

Interstate 81 Viaduct Project

Onondaga County, New York

Addendum to Appendix A of the Joint Record of Decision and Findings Statement

June 2022

The Interstate 81 (I-81) Viaduct Project Final Design Report/Final Environmental Impact Statement/Final Section 4(f) Evaluation (FDR/FEIS) was published on April 15, 2022, and the Joint Record of Decision (ROD) and Findings Statement was signed on May 31, 2022. Subsequent to the issuance of the Joint ROD and Findings Statement, the Federal Highway Administration (FHWA) and New York State Department of Transportation (NYSDOT) identified three comment submissions that were received during the 30-day FDR/FEIS review period, but were inadvertently omitted from Appendix A (Responses to Comments) of the Joint ROD and Findings Statement. The comment submissions are as follows:

Last Name	First Name	Comment Type	Date	Comment Number
Peluso	Joseph and Pauline	Email	5/11/22	C-1
Speers	Arthur	Email	5/11/22	C-1
Lewis	Minchin	Email	5/16/22	C-2

These three comment submissions have been added to the Comments Library on the Project website. The FHWA and NYSDOT have considered the comments received and determined that the omission of these comments does not warrant any changes to the findings or conclusions of the ROD.

Responses to these comments are provided below.

COMMENTS AND RESPONSES

- C-1 Commenters expressed opposition to the Community Grid (Selected) Alternative, citing concerns related to traffic on existing I-481, ease of travel and access to hospitals on existing I-81, and the need to have a highway through the Town of Salina for safety and economic reasons.
- R-1 See response to Comment 4-2 in Appendix A of the Joint ROD and Findings Statement regarding opposition to the Community Grid Alternative. As discussed in the response to Comment 4-95 in Appendix A of the Joint ROD and Findings Statement, BL 81 will continue to operate as a limited access high speed (65 mph) freeway through the Town of Salina as it functions today.
- C-2 DOT’s “Signature Bridge” Concept Evaluation is deficient because it did not respond to the comments presented by many citizens. An evaluation of a responsive alternative should be conducted to determine Construction Costs, Constructability, and Maintenance and Other Environmental Impacts with a correction of the noted deficiencies. That evaluation should be completed before a Record of Decision is issued.

This memo first presents the concept of an iconic bridge with the Community Grid (the Grid Plus Bridge alternative). The Grid Plus Bridge alternative could best meet the objectives of the I-81 Viaduct Project. It then analyzes DOT's "Signature Bridge" created by the NYSDOT. The memo demonstrates how DOT's "Signature Bridge" differs from the Grid Plus Bridge plan in 28 significant ways. The memo concludes with the need for a fair evaluation.

1. The Iconic Bridge and Community Grid Alternative.

NYSDOT, in Appendix M, Response 5-10, states that "...in consideration of the comments received, the agencies conducted a conceptual evaluation of a potential signature bridge." The conceptual evaluation of a potential signature bridge was based on a configuration constructed by DOT without considering the options presented by the community to address the concerns about the Community Grid. There is no indication that DOT considered the configuration as outlined in my comments submitted on October 14, 2021, or in other comments reported in the FDR/FEIS. Those comments include the following design considerations for an iconic alternative, the Grid and Harriet Tubman Memorial Freedom Bridge, referred to in this memo as the "Grid Plus Bridge" alternative:

The new alternative (Grid Plus Bridge) would combine the Community Grid and an Iconic Bridge (from my comments submitted on October 14, 2021).

The Community Grid Plus Bridge Alternative would include many of the features of the Community Grid. The Viaduct Alternative would be modified substantially. The details are below:

A. The existing I-81 elevated roadway would be continued north of Colvin Street with newly designed structure to reduce the negative impact on the residential neighborhood. It would be relocated away from Dr. King Elementary School as shown in the Viaduct Alternative. It would pass over the railroad and align directly over Almond Street.

B. The exit to Van Buren shown on the Community Grid Alternative would be maintained. An alternative exit direct to parking areas off Raynor would be explored as a more efficient approach taking advantage of the grade levels and avoiding a descent to grade at Raynor and the very steep ascent to destination parking.

