

**ATTACHMENT C**  
**COMMENTS RECEIVED DURING SCOPING**

**Attachment C: Comments Received During Scoping  
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THE CITY OF NEW YORK  
OFFICE OF THE MAYOR  
NEW YORK, NY 10007

## MEMORANDUM

TO: R.J. Palladino, New Jersey Transit  
Amishi Castelli, USDOT Federal Railroad Administration

FROM: Esther Brunner, Mayor's Office of Sustainability (MOS)

DATE: June 3, 2016

SUBJECT: **Hudson Tunnel Environmental Impact Statement - Scoping Document  
New York City Comments  
CEQR Number 16FRA001M**

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Thank you for the opportunity to submit comments on the Scoping Document for the Hudson Tunnel Environmental Impact Statement (EIS).

The scoping document points to the pressing need for repairs to the existing tunnel, which is over 100 years old and suffered accelerated degradation during Superstorm Sandy. Closing one tube for repairs without first completing a new tunnel would result in unacceptable disruptions and delays for the tens of thousands of New York City commuters, residents and visitors who rely on this service each day. This loss of capacity would also have a chilling effect on the economy of New York City and the entire region, with effects sufficiently significant to be felt at the national level. As such, the City of New York strongly supports the proposed action to rehabilitate the North River Tunnel without disrupting existing train service and provide redundant capacity for rail service across the Hudson River.

This project would help ensure the continuity of safe and reliable commuter and intercity rail service into New York City, which is essential to the City's and region's economic health and long-term growth. Moreover, the project will strengthen the resiliency of the regional rail system, which is among the City's most critical transportation assets. We are also encouraged to see that this project does not preclude potential future opportunities to expand capacity into Penn Station.

For all of these reasons, the City of New York endorses the purpose and need of this project and looks forward to its implementation. The comments that follow are intended to assist the lead agencies in developing a robust and comprehensive scope of environmental review that will fully identify, disclose, and evaluate potential significant impacts on the City of New York.

Below are the City of New York's specific comments about the Scoping Document.

### **Project Purpose and Need**

1. The City of New York emphasizes the importance of Goal 4 as stated in the Scoping Document, which is to ensure that the proposed project not preclude future trans-Hudson rail capacity expansion projects. In so doing, this project design and plan should not preclude a range of alternatives for potential station expansion projects in the area of Penn Station New York. Among these options may be an expansion to the south of the existing station (located generally under Block 780), an expansion beneath the existing station, or beneath 34<sup>th</sup> Street. It is our understanding that any potential future Penn Station New York station expansion would be subject to a full public planning and environmental review process.
2. While we agree that the overall purpose and need of the project is to provide redundancy for the existing tunnels, recognition should be given to freight traditionally carried by Amtrak and predecessor railroads, such as package express type freight. The project should consider that this type of freight has been carried in the recent past on Amtrak passenger trains and the project should not preclude this form of freight handling capacity in the future, particularly as we are seeking to reduce PM<sub>2.5</sub> and other emissions attributable in part to truck traffic.
3. Consideration should be given to the potential for accommodation of possible future off-hour freight service options which could help remove trucks from New York City streets and highways and support more environmentally friendly rail and intermodal goods movement.
4. Towards this end, the tunnel purpose and need should consider:
  - a. **Size:** With tunnel construction that accommodates vertical clearance for rail freight, either to meet a New York State standard size clear opening of 23 feet or height profiles of future train equipment that could operate on the Northeast Corridor.
  - b. **Through Service:** The possibility of through service for trains that includes service through the Hudson River tunnels and over the Hell's Gate to enable the possibility of congestion relief on the regional highway and city road network.
5. Please describe how the proposed project relates to the tunnel casing work evaluated in the NEPA analysis for the Western Rail Yard EA in August 2014 (Supplemental Environmental Assessment for Construction of a Concrete Casing Extension on the Hudson Yards, New York, NY; by Amtrak and the Federal Railroad Administration).

### **Environmental Review Efficiency**

6. It is likely that the Hudson Tunnel project will require New York City agency discretionary approvals. This was confirmed during a briefing graciously conducted by New Jersey Transit and Amtrak on May 20, 2016, for the City of New York. As a result, the project will be subject to New York City Environmental Quality Review (CEQR). In order to not duplicate efforts and require additional environmental review at a later point in time to satisfy CEQR, it would make sense to conduct the current environmental analysis pursuant not only to

NEPA but also in procedural and substantive compliance with CEQR. The Scoping Document, in addition, should state that the methodologies provided in the CEQR Technical Manual will be followed for all applicable analysis areas (i.e., analysis areas required by CEQR) and that the lead agencies will coordinate with the NYC Mayor's Office of Sustainability, which will coordinate with the affected City agencies, to ensure that they are able to make required findings on the basis of the analyses performed.

7. Consistent with the immediately preceding comment, the analysis areas under "E. Environmental Analysis to be included in the EIS" should fulfill both the NEPA and CEQR analysis requirements and be extended in accordance with the 2014 CEQR Technical Manual, as applicable, as the NEPA analysis areas are not explicitly sufficient for CEQR analysis areas. Specifically, the following CEQR analysis areas should be fully considered:
  - a. Shadows
  - b. Transportation
  - c. Air Quality
  - d. Noise
  - e. Public Health
  - f. Neighborhood Character
  - g. Construction
8. Please include the New York City Mayor's Office of Sustainability (MOS) under Local Agencies in Table 1, Primary List of Lead, Cooperating, and Participating Agencies. The proposed project has potential for local impacts, the review, disclosure, and mitigation of which would be coordinated by MOS. Please note that at a minimum the following New York City Agencies will be participate due to their purview over the Manhattan areas affected by the proposed project: New York City Department of City Planning (DCP), New York City Department of Environmental Protection (DEP), New York City Department of Transportation (DOT), New York City Department of Parks and Recreation (DPR), the Mayor's Office of Recovery and Resiliency (ORR), and the Mayor's Office of Capital Projects Development (MOCPD).

### **Construction**

9. Please ensure that any significant adverse construction-related impacts are fully disclosed and mitigated to the maximum extent practicable. This includes impacts, if any, related to project staging, truck access/egress, tunneling and debris removal activity, etc. Depending on the tunnel route selected, the construction work and associated vibration of the proposed project may have an effect on sensitive sites such as the High Line and the Hudson River Park, and the public visitation thereof. We suggest that these are identified, disclosed, and fully considered in the Open Space Resources, Noise and Vibration, and/or 4(f) evaluation chapters, as warranted.
10. Please describe in detail the methodologies that would be used to measure noise, vibration, air quality, and traffic impacts in the area around the proposed ventilation shaft at Penn Station New York.

11. An increasing number of residences, businesses, and hotels are now located on the Far West Side of Manhattan, and are sensitive to the noise and vibrations that often comes with trucking activities. Accordingly, we ask that they be considered as sensitive receptors to potential significant impacts from traffic-related air quality, noise and vibration impacts resulting from any trucking activities carried out in New York City during construction of the project, as appropriate based on their proximity to trucking routes.
12. Please provide a fuller description of potential visible construction impacts that could occur. Mitigation measures (such as sound barriers, silt fences, etc.) should be identified and a commitment made to their implementation in the EIS.
13. The Scoping Document should provide consideration of the timing of construction activities in the area, including the proposed project and non-project related construction, so as to fully disclose potential cumulative construction impacts and mitigation measures and to avoid any construction delays.

### **Infrastructure**

14. The EIS should note whether any of the activities, particularly those affecting the Hudson River riverbed (mentioned on page 9 of the Scoping Document) could affect outfalls or other utility structures. If there would be any potential effect on the structure or operation of infrastructure, New York City or other agencies or utilities having purview over that infrastructure should be engaged as early as possible regarding appropriate assessment and to address any conflicts.
15. The Scoping Document should also mention consultation with utilities such as Consolidated Edison and Verizon.

### **Transportation**

16. Please include in the Scoping Document that no stops are planned along West 33<sup>rd</sup> or 34<sup>th</sup> Streets between 8<sup>th</sup> Avenue and 12<sup>th</sup> Avenue.
17. Please include in the Scoping Document how future train movements could change after the two tunnels are complete.

### **Environmental Justice**

18. The Environmental Justice Coordination section of the Scoping Document should include New York City as an environmental justice community (NEPA).

### **Landmarks Preservation Commission Comments**

19. Please refer to attached Environmental Review Letter, dated May 12, 2016.

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander  
United States Coast Guard  
Sector New York

212 Coast Guard Drive  
Staten Island, NY 10305  
Staff Symbol: (spw)  
Phone: (718) 354-2353  
Fax: (718) 354-4190

16670

31 MAY 2016

Ms. Amishi Castelli, Ph.D.  
Environmental Protection Specialist  
USDOT Federal Railroad Administration  
Office of Railroad Policy and Development  
One Bowling Green, Suite 429  
New York, NY, 10004  
Attn: Amishi.Castelli@dot.gov

Dear Ms. Castelli:

Thank you for the opportunity to comment on the Hudson Tunnel Project Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).

The Proposed Action would include the construction of a new rail tunnel under the Hudson River, a navigable waterway of the United States of America. This proposal presents concerns to both the Coast Guard Captain of the Port and the members of the New York/New Jersey Harbor Safety, Navigation and Operations Committee. In the event of an emergency, commercial vessels must have the ability to rapidly deploy their anchor. If the tunnel is not buried sufficiently, there is a risk of the tunnel being struck by a commercial vessel's anchor. Such a marine casualty would have an immense impact on commercial and recreational navigation, the environment, maritime facilities, and the Hudson Tunnel Project. The commercial maritime community has raised additional concerns regarding liability in the event of an anchor strike of a buried tunnel or utility, including costs of vessel delays and environmental cleanup. In addition, there would be a security zone prohibiting vessels from entering within 25-yards of any tunnel ventilators installed for this project as codified at 33 CFR Part 165.169(a)(5).

If you have any questions, please do not hesitate to contact me or Mr. Jeff Yunker at (718) 354-4195.

Sincerely,

A handwritten signature in blue ink that reads "W. M. Grossman LCDR".

W. M. GROSSMAN  
Lieutenant Commander, U.S. Coast Guard  
Chief, Waterways Management Division  
By direction

Copy: CCGDONE (dpw)



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

**MAY 26 2016**

Dr. Amishi Castelli  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

RE: Proposed Hudson Tunnel Project

Dear Dr. Castelli:

The U.S. Environmental Protection Agency Region 2 is providing comments on the U.S. Department of Transportation Federal Railroad Administration's (FRA) Draft Scoping Document for the Hudson Tunnel Project Environmental Impact Statement (EIS). The stated purpose of this project is to preserve the current functionality of Amtrak's Northeast Corridor (NEC) service and NJ Transit's commuter rail service between New Jersey and Penn Station New York by repairing the deteriorating North River Tunnel; and to strengthen the NEC's resiliency to support reliable service by providing redundant capacity under the Hudson River. EPA understands that Amtrak is also examining a longer term capacity and resiliency project called "Gateway" which has included new tunnels under the Hudson River; however the tunnel project currently being scoped has been determined to be of independent utility, and necessary to allow for repairs of the existing tunnel.

The scoping document has an inclusive discussion concerning the resource impacts to be analyzed in the draft EIS; however, EPA has the following recommendations:

- While the scoping document indicates the EIS will describe greenhouse gas emissions (GHG) during construction, EPA recommends that the FRA analyze all the direct and indirect GHG emissions from all alternatives, including the no-action alternative. Based on the unique factual circumstances here, EPA further recommends that the EIS include an evaluation or discussion of GHG emissions that may occur under a variation of the No Action alternative with the eventual failure of one or both of the existing tubes, because such failures, and subsequent changes to commuting patterns, could result in potentially large increases in CO2 equivalent emissions per year. Mass transit, including the NJ Transit commuter and Amtrak trains that utilize the tunnels to access Penn Station New York, is an important factor in reducing GHG emissions in the metropolitan area. We recommend that the NEPA analysis consider changes to the design of the proposed action to incorporate GHG reduction measures.

The EPA further recommends that consistent with federal policy, the proposal's design incorporate measures to improve resiliency to climate change where appropriate. These changes could be informed by the future climate scenarios addressed in the "Affected Environment" section. The DEIS's alternatives analysis should, as appropriate, consider practicable changes to the proposal to make it more resilient to anticipated climate change. Changing climate conditions can affect a proposed project, as well as the project's ability to meet the purpose and need presented in the DEIS.

Last, the Draft EIS should make clear whether commitments have been made to ensure implementation of design or other measures to reduce GHG emissions or to adapt to climate change impacts.

- All potential impacts to wetlands in the Hackensack Meadowlands, aquatic resources of the Hudson River, and public recreation areas along the Hudson River shoreline in Manhattan should be evaluated.
- The scoping document and subsequent EIS need to be clear and consistent throughout in their usage of the terms "tunnel" and "tubes." Explain how these terms are used within the scope of this project; if used interchangeably, this may cause confusion in the level of environmental impacts expected. For example, is the tunnel boring machine being used in one direction for one tube or for two tubes which constitute one tunnel?
- EPA recommends that both the Access to the Region's Core Final EIS, and the Gateway Feasibility Study be placed on the new Hudson Tunnel Project website as soon as possible, with an explanation of how those projects relate to this project.
- EPA recommends that FRA contact the Shinnecock Nation on Long Island to determine the Nation's possible interest in the area of the proposed tunnel.
- The scoping document should state that any impacts to Green Acres encumbered land in New Jersey will be analyzed.

EPA appreciates the opportunity to comment on this scoping document and looks forward to working with the FRA and NJ Transit as a participating agency for the EIS. If you have any questions, please contact Lingard Knutson, Environmental Scientist, at (212) 637-3747 or at [Knutson.lingard@epa.gov](mailto:Knutson.lingard@epa.gov).

Sincerely yours,

A handwritten signature in black ink, appearing to read "Grace Musumeci".

*gr* Grace Musumeci, Chief  
Environmental Review Section



STATE OF CONNECTICUT  
DEPARTMENT OF TRANSPORTATION

2800 BERLIN TURNPIKE, P.O. BOX 317546  
NEWINGTON, CONNECTICUT 06131-7546



Office of the  
Commissioner

An Equal Opportunity Employer

May 16, 2016

Mr. RJ Palladino, AICP, PP, Senior Program Manager  
NJ Transit  
Capital Planning & Programs Department  
One Penn Plaza East, 8<sup>th</sup> Fl  
Newark, NJ 07105

Ms. Amishi Castelli, Ph.D., Environmental Protection Specialist  
Office of Railroad Policy and Development, USDOT  
Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

Dear Mr. Palladino & Ms. Castelli:

Subject: Environmental Impact Statement (EIS) for Hudson Tunnel Project in Hudson,  
County, New Jersey and New York County, NY

Thank you for the opportunity to comment on the proposed Hudson Tunnel Project.

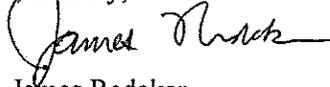
The Project is important to the economy and well-being of the State of Connecticut. Connecticut residents depend on the Amtrak intercity trains that traverse the aging, capacity constrained and often unreliable existing rail tunnels. The poor condition of these tunnels is a primary cause of many intercity train delays, affecting tens of thousands of travelers between Boston and Washington, DC, and when intercity trains are delayed, Connecticut's New Haven Line and Shore Line East services, which share the tracks with Amtrak intercity service, are also delayed.

The reason the tunnels must be replaced is evident nearly every day. In the winter months, Amtrak often suspends train service to remove accumulating ice from the roof of the tunnel. The overhead catenary system and electrical substations that feed power to the trains traversing these tunnels are increasingly unreliable. In recent years since the tunnels were flooded during Superstorm Sandy, the concrete tunnel lining and signal cables are showing signs of accelerated deterioration.

The fragile nature of the rail tunnel infrastructure is a strategic vulnerability for Connecticut and the larger region, one that must be addressed immediately. The potential closure of one or both tunnels could have devastating impacts to the economy, leaving commuters unable to reach their jobs and adding thousands of vehicles to the region's heavily congested roadways. With a prolonged tunnel outage, local and state government could see an accelerated decline in property values and tax receipts as people change jobs and relocate to avoid massive gridlock on roads and intense congestion on other transit lines.

This potential outcome must be avoided. Connecticut urges expedited completion of the Environmental Impact Statement for the new tunnels. Connecticut residents and other users of the Northeast Corridor simply cannot wait.

Sincerely,

A handwritten signature in black ink, appearing to read "James Redeker", with a long horizontal flourish extending to the right.

James Redeker  
Commissioner

## ENVIRONMENTAL REVIEW

**Project number:** FEDERAL RAILWAY ADMINISTRATION / 106.M  
**Project:** HUDSON TUNNEL PROJECT  
**Address:** 4 PENN PLAZA, **BBL:** 1007810001  
**Date Received:** 5/12/2016

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### **Comments:**

The LPC is in receipt of the Scope of Work for EIS dated April, 2016. The text is acceptable for historic and cultural resources.



5/12/2016

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SIGNATURE  
Gina Santucci, Environmental Review Coordinator

DATE

**File Name:** 31462\_FSO\_GS\_05122016.doc

E-Mail: [lisa.schreibman@nyct.com](mailto:lisa.schreibman@nyct.com)

Title: Director Strategic Planning, Operations Planning

First name: Lisa

Last name: Schreibman

Company: MTA-New York City Transit

Address 1: 2 Broadway A17.62

Address 2:

Town/city: New York City

State: NY

Zipcode: 10004

Comment or question: The scope of work does not specifically mention studying the impact that the new tunnels proposed by this project will have on transit services in and around Penn Station, where the tunnel will terminate. For the subways, station capacity and line capacity must be analyzed. For transfers to buses, bus capacity must be analyzed. MTA suggests using the methodology in the CEQR Technical Manual for such an analysis.

End of message

E-Mail: [lisa.schreibman@nyct.com](mailto:lisa.schreibman@nyct.com)

Title: Director, Strategic Plannin

First name: Lisa

Last name: Schreibman

Company: MTA-New York City Transit

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Town/city: New York City

State: NY

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Comment or question: Table 1, "List of Lead, Cooperating, and Participating Agencies" does not list MTA. As there are potential effects of the project on MTA services – subway, bus, commuter rail, the agency should be included on the list.

End of message

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**From:** Patricia Gouris [mailto:[pgouris@cb.nyc.gov](mailto:pgouris@cb.nyc.gov)]  
**Sent:** Tuesday, May 31, 2016 12:58 PM  
**To:** Team at Hudson Tunnel Project <[team@hudsonstunnelproject.com](mailto:team@hudsonstunnelproject.com)>  
**Subject:** Community Board 4 comments

Manhattan Community Board 4 would like to submit the below comments on the Hudson Tunnel Project. I tried to submit them using the online form but it has a very small character limit! I submitted a few forms, they are the same as the attached and below text.

Best,

Patty

**CITY OF NEW YORK**  
**MANHATTAN COMMUNITY BOARD FOUR**  
330 West 42<sup>nd</sup> Street, 26<sup>th</sup> floor New York, NY 10036  
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**Transportation Planning Committee**

**Item # 28 – For RATIFICATION**

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1200 New Jersey Avenue, SE  
Washington, DC 20590

AMTRAK  
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Fourth Floor  
Washington, DC 20002

NJ Transit Headquarters  
1 Penn Plaza East  
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Congressman Jerrold Nadler  
201 Varick Street, Suite 669  
New York, NY 10014

The Federal Railroad Administration (FRA) and NJ TRANSIT (NJT) are soliciting stakeholders' input on the scope of the Environmental Impact Statement (EIS) they are preparing to evaluate the Hudson Tunnel Project (the "Proposed Action" or the "Project").

Manhattan Community Board4 (CB4) requests that the proposed Project Study Area be expanded, that the study's scope encompass transportation, noise and air quality impacts from the repairs of the old tunnel and focus on the numerous cumulative effects in this area which is experiencing an extraordinary concentration of present and future projects in construction. CB4 also wants to ensure that no loss of affordable housing or public space will result from the property acquisition process.

Due the submission deadline, this resolution - adopted by the Executive Committee – is pending the full board's ratification on June 1, 2016.

### **Proposed Action**

The Hudson Tunnel Project is intended to preserve the current functionality of the Northeast Corridor's (NEC) Hudson River rail crossing between New Jersey and New York and strengthen the resilience of the NEC. The Project would consist of construction of a new rail tunnel with two tubes under the Hudson River, including railroad infrastructure in New Jersey and New York connecting the new rail tunnel to the existing NEC and Penn Station, and rehabilitation of the existing NEC tunnel beneath the Hudson River.

The tunnel has two separate tubes, each accommodating a single track for electrically powered trains, and extends approximately 2.5 miles from the tunnel portal in North Bergen to Penn Station. Within the New York City commuter catchment area, recent census data indicate that 12.8 [M1] [M1] percent of the workforce in Manhattan consists of residents of New Jersey and 7.2 percent of all New Jersey workers commute to Manhattan. In 2014, NJ TRANSIT carried almost 90,000 weekday passengers each day on approximately 350 trains between New York and New Jersey. Amtrak carried approximately 24,000 weekday passengers each day on more than 100 trains between New York and New Jersey.

Since the tunnel was damaged during Super storm Sandy in October 2012, it remains compromised. Although [M2] [M2] it is currently safe for use by Amtrak and NJ TRANSIT trains traveling between New Jersey and New York City and beyond, it has required emergency maintenance that disrupts service for hundreds of thousands of rail passengers throughout the region. Despite the ongoing maintenance, the damage caused by the storm continues to degrade systems and can only be addressed through a comprehensive reconstruction of the tunnel.

The Proposed Action would rehabilitate the Tunnel without disrupting [M3] [M3] existing levels of train service, and provide redundant capacity for rail service crossing the Hudson River. To perform the needed rehabilitation in the existing Tunnel, each tube of the tunnel will need to be closed for more than a year. However, rehabilitation needs to be accomplished without unacceptable reductions in weekday service. Therefore, the Proposed Action would include construction of a new tunnel with two new rail tubes beneath the Hudson River (the "Hudson Tunnel") that can [M4] [M4] maintain the existing level of train service while the damaged tubes are taken out of service one at a time for rehabilitation.

If no new Hudson River rail crossing were provided, closing a tube of the tunnel for rehabilitation would substantially reduce the number of trains that could serve PSNY, because the single remaining tube would have to support two-way service. Once the Tunnel rehabilitation is complete, both the old and new tunnel will be in service, providing redundant capacity and [M5] [M5] increased operational flexibility for Amtrak and NJ TRANSIT.

The Scoping of the EIS study is based on the Project, including the following elements:

- A new rail tunnel beneath the Hudson River, extending from a new tunnel portal in North Bergen, New Jersey to the PSNY rail

complex (as explained above). Modifications to the existing tracks in New York and New Jersey and to connect the new tunnel to the existing network

- Ventilation shaft buildings above the tunnel on both sides of the Hudson River to provide smoke ventilation during emergencies.
- Rehabilitation of the existing Tunnel, one tube at a time.
- Once the Tunnel rehabilitation is complete, both the old and new tunnel will be in service, providing redundant capacity and increased operational flexibility for Amtrak and NJ TRANSIT.
- In addition to those permanent features, the Proposed Action would involve the following types of construction activities, which will be described and evaluated in the Draft EIS:
  - Construction of new tracks along the NEC between Frank R. Lautenberg Station and the new tunnel portal.
  - Construction of the new tunnel using Tunnel Boring Machine (TBM) technology, which is conducted underground from a tunnel portal. At this time, it is anticipated that tunneling would likely occur from the New Jersey side of the new tunnel.
  - Construction staging sites near the tunnel portal and at the vent shaft site in New Jersey. These locations would be used to access the tunnel and to remove rock and soil from the tunnel while it is being bored.
  - Construction staging site at the vent shaft site in Manhattan.
  - Potential construction activities that affect the Hudson River riverbed above the tunnel location.

The EIS will consider the following resource areas for the No Action and the Build Alternatives: Transportation, Property Acquisition, Parks and Recreational Resources, Air Quality: Noise and Vibration, and Secondary and Cumulative Effects:

**CB4's comments** concern mostly the construction phase:

In New York the entirety of the project will take place in Manhattan District 4 (CD4) at the boundary between Chelsea and Hudson Yards. The study area is limited to 8<sup>th</sup> avenue to the east from 34<sup>th</sup> Street to the North to 30<sup>th</sup> street to the south, widening to 25<sup>th</sup> Street west of 10<sup>th</sup> Avenue. We note that the survey area is much more comprehensive in New Jersey.

#### **Transportation:**

We understand that construction staging and workers' parking will use a parking lot currently occupied by a 100-bus parking. The EIS should study the impact of the displaced buses idling and looking for nonexistent parking space in streets from 23<sup>rd</sup> to 48<sup>th</sup> streets, west of 8<sup>th</sup> avenue. Should the construction staging displace other uses, we encourage you to perform a similar study.

The EIS should also study the effect of workers and equipment's driving through the residential neighborhood of Chelsea or in the truck-intense construction zone of Hudson Yards.

While the construction of the new tunnel will be done exclusively from New Jersey, it is not clear whether the repairs of the old tunnel will be performed from New Jersey exclusively or from both sides. If repairs are to be performed and serviced from the New York side, truck traffic and routes to the Lincoln tunnel should be studied. A much larger study area should be included in New York, from 23<sup>th</sup> Street to 42<sup>nd</sup> Streets West of 8<sup>th</sup> Avenue.

#### **Property Acquisitions**

The plan describes the acquisition of properties for the installation of fan plants. Displacement of green space or low-income tenants should be avoided at all costs.

#### **Historic Properties**

The Hudson River Park bulkhead is historic (it is listed on the State and National Historic Registers) and the work will have to be compliant with the requirements of the regulatory agencies, including and especially the State Historic Preservation Office.

#### **Parks and Recreational Resources:**

In the Hudson River Park, the scope of study should include: disturbance and disposal of hazardous materials; marine and benthic (bottom-

dwelling) habitat and wildlife disturbance related to alternative construction techniques.

The project will need to restore any park area, help with finishing any park areas that may be disturbed and endeavor to disturb as small an area as possible. Coordination with the bikeway will be required to minimize disturbances.

The bulkhead areas north and south of the penetration area will need to be left in good structural condition upon conclusion of the work, since once the tunnel is built, the ability to work in proximity to the tunnel will be restricted.

**Air Quality:**

It is not clear if the building materials of the existing tunnel included asbestos or any other dangerous materials.

CD4 has one of the highest air quality concentrations in New York City as it relates to cancer-causing micro particles. The cumulative impact of air pollution from trucks and workers traffic needs to be analyzed and mitigated. A larger study area must be considered, as air does not follow neat map boundaries.

**Noise and Vibration:**

Even if debris is carted out from the New Jersey side, explosions and noise can be heard 10 blocks away. Deliveries of materials are very noisy as well as create truck traffic. This also requires a large study area. Mitigation measures including "no after hours variances" will need to be contemplated.

**Cumulative effects:**

Evaluating the cumulative effects for transportation, noise, and air quality will be critical.

This project will proceed while Hudson Yards construction is still in full swing. Currently there are already dozens of residents negatively impacted by the construction noise. This is on the top of extreme conditions due to the Lincoln Tunnel traffic and Port Authority bus terminal operation. All within 10 square blocks.

The project will possibly be concurrent with Penn Station Phase 2, Javits Center renovation and a Bus terminal relocation, each one of them being massive construction project.

We encourage NJT and Amtrak to adjust the study scope to include our recommendations.

---

Patricia Gouris  
Community Associate  
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New York, NY 10036

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[M1]pg. 4

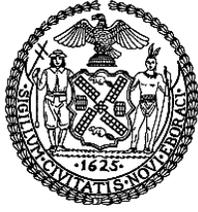
[M2]pg5

[M3]pg6

[M4]pg7

[M5]pg8

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CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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DELORES RUBIN  
Chair

Jesse R. Bodine  
District Manager

Transportation Planning Committee

Item # 28 – For RATIFICATION

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NJ Transit Headquarters  
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Congressman Jerrold Nadler  
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New York, NY 10014

The Federal Railroad Administration (FRA) and NJ TRANSIT (NJT) are soliciting stakeholders’ input on the scope of the Environmental Impact Statement (EIS) they are preparing to evaluate the Hudson Tunnel Project (the “Proposed Action” or the “Project”).

