13, 2013, Comment No. 3-48

Shoemaker, Shanti: Written comments dated June 26, 2014, Comment No. 3-62

Shubmehl, Paul: Written comments dated September 2, 2014, Comment No. 2-22, 3-66

Shults, Greg: Written comments dated October 10, 2013, Comment Nos. 3-48

Shyne, Charles: Written comments dated September 2, 2014, Comment No. 3-42

Silverman, Brenda: Oral comments dated November 13, 2013 and June 26, 2014, and written comments dated September 2, 2014, Comment Nos. 3-15, 3-42, 3-60, 3-63, 4-18

Simmons, William: Oral comments dated November 13, 2013 and June 26, 2014, and written comments dated August 18, 2014, Comment Nos. 2-1, 2-2, 3-65, 3-85, 4-49, 4-60, 4-68, 4-69, 4-70, 4-73, 5-16

Simpson, Robert: Oral comments dated November 13, 2013 and written comments dated January 17, 2014, September 2, 2014, and September 16, 2014, Comment Nos. 2-1, 2-3, 2-7, 2-8, 2-13, 2-23, 2-28, 2-30, 2-37, 2-38, 3-9, 3-15, 3-16, 3-20, 3-21, 3-22, 3-32, 3-36, 3-43, 3-62, 3-69, 3-77, 3-88, 3-93, 3-95, 3-97, 3-115, 3-116, 3-120, 3-121, 3-135, 3-138, 3-139, 3-171, 4-8, 4-10, 4-11, 4-13, 4-14, 4-26, 4-29, 4-39, 4-40, 4-45, 4-47, 4-49, 4-50, 4-52, 4-54, 4-57, 4-66, 4-67, 4-70, 5-7, and 5-24

Singleton, Perry: Written comments dated January 15, 2014, Comment No. 3-43

Sisko, Joseph: Written comments dated January 14, 2014, Comment Nos. 2-7, 2-38, 3-60, 3-141, 3-153, 4-49, and 4-67

Slagle, Rickey: Written comments dated August 29, 2014, Comment No. 3-38

Smith, Daniel: Written comments dated June 26, 2014 and oral comments dated June 26, 2014, Comment Nos. 3-42, 3-63, 4-67