C. The cable-stayed structure would begin at Burt Street. Cable-stayed structures are generally straight in-line to accommodate the engineering forces. The ramps at Adams Street should be explored for cable-staying to preserve ground-level clearance underneath them. That exit would provide a connection to Adams eastbound and Harrison westbound, both arterials designed to accommodate traffic. The 30,000 cars predicted for the Community Grid would by-pass the Southside neighborhood entirely. The roundabout proposed for the Community Grid Alternative at Martin Luther King East (or Kennedy Street) and the exits at Colvin and Brighton (Glen) would be eliminated.

D. The cable-stayed roadway would continue from Burt to and over Genesee Street, aligning with I-81 from there to the north. It would utilize the existing route to connect with I-81 at the Pearl Street on-ramp as specified in the Community Grid plan. Other than the southbound exit to Almond and Harrison, the interchanges between I-81 and I-690 would be

eliminated. This would remove the multiple ramps that add to the width of the existing roadway and to the high rate of accidents. With the elimination of those ramps, it may be possible to reduce the curves and/or improve the sight range. The speed limit would be reduced to enhance safety and meet federal standards for the redesigned I-81 roadway.

E. The current design for the Community Grid Alternative would continue. The “grid” would begin at Martin Luther King East connecting to Renwick Avenue and ultimately to Almond Street. The interchange adjacent to Dr. King Elementary School would be eliminated. Almond Street would be reconstructed as an urban boulevard with narrower streets than would be required for a Business Loop subject to heavy traffic and federal standards. The boulevard would continue north to Erie Boulevard. It would link with I-690 via an extension of the Crouse and Irving diamond interchange planned for the Community Grid.

F. The improvements to I-481 and to I-690 planned to accommodate the diversion of 60,000 cars would be eliminated. Other improvements to the roadways on the eastside would be evaluated as part of a separate project.

The Community Grid Plus Bridge Alternative would meet local and national objectives:

The Community Grid Plus Bridge Alternative combines the benefits of the Community Grid with improvements that make the Community Grid work better:

- A. The viaduct is removed.
- B. A tree-lined boulevard handles local traffic on the surface with pedestrian and bike friendly configurations.
- C. An iconic, cable-stayed bridge soars 70 feet over the boulevard to handle non-local traffic.
- D. A pedestrian and bike walkway over Almond Street can connect both sides of the boulevard.
- E. The interchange at Dr. King Elementary School is eliminated.
- F. The existing entrance and exit are maintained at Adams with an exit at Van Buren or Taylor.
- G. The bridge is straighter and simpler than the current roadway with a 45-50 mph design speed limit, not the 60-mph planned by NYSDOT.
- H. Additional land may be available for development north and east of Dr. King Elementary School.
- I. It may be possible to phase construction of the overhead bridge supports to provide for dust shields to protect the neighborhood and citizens from the pollution resulting from the demolition of the existing viaduct.
- J. The \$800+ million slated for improvements to I-481 in the suburbs can be spent in the City since no traffic will be diverted. The cost of a cable-stayed roadway is estimated at \$600

million; \$200 million would be spent for neighborhood improvements, including an LED park to attract visitors from the regional community as well as the immediate neighborhood.

K. Dedicating the bridge and LED park in response to a request from the Harriet Tubman family and committing \$200 million to neighborhood improvements can be significant initial steps in recognizing the national transportation goal to promote civil rights.

2. NYSDOT Did Not Equitably Evaluate the Grid Plus Bridge Plan.

NYSDOT created a “potential signature bridge” option that ignored the proposed Grid Plus Bridge concept. NYSDOT rejected their own concept of a “signature bridge,” but the concept constructed by NYSDOT differed substantially from the iconic Grid Plus Bridge proposed in comments submitted in response to the DEIS in October 2021. The differences enumerated below list the NYSDOT comment followed by a statement demonstrating the deficiency in the NYSDOT assertion.