Manhattan Community Board4 (CB4) requests that the proposed Project Study Area be expanded, that the study’s scope encompass transportation, noise and air quality impacts from the repairs of the old tunnel and focus on the numerous cumulative effects in this area which is experiencing an extraordinary concentration of present and future projects in construction. CB4 also wants to ensure that no loss of affordable housing or public space will result from the property acquisition process.

Due the submission deadline, this resolution - adopted by the Executive Committee – is pending the full board’s ratification on June 1, 2016.

Proposed Action

47 The Hudson Tunnel Project is intended to preserve the current functionality of the  
48 Northeast Corridor’s (NEC) Hudson River rail crossing between New Jersey and New  
49 York and strengthen the resilience of the NEC. The Project would consist of construction  
50 of a new rail tunnel with two tubes under the Hudson River, including railroad  
51 infrastructure in New Jersey and New York connecting the new rail tunnel to the existing  
52 NEC and Penn Station, and rehabilitation of the existing NEC tunnel beneath the Hudson  
53 River.

54

55 The tunnel has two separate tubes, each accommodating a single track for electrically  
56 powered trains, and extends approximately 2.5 miles from the tunnel portal in North  
57 Bergen to Penn Station. Within the New York City commuter catchment area, recent  
58 census data indicate that 12.8 percent of the workforce in Manhattan consists of residents  
59 of New Jersey and 7.2 percent of all New Jersey workers commute to Manhattan. In  
60 2014, NJ TRANSIT carried almost 90,000 weekday passengers each day on  
61 approximately 350 trains between New York and New Jersey. Amtrak carried  
62 approximately 24,000 weekday passengers each day on more than 100 trains between  
63 New York and New Jersey.

64

65 Since the tunnel was damaged during Super storm Sandy in October 2012, it remains  
66 compromised. Although it is currently safe for use by Amtrak and NJ TRANSIT trains  
67 traveling between New Jersey and New York City and beyond, it has required emergency  
68 maintenance that disrupts service for hundreds of thousands of rail passengers throughout  
69 the region. Despite the ongoing maintenance, the damage caused by the storm continues  
70 to degrade systems and can only be addressed through a comprehensive reconstruction of  
71 the tunnel.

72

73 The Proposed Action would rehabilitate the Tunnel without disrupting existing levels of  
74 train service, and provide redundant capacity for rail service crossing the Hudson River.  
75 To perform the needed rehabilitation in the existing Tunnel, each tube of the tunnel will  
76 need to be closed for more than a year. However, rehabilitation needs to be accomplished  
77 without unacceptable reductions in weekday service. Therefore, the Proposed Action  
78 would include construction of a new tunnel with two new rail tubes beneath the Hudson  
79 River (the “Hudson Tunnel”) that can maintain the existing level of train service while  
80 the damaged tubes are taken out of service one at a time for rehabilitation.

81

82 If no new Hudson River rail crossing were provided, closing a tube of the tunnel for  
83 rehabilitation would substantially reduce the number of trains that could serve PSNY,  
84 because the single remaining tube would have to support two-way service. Once the  
85 Tunnel rehabilitation is complete, both the old and new tunnel will be in service,  
86 providing redundant capacity and increased operational flexibility for Amtrak and NJ  
87 TRANSIT.

87

88 The Scoping of the EIS study is based on the Project, including the following elements:

89

- A new rail tunnel beneath the Hudson River, extending from a new tunnel portal in North Bergen, New Jersey to the PSNY rail complex (as explained above).  
90  
91 Modifications to the existing tracks in New York and New Jersey and to connect  
92 the new tunnel to the existing network

92

- 93 • Ventilation shaft buildings above the tunnel on both sides of the Hudson River to  
94 provide smoke ventilation during emergencies.  
95 • Rehabilitation of the existing Tunnel, one tube at a time.  
96 • Once the Tunnel rehabilitation is complete, both the old and new tunnel will be in  
97 service, providing redundant capacity and increased operational flexibility for  
98 Amtrak and NJ TRANSIT.  
99 • In addition to those permanent features, the Proposed Action would involve the  
100 following types of construction activities, which will be described and evaluated  
101 in the Draft EIS:
- 102 ○ Construction of new tracks along the NEC between Frank R. Lautenberg  
103 Station and the new tunnel portal.
  - 104 ○ Construction of the new tunnel using Tunnel Boring Machine (TBM)  
105 technology, which is conducted underground from a tunnel portal. At this  
106 time, it is anticipated that tunneling would likely occur from the New  
107 Jersey side of the new tunnel.
  - 108 ○ Construction staging sites near the tunnel portal and at the vent shaft site  
109 in New Jersey. These locations would be used to access the tunnel and to  
110 remove rock and soil from the tunnel while it is being bored.
  - 111 ○ Construction staging site at the vent shaft site in Manhattan.
  - 112 ○ Potential construction activities that affect the Hudson River riverbed  
113 above the tunnel location.

114  
115 The EIS will consider the following resource areas for the No Action and the Build  
116 Alternatives: Transportation, Property Acquisition, Parks and Recreational Resources,  
117 Air Quality: Noise and Vibration, and Secondary and Cumulative Effects:

118  
119 **CB4's comments** concern mostly the construction phase:

120  
121 In New York the entirety of the project will take place in Manhattan District 4 (CD4) at  
122 the boundary between Chelsea and Hudson Yards. The study area is limited to 8<sup>th</sup> avenue  
123 to the east from 34<sup>th</sup> Street to the North to 30<sup>th</sup> street to the south, widening to 25<sup>th</sup> Street  
124 west of 10th Avenue. We note that the survey area is much more comprehensive in New  
125 Jersey.

126  
127 **Transportation:**

128 We understand that construction staging and workers' parking will use a parking lot  
129 currently occupied by a 100-bus parking. The EIS should study the impact of the  
130 displaced buses idling and looking for nonexistent parking space in streets from 23<sup>rd</sup> to 48<sup>th</sup>  
131 streets, west of 8<sup>th</sup> avenue. Should the construction staging displace other uses, we  
132 encourage you to preform a similar study.

133  
134 The EIS should also study the effect of workers and equipment's driving though the  
135 residential neighborhood of Chelsea or in the truck-intense construction zone of Hudson  
136 Yards.

137

138 While the construction of the new tunnel will be done exclusively from New Jersey, it is  
139 not clear whether the repairs of the old tunnel will be performed from New Jersey  
140 exclusively or from both sides. If repairs are to be performed and serviced from the New  
141 York side, truck traffic and routes to the Lincoln tunnel should be studied. A much larger  
142 study area should be included in New York, from 23<sup>th</sup> Street to 42<sup>nd</sup> Streets West of 8<sup>th</sup>  
143 Avenue.

144

145 **Property Acquisitions**

146 The plan describes the acquisition of properties for the installation of fan plants.  
147 Displacement of green space or low-income tenants should be avoided at all costs.

148

149 **Historic Properties**

150 The Hudson River Park bulkhead is historic (it is listed on the State and National Historic  
151 Registers) and the work will have to be compliant with the requirements of the regulatory  
152 agencies, including and especially the State Historic Preservation Office.

153

154 **Parks and Recreational Resources:**

155 In the Hudson River Park, the scope of study should include: disturbance and disposal of  
156 hazardous materials; marine and benthic (bottom-dwelling) habitat and wildlife  
157 disturbance related to alternative construction techniques.

158 The project will need to restore any park area, help with finishing any park areas that may  
159 be disturbed and endeavor to disturb as small an area as possible. Coordination with the  
160 bikeway will be required to minimize disturbances.

161 The bulkhead areas north and south of the penetration area will need to be left in good  
162 structural condition upon conclusion of the work, since once the tunnel is built, the ability  
163 to work in proximity to the tunnel will be restricted.

164

165 **Air Quality:**

166 It is not clear if the building materials of the existing tunnel included asbestos or any  
167 other dangerous materials.

168 CD4 has one of the highest air quality concentrations in New York City as it relates to  
169 cancer-causing micro particles. The cumulative impact of air pollution from trucks and  
170 workers traffic needs to be analyzed and mitigated. A larger study area must be  
171 considered, as air does not follow neat map boundaries.

172

173 **Noise and Vibration:**

174 Even if debris is carted out from the New Jersey side, explosions and noise can be heard  
175 10 blocks away. Deliveries of materials are very noisy as well as create truck traffic. This  
176 also requires a large study area. Mitigation measures including “no after hours variances”  
177 will need to be contemplated.

178

179 **Cumulative effects:**

180 Evaluating the cumulative effects for transportation, noise, and air quality will be critical.  
181 This project will proceed while Hudson Yards construction is still in full swing.

182 Currently there are already dozens of residents negatively impacted by the construction

183 noise. This is on the top of extreme conditions due to the Lincoln Tunnel traffic and Port  
184 Authority bus terminal operation. All within 10 square blocks.

185  
186 The project will possibly be concurrent with Penn Station Phase 2, Javits Center  
187 renovation and a Bus terminal relocation, each one of them being massive construction  
188 project.

189  
190 We encourage NJT and Amtrak to adjust the study scope to include our  
191 recommendations.  
192



Project Study Area  
Existing North River Tunnel  
Existing Northeast Corridor

Hudson Tunnel Project

Project Study Area  
Figure 4

193  
194  
195  
196  
197  
198  
199  
200  
201  
202  
203

**Elected Officials (or their Representatives)**

**OFFICE OF THE COUNTY EXECUTIVE**

11 New Hempstead Road  
New City, New York 10956  
Phone: (845) 638-5122 Fax: (845) 638-5856  
Email: CountyExec@co.rockland.ny.us

May 9, 2016

Dennis J. Martin  
Interim Executive Director  
NJ TRANSIT  
One Penn Plaza East  
Newark, NJ 07105

Mark McKeon  
Region 1 Administrator  
Federal Railroad Administration  
55 Broadway, Room 1077  
Cambridge, MA 02142

Dear Mr. Martin and Mr. McKeon:

I write to you today to voice my concern about the scheduling of the Public Scoping Meetings for the Hudson Tunnel Project, both of which are in conflict with two other regional transportation project public meetings, and neither of which are being held in Rockland or Orange Counties, New York – the two NY communities on the West side of the Hudson River that are served by NJ Transit.

The New York Metropolitan Transportation Council (NYMTC) is holding its Rockland County Public Workshop for the Regional Transportation Plan on May 17<sup>th</sup>, and the NYS Department of Transportation (DOT) is holding its Open House for the New NY Bridge's Lower Hudson Transit Link project on May 19<sup>th</sup>. As both NYMTC and NYS DOT are Participating Agencies in your project, it would make sense that these dates should have been avoided in scheduling the two Scoping Meetings for the Hudson Tunnel Project, which are on the same dates.

When it comes to effectively including the public in the process, it would seem that a truer regional approach is called for. Because no Scoping Meeting was scheduled anywhere near Rockland or Orange County, NY or Bergen County, NJ, I would request that you add a Scoping Meeting to your schedule to include these communities. Of the currently scheduled Scoping Meetings, the closest to Rockland is more than 30 miles and 45 minutes away.

May 9, 2016  
Page 2

As you can see, this is a source of frustration that can be mitigated with proper recognition of the dynamics. I would also request that a Rockland County location be established as a Repository for the Hudson Tunnel project documents, as the nearest Repository is more than 25 miles away from Rockland County.

Lastly, it is concerning that MTA and Metro-North are not listed as Participating Agencies on your project's Preliminary List of Lead, Cooperating and Participating Agencies. As NJ Transit operates rail service in New York under contract with MTA Metro-North, it seems to me it would be vital for MTA and Metro-North to be involved in the project.

Thank you for your consideration of Rockland County's request for better public access to your project's Public Involvement process.

Sincerely,



Edwin J. Day  
COUNTY EXECUTIVE

- C: Thomas F. Prendergast, MTA Chairman & CEO  
Joseph Giuliatti, Metro-North President  
Carl Wortendyke, MTA Board  
Randolph Glucksman, MNR Commuter Council  
Orrin Getz, MNR Commuter Council  
RJ Palladino, AICP, PP, Project Contact, NJ Transit  
Amishi Castelli, Ph. D., Project Contact, FRA



STEVEN M. FULOP  
MAYOR OF JERSEY CITY

CITY OF JERSEY CITY  
OFFICE OF THE MAYOR

CITY HALL | 280 GROVE STREET | JERSEY CITY, NJ 07302  
P: 201 547 5500 | F: 201 547 5442



STEVEN M. FULOP  
MAYOR OF JERSEY CITY

July 21, 2016

Mr. RJ Palladino, AICP, PP  
Senior Program Manager  
NJ TRANSIT Capital Planning  
One Penn Plaza East – 8th Floor  
Newark, NJ 07105

Ms. Amishi Castelli, Ph.D.  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

To Mr. Palladino and Ms. Castelli:

I am writing to put my comments on the record regarding the proposed Hudson Tunnel Project that will connect New York Penn Station and Frank R. Lautenberg Station. While I agree with the overall goals of the project, I urge the Federal Railway Administration and NJ Transit to strongly consider including an added station in Hoboken or the surrounding area. Such a modification to the proposal would improve the resiliency of the regional transportation network in both the short and long terms.

The Hudson Tunnel Project's Scoping Document states "strengthen[ing] the NEC's resiliency" and "enhancing operational flexibility" among the project's primary objectives. Including an additional stop in Hoboken or one of the surrounding communities would substantially further this objective while providing much-needed relief to the local transportation network.

Such a stop, which could connect with the Hudson-Bergen Light Rail network, would take pressure off the PATH system by providing alternative transit options. This is particularly vital while the existing NEC tunnels are closed for repairs, because as we saw with Superstorm Sandy, current alternative modes of transportation become quickly overwhelmed when PATH service experiences significant disruption.

I strongly agree with the overall goals of the Hudson Tunnel Project, and in particular with the primary objectives of minimizing service disruption and improving system resiliency while the existing NEC tunnels undergo extensive repairs. Including an additional stop in Hudson County that could connect to the existing Hudson-Bergen Light Rail would further these goals by creating accessible, redundant capacity for over a hundred thousand local commuters who rely on public transit to get to work, including the tens of thousands from Jersey City alone.

Sincerely,

A handwritten signature in black ink, appearing to be 'S. Fulop', with several loops and a horizontal stroke at the end.

Steven M. Fulop  
Mayor

**RANKING MINORITY MEMBER**

ENVIRONMENTAL CONSERVATION

INVESTIGATIONS &  
GOVERNMENT OPERATIONS

**COMMITTEES**

AGING

CULTURAL AFFAIRS, TOURISM, PARKS &  
RECREATION

HEALTH

JUDICIARY

LOCAL GOVERNMENT



**SENATOR**

**BRAD HOYLMAN**

27TH SENATORIAL DISTRICT  
STATE OF NEW YORK

**DISTRICT OFFICE:**

322 EIGHTH AVENUE, SUITE 1700  
NEW YORK, NEW YORK 10001

PHONE: (212) 633-8052

FAX: (212) 633-8096

**ALBANY OFFICE:**

ROOM 413

LEGISLATIVE OFFICE BLDG

ALBANY, NY 12247

PHONE: (518) 455-2451

FAX: (518) 426-6846

**e-mail:**

hoylman@nysenate.gov

**website :**

hoylman.nysenate.gov

**TESTIMONY OF NEW YORK STATE SENATOR BRAD HOYLMAN  
TO THE FEDERAL RAILROAD ADMINISTRATION AND  
THE NEW JERSEY TRANSIT CORPORATION  
REGARDING THE HUDSON TUNNEL PROJECT**

**May 31, 2016**

Thank you to the Federal Railroad Administration (FRA) and the New Jersey Transit Corporation for the opportunity to submit testimony on the scoping process for the Hudson Tunnel Project in preparation for its Environmental Impact Statement. As part of the broader Gateway Program, this project will add critical infrastructure improvements and resilience to the Hudson River crossing. I stand in strong support of the Hudson Tunnel Project. I also want to commend my colleague, Congressman Jerrold Nadler, for his visionary leadership on advocating for the Gateway Program and for working to improve the New York metropolitan region's transportation infrastructure for decades.

The Hudson Tunnel Project consists of building a new dual-track rail tunnel underneath the Hudson River, building new infrastructure in New York and New Jersey to connect the new tunnel with existing rail lines, and fully rehabilitating the existing North River Tunnels under the Hudson. It is a state of good repair project that preserves the current functionality of the Hudson rail crossing, while allowing for future expansion once the full Gateway Program—including upgrades to New York's Penn Station—comes to fruition. At that time, the new tunnel will allow for a doubling of passenger trains able to run under the Hudson.

The existing North River Tunnels consist of one rail line traveling in each direction. At over 105 years old, the tunnels are rapidly deteriorating and often face equipment malfunctions that cause train delays. When Superstorm Sandy struck in 2012, the tunnels flooded with seawater, leaving them even more corroded and more likely to cause delays. Chlorides from the seawater remain in the tunnels and continue to eat away at concrete liners and bench walls, which in turn damages track and electrical components.

Commuters are feeling the strain. The tunnels currently serve hundreds of thousands of people each day on Amtrak intercity trains and New Jersey Transit commuter train. Trains have been running at or near capacity for over a decade, with as many as 24 trains passing through each tunnel per hour during rush hour. New Jersey Transit is notorious for delays and shutdowns, which have gotten more frequent in recent years. When one of the tunnels was closed immediately following Sandy, trains were so crowded that passengers reported standing in the train bathrooms – a warning sign for the impact of future emergency shutdowns.

The Hudson Tunnel Project is a critical solution to deteriorating rail infrastructure that will protect commuters from the impacts of future major storms – a near certainty as the impacts of human-induced climate change become more severe. While focused on keeping the system in a state of good repair, the project also paves the way for future capacity increases that will support our region's economic growth through the Gateway Program. It is important that future connectivity of the tunnels and enhancements to Penn Station go through a rigorous community screening process so local residents and businesses have the opportunity to evaluate and weigh in on the impacts of various options.

In 2014, Amtrak CEO Joseph Boardman posited that the tunnels had less than 20 years of useful life left before one or both tunnels would have to be shut down and repaired, and in 2015 U.S. Transportation Secretary Anthony Foxx called the lack of action to repair the tunnels "almost criminal." It is time to move forward on the Hudson Tunnel Project. I will continue to support this project and work to ensure it receives adequate funding from all agreed-upon sources, including from New York State.

Thank you for your consideration of my remarks.



LORETTA WEINBERG  
SENATOR, 37<sup>TH</sup> DISTRICT

GORDON M. JOHNSON  
ASSEMBLYMAN, 37<sup>TH</sup> DISTRICT

NEW JERSEY LEGISLATURE

545 CEDAR LANE  
TEANECK, NJ 07666  
PHONE: 201-928-0100  
FAX: 201-928-0406

May 30, 2016

RJ Palladino, AICP, PP  
New Jersey Transit  
One Penn Plaza East, 8th Floor  
Newark, NJ 07105

Dear Mr. Palladino,

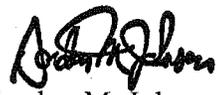
The North River Tunnel is a key piece of infrastructure that has outlived its lifespan and is in dire need of repair. The flooding of the Tunnel during Hurricane Sandy exacerbated the need for a complete rehabilitation of the 106 year old span. It is vital that a new tunnel be built to meet increasing demand for trans-Hudson travel as well as maintain current capacity during the overdue rehabilitation of the North River Tunnel.

Failure to build a new tunnel would lead to one tube at a time being taken out of service, reducing the amount of trains per hour from twenty-four to six. This reduction in service is unacceptable and would severely damage the region's economy. There is not enough trans-Hudson capacity elsewhere in the mass transit system to make up for this reduction. The region would be crippled for years while maintenance is performed.

We request that the new tunnel move forward as quickly as possible. It is only a matter of time before the North River Tunnel breaks down and creates a transportation nightmare for New Jersey commuters. A new rail underneath the Hudson River is the best option to avoid this scenario.

Sincerely,

  
Loretta Weinberg  
Majority Leader  
Senator, District 37

  
Gordon M. Johnson  
Deputy Speaker  
Assemblyman, District 37

Voice Mail from New York State Assemblyman James Skoufis  
May 5th, 2016

Transcript follows:

“Hi, good afternoon, this is **New York State Assemblyman James Skoufis**, representing parts of Orange and Rockland Counties. It’s about three-thirty in the afternoon on **Thursday, May 5th**. I’m calling because I just recieved an email from your office regarding a couple of public scoping sessions regarding the, I think it’s the EIS of the project. I unfortunately can’t make either of them. One of them I’m up in Albany, the other I have a conflict. So I would love to speak with someone, I really just have one main question at this point. I’ve actually been involved with advocating for this project and the Gateway project more generally for a number of years now and I want to check in on the status of whether the loop at Secaucus Junction Station is going to be included in this project or not. This is a critical component for me and my district. So if you don’t mind calling me back. My district office number is **845-469-6929**. I should be in the office for most of the next couple of days. Talk to you soon. Thank you.”

-End of Call-

# BOROUGH OF HALEDON

*A Pioneer Community*



DOMENICK STAMPONE  
MAYOR

ALLAN R. SUSEN, RMC/MMC  
MUNICIPAL CLERK/ADMINISTRATOR

TELEPHONE: 973-595-7766 EXT. 103  
FACSIMILE: 973-790-4781

May 11, 2016

Federal Railroad Administration  
Sarah E. Feinberg, Administrator  
1200 New Jersey Avenue, SE  
Washington D.C. 20590

**RE: Gateway Tunnel Project – Public Hearing, May 19, 2016**

Dear Administrator Feinberg:

The metropolitan area of New York/New Jersey desperately requires improved and updated transportation infrastructure. As currently proposed, the Gateway Tunnel Project does not include the much needed “Bergen Loop; which was part of the cancelled Access to the Region’s Core (“ARC”) Project. The “Bergen Loop” would have created one-seat train service from the Pascack Valley, Main, and Bergen Lines into New York Penn Station. Inclusion of the “Bergen Loop” into the Gateway Tunnel Project will drive our local economy by providing North Jersey commuters with a convenient link into New York City, creating jobs, and raising property values.

Inclusion of the Bergen Loop and creation of one-seat service into New York City for our constituents is vital. The Passaic County Freeholder Board was encouraged when they read reports that preliminary designs for the Gateway Tunnel Project included the Bergen Loop; however, questions regarding funding and construction remain. The United States Department of Transportation, Port Authority of New York and New Jersey, New Jersey Transit and the Gateway Development Corporation should all understand how important the “Bergen Loop” is to the long-term economic viability of Passaic County and North Jersey. To not include this important component in the final Project Design would be a lost opportunity.

For this reason, I support the inclusion of the “Bergen Loop” into the Gateway Tunnel Project and request the Federal Railroad Administration to move forward.

Respectfully,

Domenick Stampone  
Mayor, Borough of Haledon

Cc: US Senator Robert Menendez US Senator Cory Booker  
Governor Chris Christie  
Congressman William Pascrell Congressman Scott Garrett Congressman Rodney Frelinghuysen  
Passaic County Board of Chosen Freeholders Bergen County Board of Chosen Freeholders  
New Jersey Transit  
Port Authority of New York and New Jersey



THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

KENNETH P. ZEBROWSKI  
Assemblyman 96<sup>th</sup> District  
Rockland County

CHAIRMAN  
Administrative Regulations  
Review Commission

COMMITTEES  
Codes  
Environmental Conservation  
Ethics and Guidance  
Governmental Employees  
Judiciary  
Labor

RECEIVED

June 15, 2016

JUN 17 2016

Jamie Fox, Board Chairman  
NJ Transit  
One Penn Plaza East  
Newark, NJ 07105

CLERK OF THE ASSEMBLY  
CLERK SECRETARY'S OFFICE

Dear Mr. Fox:

I am writing you regarding the necessity for a Regional Citizens Liaison Committee to oversee the Gateway Project, beginning with the Hudson Tunnel Project.

The Gateway Project is necessary to adequately ensure that Metropolitan employees have the most efficient commute possible. A Regional Citizens Liaison Committee (RCLC) is also necessary to ensure that citizen's interests are held in high esteem. Without an RCLC citizens may be voiceless in a process that impacts them in such a great way. The Gateway Project is for them and they must be active throughout the construction process. Their opinions and desires must be heard. The RCLC for this project must be active throughout the process as the committee for the Access to the Region's Core (ARC) was not given enough leverage and the entire project fell through.

I appreciate the effort NJ Transit has put into the Gateway Project. Without your work there would be no strides in bettering mass transportation for hundreds of thousands of people a day. In order to ensure these citizens are represented through the process, I urge you to work with those interested in creating an RCLC. This will be advantageous to both your efforts and theirs.

I appreciate your consideration of this request and please feel free to reach out to my office with any questions or concerns.

Sincerely,

Kenneth P. Zebrowski  
Member of Assembly

Cc: John Leon, Director, NJ Transit Community Affairs and Government Relations



May 31, 2016

Mr. RJ Palladino, AICP, PP  
Senior Program Manager  
NJ TRANSIT Capital Planning  
One Penn Plaza East – 8th Floor  
Newark, NJ 07105  
[RPalladino@njtransit.com](mailto:RPalladino@njtransit.com)

Ms. Amishi Castelli, Ph.D.  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004  
[Amishi.Castelli@dot.gov](mailto:Amishi.Castelli@dot.gov)

Dear Mssrs. Palladino and Castelli:

I am writing to submit official comments regarding the Hudson Tunnel Environmental Impact Statement Project Scoping Document. I appreciate that I previously had the opportunity to be briefed on the project by NJ Transit staff members who also provided answers to questions from my staff. My most significant comment is that this project should contemplate and include in the alternatives analysis a new station in north Hoboken or the surrounding area.

According to recent census data, the City of Hoboken is the most transit-dependent city in the country on a per capita basis, with 56% of our residents commuting to work via public transportation. As a result of our reliance on transit, we are acutely aware of the frailty of our regional transportation network and support all efforts to improve its resiliency.

When Superstorm Sandy inundated the PATH tunnels between New York and New Jersey, other modes of transportation including cross-Hudson NJ Transit bus lines were overwhelmed as they tried to accommodate thousands of displaced passengers. Unfortunately, we experience significant disruptions to the transportation system not just from extreme weather, but also from more routine events including car crashes in the Lincoln Tunnel and incidents which take the PATH out of service. The recent threat of a transit strike made clear to everyone the importance of a resilient, redundant transportation network.

OFFICE OF THE MAYOR

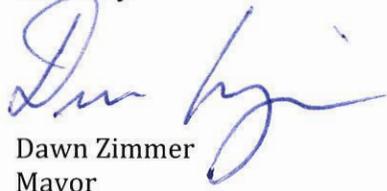
I support improving the resiliency of the NEC by constructing two new rail tubes to maintain rail service while repairs are made to the North River Tunnel, however I disagree that the Proposed Action should be considered independently of other measures to improve resiliency of the system. The stated Project Purpose includes "strengthen[ing] the NEC's resiliency to support reliable service by providing redundant capacity under the Hudson River." This redundant capacity could be dramatically augmented by adding a new NEC station in northern Hoboken, or a nearby area, at a site which will already require significant construction due to the need to construct a proposed ventilation shaft. A station in north Hoboken could connect to the existing Hudson-Bergen Light Rail line, which in turn connects to the PATH, NY Waterway ferries, and other transit options. This would greatly enhance the resiliency of the regional transportation network and provide expanded transportation options for the densely-populated Hudson River communities from Bayonne to North Bergen.

My strong recommendation for an additional stop either in Hoboken or a surrounding nearby community comes from a clear understanding that our region faces a very serious transportation challenge and taking this opportunity to add a station will not only help to meet a growing transportation crisis, but also make our overall transportation system more resilient to the inevitable service disruptions, infrastructure challenges and population growth we are facing today and in the near future. Additionally, an added station will be an economic catalyst by providing for the opportunity for job growth in Hudson County and New Jersey.

I strongly urge that the scope of the project be expanded to include the creation of a new station at the site of the proposed ventilation shaft in northern Hoboken or a surrounding location consistent with the objective of improving the resiliency of the transportation system and meeting the transportation crisis we face today.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dawn Zimmer". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

Dawn Zimmer  
Mayor

September 16, 2016

Mr. Anthony Foxx  
Secretary of Transportation  
US Dept of Transportation  
1200 New Jersey Ave. SE  
Washington, DC 20590

Mr. Charles Moorman  
President  
Amtrak  
60 Massachusetts Ave. NE  
Washington, DC 20002

Mr. Dennis J. Martin  
Interim Executive Director  
New Jersey Transit  
One Penn Plaza East  
Newark, NJ 07105-2246

Dear Gentlemen:

The Gateway Tunnel presents a unique opportunity for our region to catch up with the nation in the share of our freight shipped by rail. A new freight-capable tunnel beneath the Hudson River would improve the quality of our air, the congestion and safety of our roads, the resilience of our infrastructure and our prospects for job growth. We therefore respectfully request that you incorporate mixed freight and passenger rail operations into the scope of the project.