Smith, Daniel: Written comments dated September 2, 2014, Comment Nos. 3-66, 3-71

Smith, Frank: Written comments dated May 1, 2014, Comment Nos. 3-24 and 5-10

Smith, Jerry: Oral comments dated November 13, 2013, Comment Nos. 3-60 and 3-61

Smith, Simangaliso: Written comments dated July 20, 2014, Comment No. 5-15
Smith, Wayne: Written comments dated January 13, 2014, Comment No. 3-87
Sonneborn, James: Written comments dated August 11, 2014, Comment Nos. 3-43 and 3-62
Spadafore, Mark: Written comments dated January 13, 2014, Comment Nos. 3-43, 3-87, and 3-92
Spak, George: Written comments dated September 2, 2014, Comment No. 3-66
Spencer, Todd: Written comments dated January 17, 2014, Comment Nos. 3-21, 4-28, and 4-67
Sperry, Jason: Written comments dated January 13, 2014 and September 2, 2014 and oral comments dated June 26, 2014, Comment Nos. 3-91 and 3-160
Spiegel, Stuart: Written comments dated May 3, 2014, Comment No. 5-23
Spillman, Eric: Written comments dated September 2, 2014, Comment Nos. 3-42 and 3-63
Stanley, Maziuk: Written comments dated September 2, 2014, Comment No. 3-39
Stavenhagen, Kurt: Written comments dated June 28, 2014, Comment Nos. 2-17, 3-62, and 3-66
Steele, Rich: Written comments dated November 13, 2013, Comment No. 3-42
Stefl, Maura: Written comments dated August 7, 2014, Comment No. 3-121
Stein, Joel: Written comments dated August 27, 2014, Comment No. 3-63
Stelter, James: Written comments dated September 7, 2014, Comment Nos. 3-62 and 5-1
Stevens, Ann: Oral comments dated November 13, 2013, Comment No. 3-87
Strauch, Katie: Written comments dated June 26, 2014, Comment Nos. 3-42 and 3-63
Streater, Kelley: Written comments dated October 10, 2013, Comment Nos. 3-43 and 3-96
Streissguth, Michael: Oral comments dated November 13, 2013, Comment Nos. 2-7, 3-43, and 3-63
Stronski, Edward: Oral comments dated November 13, 2013, Comment Nos. 3-63 and 4-53
Stuhlmiller, Lary: Written comments dated January 16, 2014, Comment Nos. 3-43, 3-62, and 3-196
Suits, John: Written comments dated January 16, 2014, Comment Nos. 3-43 and 3-62
Sullivan, Patrick: Written comments dated September 17, 2013, Comment No. 3-48
Swartz, Florence: Written comments dated August 6, 2014, Comment Nos. 3-15 and 4-24
Synakowski, Robert: Written comments dated January 16, 2014, Comment Nos. 2-7 and 3-43
Syverud, Kent: Written comments dated September 2, 2014, Comment Nos. 2-7, 3-138, and 5-2
Talierecio, Ann Marie: Oral comments dated November 13, 2013 and written comments dated August 29, 2014 and September 2, 2014, Comment Nos. 3-42, 3-63, and 3-121
Taneja, Amit: Written comments dated August 29, 2014, Comment Nos. 3-42 and 3-63
Tarney, Ed: Written comments dated September 2, 2014, Comment Nos. 3-62, 3-138, 3-139, 3-172, and 3-178
Taub, Arnold: Oral comments dated June 26, 2014, Comment No. 2-44
Terrill, Carolyn: Written comments dated September 2, 2014, Comment No. 3-48
Thomas, Roberta: Written comments dated August 27, 2014, Comment No. 3-39
Thompson, Brandon: Written comments dated March 19, 2014, Comment No. 3-195
Thompson, Martha: Written comments dated January 17, 2014, Comment Nos. 2-7, 3-87, 3-92, and 3-124
Thompson, Peter: Written comments dated May 1, 2014, Comment No. 3-15
Thompson, R.: Written comments dated August 29, 2014, Comment No. 4-49
Thompson, Reverend: Oral comments dated November 13, 2013, Comment Nos. 2-7 and 3-63
Thorne, Debbie: Oral comments dated November 13, 2013, Comment Nos. 3-42 and 3-63
Tinelli, Gene: Written comments dated January 16, 2014 and August 7, 2014, Comment No. 3-96
Todd, A.B.: Written comments dated October 24, 2014, Comment Nos. 2-7 and 3-200
Todzia, Frank: Written comments dated August 30, 2014, Comment Nos. 3-42, 3-126, and 3-127
Tompkins, Tommy: Written comments dated July 29, 2014, Comment No. 3-62
Tortora, Chris: Written comments dated September 3, 2014, Comment No. 3-62
Toth, Gary: Oral comments dated November 13, 2013, Comment Nos. 2-1
Townsend, Kim: Written comments dated September 2, 2014, Comment Nos. 3-82, 4-55, 4-61, and 4-74
Traeger, John: Written comments dated May 1, 2014, Comment No. 3-91
Traino, John: Written comments dated May 4, 2014 and June 21, 2014, Comment No. 4-65
Transportation Justice Petition: Written comments dated November 13, 2013, Comment No. 2-7

Treier, Merike: Oral comments dated November 13, 2013 and written comments dated January 17, 2014, and September 2, 2014, Comment Nos. 2-1, 2-4, 2-5, 2-7, 2-9, 2-28, 2-31, 2-38, 3-5, 3-15, 3-20, 3-31, 3-43, 3-54, 3-69, 3-73, 3-88, 3-93, 3-95, 3-97, 3-116, 3-120, 4-16, 4-34, 4-40, 4-47, 4-49, 4-71

Trevvett, James: Written comments dated November 13, 2013, Comment Nos. 3-15 and 3-43

Tuttle, Greg: Written comments dated November 13, 2013, Comment Nos. 3-43 and 3-62

Vallelonga, Damian: Written comments dated January 12, 2014, May 1, 2014, and July 10, 2014, Comment Nos. 2-1 and 4-49

Varre, Michael: Written comments dated September 3, 2014, Comment No. 3-63

Vincent, Matthew: Oral comments dated November 13, 2013 and written comments dated August 27, 2014, Comment Nos. 3-42, 3-63, and 4-49

Volk, Robert: Written comments dated September 2, 2014, Comment No. 3-42

Wagner, Edward: Oral comments dated November 13, 2013 and written comments dated January 9, 2014, Comment Nos. 3-63, 3-64