Item	Location	DOT claim	Response
1.	M-5-54	In “General Limits and Configuration” DOT claims the “The potential signature bridge would connect southern I-81/Business Loop (BL) 81 and I-690.”	The Grid Plus Bridge alternative would not connect I-81 and I-690 in the city. The connection would be provided by the Community Grid.
2.	M-5-54	“The north end of the bridge would need to end in the vicinity of Cedar Street to allow enough space for ramp connections between the bridge terminus and I-690.”	The Grid Plus Bridge would not end in the vicinity of Cedar Street since there would be no connection to I-690.
3.	M-5-54	“The south end of the bridge would be located approximately where the existing viaduct begins, to facilitate inclusion of an interchange at MLK, Jr. East.”	The Grid Plus Bridge would eliminate the interchange at MLK, Jr. East.
4.	M-5-54	“It is assumed that the bridge would contain a total of either four (two in each direction) or six (three in each direction) lanes plus shoulders.”	The Grid Plus Bridge would be limited to two lanes in each direction, with no entrances or exits for the length of the span.
5.	M-5-54	“The signature bridge and approach highways would be designed to meet freeway standards.”	The Grid Plus Bridge alternative would reduce speed limits below 60 mph to be consistent with other interstate highways in urban settings. Eliminating entries and exits from the cable-stayed portion of the span would affect many of the “freeway standards.”
6.	M-5-54	“To replace the functionality of the existing Harrison Street/Adams Street interchange, the existing I-81/I-690 interchange would be reconstructed and reconfigured.”	The Grid Plus Bridge option would not eliminate the Harrison Street/Adams Street Interchange. In fact, the primary purpose of the Grid Plus Bridge option is to avoid diverting the traffic using the Adams Street exit to neighborhood streets south of that exit at either MLK, Jr. East, or in the latest DOT plan, at the

			Van Buren Roundabout. The existing I-81/I-690 interchange would be eliminated, not reconstructed or reconfigured.
7.	M-5-54	“The new I-690 interchange at Crouse and Irving Avenues, provided under the Community Grid Alternative, would be included in the signature bridge concept.”	The Grid Plus Bridge option would include the new I-690 interchange at Crouse and Irving Avenues as designed for the Community Grid Alternative.
8.	M-5-54	As described in the “Interstate Option,” the DOT’s version of a “signature bridge” option “includes many features of the Viaduct Alternative as presented in the DDR/DEIS and FDR/FEIS.”	The Grid Plus Bridge rejects many of the “features” of the Viaduct Alternative. The Grid Plus Bridge plan would not include the “flyover” ramps connecting I-81 and I-690, nor the left-side northbound exit from I-81 to I-690 eastbound, nor the dangerous merge lanes from I-81 Northbound to I-690 Eastbound.
9.	M-5-55	“Due to the characteristics of a long span signature bridge, it is not possible to provide ramp connections within the limits of the main span, and as a result, an interchange at Adams and Harrison Streets could not be included.”	The Grid Plus Bridge plan includes ramps from the multi-span bridge sections before they connect to the cable-stayed span. The cable-stayed span would eliminate entries and exits to minimize lane changes.
10.	M-5-56	“Since the signature bridge’s alignment would be straight, several buildings along Almond Street would need to be acquired, such as the Syracuse Housing Authority administration building and the Syracuse University steam plant.”	The Grid Plus Bridge option would include acquisition of the Syracuse Housing Authority building, as does the Community Grid alternative. Depending on the alignment of the multi-span connector bridges, it may be possible to avoid interference with the Syracuse University steam plant.
11.	M-5-56	“In total, it is estimated that 35 to 40 buildings would need to be removed, including residential, office, institutional, and commercial uses, as well as utility properties. The signature bridge concept would adversely affect multiple historic structures in the adjacent areas, such as Veteran’s Fastener Supply Company, the Learbury Centre (which contributes to the North Salina Street Historic District), the former NY Central Railroad Passenger and Freight Station buildings, VIP Structures, Smith Restaurant Supply, Reid Hall, Peck Hall, the Crichton Apartments, Wag Foods, the Howard & Jennings Pump Factory, and the Syracuse Herald building.”	The Grid Plus Bridge plan would avoid the adverse effect on these structures since it would not include the multiple ramps to connect to I-690, nor the 60 mph design, nor additional lanes.