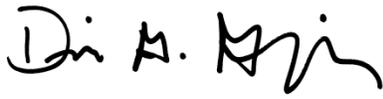
Trucks currently move more than 98% of freight in New York City. Our overreliance on truck traffic makes our air harder to breathe and our streets more difficult to navigate. It overburdens our infrastructure and challenges our businesses' ability to grow in place and create jobs locally. Now, with the first new Hudson River rail tunnel in more than a century visible on the horizon, we have never had a better occasion to fix an age old problem, one which has only worsened over time.

While government at all levels has tried mightily to construct a freight rail tunnel between New York and New Jersey at so many points over nearly one hundred years, none of those efforts have come to fruition. Meanwhile, traffic congestion has worsened, existing passenger rail tunnels have reached and exceeded their design capacity, and flooding from Superstorm Sandy now requires that those tunnels be closed for repairs, finally necessitating the construction of new interstate rail infrastructure. Given the rarity with which such enormous and complex projects are undertaken, it is critical that we take full advantage of the possibility now before us; we do not anticipate seeing it again in our lifetimes.

We cannot afford to miss this chance to maximize the value of the Gateway Tunnel to the entire New York/New Jersey/Connecticut region by expanding the scope of the project to include freight operations. Shifting truck traffic onto trains will mean cleaner air for urban neighborhoods throughout the tristate area; shorter, smoother rides on safer streets for drivers, bicyclists and pedestrians; longer lived infrastructure for public agencies and taxpayers; and manufacturing job growth, which will aid local industry while combatting inequality. Operating freight trains through the Gateway Tunnel could even help defray the project's daunting costs.

We urge you to seize this watershed moment for our economy and environment.

Sincerely,



David G. Greenfield  
NYC Council, 44<sup>th</sup> District



Simcha Felder  
NYS Senate, 17<sup>th</sup> District



Martin J. Golden  
NYS Senate, 22<sup>nd</sup> District



Diane J. Savino  
NYS Senate, 23<sup>rd</sup> District



Helene E. Weinstein  
NYS Assembly, 41<sup>st</sup> District



James F. Brennan  
NYS Assembly, 44<sup>th</sup> District



Dov Hikind  
NYS Assembly, 48<sup>th</sup> District



Peter J. Abbate, Jr.  
NYS Assembly, 49<sup>th</sup> District



Ben Kallos  
NYC Council, 5<sup>th</sup> District



Peter Koo  
NYC Council, 20<sup>th</sup> District



Donovan Richards Jr.  
NYC Council, 31<sup>st</sup> District



Rafael L. Espinal, Jr.  
NYC Council, 37<sup>th</sup> District



Vincent J. Gentile  
NYC Council, 43<sup>rd</sup> District

CC: Governor Andrew M. Cuomo  
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Mayor Bill de Blasio  
City Hall  
New York, NY 10007

William Mulrow  
Secretary to the Governor  
633 Third Avenue  
New York, NY 10017

Alicia Glen  
Deputy Mayor for Housing & Economic Development  
City Hall  
New York, NY 10007

## **Organizations and Businesses**

LACKAWANNA COALITION STATEMENT FOR HUDSON TUNNELS HEARING 5-17-16

Good afternoon. I am David Peter Alan, Chair of the Lackawanna Coalition. We advocate for better service along the Morris & Essex, Montclair-Boonton and Gladstone Lines, and all connecting transit. As you might expect, we are very concerned about tunnel capacity to New York Penn Station.

Donald Winship, our Communications Director, has outlined our position in his statement today. There are some other issues that we believe are important, and we need to place them on today's record. We are concerned about tunnel capacity, which needs to be built with or without the rest of the Gateway project. The idea of additional tunnel capacity has become synonymous with Gateway, but this is an incorrect and potentially dangerous association. Gateway depends on sufficient funding to build a project now estimated to cost about \$24 billion. On the federal side, it is difficult to fathom that the current Congress would be willing to authorize so much money for a project that would benefit New York and nearby New Jersey. On the local side, the Port Authority will have a major role, and it appears that it has difficulty staying within budget on major programs. Whatever we may think of the esthetics of the new PATH station in lower Manhattan, the cost-overrun of \$2.4 billion would have paid for a new tunnel between New Jersey and Penn Station. That would have gone a long way toward solving the current crowding at peak-commuting hours. If the former ARC Project had become unaffordable, Gateway under Port Authority financial administration will certainly be much more so.

Our goal has always been additional tunnel capacity for New Jersey's rail riders. When the ARC process started over 20 years ago, we advocated for Alternative G, which would have extended the existing line from Penn Station to Grand Central Terminal, so New Jersey's riders would have access to both the East and West Sides of the City. We are concerned that the proposed stub-end "Penn South" terminal would preclude that long-term objective by substituting a less-beneficial use for the money spent on additional capacity. We need expanded tunnel capacity and one new bridge urgently. These can be built for far less money, and open for service much sooner, than the rest of Gateway.

We do not believe that the planning frontier proposed for Gateway comports with a reasonable expectation that new tunnels will be in service before the existing ones must be taken out of service, due to flooding from Hurricane Sandy. Amtrak says the outer limit for that is 2034; 18 years from now. Planning for Gateway calls for completion of new tunnels by 2030. Given the way that completion time and cost for every project seems to expand almost uncontrollably, it is extremely dangerous to assume that new tunnels will be completed through the Gateway route before the existing tunnels must be taken out of service for rehabilitation. In short, we cannot afford to wait for Gateway, unless Amtrak makes new tunnel capacity the top priority of the Gateway project. We need more tunnel capacity as soon as it can be built, even if NJ Transit is called on to contribute to funding this capacity. Amtrak does not need this new capacity for its riders, but New Jersey's riders need it as soon as possible.

As a matter of process, this process should have a Regional Citizens Liaison Committee (RCLC). Fifteen to twenty years ago, the ARC and Portal Bridge projects had them. I was on both, as were several other advocates, some of whom are still active on the scene. Unfortunately, the RCLC was ignored, and the negative changes that ended up destroying the former ARC Project were implemented. We, and representatives of the riding public, are your best projection against bad ideas dominating the process. We call on project management to appoint an RCLC, and I hereby apply.

*Without an RCLC, the required "public participation" process would have no meaning.*

DAVID PETER ALAN  
Chair, Lackawanna Coalition

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May/June 2016

*...An independent organization  
advocating for better transit*

# RAILGRAM

## Coalition Calls for Dedicated Funding for NJ Transit Operations

By DONALD WINSHIP

In contrast to many commuter railroads in our region, New Jersey Transit lacks any dedicated funding source from state revenues. The carrier has regularly run into budget deficits, which have caused two substantial fare increases and numerous rounds of service cuts over the last several years. This year is no different: direct state support to the operating budget slightly increased, but one of a patchwork of "creative" secondary funding sources came off the books and left a \$56 million hole. This doesn't account for two other major funding pressures on the operating budget: a new contract for rail employees, and a federally mandated increase in the rent NJT and other carriers pay to Amtrak for use of the Northeast Corridor under the Passenger Rail Investment and Improvement Act (PRIIA Act). For these reasons, the Lackawanna Coalition has been pushing for dedicated funding for NJT operations.

## Operating v. Capital, or: Why the TTF Need Not Apply

Like most commuter lines, NJ Transit has two segments to its budget: capital and operating. The capital side pays for major projects and the purchase of new equipment. The operating side, as the name suggests, pays for actually running the trains: salary of employees, everyday maintenance, electricity, etc. Short-changing the capital budget is bad for NJT's future, but the impact of operating budget cuts is more immediate: fares go up, trains get cut, and institutional knowledge bleeds away as employees (particularly non-union, who have had their salaries frozen for seven years) leave for greener pastures. To make matters worse, NJT currently diverts capital dollars to the operating budget to the greatest extent that federal regulations allow, which a former Coalition officer once described as "stealing from the future to pay for the present."

New Jersey's Transportation Trust Fund is one of the contributors to NJT's capital budget, but beyond the aforementioned diversion of capital dollars it doesn't do anything to support operating; and frankly, it shouldn't. In the longer term, both sides of the budget need to be shored up, but given the growing support for a TTF funding fix, we're concerned that the operating side could easily get lost in the shuffle.

*(Article continues on reverse side)*

## Report From The Chair

By DAVID PETER ALAN, Chair

If you were to check New Jersey Transit's website for news releases at press time, you would not believe that anything has happened at our transit agency. A check made last Wednesday, May 4, indicated that the most recently posted news release came from April 4 and concerned the expansion of NJT's Mobile Ticketing App to interstate buses. There was no mention of the unsuccessful attempt to hire William Crosbie as Executive Director, the rejection of the proposed labor agreement by the unions representing the engineers and crews on our trains, or NJT's newly-announced policy of recording the sounds made by riders on board the company's light rail vehicles and some buses. In reality, it has been a very difficult month for NJT and its riders, and one in which "cooler heads" failed, rather than prevailed.

When the labor dispute between New Jersey Transit and rail labor threatened to halt our trains in March, we called for "cooler heads" to prevail, so the lives of New Jersey's rail riders would not be disrupted. The strike threat is back, and NJT's Board of Directors and management appear to have handled the hiring of a new Executive Director in a less-than-professional manner. So now, it appears that "cooler heads" must prevail in both the labor and management camps. This is now even more important than it was in February and early March.

### Part One: The Labor Dispute Continues

On the labor front, we at the Lackawanna Coalition were shocked to learn that the unions representing NJT's engineers and train crews had voted down the proposed contract. We had been pleased that the labor coalition that represented all of NJT's rail unions had reached agreement with management only 29 hours before the strike deadline. It appeared to us, as it appeared to union leaders, that the members had been offered a favorable settlement, especially given NJT's financial condition, which continues to deteriorate.

There is a cooling-off period in effect now, and we continue to hope that whatever difficulties caused the members of the two unions to reject the contract, which the members of the other unions accepted, can be resolved soon. We, New Jersey's rail riders, deserve to have our trains available, as they always have been.

### Part Two: Not Hiring a New Executive Director

The bad news on the labor front comes at a time when NJT was supposed to have hired a new Executive Director, but did not. We do not understand how events actually unfolded, because there has been little information released. Still, we can talk about the procedure that was followed, and why that procedure appears questionable, at least to us.

*(Article continues on reverse side)*

**HELP MAKE A DIFFERENCE!**

**Come to a Lackawanna Coalition meeting!**

Fourth Monday of the month (except holidays), 7:00 p.m., Millburn Town Hall. Next meetings: May 23 and June 27.

## Report From The Chair *(Continued from reverse side)*

On Wednesday, April 6, the NJT Board of Directors held a special meeting. The sole item of business was to hire William Crosbie as Executive Director. The resolution adopted by the Board was different from those presented and approved when then-Executive Directors James W. Weinstein and Veronique "Ronnie" Hakim were hired. Those resolutions specified the compensation that each of the new Executive Directors would receive. The resolution concerning Crosbie did not. It is an elementary principle of contract law that the parties must agree to all material terms, or else there is no agreement. The Board resolution left the issue of Crosbie's pay indefinite, so there is reason to believe that he and NJT had not agreed on his compensation. We wonder why the NJT Board had called a special meeting to announce that a new Executive Director had been hired, when it appears that there had not yet been a "meeting of the minds" about his pay.

We also do not understand why NJT officials decided that they needed a special meeting to announce that they had hired Crosbie (even though it is questionable whether they actually had), when a regular Board meeting was scheduled only six days later. Crosbie was not supposed to join NJT until Monday, April 25, so there was plenty of time to hire him officially at the regularly scheduled Board meeting. Could the special meeting have been added for the express purpose of making it inconvenient for advocates for the riders, as well as the riders themselves, to attend and comment on matters like the omission of the pay that Crosbie would have received?

The Lackawanna Coalition has consistently called for increased transparency on the part of the Board and management at NJT. The events of April represent a step backward from that goal, and a series of events that should never be repeated. It has been reported that it was the New Jersey Department of Transportation (NJ DOT), and not NJT itself, that was negotiating with Crosbie. If that report is correct, then there was a flagrant breach of NJT's right to hire its own managers.

If the NJT Board had exercised its fiduciary responsibility in an appropriate manner, it would have insisted that NJT, and not NJ DOT, had the sole authority to negotiate with Crosbie concerning his pay and other issues pursuant to any offer. Then it would have exercised that authority by directing NJT management to negotiate with Crosbie.

As it turned out, Crosbie did not take the job, after all. We can only conjecture about the reason. In any event, it would not make sense for a similar scenario to play out in the future, under any circumstances.

It would make more sense to allow Dennis Martin to keep the job officially, with the same compensation that the last two Executive Directors received, until Gov. Chris Christie leaves office at the beginning of 2018. It appears highly unlikely that an "outsider" could exercise the required leadership in the immediate run. NJT is in trouble in many ways, from lack of funding, to riders who are angry about the high fares they pay and the unreliable transit they receive for those fares. Martin did well as a manager on the bus side: he improved the flow of buses at the Port Authority Bus Terminal during the afternoon peak-commuting hours, and he has not done any harm to the rail system. He has experience at NJT, and it would be very difficult, if not impossible, to find anyone with comparable experience who could lead NJT effectively in the time left for the Christie Administration before the next governor names a new Executive Director in 2018.

### Part Three: "Big Brother" NJT is Listening as We Ride

Another announcement that came from NJT last month was shocking, at least to some members of the Lackawanna Coalition. NJT is now using audio surveillance, in addition to video surveillance, on light rail vehicles, and is beginning to use it on buses, too. There is no imminent threat to expand it to our trains, but there is no reason why NJT would refrain from doing so.

At the NJT Board meeting of April 12, this writer had prepared a statement that included a personal welcome to Executive-Director-designate Crosbie, who was not present and ultimately did not take the job. So, instead of welcoming Crosbie, this writer made a personal statement objecting to the newly announced audio surveillance of NJT's riders. The Coalition membership had not acted on the item yet, so the statement was not made on behalf of the organization.

At our April 25 meeting, the members voted to agree with this writer's position and to object to such audio recording of transit riders. We understand that a video camera can capture aggressive behavior that can lead to a crime. What we say, rather than our visual conduct, is different. It is protected by the First Amendment to the U.S. Constitution. Our protection against unreasonable searches by law-enforcement personnel is expressed in the Fourth Amendment.

Our conversations are our own business, and not New Jersey Transit's business. NJT has not proposed any guidelines about what would be recorded, who would make or keep those recordings, how they would be used, and when they would be deleted and destroyed, if ever. Under those circumstances, it not only makes no sense to pursue such a policy; it is also so invasive as to violate the Constitutional rights of transit riders.

There are many places where "cool heads" need to prevail, and this must start now, in all of them.

## Dedicated Funding for NJT *(Continued from reverse side)* A Study in Contrasts Across the Hudson

Our closest neighbor, New York's Metropolitan Transportation Authority, is in much better shape in this regard. For all their problems, and all the funding uncertainty on the *capital* side that has been much in the news lately, they have a number of tax revenues directly dedicated to them. In addition, they operate several of New York's road bridges into the city, which bring in substantial toll revenue. None of this insulates them from the ups and downs of those revenue sources, but it helps protect day-to-day operations from massive overnight cuts. In contrast, New Jersey Transit has to fight a losing battle for funding every year.

NJT riders already pay the highest commuter fares in the nation, and costs show no sign of going down even as ridership grows. But year after year, the budget gets cut and NJT is left scrambling. We call on our elected officials to dedicate a portion of state revenues to NJT's operations. Until then the budget beatings will continue, and morale will not improve.

*Donald Winship is Communications Director of the Lackawanna Coalition.*

### Coming Attractions for Meeting Presentations

On May 23, "Conductor" Joshua Crandall, who started the Clever Commute app, will come to tell us more about it. Michael Slack, IT Director at NJ Transit, will make a return engagement by popular request on June 27, when he will brief us on the latest technology at NJT. On July 25, Aaron Zisook, who recently completed his Master's degree in Planning, will give us the results of his study of Transit-Oriented Development in Morristown.

### Railgram

**David Peter Alan, Esq.**  
Chairman/Publisher

**Stephen E. Thorpe**  
Vice Chairman

**Brad Payeur**  
Treasurer

**Gary R. Kazin**  
Secretary

**Donald Winship**  
Communications Director

Editor for This Issue  
**Paul Bubny**

Contributors  
**David Peter Alan**  
**Donald Winship**

Lackawanna Coalition  
P.O. Box 283  
Millburn, NJ 07041

**From:** Dan Pisark [<mailto:dpisark@urbanmgt.com>]  
**Sent:** Friday, June 03, 2016 4:56 PM  
**To:** Palladino, Robert J. (CCAPRJP); [amishi.castelli@dot.gov](mailto:amishi.castelli@dot.gov)  
**Subject:** Comment on Hudson Tunnel Project: EIS

Ms. Castelli and Mr Palladino: On behalf of the board of directors of the 34<sup>th</sup> Street Partnership, and our many constituents, I urge you to not spend the next two years on the EIS. The new Hudson River rail tunnel is urgently needed. We concur with Senator Booker when he recently said “the tunnel is an immediate crisis. We need to get construction going as quickly as possible.” Please shorten the EIS schedule. We can’t wait more than a dozen years for the completion of a new rail tunnel.

Thank you,

Dan Biederman  
President  
34<sup>th</sup> Street Partnership  
New York City

From: Bill Galligan [mailto:[easthudson@yahoo.com](mailto:easthudson@yahoo.com)]  
Sent: Wednesday, June 01, 2016 2:25 AM  
To: Team at Hudson Tunnel Project <[team@hudsonunnelproject.com](mailto:team@hudsonunnelproject.com)>  
Cc: [jfmchugh@aol.com](mailto:jfmchugh@aol.com)  
Subject: Hudson Tunnel Comments—repaired copy

Believe this copy should be readable. I cleaned it up from a mangled version that was sent back.

But still sending as attachments..detachment East of Hudson contains the comments. Third Track comments is the "Two for One" plan.

Bill Galligan

[917-817-5904](tel:917-817-5904)

—Original Message—

From: Bill Galligan [mailto:[easthudson@yahoo.com](mailto:easthudson@yahoo.com)]  
Sent: Wednesday, June 01, 2016 12:11 AM  
To: Team at Hudson Tunnel Project <[team@hudsonunnelproject.com](mailto:team@hudsonunnelproject.com)>  
Cc: [jfmchugh@aol.com](mailto:jfmchugh@aol.com)  
Subject: Hudson Tunnel Comments

I had difficulty sending my comments, I made several try's over a forty minute period. The attachment titled East of Hudson are the comments. The attachment titled Landow third Track Proposal is an attachment supporting comments.

I will try again.

Bill Galligan

919817-5904I

---

—Original Message—

From: Bill Galligan [mailto:[easthudson@yahoo.com](mailto:easthudson@yahoo.com)]  
Sent: Wednesday, June 01, 2016 12:25 AM  
To: Team at Hudson Tunnel Project <[team@hudsontunnelproject.com](mailto:team@hudsontunnelproject.com)>  
Cc: [jfmchugh@aol.com](mailto:jfmchugh@aol.com)  
Subject: Hudson Tunnel Comments

EAST OF HUDSON RAIL FREIGHT TASK FORCE, INC.  
The East of Hudson Rail Freight Task Force, Inc. was established in 1999 by order of the Surface Transportation Board to promote rail freight east of the Hudson River.  
The Task force:  
1. Supports the timely construction of a third rail tunnel under the Hudson River between New Jersey and New York as described in the Environmental Impact Statement for the Hudson Tunnel in Hudson County, New Jersey and New York County, New York.  
2. Believes that because no rail tunnel in the Metropolitan Region between New Jersey and New York exists which can be used by the most in demand rail freight cars and because the critically poor condition of the existing and vital cross Hudson rail passenger infrastructure as noted in the Hudson Tunnel EIS the construction of a standalone all freight tunnel between New Jersey and New York is unlikely to occur until after the full Gateway Project is completed. A prospect of 15 to 20 years.  
3. Requests that the Hudson Tunnel EIS include a full professional and unbiased comparison of the construction cost, operating cost, income (a toll tunnel used by trains) that could be derived, environmental impact, emergency response (especially not available currently or envisioned by the improvements identified in the recently completed NYNJ Port Authority, Cross Harbor Railroad Project-Tier I-EIS) needs and benefits of the passenger train only tunnel currently envisioned by the Federal Railroad Administration and NJ Transit with a tunnel which could be used by freight trains at different times of the day when there operation doesn't conflict with the reliable and safe operation of commuter and fast intercity passenger trains in the study area from its western eastern points.  
4. Considers the primary physical requirements for a modern rail freight tunnel between New Jersey and New York:  
1. To be large enough to all allow the safe movement Plate H, 20' Double Stack freight cars, underwire, Double-Stack Cars at track design speeds.  
2. To have an alignment that would allow an easy and low cost extension eastward across Manhattan, under the East River to a connection with the Montauk Line of the Long Island Railroad some time in the future, similar to what is expected to occur as the other parts of the Gateway Project are designed and brought on line.  
3. Specific physical operating and safety requirements uniformly applied where freight and passenger trains share the same tracks.  
5. Urges the Federal Railroad Administration, NJ Transit consider the "Two for One" solution developed several years ago Mr. Herb Landow, was NJ Transit's, first and longtime Director of Operations Planning. ("Two for One" plan attached) Mr. Landow after his retirement from NJ Transit but before full retirement worked on the ARC EIS under a Consulting contract. He is credited during that period with initiating the train signal and control system now in use at the Pennsylvania station.  
6. Believes the "Two for One" plan would generate the best overall public benefits because the critical Cross Hudson rail passenger and freight infrastructure could be repaired and expanded at the lower capital investment than currently anticipated.  
7. Believes the EIS should include consideration of other alignments such as the Hoboken Alignment to insure that changing demographics and scarcity of investment funds are brought into prospective. The alignment selected for study has its origins more than 25 years ago, it may be outdated. The "Two for One" could easily be overlaid on the Hoboken Alignment.  
Respectively Submitted.  
William B. Galligan  
John F. Mc Hugh  
Executive Director  
General Counsel  
917-817-5904

---

## EAST OF HUDSON RAIL FREIGHT TASK FORCE, INC. COMMENTS ON HUDSON TUNNEL PROJECT

The East of Hudson Rail Freight Task Force, Inc. was established in 1999 by order of the Surface Transportation Board to promote rail freight east of the Hudson River.

The Task force:

1. The Task Force supports the timely construction of a third rail tunnel under the Hudson River between New Jersey and New York as described in the Environmental Impact Statement for the Hudson Tunnel in Hudson County, New Jersey and New York County, New York as described in the EIS if it is designed to be used jointly by passenger and freight trains and at a future date be extended across Manhattan, under the East River and connected to the Montauk Line of the Long Island Railroad.

2. The Task Force believes a shared passenger freight tunnel is appropriate and necessary because no rail tunnel in the Metropolitan Region between New Jersey and New York exists thru which the most in demand rail freight cars can pass thru and the need to repair and expand the existing and vital cross Hudson rail passenger tunnels (as

noted in the Hudson Tunnel EIS) will preclude the building of a standalone all freight tunnel between New Jersey and New York until after the full Gateway Project is completed. A prospect of 15 to 20 years.

3. The Task Force requests that the Hudson Tunnel EIS include a full professional and unbiased comparison of the construction cost, operating cost, income (a toll tunnel used by trains) that could be derived, environmental impact, emergency response (especially not available currently or envisioned by the improvements identified in the recently completed NYNJ Port Authority, Cross Harbor Railroad Project-Tier I-EIS) needs and benefits of the passenger train only tunnel currently envisioned by the Federal Railroad Administration and NJ Transit with a tunnel which could be used by freight trains at different times of the day when their presence does not conflict with the reliable and safe operation of commuter and fast intercity passenger trains in the study area.

4. The Task Force believes a modern rail freight tunnel between New Jersey and New York to be cost and service competitive with trucks:

1. Must be large enough to all allow the safe movement freight cars up to Plate H to enable 20'2" Double Stack to move at underwire, at track design speeds.

2. Must have an alignment that would allow in the near future an easy and low cost extension eastward across Manhattan and under the East River to a connection with the Montauk Line of the Long Island Railroad. A similar situation to what is expected as the other parts of the Gateway Project are designed and brought on line.

3. Must support the appropriate operating and safety requirements. The requirements should be included in the tunnel operating costs.

5. The Task Force urges the Federal Railroad Administration, NJ Transit consider the Two for One approach attached. It was developed several years ago by Herb Landow, NJ Transit's first and longtime Director of Operations Planning. After his retirement from NJ Transit but before full retirement he worked on the ARC EIS as a consultant and is credited with initiating the train signal and control system used at Pennsylvania station.

6. The Task Force believes the Two for One plan would generate the best overall set of public benefits because the critical Cross Hudson rail passenger infrastructure could be installed quickly while supporting a higher quality

of freight service at a lower investment cost for both. A new long standalone freight tunnel and infrastructure investments on the Bay Ridge Line would not have to be built. Construction of a land tunnel over a short distance in the ground and under the East River would cost less than a long underwater tunnel from Jersey City to Brooklyn and infrastructure improvements on the Bay Ridge Line.

7. The Task Force believes the EIS should include consideration of other alignments such as the Hoboken Alignment to insure that changing demographics and scarcity of investment funds are brought into proper perspective. The alignment selected for study has its origins more than 25 years ago, it may be outdated. The Two for One plan could easily be overplayed on the Hoboken Alignment.

Respectively Submitted.

William B. Galligan  
Executive Director

John F. Mc Hugh  
General Counsel

917-817-5904

**ONE NEW HUDSON TUNNEL**

**– NOT TWO**

**JOINT PROJECT**

**BENEFITING**

**AMTRAK**

**NEW JERSY TRANSIT**

Submitted by

H Landow

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Binghamton, NY 13905

607-722-4945  
LandowHerb@Yahoo.com

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# EXECUTIVE SUMMARY

## Central Concept

A centerpiece of the proposal is that only **one** new tunnel is needed under the Hudson to raise PSNY capacity in a major way. The reason lies in the low utilization of the reverse rush tunnel. A third tunnel allows the rush direction to be handled with two tracks - and one tunnel for the reverse direction. (2-1 mode).

The operations analysis demonstrates this in great detail. The reader is invited to study the operating plan carefully. **The total TransHudson volume exceeds 60 trains per hour (page 44)**

The 2-1 directional flows result in vastly reduced cost. This enables limited funds to be used in more vitally needed places.

## History / Scope

This alternative for the Hudson River crossings was developed when the freight tunnel advocates were focused on a new tunnel system from Greenville to Bay Ridge Brooklyn. At the same time, ARC advocates were pushing for a multi-track Hudson River tunnel system to PSNY.

This alternative was a blending of the separate proposals and based on the economies that could be realized by sharing a common infrastructure.

The first phase would be the single Hudson River tunnel and its passenger operating plan.

The second phase would add a single tunnel under 31<sup>st</sup> Street and East River to Long Island City. Passenger trains would have expanded capacity at Sunnyside. Freight trains from NJ would have off peak access to the LIRR Montauk Branch. By using Plate H clearances, double stacks would have a NJ to LI route.

## Current Scope

Unless the current effort expands to include Phase 2 (to widen the base of benefits), the Phase 2 freight aspects of the current offering can simply be ignored. The focus should then be on the economic and productive use of the 2-1 mode.

The choice is yours. In either case, the underlying concept of 2-1 operations provides powerful economic leverage. Massive project size does not necessarily equate to economic wisdom.

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# JOINT PROJECT

## PROJECT OVERVIEW

### Context / History 2000-2006

NJ Transit is advocating the construction of a new system of two tunnels under the Hudson River. These would connect to both Penn Station NY and a new special terminal under 34<sup>th</sup> street. This tunnel system is planned for passenger train operations not freight trains.

The NY State Economic Development Corporation is studying and advocating the construction of new freight tunnels under the Hudson (Upper Bay). The line would connect the Conrail Shared Assets lines in New Jersey to Brooklyn and the Bay Ridge Line. This tunnel system is planned for freight train operation, not passenger trains.

The total construction length in these tunnels is 75,000 feet. The combined expenditure is about \$8 Billion.

