



City of Rochester

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December 15, 2003

Mr. Mark Aesch  
Rochester-Genesee Regional Transportation Authority  
1372 East Main Street  
Rochester, NY 14609

Dear Mr. Aesch:

The City of Rochester has reviewed the Environmental Assessment/Draft Environmental Impact Statement (EA/DEIS) for the Rochester Central Station released on November 6, 2003 and offers the comments/questions contained herein. We look forward to continuing our joint effort in moving this project forward as outlined in our Memorandum of Understanding. The following comments are offered to ensure the full and open disclosure and discussion of the project's potential benefits and impacts as will be necessary for future public approvals.

**APPROVAL AUTHORITIES**

While, as stated on p. 4 of the EA/DEIS, "the applicable New York Public Authority Law relieves the Proposed Action from compliance with municipal zoning requirements," the statute does not exempt the Proposed Action from the following City approvals:

ACTION	AGENCY
Building Permits including Demolition Permits	Commissioner of Community Development
Site Preparation Permits	Commissioner of Community Development
Official Map Amendments (Street Abandonments)	Mayor, City Council
Street Width Change Approvals	Mayor, City Council
Land Disposition	Mayor, City Council
Traffic Regulation Approval	City Traffic Control Board/City Council
Curb Opening Approval	City Traffic Control Board

**ALTERNATIVES**

1. With regard to the assessment of reasonable alternatives, an assessment must be done on the Proposed Action build out **only** inasmuch as it is stated that the associated secondary development may not occur. This assessment should be made of the Proposed Action as a stand-alone project and should include associated renderings with respect to all adjacent streets as well as a discussion of all potential interim uses that may be established in the areas designated for future associated secondary development. Mitigation measures discussed in relation to impacts associated with this alternative should not include any benefits associated with the secondary development.
2. Additionally, the Sibley Station alternative and State Street/Inner Loop alternative were reasonable alternatives that have been previously publicly discussed and should be included in the EA/DEIS.



3. Discuss any plans for surrounding properties (e.g. Granite Building, Gateway Building) that may impact the Proposed Action of secondary development

#### **ASSOCIATED SECONDARY DEVELOPMENT**

1. The secondary development is addressed in the EA/DEIS in a generic format, as defined by SEQR (617.10). This is a reasonable course of action considering the speculative nature of the development. In accordance with the requirements of SEQR, however, the EA/DEIS should "set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQR compliance." In addition, to adequately address cumulative impacts as well as facilitate future approval processes, establishing clear parameters for the secondary development in the context of environmental impacts would seem imperative and desirable.
2. The project sponsor has publicly discussed other potential uses (e.g., performing arts center, Advanced Technical Education Center) being explored for the secondary development. The EA/DEIS should disclose those options for public review.

#### **ECONOMIC IMPACTS**

1. The assessed value of the properties to be acquired and developed as the Proposed Action is \$14,330,400. Since these properties will come off the tax roll (until the secondary development occurs), the fact that the City and school district will lose approximately \$183,160 in annual tax revenue should be addressed.
2. Was a market study completed in support of the proposed housing, retail and office components described as the associated secondary development? If so, the results of that study should be discussed.
3. The economic impact for the Proposed Action only identifies 15 jobs being created, yet 27,000 square feet of tenant space is being created. An explanation of this minimal job impact should be explained.
4. The EA/DEIS assumes that the associated secondary development will generate 1,450 full time office jobs. It is highly unlikely that the new office tower will result in 1,450 net new jobs being created in the City. It is more likely that occupancy of the 250,000 to 300,000 square feet of new office space will result in vacancy of office space elsewhere in downtown. This impact should be addressed.
5. A group of East Main Street property owners, working with the City East Main Street Initiative, created an agenda of goals and strategies for stimulating development along the East Main Street corridor. In September of 2003, the group made public these recommendations including their support for an underground bus terminal, but not a 300,000 square foot office building. Please address how the Proposed Action and secondary development relates to these goals and strategies.
6. The EA/DEIS does not include a discussion of operational/maintenance responsibilities and cost commitments for bus/ facility operations, including police services and public space maintenance. Please address how these services will be staffed and financed.
7. RGRTA stated in the past that the revenue generated by the secondary development would support the operating costs of the transit center. If the secondary development does not occur for several



years or at all, as stated in the EA/DEIS, from what source will the money for operating costs be obtained or generated?

#### **PUBLIC BENEFIT**

1. Much of the public benefit described in the EA/DEIS is derived from the secondary development. If, as stated in the EA/DEIS the secondary development is speculative, then the benefits of the Proposed Action alone should be discussed.
2. The EA/DEIS should discuss the impacts on bus and pedestrian travel times caused by new bus routing to the proposed center and proposed bus stop and park/ride closings and changes.
3. The advantages of bus riders waiting in the new transit center out of weather is discussed (p.10), but the potential of longer walks to the center (in weather) due to bus stop closings is not.