12.	M-5-56	<p>“The Crouse and Irving Avenues interchange configuration would be similar to that in the Community Grid Alternative design, except that the overall footprint of I-690 would be wider between McBride Street and Irving Avenue to accommodate the I-81 connector ramps in the median area and the Crouse and Irving Avenues ramps on the outside.”</p>	<p>The Grid Plus Bridge plan would not require the expansion of the Crouse and Irving Avenue interchange design since I-690 would not be connecting to I-81 directly. The Community Grid as proposed would provide the connectivity, avoiding impacts on adjacent property other than those required by the Community Grid.</p>
13.	M-5-57	<p>“The highway, including the portion carried by the signature bridge, would be subject to freeway design criteria and a 60-mph design speed.”</p>	<p>The Grid Plus Bridge plan would seek a waiver of this requirement. Traffic needing a high-speed route (including military travel) would use the I-481 bypass route included in the Community Grid Plan with a 70 mph speed limit. The design speed limit for the Grid Plus Bridge elevated span could be reduced to speed limits approved for urban sections of interstate highways in other communities.</p>
14.	M-5-60	<p>“A minimum project cost increase of \$800 million could be expected.”</p>	<p>The cost of the Grid Plus Bridge plan would be offset by the savings from eliminating the improvements to I-481 that are part of the Community Grid estimated cost. NYS DOT recognized this savings “since [the Grid Plus Bridge] option would maintain I-81 through the city, the conversion of I-481 to I-81 would not be necessary.” (M-5-54) The cost of maintaining the exit at Adams Street would be offset by eliminating the roundabout at Van Buren and reducing Almond Street from an interstate arterial to a city boulevard.</p>
15.	M-5-60	<p>“For discussion purposes, a cable stayed bridge concept was considered for the I-81 signature bridge, given its cost advantages and potential for aesthetic treatments. The bridge would carry the four lanes of I-81 (with the potential to require six lanes) with 5-foot inside shoulders and 12-foot outside shoulders, with 2-foot median and 1.5-foot barriers, for a minimum total roadway width of 85 feet.”</p>	<p>The actual design (not discussion purposes) may result in a different configuration, especially due to the fact that the cable-stayed span would be a direct roadway from I-81 on the south to I-81 on the north without entrances or exits.</p>

16.	M-5-60	<p>“In addition to increases in construction duration, the overall project timeline would be increased due to the time required for the bridge’s design. This would be the case whether design-build or design-bid-build was chosen as the project delivery method. A project duration increase of three to five years could be reasonably expected.”</p>	<p>The duration of the Grid Plus Bridge plan should be compared with the duration of the entire Community Grid plan including the four years for the completion of the 481 improvements before the removal of the viaduct can begin. It should be noted that the additional design time would not be creating traffic disruptions. The impact on construction scheduling is not known without further study.</p>
17.	M-5-60	<p>“The construction of the bridge would pose challenges given its location and proximity to the local community. There would be difficulties in finding the space needed for staging areas near the site to allow for material storage and pre-assembly of bridge components. Travel through the area would be disrupted substantially and additional/larger construction vehicles and equipment (e.g., cranes) would add traffic, noise, and air quality emissions to the communities for the duration of construction due to the large bridge members required for this type of structure.”</p>	<p>The Grid Plus Bridge option would involve construction challenges but not unlike the challenges the community accommodated for the replacement of the roof on the Syracuse University stadium, including the delivery of two of the world’s largest cranes. Equipment and materials were staged at many locations throughout the community for the stadium roof replacement. For the Grid Plus Bridge project, during construction disruptions, travelers would have the options provided by the Community Grid, namely rerouting to I-481 and I-690 or to city streets. The inconvenience should be no greater than the disruptions when NYS DOT replaced the I-690 bridges at Teall Avenue.</p>
18.	M-5-61	<p>“Due to the width and height of a signature bridge, there would be more snow requiring removal and the current method of plowing the snow over the edge of the bridge would need to be replaced with a slower, more expensive process of loading the snow into trucks for disposal to an offsite location.”</p>	<p>The Grid Plus Bridge may have lane reductions to allow for snow removal during heavy snowfalls. The lane reduction, and even closure for snow removal, would give travelers the option provided by the Community Grid, as stated above in #17. While snow removal may result in some inconvenience, it is likely to be less frustrating than the inconvenience resulting from clearing the city streets that would be impacted by the Community Grid plan.</p>
19.	M-5-61	<p>“Based on its substantial cost and constructability issues, and in consideration of the potential environmental and other impacts described below, the signature bridge concept is considered unreasonable and dismissed from further study.”</p>	<p>The signature bridge concept as conceived by DOT is much different than the Grid Plus Bridge option. The differences are detailed in Items above. The Grid Plus Bridge option cannot be dismissed from “further study”--it has not been studied in the current version of the FDR/FEIS.</p>