### Proposal

That the two projects be merged into one smaller project that can fulfill the objectives of each. The total new tunnel length for the JOINT PROJECT IS 38,340 feet. This is 51% of the length of the combined separate projects.

The proposed JOINT freight system moves the trains between:

- a. Conrail Shared Assets territory in New Jersey, and
- b. Montauk Branch of the Long Island RR in Long Island City

The proposed JOINT passenger system connects between:

- a. Secaucus on the Northeast Corridor Line in New Jersey, and
- b. Penn Station NY, and
- c. Sunnyside Yard, Long Island

Only one new tunnel is required from NJ to Long Island via Penn Station. The tunnel usage is shared by freight and passenger trains as needed except for the rush periods of the weekday. The freight access time is 88% of the week, 83% on a weekday.

### Clearances

The shared route through Penn Station includes the use of Track 1. This track is under 31<sup>st</sup> Street rather than under Penn Station per se. Double stack containers would be handled using Plate H clearances at 20'2". The high vertical clearances required can be created with moderate effort. (See Segment 6).

## **Operations**

The passenger operation is enhanced by using the tunnel capacity in the direction of major use. Excluding the LIRR exclusive use tunnels, the system would have three tracks under the Hudson, and three under the East River. These would be used in a 2:1 mode. In the morning two tracks would be eastward from New Jersey and continue eastward to an expanded Sunnyside yard. In the evening, the westward flow would dominate.

The Secaucus area trackage of the NEC is also a three-track system. This matches the proposed tunnels.

Sunnyside storage trackage is expanded for NJT use. The project reaches this area with a new underpass proposed by the PRR in the pre-1910 era (See Bridge #6 in Segment 10). This route also serves an Amtrak project (not yet built) to improve eastward flows to Boston.

## **Penn Station**

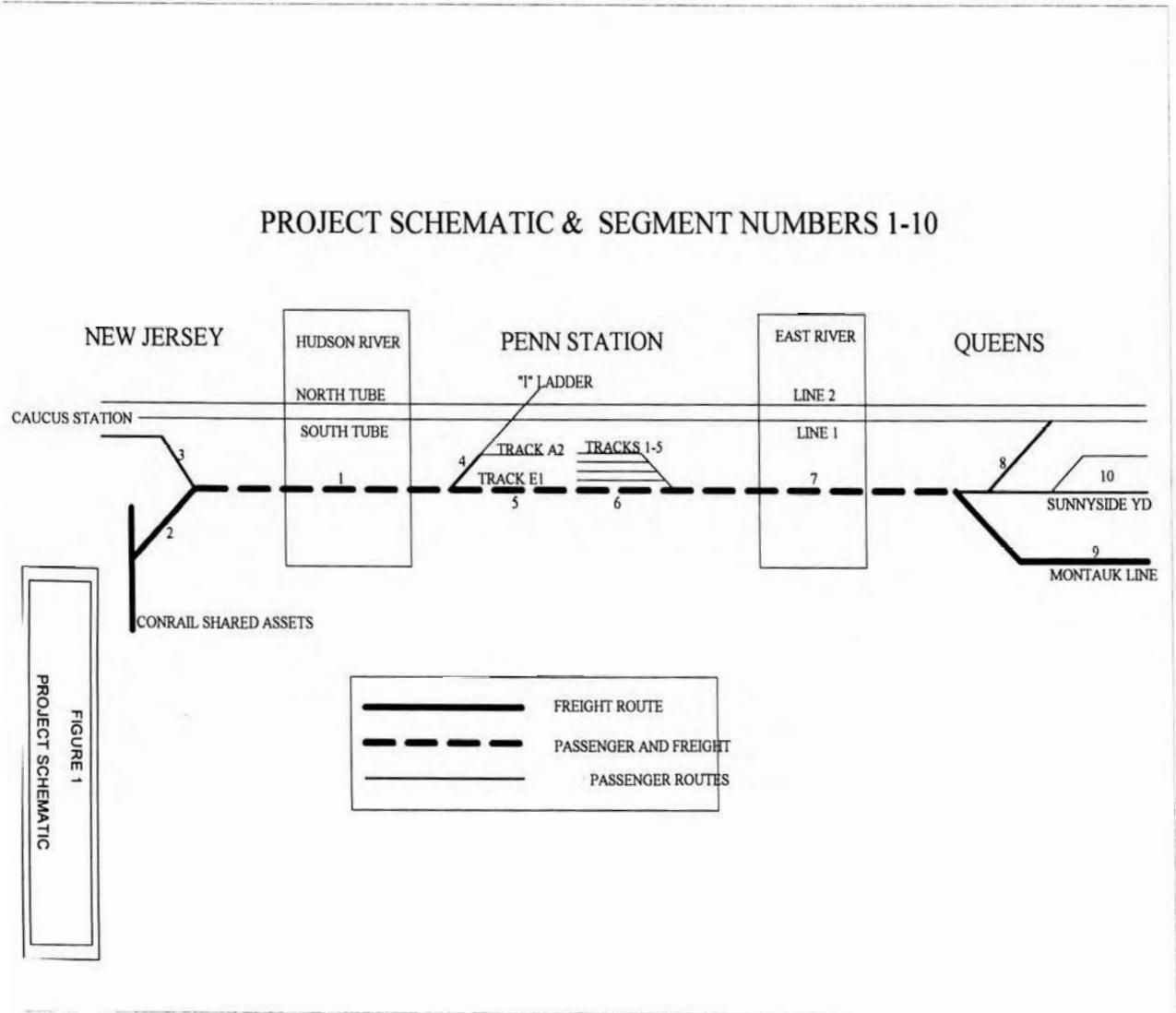
The proposed JOINT tunnel would connect to the existing trackage and provide full access to PSNY. It would connect to tracks A2 and Ladder "I".

On the East Side of Penn Station, tracks 1-5 would converge into 31<sup>st</sup> Street to the new tunnel under the East River. These tracks were originally planned for extensions via 31<sup>st</sup> Street. However, the original work was for a two track tunnel system. As the future does not require such overwhelming investment, we limit ourselves to the third track alone (Track F). Space for this track was allowed in the original 1910 Sunnyside construction.

## **Segments**

The details of the project can be read in the following descriptive material.

Figure 1



## PROJECT SEGMENTS

### **1. New Tunnel Bergen Hill to Hudson River, East Side Pierhead line.**

Single track with turnouts on each end.

On the west, splits into Segments 2 and 3.

On the east, splits into Segments 4 and 5.

### **2. NJ Freight Connection.**

Runs from Conrail Joint Assets line west of Bergen Hill, tunnels into Bergen Hill and joins Segment 1 above.

### **3. NE Corridor**

Secaucus Road to a junction with the freight line under Bergen Hill.

### **4. Track A7**

Passenger route from Pierhead line, Hudson River to Yard A. It then connects to the "I" ladder and track A2,

### **5. Track E1**

Freight route from Segment 3 to Yard E, track E1.

### **6. Penn Station Track 1**

Modifications to the vertical clearance on track 1. Includes changes to the baggage passageway, 7<sup>th</sup> and 8<sup>th</sup> Avenue subway bridges.

### **7. Line 6 Tunnel under 31<sup>st</sup> Street to East River**

Single track with turnouts on each end.

On the west, combines Penn Station tracks 1-5.

On the east, splits into Segments 8 and 9 at Long Island City.

### **8. Line F, Long Island City**

Passenger route on original Line F alignment.

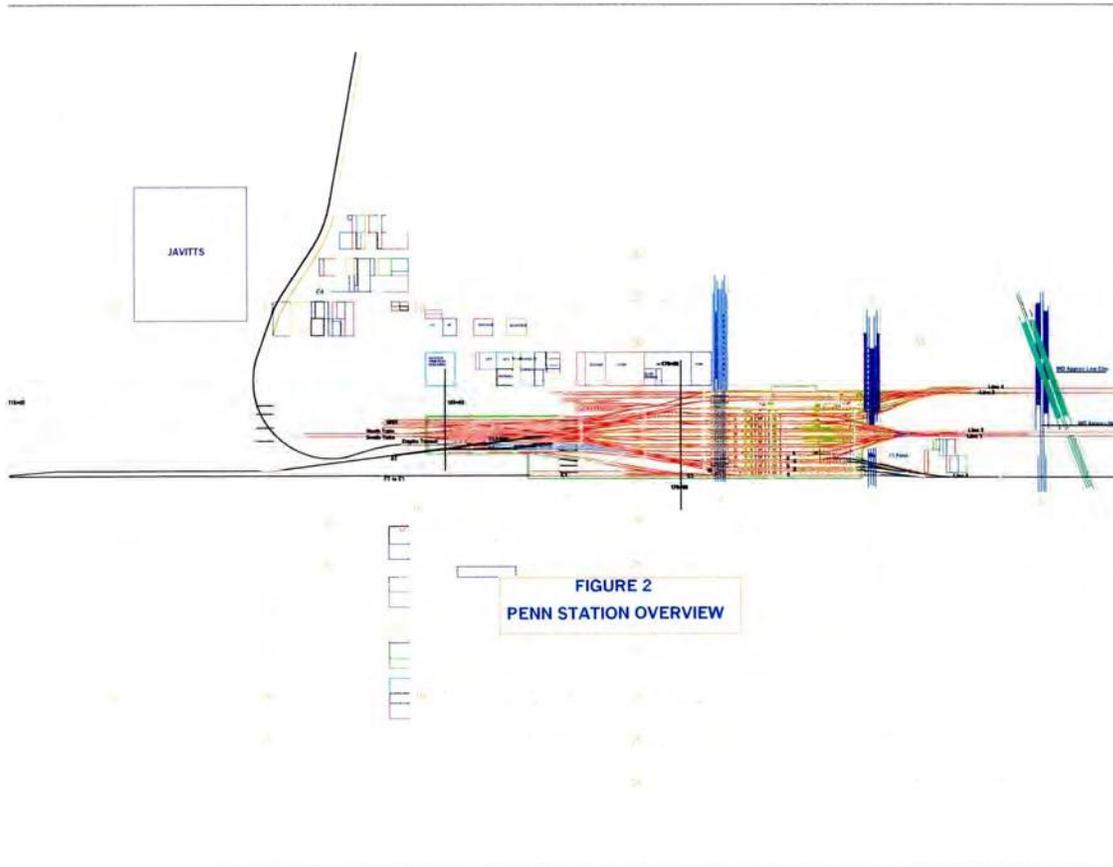
### **9. Line MB, Long Island City**

Freight tunnel from Segment 7 to surface on Montauk Branch.

### **10 Sunnyside Yard - Storage Track Expansion**

Bridge 6 Line 1 to Yard.

Fig 2



## **SEGMENT 1**

### **NEW TUNNEL - BERGEN HILL TO HUDSON RIVER EAST SIDE PIERHEAD LINE.**

The segment is single track with turnouts on each end. A plan view is shown on Figure 3.

On the west end, it splits into segments 2 and 3.

On the east end at PSNY, it splits into segments 4 and 5.

The existing tunnels are shown in profile in Figures 18-20. The existing westbound grade is 1.3%. However, Segment 7, east of PSNY will develop a 1.2% westbound grade. This westbound ascending grade becomes an ideal model for the westbound grade up from the Hudson. The ruling westbound grade would then be 1.2%.

The existing low point of the tunnel under the Hudson is at Table 3, item #4. The station is 242+00 and the elevation at 207.60. The existing profile reflects the depth of the Hudson at various points. By following this in preliminary engineering, we minimize the risk of radical changes from known conditions.

The PVI at the west end of this segment is at station 300+00. This is 5800' from the lowest elevation under the Hudson (elev. 207.60). Using the target grade of 1.2%, we climb 69.6' to an elevation of 277.2.

At 298+00, we define the point of switch for the junction of the segments 2 and 3 from segment 1. Thus, the vertical curve is west of the heel of the frog.

Fig 3

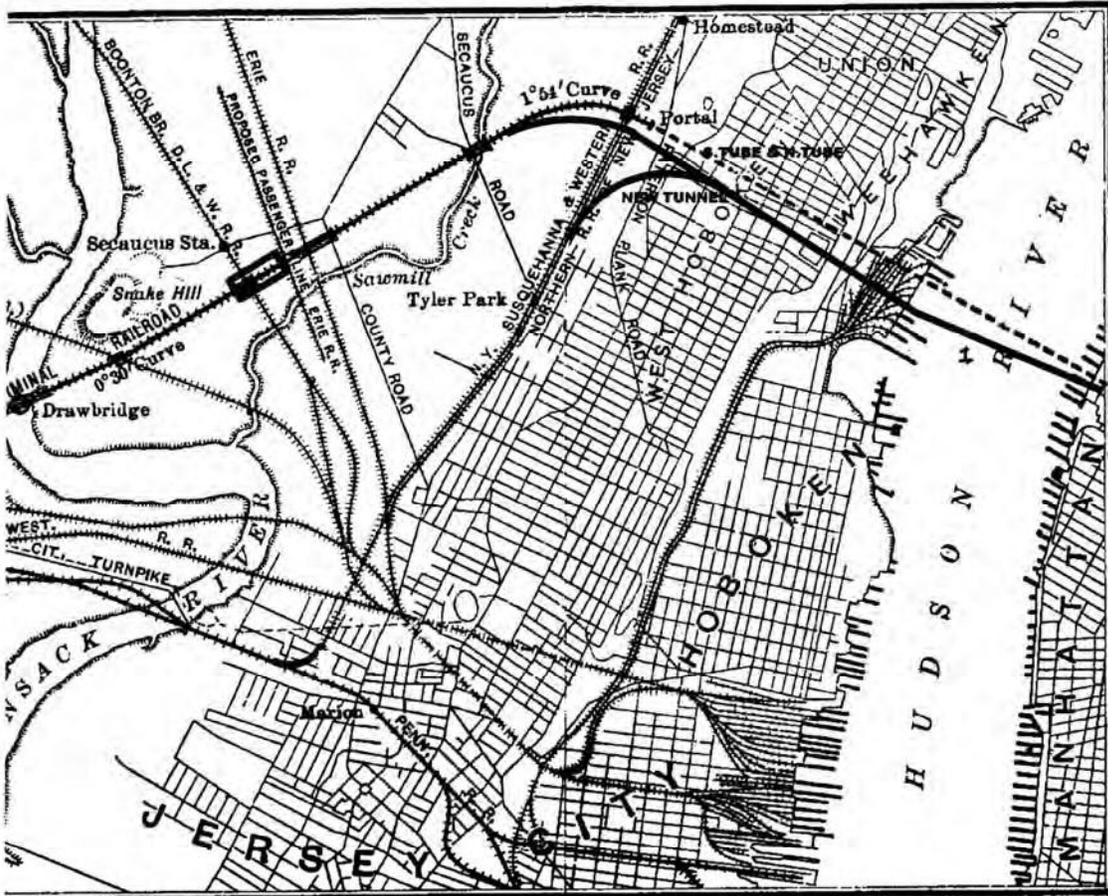
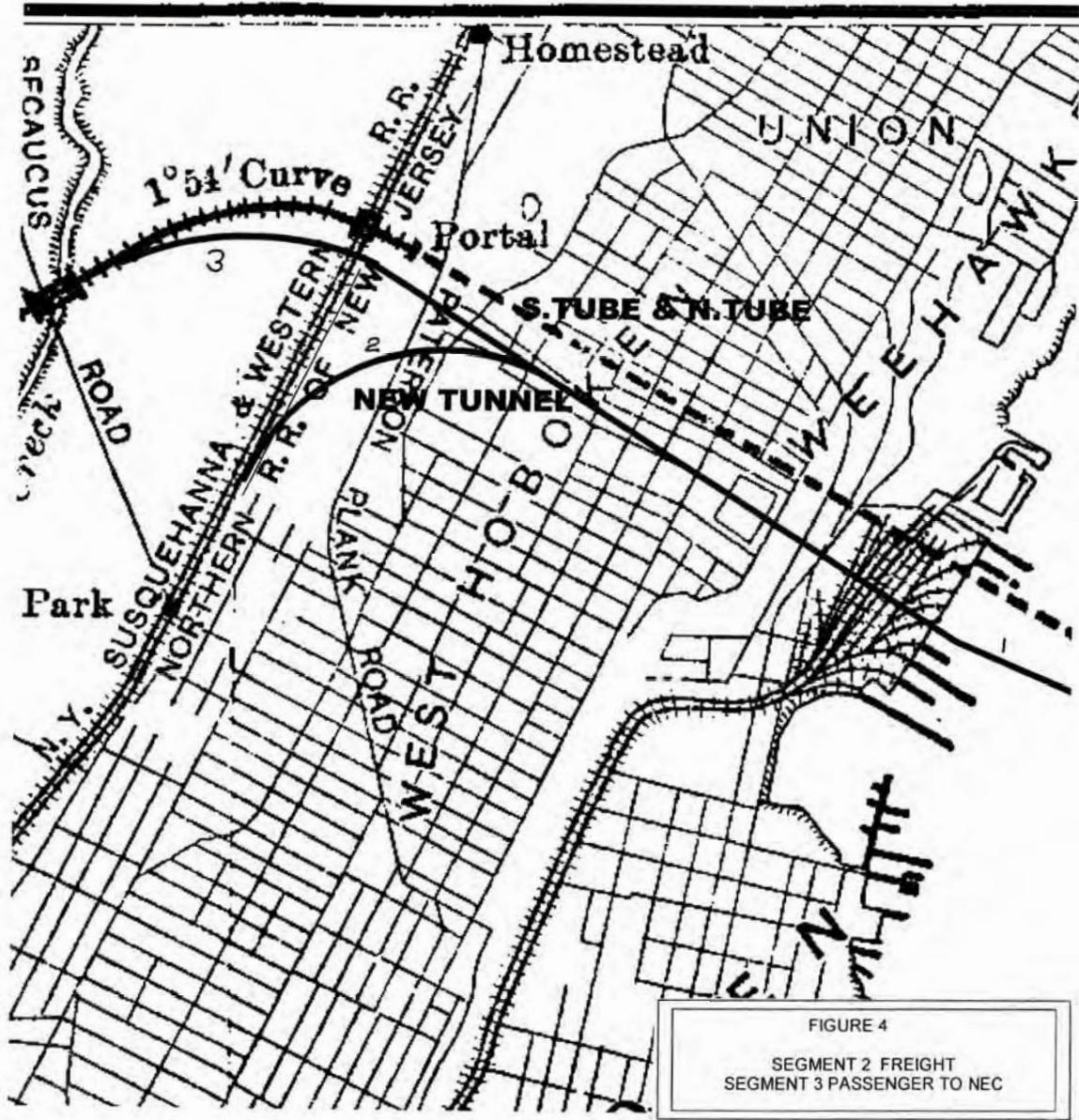


FIGURE 3  
SEGMENT 1 UNDER HUDSON RIVER

Fig 4



## **SEGMENT 2            NJ FREIGHT CONNECTION.**

This segment runs from the Conrail Joint Assets line west of Bergen Hill, tunnels into Bergen Hill and joins Segment 1.

The PVI at the west end of Segment 2 is at station 300+00. This is 5800' from the lowest elevation under the Hudson (elev. 207.60). Using the target grade of 1.2%, we climb 69.6 feet to an elevation of 277.2.

The curve is 3 degrees, radius 1909'. The length of the curve is 3000'.

The final elevation of the west end of the curve is at 307.5, equivalent to 10' above Mean Sea Level. This matches the rail height on the Conrail Joint Assets trackage at the edge of Bergen Hill. The elevation change is 30.3'. The grade is 1.01%.

The route connects on the south to the Croxton Yard complex. Continuing South it connects into the Meadows Yard via the reconfigured Marion Junction.

A northerly tunnel curve could be established to connect to the North Bergen Yard. However, as most traffic will arrive from the south and west, the cost for an additional tunnel segment seems excessive. The traffic from the north could be run towards Marion Junction and thence into the tunnel. However, traffic from Selkirk can also be routed down the Hudson Division / Hell Gate route as at present.

Fig 5  
Secaucus Road Interlocking with Flyovers

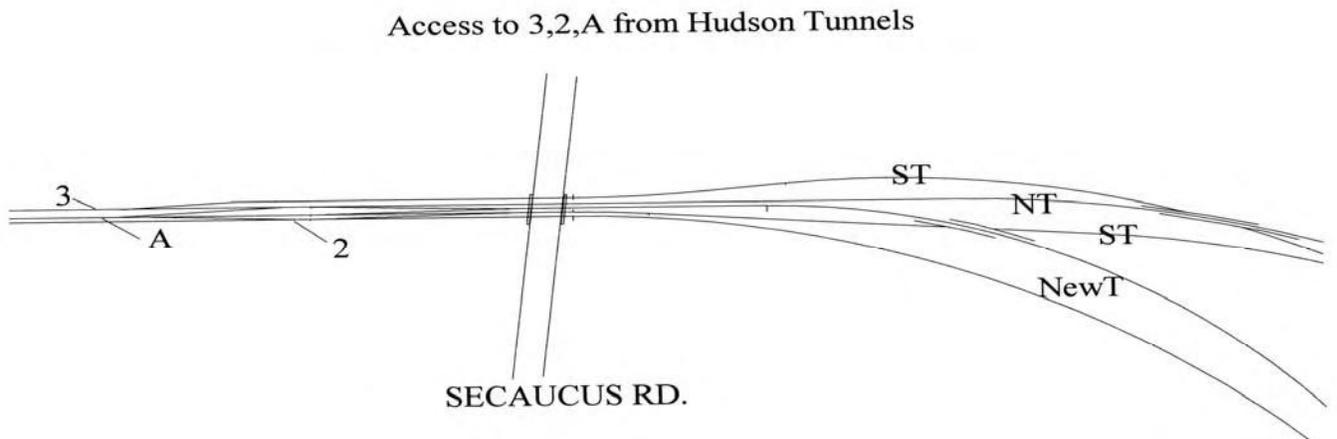
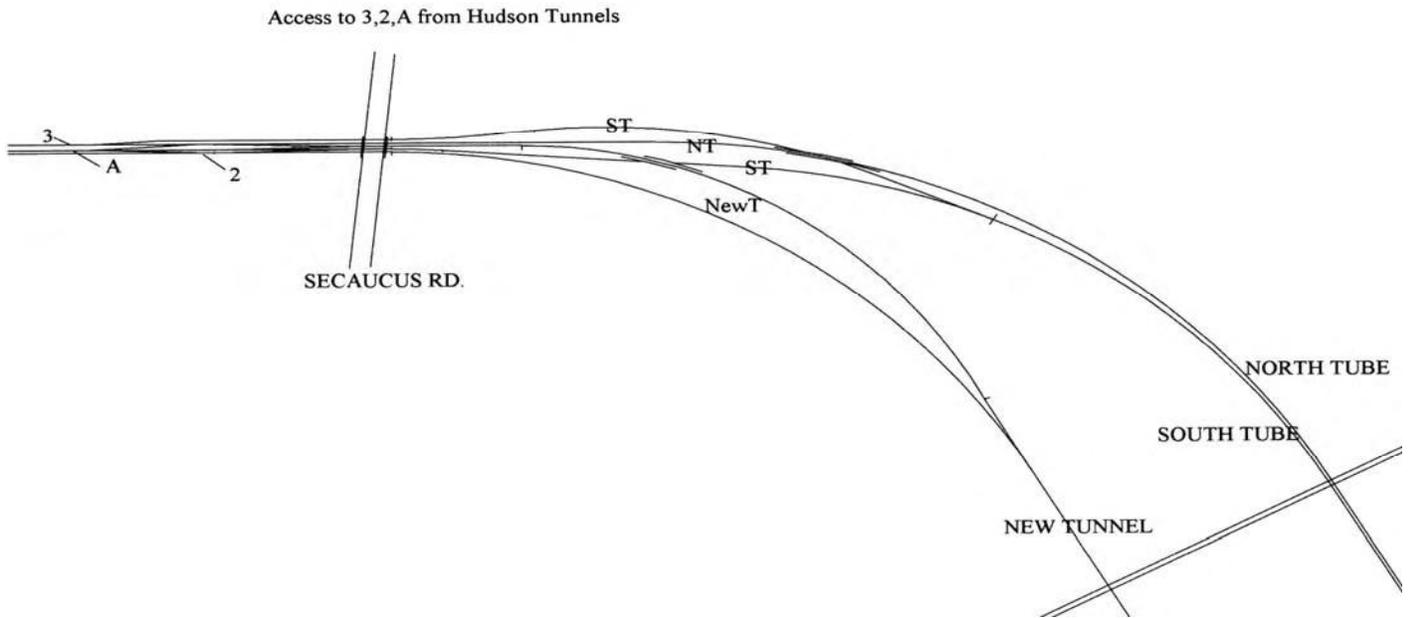
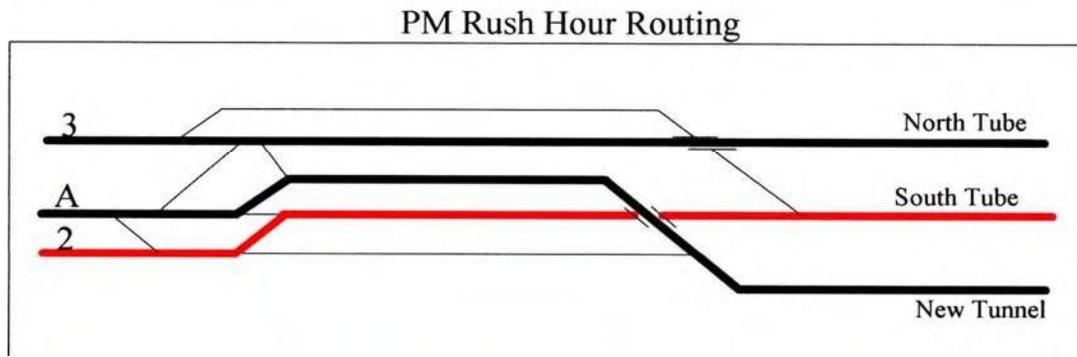
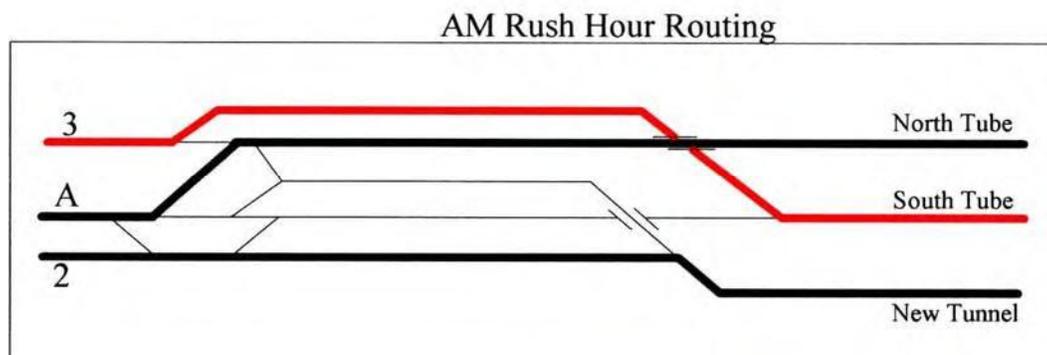


Fig 6  
2-1 Mode Peak Hour Routes



PM

Westbound from PSNY via North Tube and New Tunnel  
Eastbound to PSNY from NEC track 2 to South Tube



AM

Eastbound to PSNY from tracks A and 2 to North Tube and New Tunnel  
Westbound from PSNY via South Tube to NEC Track 3

## **SEGMENT 3            NE CORRIDOR**

This segment extends from Secaucus Road to a junction with the freight line. The junction is under Bergen Hill.

### **Connections**

The passenger route from the new tunnel must be integrated into the trackage at Secaucus Transfer. Secaucus is a 4-track station that is approached from 3 tracks over Croxton Yard. The 3 tracks are labeled 3, A, 2. (See Figure 6.). Each of these tracks must have access to the new tunnel route.

This is accomplished as shown in Figure 5. The passenger route splits into two tracks ( 2 and B). Track B rises over track A. When track B crosses over Secaucus Road, it connects to tracks 3 and A.

EB Track 2 flows into the new tunnel. By a crossover, it also connects to the South Tube. The North Tube route flows directly into track 3.

Trains EB on tracks A and 2, could each move without conflict. The bridge allows the two trains to invert their positions (Track 2 to South Tube and Track A to New Tunnel).

### **Profile**

The PVI at the west end of this segment is at station 300+00, elevation of 277.2. The elevation at the Secaucus Road is 323.5 (26' above MSL). This elevation is held until the vertical curve #1 at station 331+39.