Wallace, Kathy: Written comments dated May 1, 2014, Comment No. 5-7

Walls, Martin: Written comments dated January 16, 2014, Comment Nos. 3-62, 3-129, and 3-151

Walter, Elaine: Written comments dated November 13, 2013 and August 28, 2014, Comment No. 2-7, 2-37, 2-38, and 3-62

Walton, Barbara: Written comments dated August 27, 2014, Comment Nos. 3-42 and 3-88

Ward, Andrew: Written comments dated September 2, 2014, Comment Nos. 3-62 and 3-66


Watrous, Michael: Written comments dated November 20, 2013, Comment No. 4-67

Watrous, Michael: Written comments dated November 20, 2013, Comment No. 4-67

Webster, Christopher: Written comments dated September 2, 2014, Comment No. 2-12

Werbeck, Joshua: Written comments dated June 26, 2014, Comment Nos. 2-22, 3-63, and 3-87

Wetterhahn, Lauren: Written comments dated May 1, 2014; and oral comments dated June 26, 2014, Comment Nos. 3-21, 3-99, and 4-52

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White, Jon: Written comments dated March 5, 2014, Comment Nos. 3-62, 3-92, and 3-123
White, Stephen: Written comments dated November 13, 2013 and oral comments dated November 13, 2013 and June 26, 2014, Comment Nos. 3-15, 3-16, 3-42, 3-57, 3-63, 4-24
Whitfield, Paula: Written comments dated November 13, 2013, Comment Nos. 3-42 and 3-182
Wieder, Lori: Written comments dated August 27, 2014, Comment Nos. 3-43 and 3-62
Wiggins, Jerry: Written comments dated July 5, 2014, Comment Nos. 3-42, 3-182, and 4-77
Wilcox, Joshua: Written comments dated July 23, 2014, Comment No. 2-7
Wilke, Tim: Written comments dated July 16, 2014 and September 2, 2014, Comment Nos. 3-62, 3-121, and 3-187
Williams, Jr, Clinton: Written comments dated November 13, 2013, Comment No. 3-62
Winnewisser, Bill: Written comments dated November 13, 2013 and September 2, 2014, Comment No. 3-92
Witherell, Matthew: Written comments dated August 28, 2014, Comment No. 3-184
Harris, Alcha: Written comments dated September 2, 2014, Comment No. 3-41
Wolf, Douglas: Written comments dated June 27, 2014, Comment Nos. 2-7, 3-62, and 4-47
Wolf, Elaine: Written comments dated June 29, 2014, Comment Nos. 2-7 and 3-62
Wood, Brian K.: Written comments dated January 7, 2014, Comment No. 3-63
Wood, Cynthia: Written comments dated January 12, 2014, Comment No. 3-63
Wood, S. Penelope: Written comments dated November 13, 2013, Comment No. 3-62
Woods, Brian: Written comments dated May 1, 2014, Comment No. 3-74
Woodway, Dick: Written comments dated November 13, 2013, Comment Nos. 3-42 and 3-63
Woodworth, Cheryl: Written comments dated August 26, 2014, Comment No. 3-63
Woodworth, Richard: Written comments dated August 25, 2014, Comment No. 3-42
Wright, Timothy J.: Written comments dated November 13, 2013, Comment Nos. 2-7, 2-38, and 4-22
Yanan, Ruth: Written comments dated May 1, 2014, Comment No. 3-62
Yolla, DeRose: Written comments dated August 21, 2014, Comment No. 3-46
Yonge, Paul: Written comments dated December 23, 2013 and January 3, 2014, Comment Nos. 2-7 and 3-143
Yost, Kevin: Written comments dated July 21, 2014, Comment Nos. 3-62 and 3-185
Young, Donald: Written comments dated August 8, 2014, Comment No. 3-39
Zamojski, Ronald: Written comments dated January 17, 2014, Comment No. 3-63
Zenker, Bob and Jean Ann: Written comments dated June 26, 2014, Comment No. 3-42, 3-50, and 3-63
Zimbal, Larry: Written comments dated August 30, 2014, Comment Nos. 3-42 and 3-63
Zizzi, Annamarie: Written comments dated June 26, 2014, Comment No. 3-88
Zorabozo, Peter: Oral comments dated November 13, 2013 and written comments dated November 13, 2013, Comment Nos. 3-43, 3-62, 3-92, and 3-151