20.	M-5-61	“The potential cost of this concept does not provide added value commensurate with the increased cost at least \$800 million to \$1.2 billion more than the cost of the Community Grid Alternative.”	See Item 14 above.
21.	M-5-61	“Construction of the signature bridge concept would take at least 8 to 10 years (two more years than the Community Grid Alternative.)”	The construction of the Grid Plus Bridge project would proceed in phases. The actual duration will be determined in the process of detailed design. But it could be expected that the initial phase would involve the initial construction of the Community Grid interchange on I-690 at Crouse and Irving. This would divert traffic that would otherwise use the Harrison Street entry and exit. The northbound exit from I-81 to Adams Street may remain open until the later phases of the project. By staging construction, inconveniences may be minimized. In any case, after the new I-690 interchange at Crouse and Irving opens, traffic could be diverted to the routes that are being promoted in the Community Grid plan.
22.	M-5-63	“The removal of direct access to Harrison and Adams Streets would increase traffic using the local street network to reach University Hill from the south. Consequently, it would increase traffic and related emissions and noise near Dr. King Elementary School and the adjacent residential neighborhood.”	This DOT comment is meant to apply to the Grid Plus Bridge plan, but it describes the impact of traffic that will occur under the Community Grid plan if traffic is diverted to city streets at the new proposed exit at Colvin and at the Van Buren Roundabout. The Grid Plus Bridge plan would avoid the impact on the minority neighborhood by maintaining the existing exit at Adams Street.
23.	M-5-63	“A signature bridge spanning these areas would displace these residents. It would displace businesses with minority and/or low-income employees and that serve low-income and minority populations.”	Without detailed plans, assertions about the displacement of persons or businesses are meaningless.
24.	M-5-63	“It would increase transportation right-of-way through the neighborhoods and encroach on important community facilities, such as Dr. King Elementary School and Wilson Park. It would also increase traffic through minority and low-income communities to serve University Hill and consequently result in greater air and noise impacts.”	The Grid Plus Bridge plan would maintain the exit at Adams Street. The exits at Colvin and the Van Buren roundabout would be eliminated. No traffic would be diverted to the neighborhoods affecting important community facilities such as Dr. King Elementary School, Dunbar Center, or Wilson Park.