Tracks A and B cross on a bridge. The clearance on the bottom Track A is 16'2".

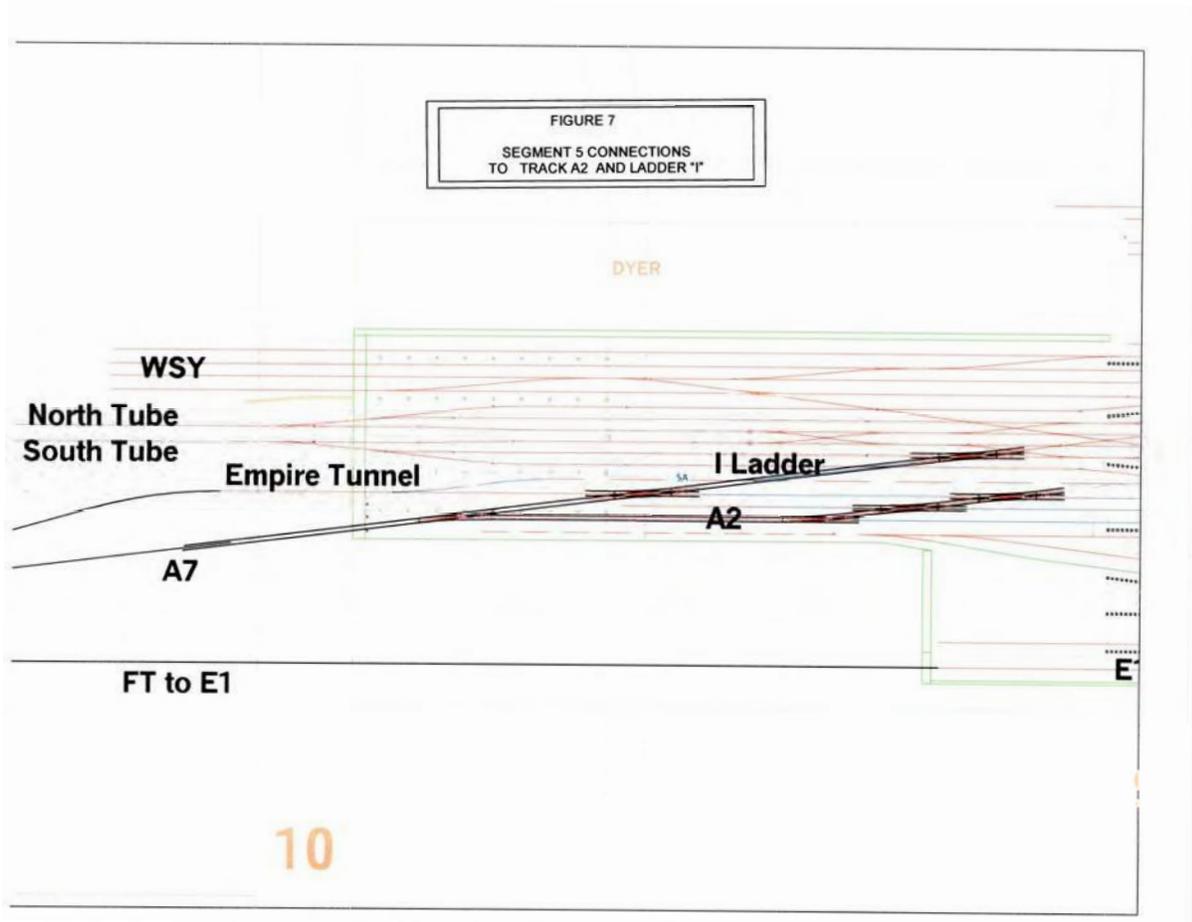
Track A descends to a PVI elevation 313.5. Track B rises to a PVI at 333.5 at the point of crossing. Both tracks are on vertical curves at this location.

The details of this segment are uncertain pending a final alignment for the new tunnel.

### **Operations**

The new tunnel would be used exclusively in rush periods for passenger trains in the rush hour direction. Thus, in the morning peak, the EB tracks are New Tunnel and North Tube. In the evening peak, the westbound flow uses the same tracks (New Tunnel and North Tube). This operation is integrated into the system with appropriate connections to Sunnyside Yard. (See Segment 10).

Fig 7



**SEGMENT 4            TRACK A7**

This is the passenger route from the Pierhead line, Hudson River to Yard A. It then connects to the “I” ladder and track A2. The “I” Ladder provides access to the full upper range of PSNY platform tracks (1-18). Parallel moves could occur from the new tunnel and the Empire Tunnel.

Working from the profile of the Freight Segment 5, the passenger segment 4 can begin at a new PVI located at 217+60, elevation 203.6 This is extra deep in order to provide the required channel clearances as required by the US Coast Guard.

The PVI at the top of the grade would be in Yard “A”. The PVI there would be at station 189+00, elevation 286.0. The resulting climb is 82.4’ over a distance of 2860’.

The resulting grade is 2.88%. This is not as steep as the grades planned in Queens for the East Side Access project. The ESA grades exceed 3 % over a comparable distance near Harold Tower.

Figure 7 shows the track A7 joining the “I” ladder extension and connecting to A2 as well.

Summarizing the specifics we have:

West PVI at 217+60, elevation 203.6	Pierhead Line under the Hudson
East PVI at 189+00. elevation 286.0	In “A” Yard
Change            28+60            82.4’	Grade 2.88%

## **SEGMENT 5            TRACK E1**

This is the freight route from segment 3 to Yard E, track E1.

### **Gradients**

The freight line can rise until it reaches the vicinity of the “M” ladder at 8<sup>th</sup> Avenue. The new PVI would be at 175+00, elevation 288.8. While existing gradients are described in the paper, they are merely guidelines and need not be followed. Of special concern is the eastward gradient climbing into Manhattan from the Hudson River. It was a problem during construction (pre-1910). A blowout occurred near the Manhattan side. The future tunnel should be deeper at this location.

To test one of the many alternatives possible, we have postulated a 2% freight grade. Lesser grades are also possible. Assuming the 2% case, a distance of 4260 feet is available for the rise from the Hudson to 8<sup>th</sup> Avenue in the station. The specifics are:

West PVI at 217+60, elevation 203.6

East PVI at 175+00, elevation 288.8

Change	4260'	85.2'	Grade 2%
--------	-------	-------	----------

This alternative reduces the elevation at the critical location of the Manhattan Pierhead line. It changes from 223.64 to 203.6, a 20' increase in depth. The top of the tunnel will be 15 feet lower than the existing tunnels after allowing for increased tunnel diameter for double stack cars with Plate H clearances.

### **Train Size**

Dual E-60s (or equivalent) would have a total weight of 800,000 lbs. At 25% adhesion they would develop 200,000 lbs (100 tons) of tractive effort. This is equivalent to the gravitational force slowing a 5000 ton train on a 2% grade. Such a train would be longer than the grade itself. This reduces the apparent grade under the train.

The grade, therefore, is suitable for freight trains of moderate size.

Figure 8

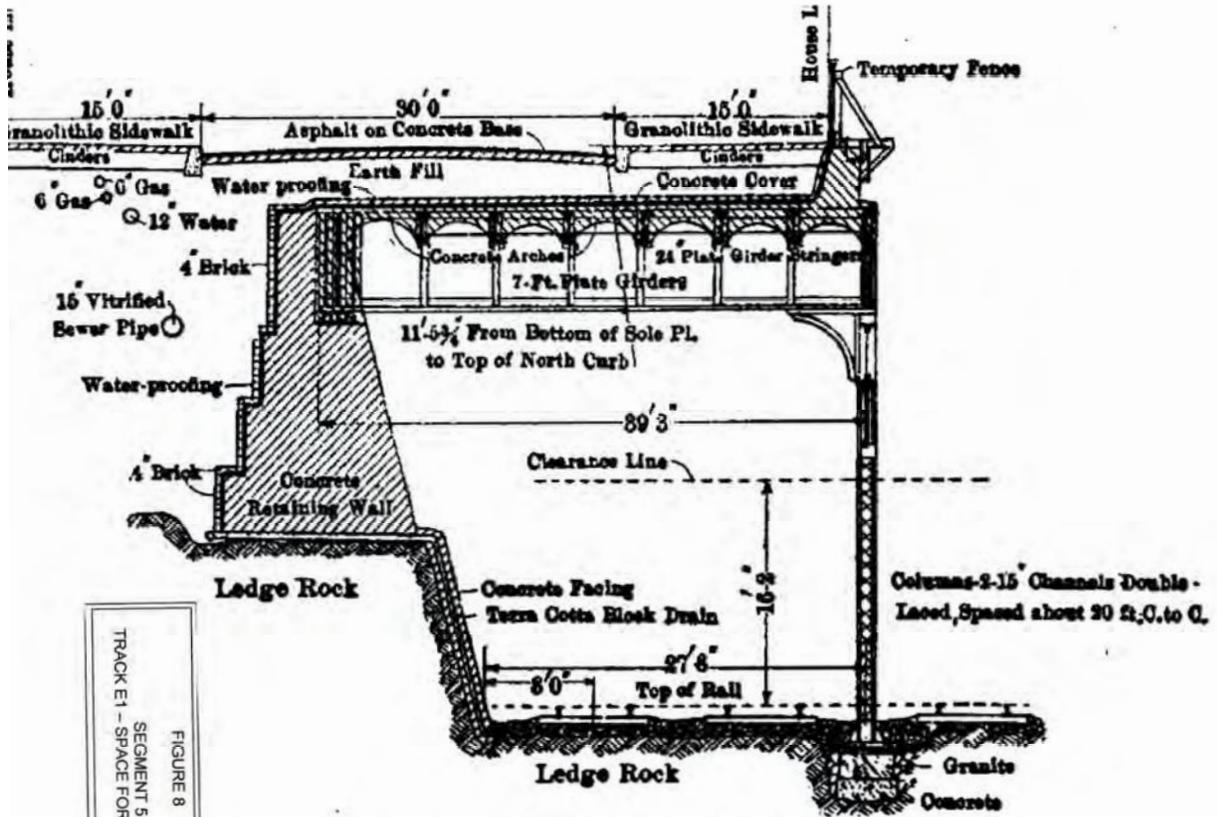
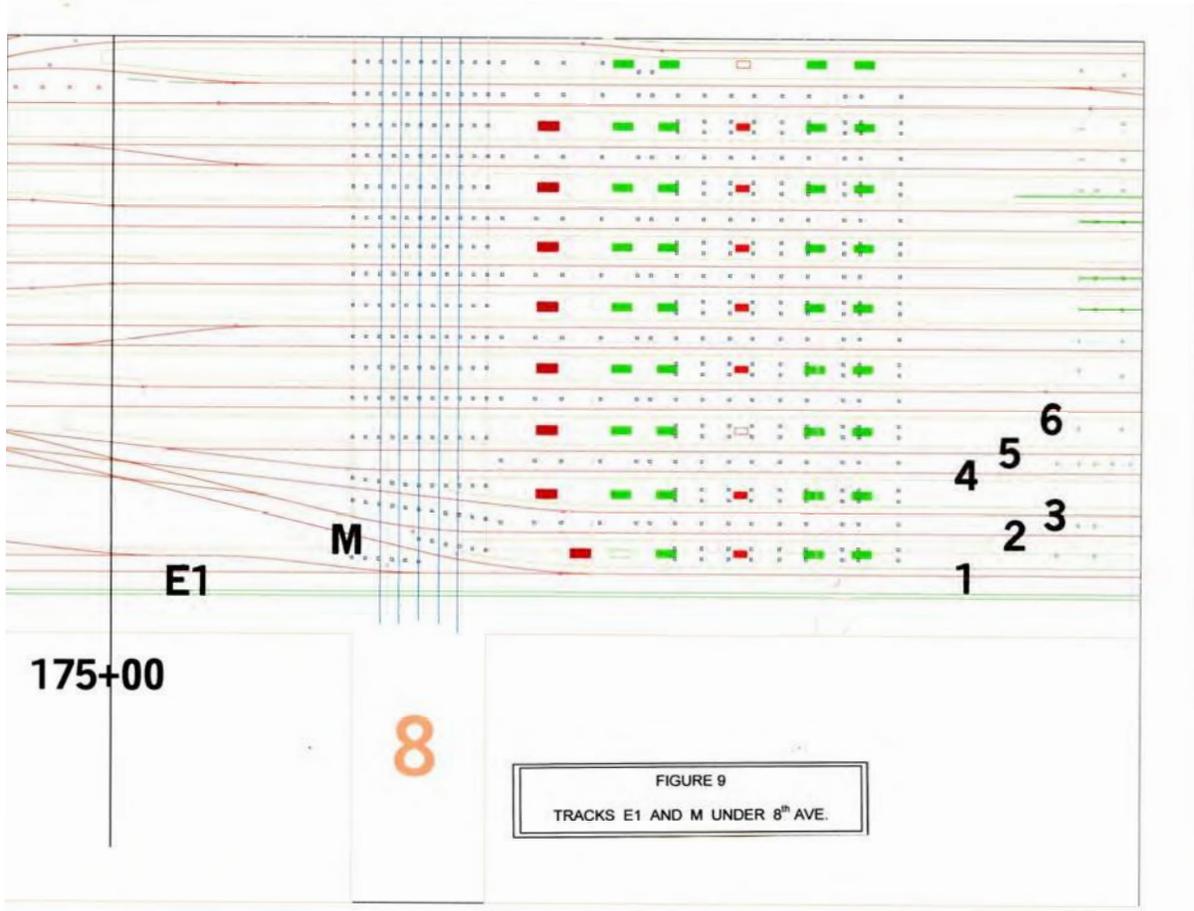


FIGURE 8  
SEGMENT 5  
TRACK E1 - SPACE FOR OPEN CUT

**WEST 31ST STREET VIADUCT  
BETWEEN EIGHTH AVENUE AND NINTH AVENUE**

Fig 9

Eight Avenue Near Track 1





## SEGMENT 6          PENN STATION, TRACK 1

### Clearance Requirement

The desired freight route clearance diagram is defined by Plate H. This will clear two double stacked containers. The Plate H total of 20'2" suggests a 21'2" clearance to bottom of any overhead structure. This provides room for catenary and its electrical clearance requirements at 11 KV.

Plate H is not compatible with third rail structures. However, no third rail is required or desired on this route.

### 8<sup>th</sup> Avenue Subway

On crossing under the 8<sup>th</sup> Avenue subway, track 1 is not under the Penn Station concourses. Track 1 is under 31<sup>st</sup> Street. With the track at elevation 290, the bottom of overhead structure becomes 311.16' (290 + 21.16).

The subway elevation can be estimated by reference to the concourses. The lower concourse has an elevation 308.39. The upper concourse is at 318.82. This is a 10.43' difference. The target rail clearance to bottom of structure (elev. 311.16) is 2.77' above the lower floor. Figure 10 shows these elevations.

The IND subway platform elevation is near 318.8. Therefore, the bottom of IND rail is near 314.8. This elevation is 3.64' higher than the clearance suggested.

However, the existing supporting girders are set too low for the planned clearance. They were built when the railroad clearance requirement was 16'2". Deep girders were used under the subway. This bridge must be rebuilt over Track 1. A *through girder* span is needed in which the vertical girder is placed between the tracks rather than underneath. This will radically reduce the depth needed below the subway rail.

The subway rail would be placed on a floor of beams placed transverse to the rails. This floor would carry the load to the new girders. These girders are placed between the tracks and extend upward from the subway toward the street.

The "M" ladder joins track 1 near the overhead IND subway structure. The lateral distance required to span these two tracks varies from 33' to 15'. This applies to the 5 tracks of the IND (includes the middle layup track).

## **Baggage Passageway**

As shown in Figure 10, an old baggage passageway exists over track 1. It is below 31<sup>st</sup> Street and part of a concrete deck passageway that circles around much of the station. Its primary use today is as back shop space. Escalator repairs, for example, have been done on this space. The passageway is too low for the Plate H clearance. The floor itself is high enough. However, the supporting girders are too low. The floor system must be raised and rebuilt to provide adequate clearance.

## **7<sup>th</sup> Avenue Subway**

Like the IND, the IRT line is close to the street surface. The platform elevation matches the upper concourse. However, the IRT tracks converge south of 32<sup>nd</sup> and lose some elevation near 31<sup>st</sup> Street. The new IRT bridge over track 1 will require construction similar to that of the IND crossing.

Track 1 was planned to have a support wall parallel to the track under 7<sup>th</sup> Avenue. This creates a 15' span over track 1 for the expanded vertical clearance. The other tracks (2-5) converge below the IRT but do not require the expanded vertical clearance.

## **Other Overhead Obstacles**

Care must be given to the pipe gallery connections to the Service Building.

The new NJT concourse structures near 7<sup>th</sup> Avenue do not extend south over Track 1 and will not present any special problems.

Fig 11

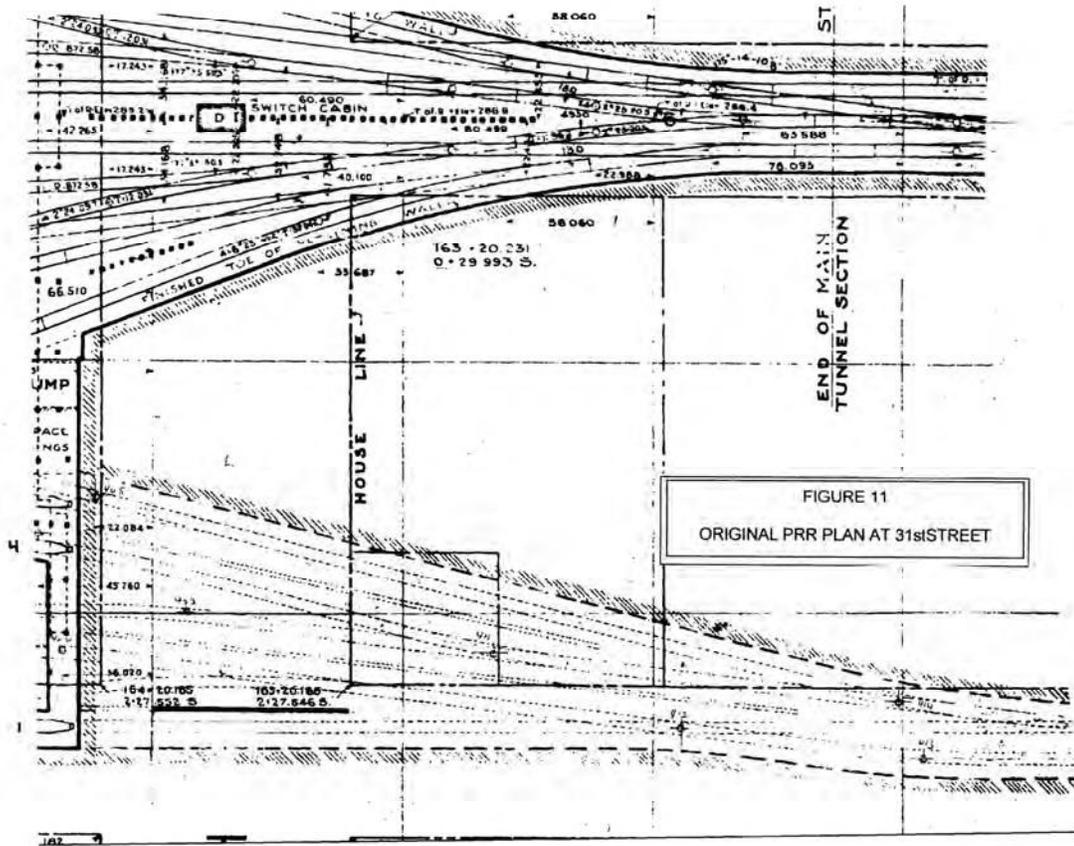


Fig 12

Seventh Avenue Region of PSNY

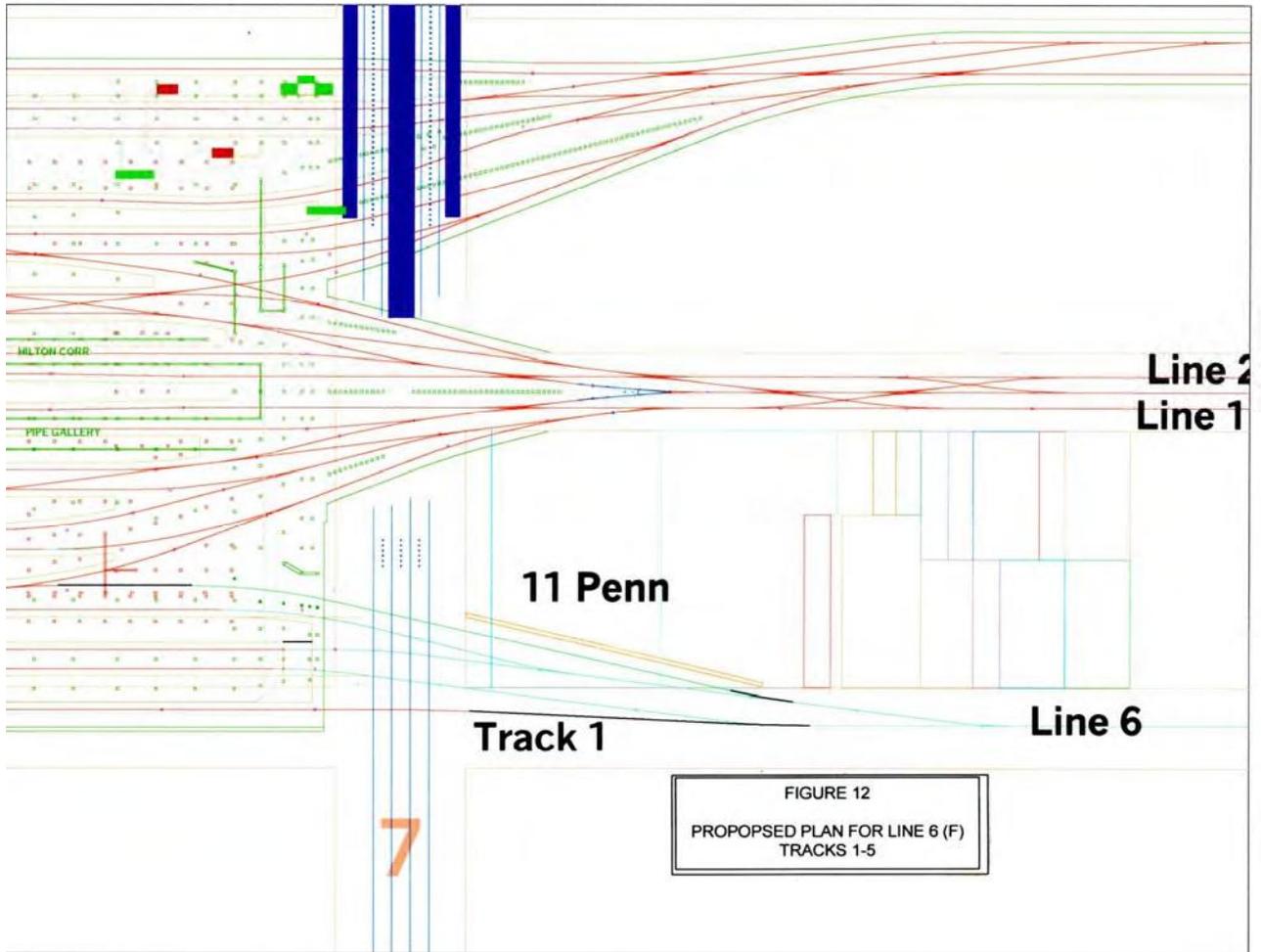
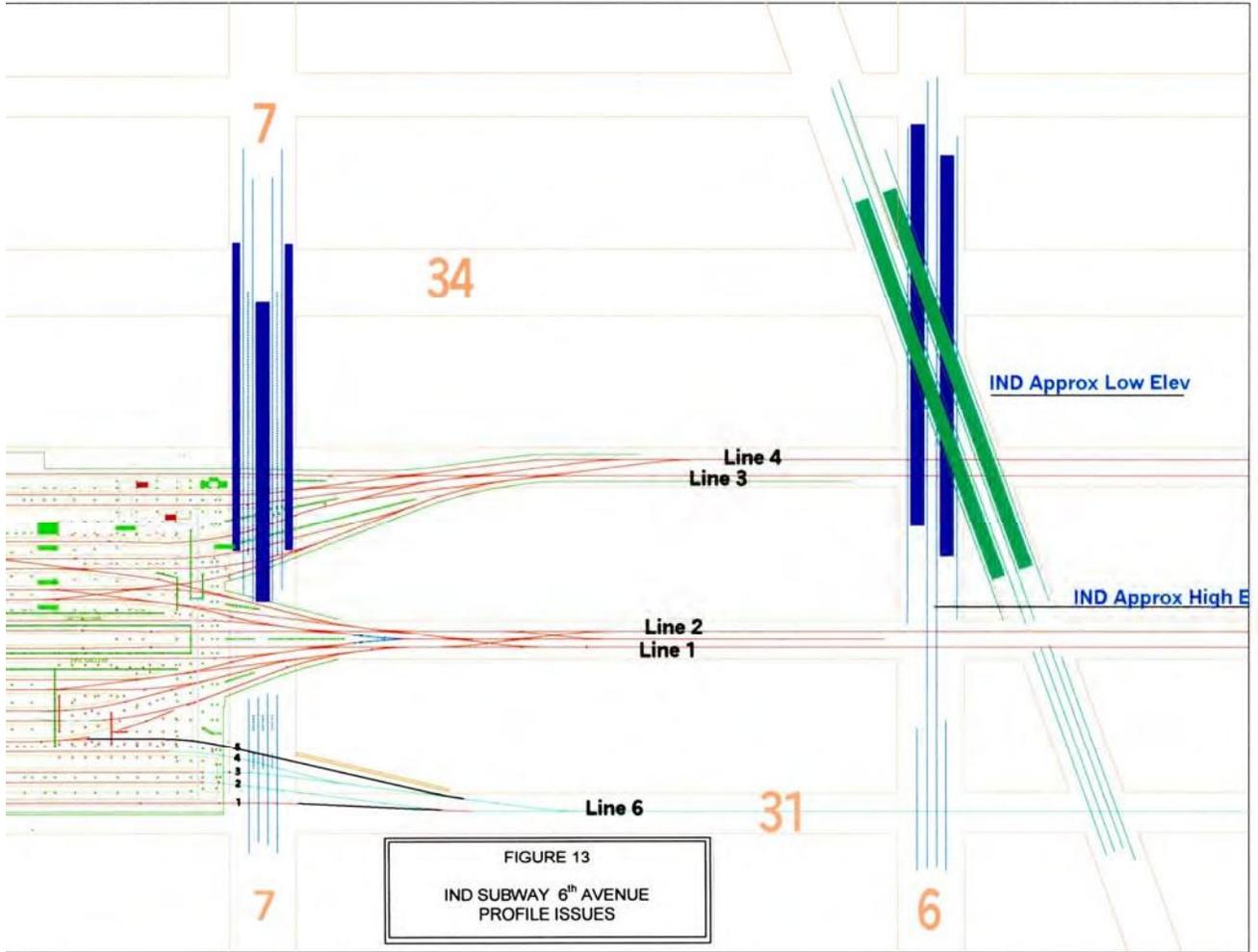


Fig 13

6<sup>th</sup> Avenue / Broadway Crossings



## **SEGMENT 7    LINE 6    TUNNEL UNDER 31<sup>ST</sup> STREET TO EAST RIVER**

Single track with turnouts on each end.

On the west, combines Penn Station tracks 1-5.

On the east, splits into segments 8 and 9 at Long Island City

### **Grade – To the East River from PSNY**

Assume:

1. PVI item 14 of Table 3  
Lowest location under East River station 98+60, elevation 211.8
2. PVI at PSNY 163+60 7<sup>th</sup> Avenue, elevation 290.0  
Delta distance = 6500', delta elevation 78.2'  
Grade = 1.2%

### **IND Subway, 6<sup>th</sup> Avenue**

The IND has a wavy profile as it crosses under the BMT and over the PRR at 33<sup>rd</sup> and 32<sup>nd</sup> Streets. The IND just barely clears over the PRR tunnel at 33<sup>rd</sup> Street.

It then rises rapidly for the crossing over the PRR at 32<sup>nd</sup> Street, then descends to the south.

The new (Line 6) tunnel is designed for 20' clearances (Plate H). This is 5.5' higher than the existing PRR tunnels. The proposed 1.2% eastbound downgrade may be ideal to get under the IND at 31<sup>st</sup> Street.