#### **TECHNICAL ISSUES**

##### Transportation

1. Clarify the hours of operation of the transit center.
2. How will Lift Line interface with the transit center?
3. Division Street, a narrow but important access for delivery and emergency vehicles to properties on Main and Mortimer Streets, is proposed to be modified to a dead end street. It must safely and efficiently accommodate two-way traffic. Describe and depict how this will be accomplished.
4. Any vehicular maneuvering (i.e. backing up) to access/service the secondary development will not be permitted on N. Clinton Avenue as is proposed. Alternatives should be addressed.
5. The impacts and mitigation associated with potential pedestrian/bus turning conflicts at the intersections of Main St. and Clinton Ave. and Main St. and St. Paul Blvd. should address the high pedestrian activity described in the benefits. Conflicts at the wide bus entrances/exits on Clinton Ave. and St. Paul Blvd. should also be addressed.
6. The EA/DEIS does not discuss the additional crossings required for pedestrians formerly getting on a bus on the south side of Main Street and Clinton Avenue. The need for additional crossings is listed as negative characteristic of some alternatives on p. 10 of the EA/DEIS.
7. Explain what is proposed for the existing bus facilities at Midtown Plaza and on the south side of Main Street and Clinton Avenue once their operation/use is discontinued. The responsibilities and costs of removal of existing bus shelters and restoration of right-of-ways should be addressed.

##### Parking

The EA/DEIS states that, although the 620 space Mortimer Garage will be demolished, and two surface lots displaced, adequate replacement parking is available in the area. This is only true if the vacancy rates of Midtown Plaza, Sibley Center, Granite Building and Alliance Building never improve. If revitalization of these buildings is successful, and the 1,000 space parking garage proposed as associated secondary development does not occur, there will be a shortage of parking for the area.

##### Noise

The noise and vibration impacts on the Michael Stern apartments, Catholic Family housing and





proposed new housing must be addressed, particularly, noise of buses climbing an exit grade.

#### Air Quality

1. The EA/DEIS provides an analysis of transportation-related air pollution at two intersections - Main St and Clinton Ave and Main St and St Paul St. The air quality impacts on the proposed housing on Mortimer St and Stone St extension should be included in that analysis.
2. The Michael Stern building, Catholic Family Center, St. Paul office building, and the secondary development are not listed as receptors for the Air Quality Impact Analysis as they should be.

#### Design/Visual Impacts

1. The EA/DEIS contains no statement of history, value, character or contributing status of properties to be demolished.
2. Again, it is important to evaluate the visual impacts of the development site without the speculative secondary development.

#### Construction Impacts

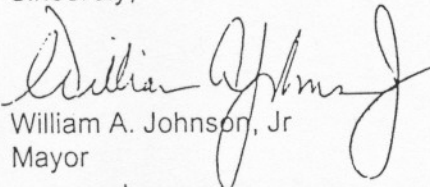
1. This section needs further detailed analysis (e.g. phasing, staging areas, construction vehicle routes, right-of-way impacts, etc.).
2. Vibrations resulting from demolition, blasting and construction equipment should be addressed in the EA/DEIS with regard to impacts on adjacent historic buildings. Simply committing to a future analysis is contrary to the intent of NEPA and SEQR.
3. The removal of the available parking for SUNY Brockport and other adjacent businesses during construction should be addressed and mitigated.

#### Miscellaneous

1. P.53 of the EA/DEIS claims that there are " no residential components within surrounding area." Michael Stern and Catholic Family residential are directly adjacent to the proposed entrance ramp. The potential for disruption should be recognized and discussed.
2. The project site contains 19 parcels, not 16 as indicated in the report. The former McCrory's building actually occupies 4 properties.
3. P.15 - The referenced police substation is a concept that is not supported by the City.

I look forward, with great interest, to a thorough discussion and analysis of these comments in the Final Environmental Impact Statement pursuant to the requirements of the State Environmental Quality Review Act. If you need any clarification of the above comments, please do not hesitate to contact Art Ientilucci, Director of Zoning at 428-7091.

Sincerely,

  
William A. Johnson, Jr  
Mayor



Rochester Central Station

December 15, 2003

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xc: Jeffrey Carlson, Deputy Mayor  
Lois Giess, President, City Council  
Linda Kingsley, Corporation Council  
Rick Hannon, Assistant to the Mayor  
Edward Doherty, Commissioner of Environmental Services  
Fashun Ku, Commissioner of Economic Development  
Linda Stango, Commissioner of Community Development  
John Doyle, County Executive  
Dennis Pellitier, President, County Legislature  
Donald Riley, Chief Executive Officer, RGRTA  
Steve Gleason, Director, GTC  
Charles Moynihan, Regional Director, NYS DOT  
Letitia Thompson, Regional Administrator, Federal Transit Administration, Region II