25.	M-5-63	“While the Community Grid portion of the signature bridge concept would provide east-west access between neighborhoods for vehicles, bicycles, and pedestrians, the signature bridge would negatively affect community cohesion and its abutments would impact bicycle path continuity and connectivity.”	The Community Grid would eliminate one of the most important east-west access points by terminating MLK, Jr. East at the Dr. King Elementary School. The Grid Plus Bridge plan would maintain the connection between MLK, Jr. East and the beginning of the Community Grid leading to Almond Street. It would provide a pedestrian bridge crossing Almond Street for bikers and pedestrians avoiding vehicle/pedestrian conflicts on Almond Street during rush hours.
26.	M-5-63	“Compared to the existing I-81 viaduct, the wider signature bridge structure would have more encroachment on Wilson Park and would be closer to Forman Park.”	The Grid Plus Bridge Alternative orientation may not affect Wilson Park. With the elimination of the ramps connecting I-81 to I-690, it is unlikely that the Grid Plus Bridge would impact Forman Park.
27.	M-5-63	“The signature bridge’s greater width and height would substantially change the visual character of the area for multiple user groups. Its towers would be among the tallest structures in Syracuse and would be visible from many parts of the city. The bridge itself would also be taller than many adjacent structures and would be even more of a prominent feature of the skyline than the I-81 and I-690 viaducts are today.”	The purpose of an “iconic” structure is to change the visual character of the City. In fact, the Grid Plus Bridge, with an LED park, would create a landmark with prominence for the neighborhood but also with prominence as a landmark putting Syracuse on a national map of tourist destinations. The features cited by DOT are the characteristics that would give Syracuse notoriety for something other than its snowfall.
28.	M-5-63	“Since the signature bridge would be in an urban setting, and its design would include features to manage storm water flows, it would not result in effects to natural resources that would differ from those predicted for the Viaduct and Community Grid Alternatives.”	The Grid Plus Bridge would avoid the negative environmental impacts associated with the Community Grid’s designation of I-481 as I-81 with its violation of principles of Smart Growth and NYS environmental laws. The Grid Plus Bridge plan would avoid the negative environmental impacts inherent in the Community Grid Alternative.

3. Conclusion: A fair evaluation of the Grid Plus Bridge Plan is required.

The FDR/FEIS recognized the importance of the many public comments calling for an iconic bridge, including a bridge that would be dedicated to Harriet Tubman. As cited above, “In consideration of the comments received, the agencies conducted a conceptual evaluation of a potential signature bridge.” While the DOT effort is meritorious, the results are problematic for two reasons. First, unfortunately, the “potential signature bridge” the agencies evaluated was not the iconic bridge alternative that was being proposed. Secondly, the “preferred alternative” Community Grid is not preferred by a majority of citizens, including an overwhelming majority of residents living adjacent to the current viaduct.

The community deserves a fair evaluation of the Grid Plus Bridge alternative. An evaluation of the Grid Plus Bridge should be conducted with community input to determine Construction Costs, Constructability, and Maintenance and Other Environmental Impacts. This evaluation should correct the deficiencies noted above in the FDR/FEIS. That evaluation should be completed before a Record of Decision is issued. Without that step, the community has no assurance that the mistakes of the past are not being repeated in the future.

- R-2 FHWA and NYSDOT received multiple comments that the Project should include a “signature,” “iconic,” or “skyway” bridge structure, either as a separate alternative or in addition to the Community Grid Alternative (see response to Comment 5-10 in Appendix M-5 of the FDR/FEIS). Both interstate (with a full I-81/I-690 interchange) and non-interstate (with partial BL 81/I-690 interchange) options were considered. The interstate option would reconstruct I-81 generally along its current elevated alignment through the city. Since this option would maintain I-81 through the city, the conversion of I-481 to I-81 would not be necessary. Under this option, all interchanges would need to be full interchanges (an interchange that provides all directions of travel). The non-interstate option would replace existing I-81 through the city with an elevated, non-interstate freeway (i.e., Business Loop 81) that would generally follow the current I-81 alignment. Since this option would remove a section of I-81, the conversion of I-481 to I-81 would be necessary. Partial interchanges would be allowable along the non-interstate freeway.