### **Merging station tracks 1-5 into Line 6**

The plan for this merge was established prior to 1910 and reflected in the actual construction. The Montgomery Ward Building (11 Penn Plaza) was built with a cutout segment in the foundation as shown in Figure 11.

Line 6 is shown in Figure 12 in the middle of 31<sup>st</sup> Street. It is connected to PSNY Track 1 with a 1000' radius reverse curve.

### **Grade – East River – Rising to Long Island City**

We assume that the Line 6 profile would parallel that of Line 1. Accordingly the PVI is at 98+60, elev. 211.8 would evolve a 0.7% upgrade (Item 14 Table 3). The discussion of the grade to the east is included in the discussion of Segments 8 and 9.

Fig 14

1910 PRR Plan – Lines A-F

Lines A-D Correspond to Today's Lines 4-1

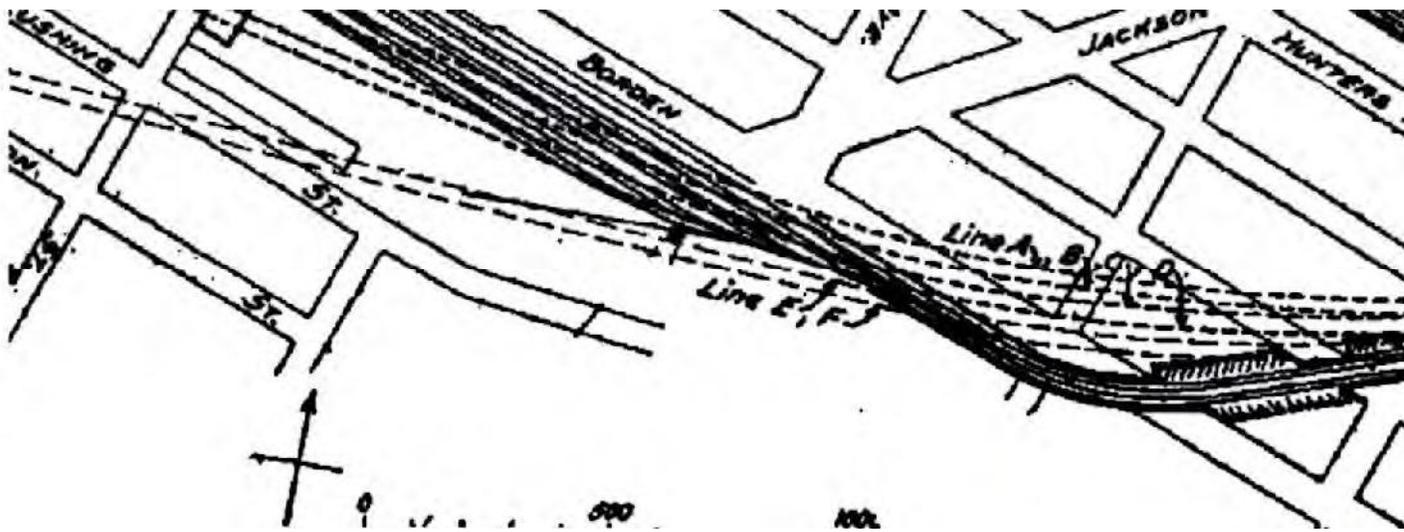
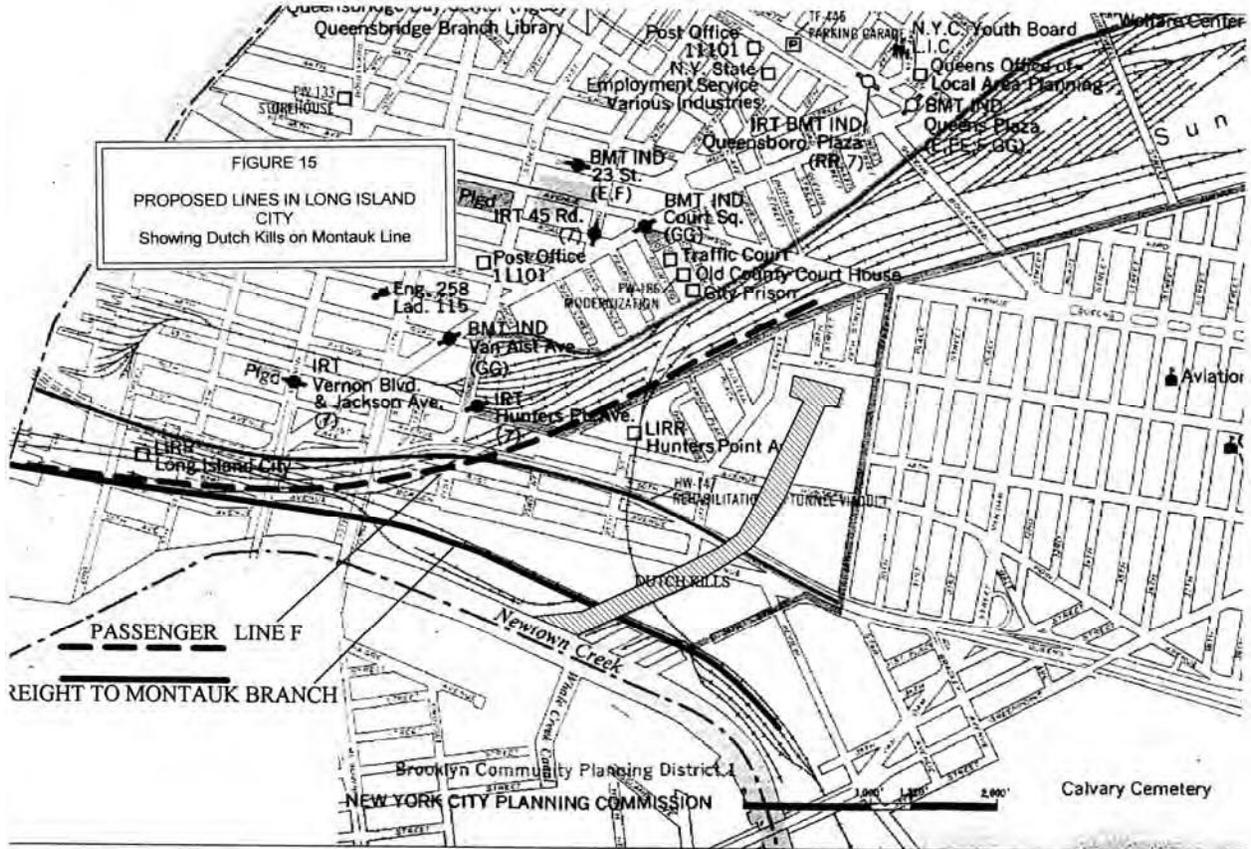


Fig 15



## **SEGMENT 8                      PASSENGER LINE F, LONG ISLAND CITY**

The plan view of Segments 8 and 9 is shown in Figure 15.

The passenger route is on the original Line F alignment. This segment evolves from Line 6 (old Line F) at a turnout under the East River near the Long Island City pierhead line. In order to define the grades involved we must specify the locations and elevations of the vertical curve and point of switch.

We assume that the point of switch is at 77+00. A #20 equilateral would enable each route to maintain 70 MPH. The vertical curve would correspond to item #15 of Table 3. In fact, two vertical curves would be involved, one on each of segments 8 and 9.

The grade of segment 8 would parallel that of Line 1 (old Line D). This corresponds to the original PRR plan for Line F. The grade averages 1.34% to a level profile at elevation 312' near Thomson Avenue.

As the tunnel rises next to Line 1, it can take advantage of the original work on overhead highway bridges and their foundations that assumed Line F construction. Figure 14 clearly shows the track slot under the Hunters Point Avenue Bridge.

On reaching the surface, Line F can continue into the Sunnyside Loop tracks where a graded slot for it already exists. A crossover to Line 1 would be provided so that Amtrak trains could use Line F when desired.

The normal operating plan would have NJT use Line F to and from Sunnyside during the rush periods. During the evening, some NJT trains would leave Sunnyside on the outside slot (Loop 0) to enter Line F westbound.

## **SEGMENT 9 FREIGHT LINE, LONG ISLAND CITY**

### **Freight tunnel from segment 7 to surface on Montauk branch.**

The alignment of this segment begins with the turnout mentioned in segment 7. The freight route moves under the LI City layup yard and moves eastward below the Montauk Branch.

The route parallels Newtown Creek. A side channel (Dutch Kills) diverts north from Newtown Creek. It is shown on Figure 15 as a crosshatched area. At present two LIRR bridges span Dutch Kills. One is from the Sunnyside yard area. The other is the Montauk line from the LIC Yard. These bridges may no longer be moveable to clear for waterborne traffic.

Dutch Kills reaches north to 47<sup>th</sup> Street. It is rarely used for waterborne traffic. Crossroads such as Borden Avenue and Hunterspoint Avenue use lift bridges that are unmanned and require advance notice to use.

If the Dutch Kills channel could be permanently closed to water traffic with Coast Guard and NYC approvals, it would reduce the grades.

The ruling eastbound grade is 1.5%. This is from the route under the Hudson River rising to become track E1. If this can be matched in Long Island City, the ruling grade of 1.5% will not increase further.

Fig 16

Sunnyside – Bridge 6 Area

New Yard – Exits in PM via Line 2  
South Yard NJT PM exit via Loop to New Tunnel Route

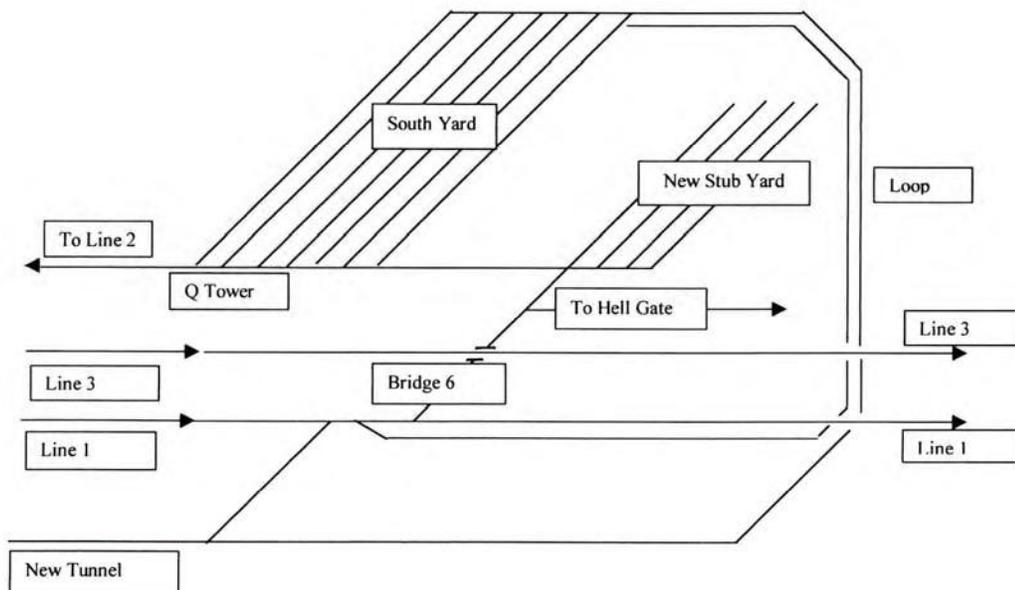


FIGURE 16  
SUNNYSIDE – SELECTED ITEMS  
BRIDGE #6 AND NEW YARD SECTION



## **SEGMENT 10            SUNNYSIDE YARD - STORAGE TRACK EXPANSION**

NJT plans an increase in the number of trains operated. This occasions an increase in the yard space needed to hold these trains in the midday period. By operating PSNY as a fully through station, the rush period trains can use the station without reversing direction, thereby avoiding conflicting moves in the interlocking. This raises capacity and efficiency.

The “JOINT” plan entails doing the midday storage at Sunnyside. This yard was originally designed to handle far more than it does today. We can take advantage of this fact.

Two types of yards were originally planned within the South Yard of Sunnyside. They were:

- a. Through tracks connecting to the loop.  
    These were tracks 1-60 when built. Only #1-35 are still in use.
- b. Stub tracks that connect to Line 2, but which are filled in the AM period via Bridge 6.

These types are shown Figure 17. To examine this in detail, locate Bridge 4. This allows the loop tracks to move under Line 1. Just to the left is Bridge 6. This diverts from the loop tracks under the LIRR main tracks to reach Sunnyside and the area marked “Additional Coach Yard”. This yard area is now used as a material storage yard for old ties, ballast and other objects.

Bridge 6 has had a modern era partial reincarnation as the Amtrak “duck under” route. This is to carry Line 1 traffic under Line 3 and then proceed east toward the Hell Gate route. This is compatible with the full build-out of Bridge 6.

Fig 18

FIGURE 18  
PROFILE UNDER BERGEN HILL  
PLATE 1, ASCE 1910

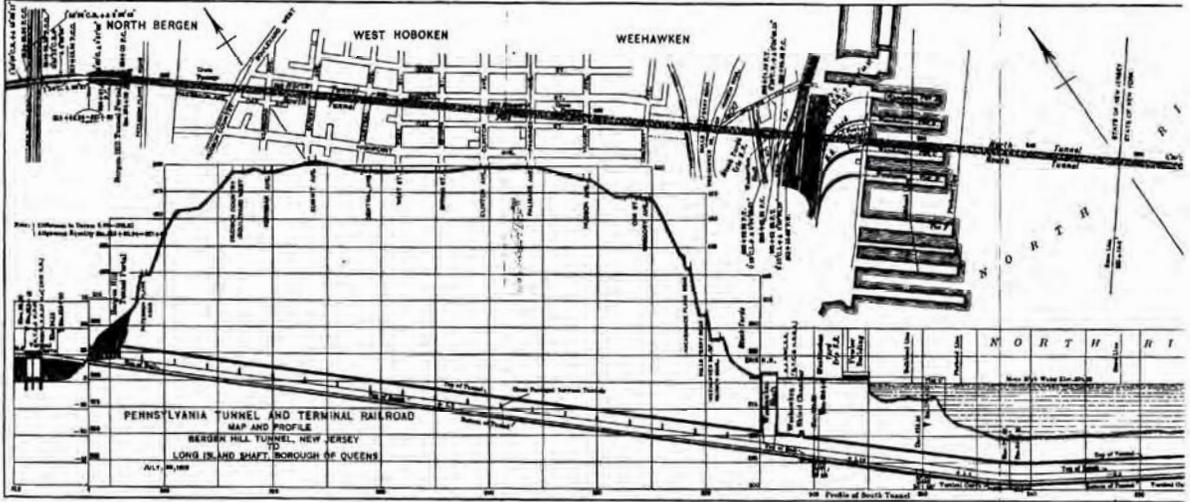


Fig 19

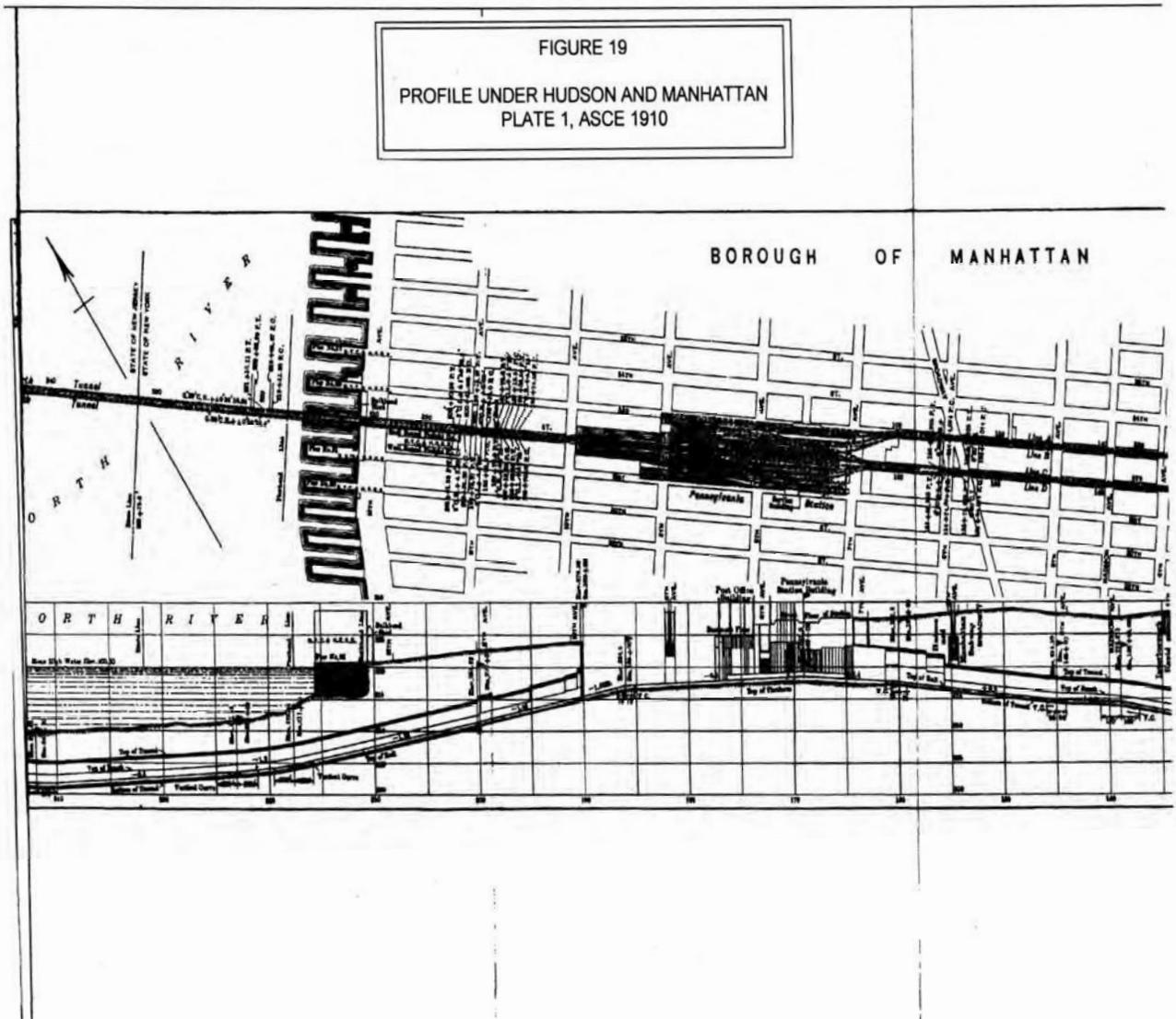
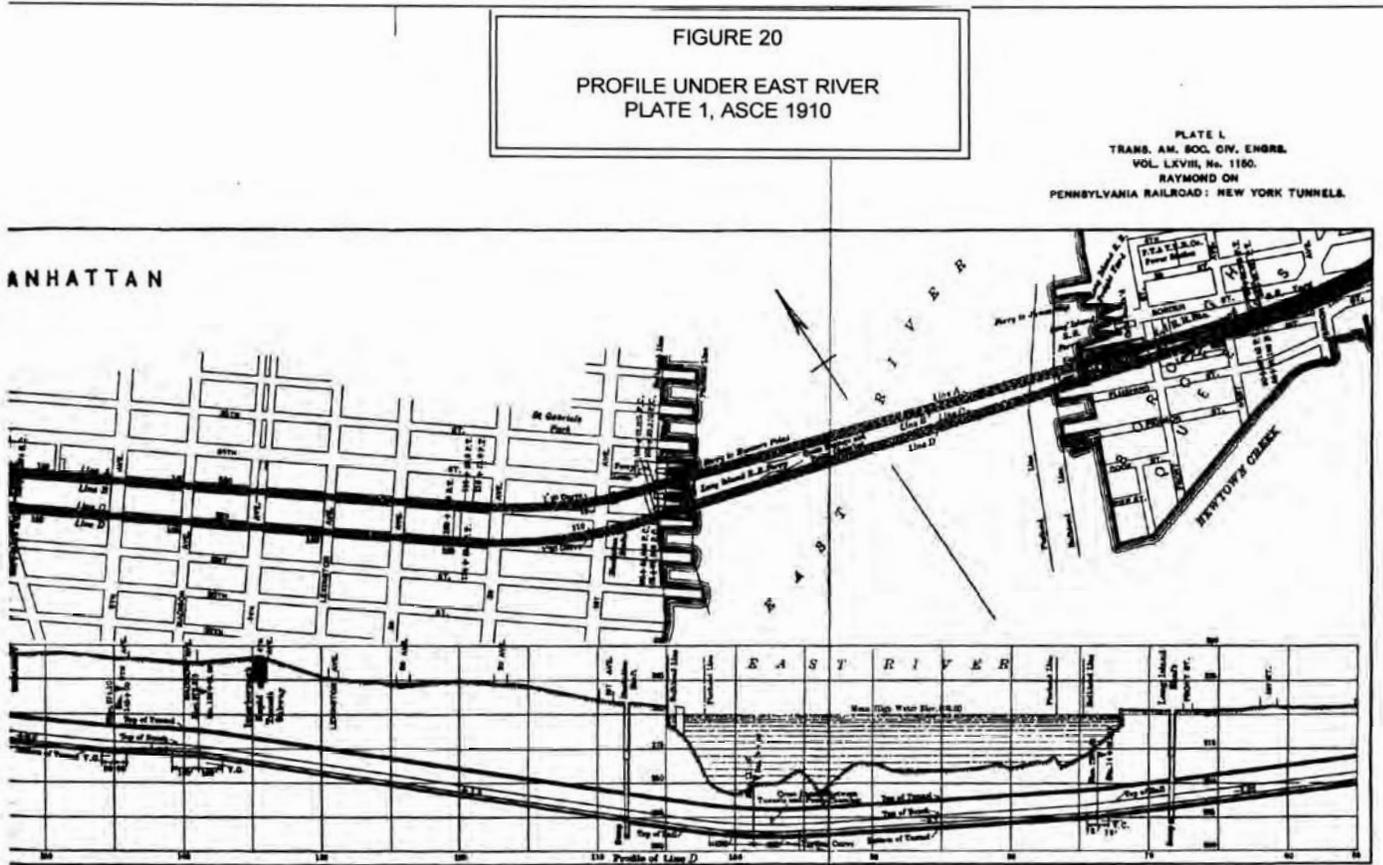


Fig 20



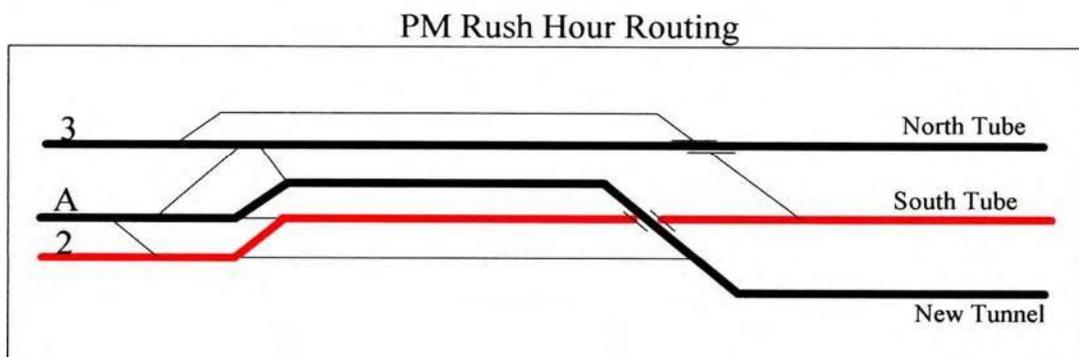
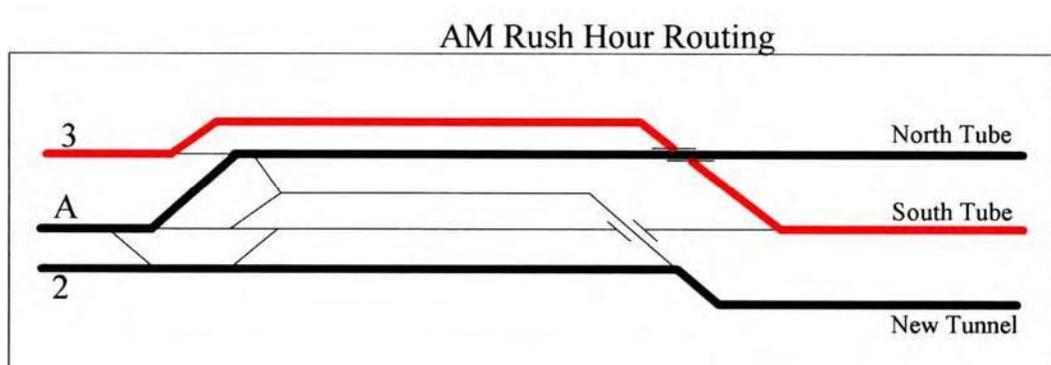
## ROUTES BETWEEN PSNY AND SECAUCUS

The Secaucus station complex is approached over a three track system over Croxton Yard (Tracks 3 westward, A, and 2 eastward). Under the Hudson are three tracks as well. The tracks merge as shown in Segment 3 descriptions. The use of a flyover ensures that all trains can reach any track as needed without conflicting with other normal routes.

The morning rush direction uses the North Tube and New Tunnel.  
The evening rush direction uses the North Tube and New Tunnel.

The south tube is used for reverse rush flows

During maintenance functions (off – peak) any two tunnels will suffice.



## **NJT OPERATIONS via NEW HUDSON TUNNEL**

AM Rush – EB all turn to become WB

Inbound: via New Tunnel, M Ladder

Tracks 1-5

Outbound: U, M Ladder, 3X to South Tube

Volume v1 = 20 TPH.

Headway/Platform Track = 15 minutes.

PM Rush – EB All turn to become WB

Inbound: via South Tube, 3x, M, U Ladder.

Tracks 1-5

Outbound: To New Hudson Tunnel

Volume v1 = 20 TPH.

Headway/ Platform Track = 15 minutes.

## AMTRAK OPERATIONS

### AM Rush – EB

Inbound: via NT, U Ladder  
Tracks 9-10 (2)  
Outbound: Line 1 and Sunnyside.  
Volume  $v_2 = 3$  TPH.  
Headway / Platform Track = 40 minutes.

### AM Rush – WB

Inbound: Sunnyside via Line 2.  
Tracks 11-12 (2)  
Outbound: South Tube via 3x.  
Volume  $v_3 = 3$  TPH.  
Headway / Platform Track = 40 minutes.

### PM Rush – EB

Inbound: via South Tube, U Ladder.  
Tracks 9-10 (2)  
Outbound: To Line 1 and Sunnyside.  
Volume  $v_4 = 3$  TPH.  
Headway/ Platform Track = 40 minutes.

### PM Rush – WB

Inbound: From Sunnyside and arrivals from Boston. All are via Line 2.  
Tracks 11-12 (2)  
Outbound: Departure via 4x and North Tube.  
Volume  $v_5 = 4$  TPH.  
Headway/ Platform Track = 30 minutes.

**NJT OPERATIONS  
VIA NORTH TUBE, SOUTH TUBE**

**AM Rush – EB**

Inbound: North Tube via U ladder

Tracks: 6-8 (3)

Outbound: Line 1 to Sunnyside

Volume v7 = 18 TPH.

Headway/ Platform Track = 10 minutes.

**AM Rush – WB**

See New tunnel arrivals turning as NJT revenue trains on 1-5

**PM Rush – EB**

See South Tube arrivals turning as NJT revenue trains on 1-5

**PM Rush – WB**

Inbound: Sunnyside Line 2

Tracks: 6-8 (3)

Outbound: U Ladder, 4X to North Tube

Volume v8 = 18 TPH.

Headway/ Platform Track = 10 minutes.

## LIRR OPERATIONS

AM Rush – WB via Line 4 to WSY

Inbound: Line 4  
Tracks: 19-21 (3)  
Outbound: To WSY  
Volume is  $v_{10} = 18$  TPH.  
Headway/Track = 10 minutes

AM Rush – WB/EB Turns via Line 4/3

Inbound: Line 4, turns at platform  
Tracks: 17-18 (2)  
Outbound: Line 3  
Volume is  $v_{11} = 6$  TPH.  
Headway/Track = 20 minutes.

AM Rush – WB via Line 2

Inbound: Line 2  
Tracks: 13-16 (4)  
Outbound: To WSY  
Volume is  $v_{12} = 12$  TPH.  
Headway/Track = 20 minutes.

PM Rush – EB via Line 3

Inbound: From WSY  
Tracks: 19-21 (3)  
Outbound: Line 3  
Volume is  $v_{13} = 18$  TPH.  
Headway/Track = 10 minutes

PM Rush – WB/EB via Line 4/3 only

Inbound: Line 4  
Tracks: 17-18 (2)  
Outbound: Turns to EB, Line 3  
Volume is  $v_{14} = 6$  TPH.  
Headway/Track = 20 minutes.

PM Rush – EB via Line 1 at JO

Inbound: WSY  
Tracks: 13-16 (4)  
Outbound: Line 1 via JO  
Volume is  $v_{15} = 12$  TPH.  
Headway/Track = 20 minutes.

## OPERATING ZONES

### Tracks 1-5

NJT - New Tunnel (NewT) serves only 1-5

All trains to turn and use ST in the opposite direction.

AM rush	NewT to ST	v1	20 TPH
PM rush	ST to NewT	v1	20 TPH

### Tracks 6-8

NJT through operations to/from Sunnyside.

AM rush	EB NT to Line 1	v7	18 TPH
PM rush	WB Line 2 to NT	v8	18 TPH

### Tracks 9-10

Amtrak EB.

AM rush	NT to Line 1	v2	3 TPH
PM rush	ST to Line 1	v4	3 TPH

### Tracks 11-12

Amtrak WB.

AM rush	Line 2 to ST	v3	3 TPH
PM rush	Line 2 to NT	v5	4 TPH

### Tracks 13-16 LIRR

Through operations to/from WSY

AM rush	WB Line 2 to WSY	v12	12 TPH
PM rush	EB WSY to Line 1	v15	12 TPH

### Tracks 17-18 LIRR WB L4, turn, EB Line 3

Platform turns during rush period

AM rush	Line 4 to L3	v11	6 TPH
PM rush	Line 4 to L3	v14	6 TPH

### Tracks 19-21 LIRR

Through operations to/from WSY

AM rush	WB Line 4 to WSY	v10	18 TPH
PM rush	EB WSY to Line 3	v13	18 TPH

## TOTAL VOLUMES ON APPROACH TRACKS

### Trains Per Hour

V code number is a referenced to prior work

	<b>AM</b>		<b>PM</b>
North Tube	21 east	v2+v7	22 west v5+v8
South Tube	23 w	v1+v3	23 e v4+v1
New Tunnel	20 e	v1	20 w v1
<b>Trans Hudson Total</b>	<b>64</b>		<b>65</b>
Line 4	24 west	v10+v11	6 west v14
Line 3	6 e	v11	24 e v14+v13
Line 2	15 w	v12+v3	22 w v5+v8
Line 1	21 e	v2+v7	15 e v4+v15
WSY	30w	v10+v12	30e v15+v13

## CONFLICT POINTS

When route conflicts occur they block traffic flow. An operating plan has to be evaluated for reliability. If the frequency of conflict is very high the traffic may be blocked. If the frequency of conflict is low, the traffic may flow smoothly.

A prime example is JO where the LIRR PM Eastbound flow to Line 1 blocks Amtrak and NJT from Line 2. As each operation takes about 2 minutes, only 30 moves an hour can occur. If the LIRR has 12 moves of this type, the other operators can only operate the balance of 18. In fact, this would be too much conflict. Trains waiting for their turn could block the approach tracks and create a cumbersome operation.

The following is a list of conflict points. The total conflict moves per hour should be evaluated as to overall system reliability.

### **M LADDER near tracks 1-5**

NJT turns are occurring on tracks 1-5. Trains are using South Tube, 3x and the M ladder to/from the tracks and M ladder to/from the new tunnel. For example, a train ST to track 3 would block a move from track 2 to the new tunnel.

With the volume  $v_1 = 20$  TPH, the M ladder is trying to support 40 TPH. At 2 minutes per move, this cannot be done. To relieve the situation about half of the moves in/out must become simultaneous.

This can be done in several ways. They are:

- Use the U ladder for ST moves from a point near the MU connection to tracks 6-2. (Note: The track 6 connection creates a low frequency conflict with the NJT EB moves via track 6 to Sunnyside.
- Designate the old mail track north of the diagonal platform as track D3. Use it for tracks 1-2, NewT in lieu of D4. Reconnect D3 to track 3 across UM ladder.
- Complete the direct route from the New Tunnel to track 1. This avoids the M ladder for track 1 - NewT moves.

The net effect would be a viable plan.

## **A TOWER (South Tube vs. North Tube)**

### **AM CONFLICTS**

Tracks 11-12 Amtrak WB to ST v3 3 TPH

Versus

NT EB to U Ladder

V2 3 TPH to tracks 9-10 via U

V7 18 TPH to tracks 6-8 via U

This sums to 21 TPH crossing 3 TPH, a low frequency. No problem

Tracks 1-5 v1(20) via M ladder, 3x, ST

Note: Platform Track 6 (at 6 TPH) may conflict with Track 5 WB (4 TPH) on U ladder on a few occasions.

### **PM CONFLICTS**

EB ST to tracks 9-10 v4 3 TPH

Versus

WB Track 6-8 to NT v8 18 TPH

This is a low volume conflict. No problem

## **C TOWER Line 3 versus Line 4**

### **AM CONFLICTS – All relate to track 17-18 turns**

WB Line 4 v11 6 TPH (out of 24 TPH)

Versus

EB Track 17-18 to Line 3

Note: Tracks 17 and 18 have different routes to/from Lines 3 and 4

Low conflict level.

### **PM CONFLICTS**

WB v14 6 TPH on Line 4 to 17-18

Versus

EB tracks 19-21 v13 18 TPH

Note: Tracks 17 and 18 have different routes to/from Lines 3 and 4

Low conflict level.

## JO INTERLOCKING

### AM CONFLICTS

Almost no conflicts re Lines 1 and 2.

The only exception is track 10 EB and track 11 WB which share a common turnout.

Track 11 WB v3 3 TPH

Versus

Track 10 EB v2 3 TPH

Very low conflict level

### PM CONFLICTS

This is the major conflict problem of the whole station.

Lines 1 and 2 have only a few parallel moves. These are:

WB v5 4 TPH Tracks 11-12

Versus

EB v4 3 TPH Tracks 9-10

Even here, however, there is the problem of the common turnout mentioned for the AM situation re tracks 10-11.

The bulk of the conflict is:

LIRR EB v15 12 TPH from tracks 13-16 to Line 1

Versus

Amtrak WB Line 2 v5 4 TPH to tracks 11-12 and

NJT WB Line 2 v8 18 TPH to tracks 6-8

This sums to EB 12 TPH vs WB 22 TPH. This is 12 net conflict events.

This situation is the same as today. The system functions – but with little spare time between moves. If the LIRR GCT operation reduced PSNY- LIRR volume, the situation would improve. In the meantime, the plan proposed is viable – even without such reductions.

**Table**

**EXISTING GRADES**

**NJ Meadows to Long Island City**

**Datum 300 = Mean High Water, Sandy Hook = 2.49 Meadows Division**  
**Datum 327+00 North River Division = 318+89 Meadows Division**

Grade 0%

**1. Location: Meadows Div., Bridge over Susquehanna RR near PRR MP 3.0**

PVI Adjusted Datum Station 331+39 Elevation 323.51 LVC 300'

Grade 1.3%    delta length 7179'    delta elevation 93.23'

**2. Location: Under Weehawken Yd Erie RR**

PVI Station 259+60 Elevation 230.28 LVC 100'

Grade 1.19%            960'    11.42

**3. Location: Bulkhead Line, West side Hudson River**

PVI Station 250+00 Elevation 218.86 LVC 100'

Grade 1.4%            800'    11.26

**4. Location: Max Channel Depth of Hudson River**

PVI Station 242+00 Elevation 207.60 LVC 400'

Grade -0.5%            1900'    9.56

**5. Location: 500' from East side Hudson River Shore**

PVI Station 223+00 Elevation 217.16 LVC 400'

Grade -1.2%            540'    6.48

**6. Location: Pierhead Line Manhattan Side**

PVI Station 217+60 Elevation 223.64 LVC 400'

Grade -1.93%            1734'    33.58

**7. Location: 11<sup>th</sup> Avenue**

PVI Station 200+26 Elevation 257.22

Grade -1.91%            1006'    19.1

**8. Location: 10<sup>th</sup> Avenue**

PVI Station 190+20 Elevation 276.32

Grade -1.9235% 420' 8.08

**9. Location: Mid 9<sup>th</sup>-10<sup>th</sup> Avenue**

PVI Station 186+00 Elevation 284.4 LVC 150'

Grade -0.4% 1700' 6.8

**10. Location: Mid Penn Station, Highest PRR Manhattan Elevation**

PVI Station 169+00 Elevation 291.2

Grade 0.4% 900' 3.6

**11. Location: Mid 7<sup>th</sup>-6<sup>th</sup> Avenue**

PVI Station 160+00 Elevation 287.6 LVC 150'

Grade 0.9% 1500' 13.5

**12. Location: 5<sup>th</sup> Avenue**

PVI Station 145+00 Elevation 274.1 LVC 180'

Grade 0.3% 609' 1.9

**13. Location: Madison Avenue**

PVI Station 138+91 Elevation 272.2 LVC 360'

Grade 1.5% 4031' 60.4

**14. Location: Lowest elevation under East River**

PVI Station 98+60 Elevation 211.8 LVC 660'

Grade -0.7% 2398 17.08

**15. Location: Bulkhead Line Long Island City**

PVI Station 74+62 Elevation 228.88 LVC 156'

Grade -1.22%

Grade -1.5 %

Average Grade 1.34% 6181' 83.12

**16. Location: Line D (Line1) 300' west of Thomson Ave.**

PVI Station 12+81 Elevation 312

Grade 0 %

**Sources:**

1. Transactions of the American Society of Civil Engineers  
Published by the Society, New York NY  
Volume 68, September 1910  
Volume 69, October 1910.
  
2. Plan For New York City  
New York City Planning Commission, 1969  
Volume 5, Borough of Queens  
Page 24
  
3. CAD Drawings by H. Landow  
Various drawings of Penn Station and other locations  
Based on PRR 50 scale track drawings and Item #1 above
  
4. Passenger Terminal and Trains, by John A. Droege  
McGraw Hill Book Company, New York, 1916, pg. 240

---

**From:** Chris LaPunzina [mailto:[clapunzina@investcoinc.com](mailto:clapunzina@investcoinc.com)]  
**Sent:** Tuesday, May 31, 2016 3:18 PM  
**To:** Team at Hudson Tunnel Project <[team@hudsontunnelproject.com](mailto:team@hudsontunnelproject.com)>  
**Subject:** EIS scope comments

Please refer to the attached letter for our comments.

Thank you.

**Christopher S. LaPunzina, P.E.**

**Executive VP – Development**

Meyers Parking, Inc.

441 Lexington Avenue, 8<sup>th</sup> Flr

New York, NY 10017

Tel: [212-503-0903](tel:212-503-0903)

Cell: [646-413-0624](tel:646-413-0624)

[clapunzina@investcoinc.com](mailto:clapunzina@investcoinc.com)



MEYERS PARKING, INC.

May 31, 2016

Hudson Tunnel Project

Re: Draft EIS Scoping Document

Dear Sir/Madam:

We are the owners of property located at 218 W. 31<sup>st</sup> St. between 7<sup>th</sup> and 8<sup>th</sup> Avenues immediately south of the existing Penn Station. We are writing on behalf of and with the consent of the property owners immediately to the east of our parcel as well, specifically 204 W. 31<sup>st</sup> St and 209 W. 30<sup>th</sup> St. Collectively, we own 40% of the full block bordered by 7<sup>th</sup> and 8<sup>th</sup> Avenue between 30<sup>th</sup> and 31<sup>st</sup> Streets, the proposed location of the Penn Station South expansion. The properties include an active Catholic church, a church office building and a parking garage servicing many individuals and businesses in the area as well as Madison Square Garden events.

Thank you for the opportunity to comment on the Scoping Document issued by the Federal Railroad Administration and NJ Transit on the Environmental Impact Statement (EIS) that will be prepared for the Gateway Project, a significant transportation improvement project for guaranteeing and improving access to and from New York City over the next decades. The need for and goals of the project are meritorious, and accordingly the EIS must be sufficiently detailed and comprehensive to ensure that the analysis covers all aspects of the environment, including the consequences of the project and its time frame on the built environment. In particular, the EIS must consider the consequences of the Gateway Project on zoning, land use, and urban policy in the areas immediately impacted by the construction and operation of the Gateway terminal station, including the impacts caused by the uncertainty in schedule of the Gateway Project. This analysis is consistent with Goal 5 identified in the Scoping Document, namely to “[m]inimize impacts on the natural and built environment” and to “[s]trive for consistency with local plans and policies”.

If built, the Gateway Project will end in a station located between West 30th Street and West 31st Street (the “Station Block”), immediately south of and connected to the Penn Station terminal, and accordingly the Station block is likely to experience the most impacts from the project, both during and after construction. Penn Station is the most active transportation complex in New York City, with Amtrak, NJ Transit, LIRR, and 1, 2, 3, A, C, and E subways occupying the block. Because of this concentrated network of mass transit, the blocks surrounding Penn Station are ideally situated for high density transit-oriented development. However, the current zoning for the Station Block is obsolete and is ripe for a rezoning. With the exception of the Seventh Avenue frontage, the Station Block is zoned M1-5, a manufacturing designation having a floor area ratio (FAR) of 5.0. This zoning designation is a vestige of historic zoning in the area, and today is inconsistent with both the surrounding area and the transit oriented development policies of the City of New York. As an example, the development potential of all other parcels in the area immediately adjacent to Penn Station is between 2.4 and nearly four times that of the Station Block. The Station Block should have a density comparable to the surrounding properties

today, and the Environmental Impact Statement must consider how and whether the Gateway Project is interfering with the appropriate zoning and development of the Station Block.

We would welcome a collaborative process and a productive dialogue with the appropriate parties to discuss the Project in further detail.

Thank you.

Very truly yours,

A handwritten signature in blue ink that reads "Timothy Gordon". The signature is written in a cursive style with a large initial "T" and a long, sweeping underline.

Tim Gordon

Principal

# EDISON PROPERTIES



May 26, 2016

Amishi Castelli, Ph.D.  
Environmental Protection Specialist Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

RJ Palladino, AICP, PP  
Senior Program Manager  
NJ TRANSIT Capital Planning  
One Penn Plaza East – 8<sup>th</sup> Floor  
Newark, NJ 07105

Dear Ms. Castelli and Mr. Palladino:

I would like to take this opportunity to provide comments regarding the Hudson Tunnel Project Environmental Impact statement (EIS) Scoping effort.

In 2011, the City of New York convened a bi-state, multi-agency group to study the feasibility of extending the No. 7 Subway to Secaucus, New Jersey. The study group included representatives of the Governor's offices of New York and New Jersey, the Mayor's Office of the City of New York, the New York Metropolitan Transportation Authority (MTA), the Port Authority of New York and New Jersey (PANYNJ), NJ TRANSIT, the Hudson Yards Development Corporation, the New York City Department of Planning, the New York City Department of Transportation and the New Jersey Department of Transportation.

The *No. 7 Secaucus Extension Feasibility Analysis – Final Report*, prepared by Parsons Brinckerhoff, evaluated the physical, operational, environmental and legal feasibility of a plan to extend the No. 7 through a new tunnel under the Hudson River connecting it to a new terminal at the Frank R. Lautenberg Station in Secaucus. This new trans-Hudson connection would provide direct connections for thousands of New Jersey commuters to the fastest growing employment centers in Manhattan – Hudson Yards and the Grand Central area– and give Queens riders direct access to New Jersey as well. The study concluded that the No. 7 extension was physically and operationally feasible.

Edison Properties firmly supports the Hudson Tunnel Project as described in the EIS Scoping Document and views the extension of the No. 7 to Secaucus Junction as a companion project that, along with the Tunnel Project and the Secaucus Loop element of the Gateway Project, would contribute significantly to a long term solution to the trans-Hudson commuter capacity crisis facing the region.

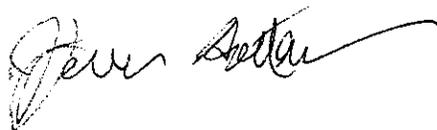
We believe that Hudson Tunnel Project EIS presents an opportunity to explore an engineering solution that links the two projects and we would like you to consider including the study of an alternative that uses one tunnel structure for both projects. Having the two systems share a tunnel is not a new solution. The 63<sup>rd</sup> Street subway tunnel for the F train was built with two levels, one above the other. The Long Island Railroad extension to Grand Central Station used the unused level of that tunnel. By building one tunnel that can serve both the No.7 train and the Hudson Tunnel project, both projects will be able to advance when the first one proceeds, laying the foundation for future regional mobility and growth.

The Hudson Tunnel Project defines the end points or termini of the project as the interlocking near the NEC Secaucus Station in New Jersey and the existing rail complex at Penn Station New York. The termini for the No. 7 extension, as envisioned in the PB report, are the NEC Secaucus Station, about 40 feet south of the existing Amtrak railroad embankment, and south of the No. 7 West 34<sup>th</sup> Street station in New York. So, while we understand that the divergence of terminal points in New York precludes a completely shared tunnel alignment, we believe there are opportunities to share a large portion of a new tunnel.

We understand that the Hudson Tunnel Project EIS will describe and evaluate a range of Build Alternatives and that several locations for the new tunnel will be considered. We urge you to consider the proposal for the construction of a tunnel that could accommodate both the NEC and the No. 7 extension among the alternatives studied.

We would welcome the opportunity to meet with you to discuss this proposal, and our vision for the role of the No. 7 line extension in the trans-Hudson capacity discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerome Gottesman", with a long, sweeping flourish extending to the right.

Jerome Gottesman  
Chairman

Monday, November 4, 2013

## OPINION

### Let's extend the 7 train to Secaucus

After the far West Side, the next stop on the 7 should be across the river

By Jerry Gottesman, Steven Spinola

Next year, after \$2 billion and seven years of construction, the extension of the 7 train will begin shuttling thousands of riders daily to a new station in Hudson Yards on Manhattan's far West Side.

One of the city's most exciting neighborhoods will spring to life — with millions of square feet of new residential, commercial, retail and public space in an area that just a decade ago was a collection of derelict warehouses and a parking area for trains.

But why stop there?

Over the past three years, the mayor's office, working with a bi-state multi-agency task force, has studied a plan to extend the No. 7 line through a new tunnel under the Hudson River, connecting it to the Lautenberg train station in Secaucus, New Jersey.

There, it would become the transit connection of choice for many of the millions of New Jersey commuters each day, linking this key workforce seamlessly to the Hudson Yards, Bryant Park, Grand Central Station, Long Island City and Flushing — and giving Queens riders direct access to New Jersey as well.

This would be the first new train tunnel under the Hudson River built in over 100 years. During this period, the populations of New Jersey and Rockland County have grown by 335 percent.

The extension of the No. 7 to Secaucus would create important ancillary benefits.

With over 200 peak-hour buses full of riders travelling to Secaucus for a smooth transfer to the No.7 Line, the Port Authority Bus Terminal on 8th Ave. and West 42nd St. would be relieved of a significant portion of the demand that presently clogs that facility daily, increasing its operating efficiency and finally unburdening it enough to allow it to undergo a much needed renovation.

The extension would also significantly reduce the endless lines of buses that currently travel in and out of the city twice a day, jamming the vehicular tunnels and streets on the West Side.

And it would reduce the demand on New York's Penn Station, which is a nightmare during peak travel periods, even as half of the station's arriving commuters are headed to other areas of Manhattan.

Most importantly, it would provide the necessary access to support a growing employment base.

The public should know that there are two rail-tunnel proposals, both necessary. In addition to the No. 7 extension — which would address the needs of regional commuters and employers in both the city and New Jersey — there is the Gateway Tunnel, a keystone in Amtrak's realization of a robust intercity rail system between Washington and

Boston on its premier line, the Northeast Corridor. It would also provide redundancy in the event of failure of the existing 100-year-old tunnel to Penn Station.

Having the two systems share a tunnel is not a new solution. The 63rd St. subway tunnel for the F train was built with two levels, one above the other. The Long Island Railroad extension to Grand Central Station will utilize the currently unused level of that tunnel.

By building one tunnel that can serve both the 7 train and Gateway, both projects will be able to advance when the first one proceeds, laying the foundation for future regional mobility and growth.

For that to happen, the governors of New York and New Jersey and their transportation agencies must join forces to fund a \$2 million study to seriously explore these and other opportunities.

Let's take that step, give the engineers the go-ahead and fund a serious, preliminary study of transportation needs that benefit New York, New Jersey and the entire region.

*Gottesman is chairman of Edison Properties. Spinola is president of the Real Estate Board of New York.*

---

**From:** Jonathan Gouveia [mailto:[jgouveia@mas.org](mailto:jgouveia@mas.org)]  
**Sent:** Tuesday, May 31, 2016 4:20 PM  
**To:** Team at Hudson Tunnel Project <[team@hudsonunnelproject.com](mailto:team@hudsonunnelproject.com)>; [rpalladino@njtransit.com](mailto:rpalladino@njtransit.com);  
[amishi.castelli@dot.gov](mailto:amishi.castelli@dot.gov)  
**Subject:** Hudson River Project Environmental Impact Statement Scoping

Dear Ms. Castelli and Mr. Palladino,

Please find attached The Municipal Art Society of New York's comments regarding the Hudson River Project Environmental Impact Statement Scoping Document.

Please feel free to contact me with any questions or concerns.

Many thanks,

Jonathan

**Jonathan Gouveia**

Senior Director, Planning and Infrastructure  
The Municipal Art Society of New York

488 Madison Avenue, 19<sup>th</sup> floor  
New York, NY 10022  
[jgouveia@mas.org](mailto:jgouveia@mas.org) | [MAS.org](http://MAS.org) | [212.935.3960](tel:212.935.3960) x1227

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May 31, 2016

Ms. Amishi Castelli, Ph.D.  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

Mr. RJ Palladino, AICP, PP  
Senior Project Manager  
NJ Transit Capital Planning  
One Penn Plaza East – 8<sup>th</sup> Floor  
Newark, NJ 07105

**RE: Comments Regarding the Hudson River Project Environmental Impact Statement Scoping Document**

Dear Ms. Castelli and Mr. Palladino,

The Municipal Art Society of New York (MAS) welcomes the opportunity to provide comments on the Scoping Document for the Hudson River Project (Project) Environmental Impact Statement (EIS) being prepared by the Federal Railroad Administration and New Jersey Transit.

The North River Tunnels into New York Penn Station – which moves a workforce that annually contributes more than \$50 billion to the U.S. economy – are crucial to the entire Northeast Corridor. The Hudson River Project plan to repair damage in the existing tunnels from Superstorm Sandy and construct two additional tunnels to improve resiliency is critical to the future of New York City and the surrounding region. Thus, MAS strongly supports the Hudson River Project.

For many years, MAS has been the leading advocate for a new Penn Station and a comprehensive district and infrastructure plan for West Midtown. As such, MAS makes the following recommendations for the Project:

- 1. Tunnel Alignment Alternatives** – Although the primary purpose is to rehabilitate the existing Hudson River tunnels, the Project is undeniably connected to the future expansion of Penn Station and a number of long-range infrastructural improvements that would affect area transportation for generations. The EIS needs to evaluate tunnel alignments that provide optimal

connections to local subway and bus lines, while also accommodating potential through-running service for commuter rail lines (i.e., NJ Transit and LIRR). Further, we encourage the analysis of tunnel alignments that do not solely align with the Right of Way at Hudson Yards or those proposed under the Penn Station South project, to comprehensively assess a wider range of potential local and regional connections.

**2. Coordination with Other Planning Efforts:**

MAS has long called on elected officials to develop a long-term vision for both trans-Hudson transportation capacity and a forward looking vision for West Midtown. We therefore request that the EIS carefully and comprehensively evaluate how best to coordinate the Project with other related planning efforts, including:

*Empire Station Complex Proposal*

We believe that Governor Cuomo's ongoing solicitation for the Empire Station Complex could result in a series of worthwhile efforts to ease congestion and improve public spaces and amenities at Penn Station. Although the Hudson River Project is primarily focused on restoring the North River tunnels, tunnel alignment alternatives must incorporate Governor Cuomo's planned improvements to the station, while not foreclosing opportunities for additional and more substantial transit capacity, life safety, circulation and public space improvements in the future.

*Penn Station South Project / Block 780*

MAS understands that in an effort to expedite the construction of the tunnels, other elements of Amtrak's Gateway Project, including the expansion of Penn Station south to Manhattan's Block 780, are not included in the scope of the current Project. However, in order to maximize the return on the proposed investments, the EIS should evaluate the proposed tunnel and existing tunnel repairs in coordination with platform area enlargements and improvements anticipated for the planned expansion of Penn Station or Amtrak's Block 780 project.

*Port Authority Bus Terminal Master Plan*

Like Penn Station, the Port Authority Bus Terminal (PABT) is in dire need of rehabilitation and increased capacity. The Port Authority's planning efforts for the site should be incorporated into the EIS as part of a comprehensive look at how best to add new trans-Hudson capacity to the region. The EIS should disclose an estimated range of new capacity for the rehabilitated tunnels, as well as the new tunnels. This information will allow for better planning for future improvements at the PABT, as well as Penn Station.

- 3. Cost Effectiveness** - Although the Hudson River Tunnel Project, as stated, will not directly increase rail capacity, the EIS should also evaluate alternatives that utilize the analyses and findings from the Northeast Corridor (NEC) Future Study EIS that provide the highest level of capacity improvements balanced with the most feasible costs.

Thank you for the opportunity to provide comments on this critically important project.

# **INSTITUTE FOR RATIONAL URBAN MOBILITY, INC.**

**George Haikalis  
President**

**One Washington Square Village, Suite 5D  
New York, NY 10012 212-475-3394  
geo@irum.org www.irum.org**

## **Comments on USDOT Hudson Tunnel Project EIS Scoping Document, May 17, 2016**

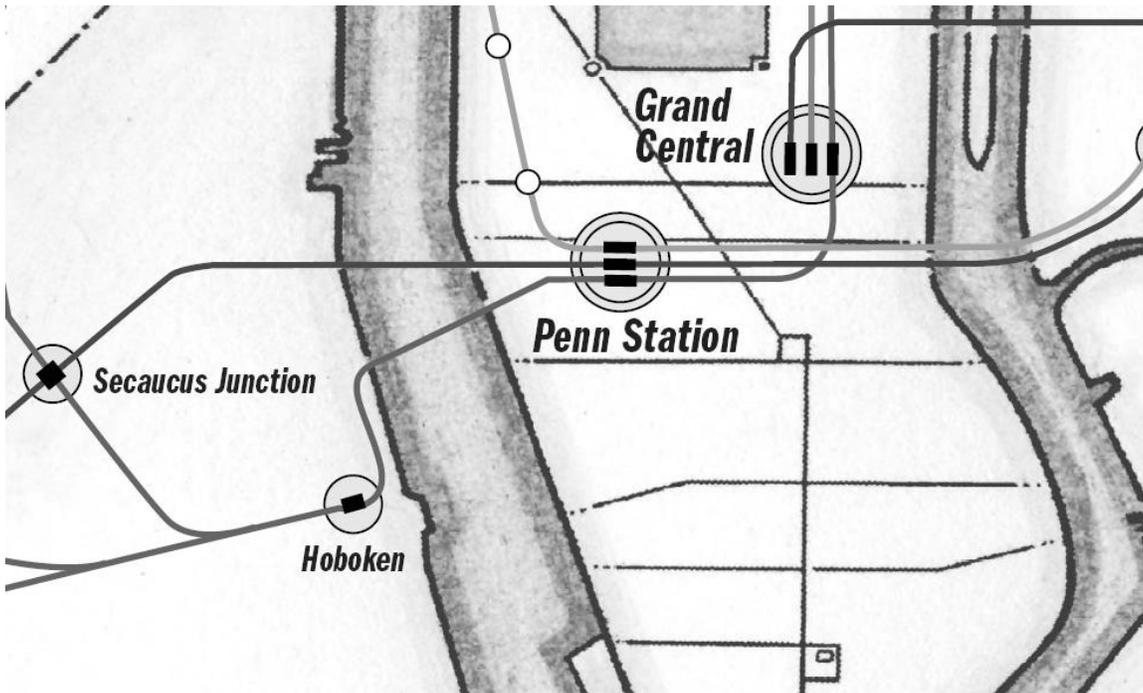
**The Institute for Rational Urban Mobility, Inc. (IRUM) is a NYC-based non-profit concerned with reducing motor vehicular congestion and improving the livability of dense urban places.**

**IRUM fully supports initiatives to expand Hudson River passenger and freight rail tunnel capacity. However, IRUM finds the current USDOT scoping document “segmented” and seriously flawed and suggests that the following changes be made:**

- 1. The geographic scope should be expanded to include the full range of options from the City of Newark to the City of New York, including consideration of options that would route new Hudson River tunnels by way of the Hoboken Terminal area.**
- 2. Full consideration should be given to all options, including the economic impact of postponing, or even eliminating the replacement of the Portal Bridge. Routing the new tunnels by way of the Hoboken Terminal area clearly should be included as one of the options included in the scope.**
- 3. Manhattan terminal options should be considered in this EIS Scoping process, including the direct Penn Station-Grand Central Terminal connection, studied in detail in the Access to the region’s Core (ARC) Major Investment Study (MIS). The full details of all option studied in the ARC project should be made available to the public as part of the scope of this EIS. The advantages of this option should be weighed against the serious adverse impacts of expanding Penn Station to the south, with its substantial displacement of thousands of employees in dozens of structures that would have to be demolished in the blocks south of Penn Station. Linking west of Hudson commuters employees with the concentration of office buildings in East Midtown would make the new tunnel much more useful.**

**The attached thumbnail describes some of these advantages and should be considered as part of this comment.**

**George Haikalis, President, IRUM, May 17, 2016**



## Build new Hudson River Passenger Rail Tunnels via Hoboken/Jersey City/Penn Station and Grand Central

A simple and cost-effective way to remake the region's three commuter rail lines into a coordinated **Regional Rail System** is to route much-needed new Hudson River passenger rail tunnels by way of the Hoboken/Jersey City waterfront business district. A new on-line station would be constructed just south of the Hoboken Terminal and a new 2.3 mile two-track tunnel would connect with existing tracks and platforms at Penn Station, NY. A new 1.2 mile two-track tunnel would be constructed under 31<sup>st</sup> Street and Park Avenue to link with existing tracks and platforms in the Lower Level of Grand Central Terminal. New stairways and wider concourses are critical to rebuilding Penn Station into a suitable gateway to NYC. Thru-running increases capacity and connectivity while permitting removal of rail yards for new resilient waterfront development. It efficiently uses existing rail infrastructure, avoiding adverse environmental impacts of new rail trackage in the Hackensack Meadowlands.