The Grid Plus Bridge plan presented in this comment is a variation of the skyway concept described in the response to Comment 5-10 in Appendix M-5 of the FDR/FEIS. The Grid Plus Bridge plan would include elements of the existing viaduct or the dismissed Viaduct Alternative, portions of the Community Grid Alternative, as well as an iconic bridge, potentially dedicated to Harriet Tubman. Similarly, the skyway concept presented in the response to Comment 5-10 is based on the premise that the Community Grid Alternative by itself would not adequately accommodate traffic demand and therefore would require additional transportation infrastructure. However, as documented in the FDR/FEIS, the Community Grid Alternative will adequately accommodate traffic demand (see Chapter 5, Engineering and Transportation Considerations, of the FDR/FEIS, and the responses to traffic comments in Section 6 [Transportation Considerations] of Appendix M-5 of the FDR/FEIS and Comment 4-1 of Appendix A of the Joint ROD and Findings Statement). While the Grid Plus Bridge plan would facilitate travel for north-south through-drivers who are not connecting to I-690 (e.g., from LaFayette to Salina), these drivers constitute only a small portion of the travel demand. The Grid Plus Bridge plan’s additional elements—an iconic bridge and retention of the Harrison Street/Adams Streets ramps—would not provide added value commensurate with its associated cost and would also result in greater adverse impacts than the Community Grid Alternative. For example, the Grid Plus Bridge plan would require additional construction duration and associated construction disruptions; substantially greater cost; greater property acquisitions, including historic resources as well as the steam plant; and other adverse effects as described for the skyway concept in the response to Comment 5-10 in Appendix M-5 of the FDR/FEIS.

The concept proposed in this comment would provide a cable-stayed bridge 70 feet high between Burt and East Genesee Streets. It would maintain local street ramp connections at Harrison and Adams Streets, which are removed under the Community Grid Alternative. Due to the height of the iconic bridge, the Harrison and Adams Street entrance and exit ramp lengths would need to be approximately three times longer than they currently are (assuming a 3 percent mainline approach grade) so that they could intersect the increased mainline approach heights leading to the proposed iconic bridge. This means that the bridge's southern entrance/exit ramps would need to end/begin in the vicinity of MLK, Jr. East, and the northern entrance/exit ramps would need to begin/end in the vicinity of Townsend Street. An interchange at MLK, Jr. East would therefore be required. The footprint of the iconic bridge would also be wider than described, even if it were a non-interstate roadway that only carried two lanes as the commenter proposes, since the bridge would still need to meet freeway design criteria and would require 12-foot lanes, standard four-foot shoulders on the left and 10-foot shoulders on the right, space for bridge barriers, and space for the cable support structure. This wider bridge footprint would also require shifting the location of the Adams and Harrison Streets ramps, resulting in impacts to the Pioneer Homes and other adjacent properties. Additionally, the ramps themselves would need to be reconstructed and widened to meet current design standards.

Moreover, maintaining an exit from northbound I-81 to Adams Street and a southbound entrance from Adams Street would require a long sloping ramp—almost entirely on elevated bridges similar to the existing viaduct, between Raynor Avenue and Jackson Street, and then on embankment with retaining walls between Jackson and Monroe/Adams Streets—near the Pioneer Homes. This would result in two elevated structures placed adjacent to the Pioneer Homes on both sides of the highway: a 70-foot-high cable-stayed bridge as well as the elevated northbound and southbound ramps. Because of the wider mainline, and wider ramps described above, the outside faces of the ramps would be shifted an estimated 15-20 feet closer to the Pioneer Homes on both sides of the highway. These three elevated structures would create more of a barrier than the existing viaduct and result in increased right-of-way impacts and other associated environmental impacts.

Regarding specific design comments in the table above:

- 1 & 2: Refer to the explanation above regarding the interstate and non-interstate options that were studied as part of the skyway concept and would also apply to the Grid Plus Bridge plan.
3. See above with regard to the MLK, Jr. East interchange.
4. An option with two lanes in each direction was considered.
5. Freeways must be designed to freeway standards, even those with a posted speed limit of 55 mph or less.
6. Comment noted. Under the Community Grid Alternative, traffic from the Harrison Street and Adams Street ramps will be dispersed to numerous east-west and north-south streets, including Crouse and Irving Avenues.
7. Comment noted.

8. As noted above, both interstate (with a full I-81/I-690 interchange) and non-interstate (with a partial I-81/I-690 interchange) options were considered.
9. Refer to the response above regarding maintaining the northbound and southbound ramps between Harrison and Adams Streets and the elevated approaches to the iconic bridge.
- 10 and 11. The Community Grid Alternative does not require acquisition of the Syracuse Housing Authority (SHA) administration building. The Community Grid Alternative requires acquisition of 500 Renwick Avenue, which is an SHA garage. Like the skyway concept, the proposed Grid Plus Bridge plan, with its lengthy ramps and wide footprint, would impact the steam plant, the SHA Administration building, and numerous other properties, including historic buildings, resulting in greater displacements and associated effects than the Community Grid Alternative.
12. As noted above, both interstate (with a full I-81/I-690 interchange) and non-interstate (with a partial I-81/I-690 interchange) were considered.
13. As noted, all highways, including the portion carried by the signature bridge, would be subject to freeway design criteria and a 60 mph design speed.
14. The Grid Plus Bridge plan includes a non-interstate iconic bridge, which would not require the conversion of I-481 to the I-81 mainline and necessitate the improvements to existing I-481 that will be implemented with the Community Grid Alternative. Even if the I-481 improvements could be avoided in the Grid Plus Bridge plan (by making the iconic bridge an interstate with a full interchange at I-690), the cost savings would not offset the costs of constructing the iconic bridge, including the reconstructed, substantially lengthier ramps at Adams and Harrison Streets. The skyway interstate option evaluated in response to Comment 5-10 in Appendix M-5 of the FDR/FEIS, which did not include the I-481 conversion to I-81 and associated improvements, would nonetheless be more costly than the entire Community Grid Alternative.
15. Comment noted.
16. While the additional design time would not contribute to construction disruption, it would delay the construction start of the Project. The additional infrastructure associated with the Grid Plus Bridge plan would also extend the overall construction duration and associated impacts as documented in the FDR/FEIS.
17. The construction for the Grid Plus Bridge plan would be far more extensive and disruptive than localized, smaller projects, such as the replacement of the stadium roof and the I-690 over Teall Avenue and Beech Street Bridge Replacement Project.
18. Due to the heavy snowfall in Syracuse, lane reductions or closures would be frequent and impractical.
19. The Grid Plus Bridge plan is a variation of the skyway concept that was evaluated and presented in the response to Comment 5-10 in Appendix M-5 of the FDR/FEIS. As described in the response to Comment 5-10, based on cost, constructability, and other issues, further consideration of a skyway concept is not warranted. This conclusion also applies to variations of the skyway concept, such as the Grid Plus Bridge plan.
20. See response to #14 above.
21. While construction phasing would be used, the duration of the Grid Plus Bridge plan would be similar to that of the skyway concept.

22. As documented in the FDR/FEIS, the Community Grid Alternative will accommodate travel demand. Refer to Chapter 5, Engineering and Transportation Considerations, of the FDR/FEIS, as well as the responses to traffic comments in Section 6 (Transportation Considerations) of Appendix M-5 of the FDR/FEIS, for additional information.
23. The skyway concept was investigated in sufficient detail to determine those impacts.
24. Refer to responses above.
25. Regarding a pedestrian/bicycle bridge at Almond Street, please refer to response to Comment 4-107 in Appendix M-5 of the FDR/FEIS.
26. Regarding Wilson Park, the Grid Plus Bridge plan's wider footprint to meet the freeway design criteria noted above would have more encroachment on the park, as detailed in the evaluation. Likewise, the Grid Plus Bridge plan would be closer to Forman Park than the existing I-81 viaduct.
27. Comment noted.
28. As documented in the response to Comment 5-6 in Appendix M-5 of the DDR/DEIS, the Project has been developed in alignment with the principles of the Smart Growth Public Infrastructure Policy Act. The Community Grid Alternative will improve existing infrastructure in the City's municipal centers, strengthening the existing communities in these centers with improved transportation infrastructure, including facilities that promote sustainable (pedestrian and bicycle) traffic modes. Refer to Appendix D-3 of the FDR/FEIS for the Smart Growth Screening Assessment.