The Penn Station-Grand Central connection allows west of Hudson residents to reach destinations in East Midtown, the largest concentration of office buildings in the nation and makes it easier for Bronx, Westchester and Connecticut residents to reach the growing West Midtown area as well as Hoboken/Jersey City, Newark and Newark Airport. An interconnected **Regional Rail System** -- with frequent service, integrated fares and through-running -- provides an attractive alternative to driving on crowded highways that cannot be expanded and increases the economic viability of the region in the face of growing global competition.

**The New ARC Hudson River Passenger Rail Tunnels:  
The Hoboken Alternative**

**December 1, 2009**

**Prepared by**

**George Haikalis  
President, Institute for Rational Urban Mobility, Inc.  
One Washington Square Village, Suite 5D  
New York, NY 10012  
212-475-3394 [geo@irum.org](mailto:geo@irum.org) [www.irum.org](http://www.irum.org)**

## Why via Hoboken?

Routing the new Access to the Region's Core (ARC) Hudson River passenger rail tunnels by way of Hoboken Terminal – the Hoboken Alternative – allows existing rail infrastructure to be used more productively. When combined with "Penn Station First" -- a simpler and more direct Penn Station connection in Manhattan -- the Hoboken Alternative holds the promise of reducing construction cost of the new tunnels and its essential related component -- the Portal Bridge Capacity Expansion project -- by more than \$8 billion or 70% of the total \$11.4 billion cost.

Even in good times this option merits serious consideration, but in light of the growing economic difficulties facing New Jersey and New York it is extremely important to give fair and impartial consideration to credible options.

The simpler construction also results in speeding completion of an operational "first phase", saving four years or more off the projected eight

year time frame in the current plan, before any additional trains can be handled across the Hudson.

## Other Important benefits of the Hoboken Alternative

Significant environmental gains would be realized as well. Since the Hoboken Alternative routes trains over existing underutilized tracks and bridges through the Hackensack Meadowlands, no wetlands would be destroyed. A less costly construction scheme will greatly reduce the project's carbon footprint as well. The route better serves the waterfront, providing motorists with a more attractive alternative and reducing congestion which is at critical levels.

Routing the new tunnels by way of Hoboken offers significant savings in operating cost, while providing a much higher level of rail service to New Jersey's economic engine – the massive concentration of commercial and residential development on the Jersey City and Hoboken waterfront.

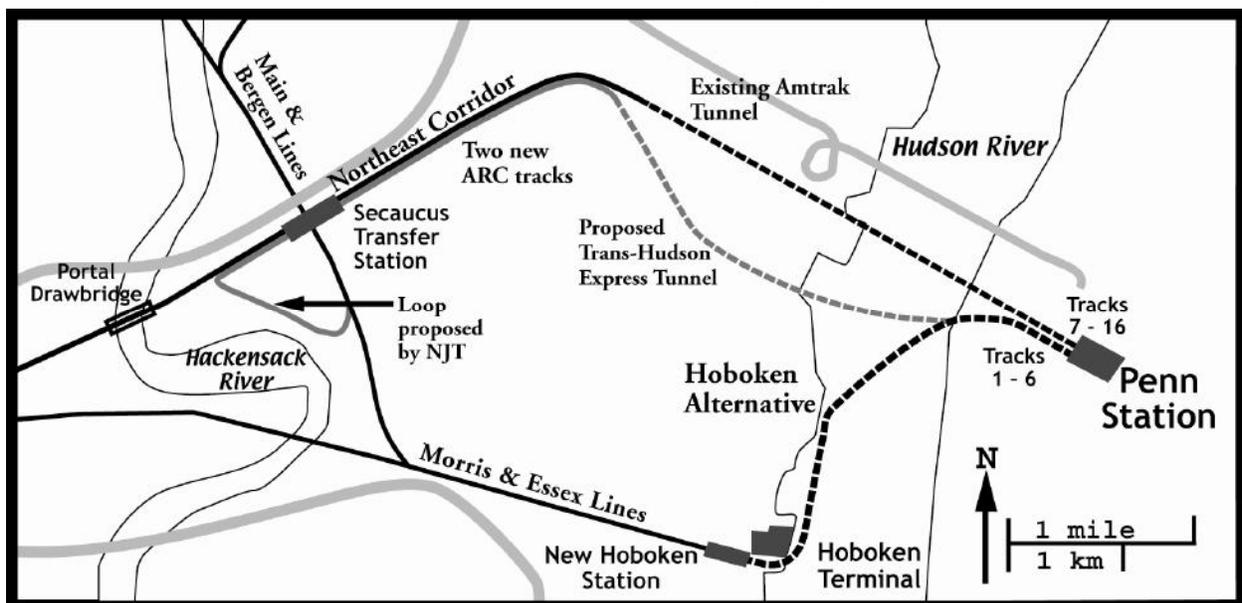


Figure One - The Hoboken Alternative

The state would gain a much higher return on its valuable waterfront properties. By converting Hoboken Terminal into a “way” station, a simple four-track through station could readily handle projected traffic needs for passengers boarding or alighting at Hoboken. Should more detailed studies indicate that greater capacity is needed, the station could be expanded to six or even eight tracks.

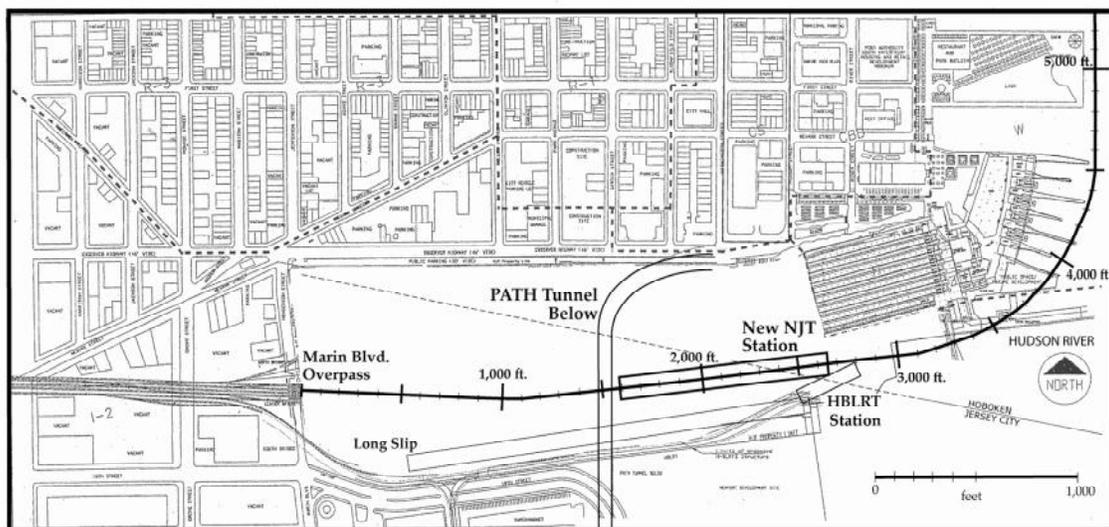
As a through station, no trains would terminate at this location. All of the existing tracks and servicing facilities at Hoboken Terminal would be eliminated. Other existing NJ Transit facilities, located inland would be used, and expanded if needed. Except for the new station itself, the entire Hoboken waterfront terminal could be sold and re-used as a valuable development site. However, the historic train shed and terminal building should be preserved and incorporated into new development at this site.

While a change of direction will require

additional environmental and procedural filings, all of the impacts on the New Jersey side of the tunnel will be experienced on NJ Transit-owned property, eliminating objections from nearby property-owners. Environmental stakeholders who are concerned about the Meadowlands wetlands can be expected to become strong supporters of the change in route.

### Background

The Hoboken Alternative was offered by rail advocates in early 2005 after NJ Transit proposed a revised alignment for its tunnels in the summer of 2004. In order to gain additional depth under the riverbed, NJ Transit proposed that instead of building its new tunnels parallel to the existing century-old PRR tunnels, they would curve southwest under Manhattan’s West Side before turning west, reaching the New Jersey shoreline in the northern portion of Hoboken. The tunnels would then curve northwest reaching a portal in



New Hudson River Passenger Rail Tunnels - Plan at Hoboken

Figure Two – Detailed Plan at Hoboken

the vicinity of the existing tunnel portals in North Bergen. The bow in the tunnel adds approximately 0.3 miles to the tunnel's length, compared to a straight-line alignment of the current tunnels.

Since NJ Transit's new alignment was heading toward the Hoboken Terminal before turning north it occurred to rail advocates that an alternative of continuing southwest and then turning west at Hoboken terminal was feasible, as shown in Figure One.

For the Hoboken Alternative the distance between Penn Station, New York and Penn Station, Newark is the same as the current route via Secaucus. The Hoboken route saves about 0.4 mile over the Secaucus loop route for Bergen and Rockland County destinations and avoids the sharp curves, offering the potential for travel time savings.

During the EIS proceedings, the Mayors of Jersey City and Hoboken and the owner of the largest development site adjacent to the Hoboken Terminal -- the Lefrak Organization -- all endorsed the routing through Hoboken. In its submittal Jersey City outlined a more ambitious alignment than the one contained in this report. In the EIS, NJ Transit criticized Jersey City's suggested alignment but made no comment on the alignment offered by rail advocates, which was also entered into the record.

Two concerns, other than questions about alignment details, were raised by NJ Transit in the EIS process. The first was that in the longer term, capacity limitations would occur. Waterfront-bound and Lower

Manhattan-bound passengers from points further west in the state would pre-empt space on trains from Manhattan-bound passengers, limiting the full use of the Hudson River tunnels. This is a longer term concern. The optimistic forecasts of ridership are unlikely to be realized for many years, because of the downturn in the economy. Should ridership reach projected levels there are other options for accommodating West of Hudson passengers heading to the Exchange Place area or Lower Manhattan. These passengers would be better served if they could transfer to PATH further west, and avoid the Hoboken Terminal entirely. Plans for a transfer from the Morristown Line to PATH at Harrison, and for an extension of PATH to Secaucus were developed in 1962 as part of the agreement with the Port Authority to acquire the Hudson Tubes. These plans could be re-examined as part of a future capacity enhancement analysis.

The second concern was the greater length of the underwater segment of the tunnels, and whether adequate ventilation facilities could be constructed. While clearly this issue must be addressed during the detailed design effort, it can hardly be called a fatal flaw, since many subaqueous rail tunnels of much greater length have been constructed around the world.

## **Engineering Feasibility**

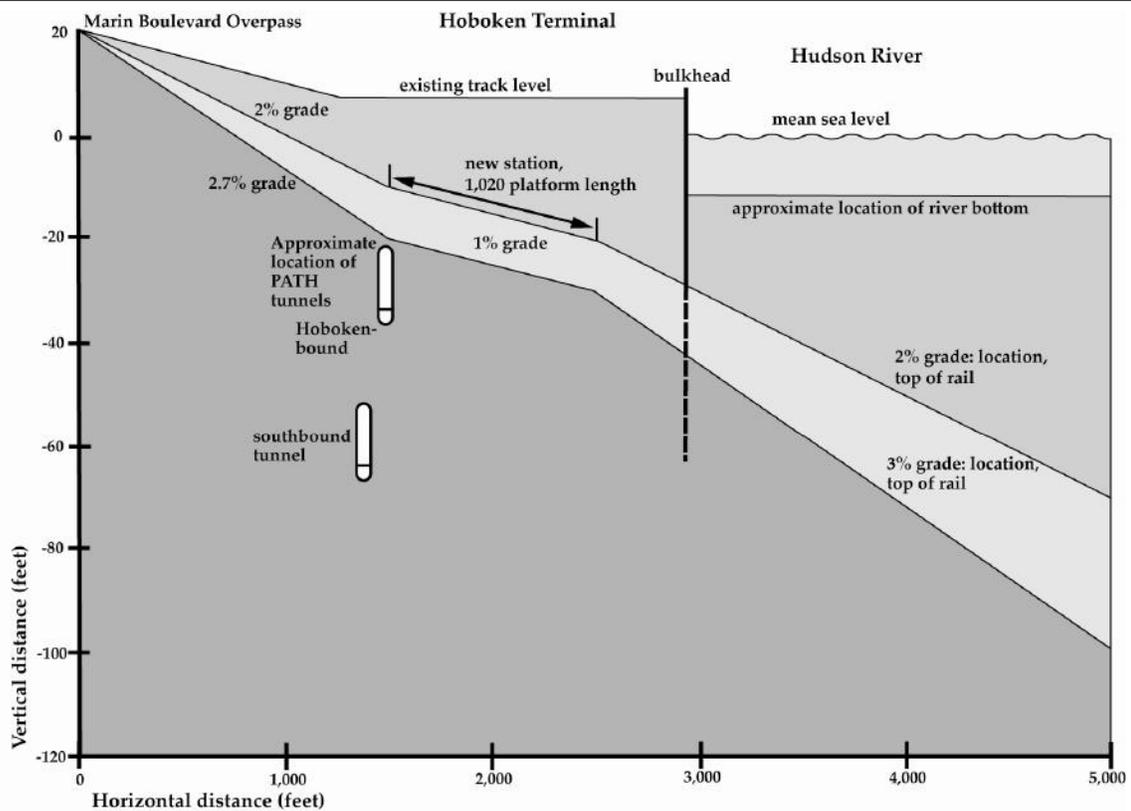
While a number of options for connecting existing NJ Transit tracks at Hoboken with the new Hudson River rail tunnels are possible, and should be carefully analyzed by NJ Transit's engineering team, this report focuses on what seems to be the most

promising scheme -- ramping down from the embankment east of the Palisade tunnels, beginning with the last highway underpass at Marin Boulevard, before reaching the Hoboken Terminal complex. The overall plan is shown in Figure Two and the accompanying profile is shown in Figure Three.

Two grade options – 2% and 3% -- were considered in this analysis, as they were in the track connection plan to Penn Station in Manhattan described in the February 2007 DEIS. A 3% grade has less impact on the riverbed, but is more challenging in terms of train performance and capacity. Modern high-powered electric trains can easily negotiate a 3% grade. MTA’s LIRR East Side Access Project, now under construction, includes a 4,200 foot

long segment of 3% grade in Long Island City where the tracks rise from the 63<sup>rd</sup> Street tunnels to meet existing LIRR tracks on an elevated embankment in Sunnyside. For the Hudson River Hoboken routing both grade options are feasible.

Relatively straightforward cut-and-cover construction is envisioned in Hoboken. The challenge is to descend from the Marin Boulevard overpass, pass over the Hoboken-bound PATH tunnel and still clear the river bottom with sufficient cover to permit soft-soil tunnel boring machine construction. The extent to which fill must be placed in the river bed in Hoboken depends on the degree that silting has already occurred around the Hoboken ferry slips and pilings. NJ Transit’s plans to restore some of the ferry slips for cross-Hudson service must be



New Hudson River Passenger Rail Tunnels - Profile

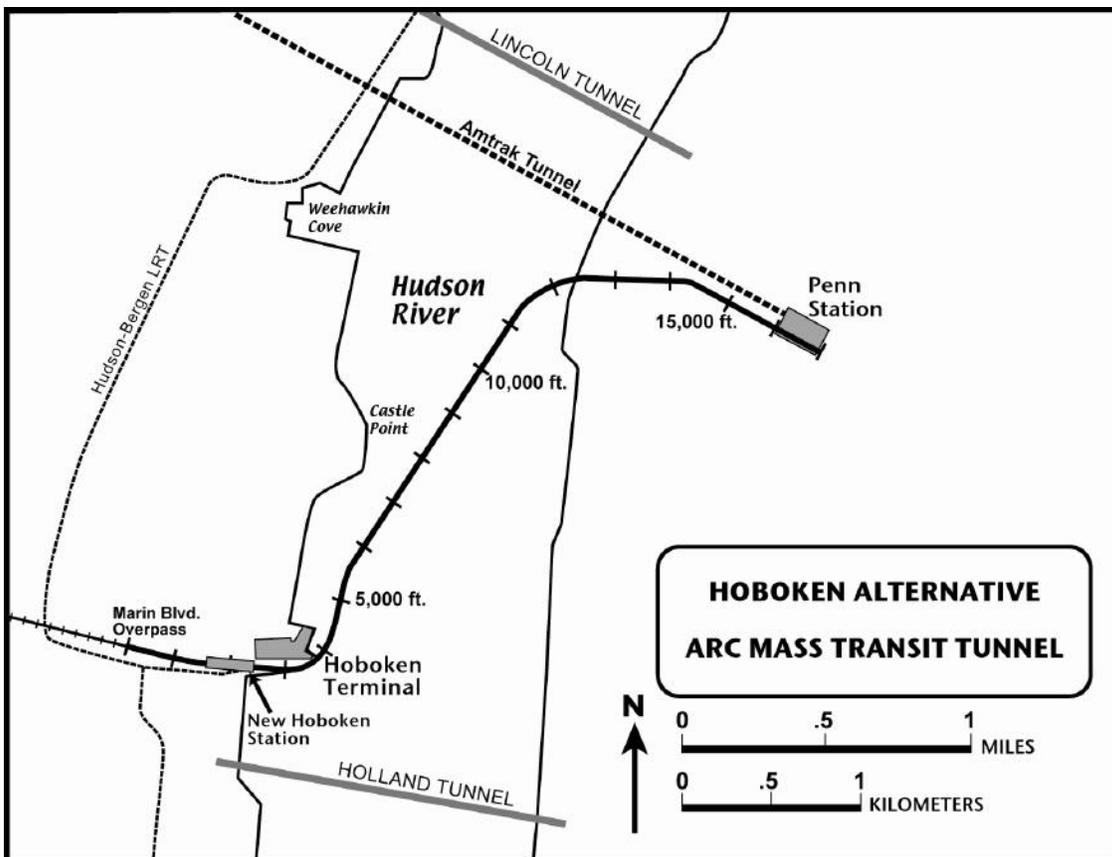
**Figure Three – Detailed Profile at Hoboken**

coordinated with the new tunnel construction.

The existing yards and platforms at Hoboken Terminal are less than ten feet above river level. The new alignment will begin its descent at the Marin Boulevard overpass, the beginning of the numbering of 1,000 foot intervals shown in the figures. After reaching grade, the lines will continue to descend in an open cut to be built in a "bath-tub" design with adequate drainage. A new four track thru station will be constructed just south of the existing platforms and tracks at Hoboken Terminal. For both grade options, the station could be open to daylight with natural ventilation, with canopies over the platforms. Within the 12-car, 1,000 foot long station a 1% grade would be maintained. East of the station the

tunnels would begin, with a construction shaft for launching the soft soil TBMs toward Manhattan. Depending on a more detailed design analysis and construction scheduling plan, the existing Hudson-Bergen light rail station might be temporarily relocated.

With the new thru station in place all of the tracks and train servicing facilities would be removed. A new site plan for redeveloping this valuable NJ Transit-owned parcel would be developed. The historic train shed and terminal building would be preserved and appropriate new uses considered. A covered pedestrian path from the new station to the existing PATH Hoboken Station would be included in the new development and a new alignment for the light rail line through the site should be considered that



**Figure Four – Full Plan – Hoboken-Penn Station**

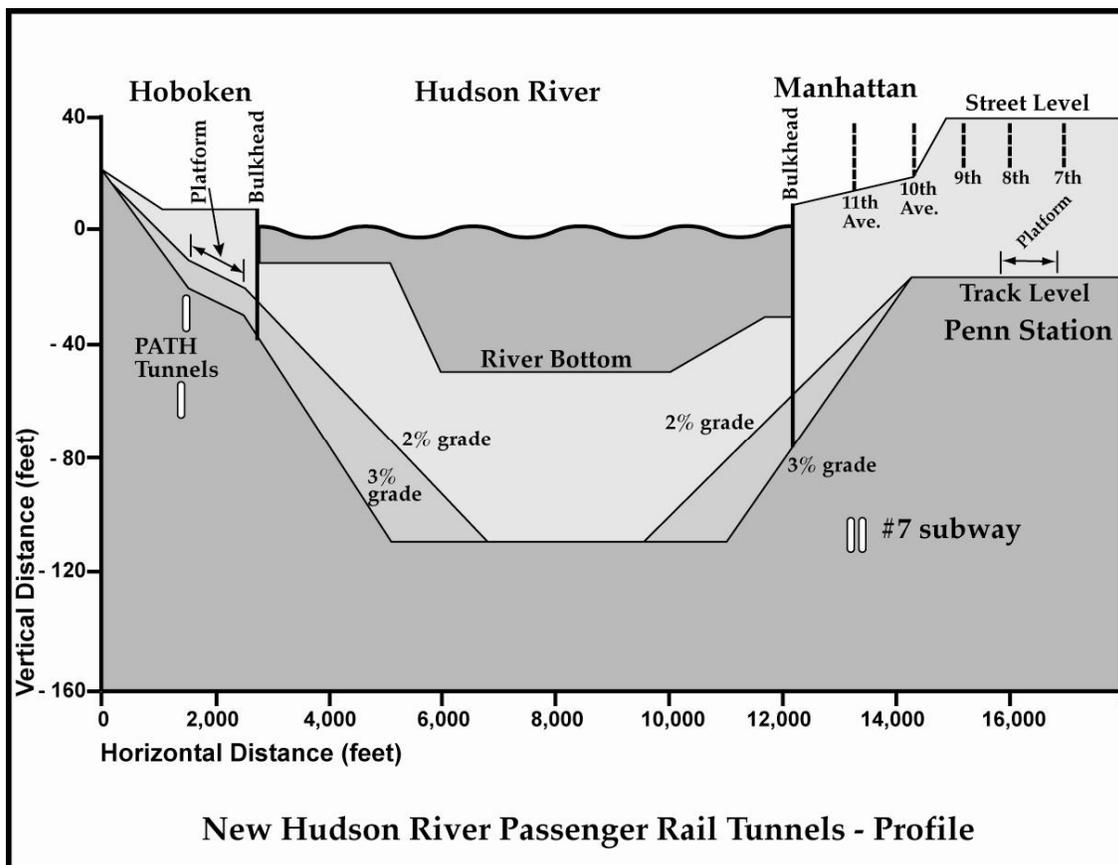
would bring the line closer to the center of Hoboken. It is important that new development plans for the Hoboken Terminal be prepared in consultation with elected officials in Hoboken and Jersey City.

The existing four track rail line between the Marin Boulevard overpass and the Palisade tunnels provides double the capacity of the two-track Hudson River crossing. A short segment of fifth main track is in place and could be used to enhance capacity in the near term. In the longer term, it might make sense to operate the Palisade tunnels as two separate two-track lines, with the northern pair of tracks linking only to the Bergen lines and the southern pair only to the Morristown and Northeast Corridor lines. The layout just west of the

Bergen tunnels could be simplified, permitting much higher operating speeds. In this case consideration should be given to adding a flyover to permit separation of inbound and outbound movements.

Several additional systems issues should be addressed. At Harrison a new flyover is needed to separate the westbound PATH trains from westbound Northeast Corridor trains that come via Hoboken. An additional westbound rail track is needed thru the Harrison Station. Space is available for this track, but an expansion of the embankment will be needed.

At the Manhattan end, the cut-and-cover Penn Station direct track connection described in the February



**Figure Five – Full Profile – Hoboken-Penn Station**

2007 Draft Environmental Impact Study (DEIS) report would be advanced and the deep cavern station 175 feet below 34<sup>th</sup> Street would be eliminated from the plan. As described in the DEIS, the link would extend from the bulkhead at 12<sup>th</sup> Avenue and 28<sup>th</sup> Street to the western retaining wall of the Penn Station complex, just east of 10<sup>th</sup> Avenue. Only a two-track cut-and-cover connection is needed, reducing the width of the sub-surface easement. This easement would be beneath properties slated for future development. Plans for new residential and commercial structures have been postponed because of the economic downturn, and can be modified to allow construction over the easement.

The alignment and the profile between Hoboken Terminal and Penn Station are shown in Figures Four and Five. The station to station distance (midpoint to midpoint of stations) is 2.8 miles. The soft soil tunnel, from bulkhead to bulkhead, is 1.8 miles in total for each tube. Cut and cover two-track approach links are about 0.5 miles each, on either side of the river.

The detailed route in Manhattan is shown in Figure Six. East of 10<sup>th</sup> Avenue the new tunnels connect into existing tracks west of Penn Station. With the existing track configuration already in place full interconnectivity from the new tunnels to most existing platform tracks is possible. A more careful analysis would be needed to justify higher speed turnouts or new switches. Clearly, within the station itself additional stairways and widened concourses will be needed. Even without the new track connection, these passenger flow enhancements would be needed over the next eight

years as part of an expansion of Moynihan/Penn Station.

Based on this preliminary analysis the Hoboken Alternative connection seems doable, and has the potential of saving as much as 80% of the cost of the Hudson River tunnel project.

## **Next Steps**

With new leadership in Trenton there is a critical opportunity to change direction and conduct a fair and impartial review of a more cost-effective and passenger- friendly plan for the new Hudson River tunnels. All construction contracts for the current plan should be put on hold until the engineering feasibility and constructability of the Hoboken Alternative is assessed. The expertise of the existing consultant team, currently under contract to NJ Transit, is already available and can be put to use immediately.

Concurrently, NJ Transit, in cooperation with MTA, should devise a full service implementation plan for thru-running at Penn Station, building on the successful "football specials" pilot program begun this fall. Thru-running has the potential to increase peak hour train capacity at Penn Station in the near term by 25% or more. To handle this increased ridership, additional stairways and widened concourse are needed as part of a plan to remake Moynihan/Penn station into a more fitting gateway to NYC.

The Hoboken Alternative and the "Penn Station First" direct track connection plan are part of a longer range plan for an interconnected Regional Rail system. A subsequent

step is the connection between Penn Station and Grand Central Terminal. Critical information about this connection is contained in the full 1,600 page 2003 ARC Major Investment Study, which must be released.

By moving forward on the Hoboken Alternative, the new Christie administration can show its commitment to advancing bold, yet cost-effective strategies in the face of New Jersey's unprecedented fiscal crisis.

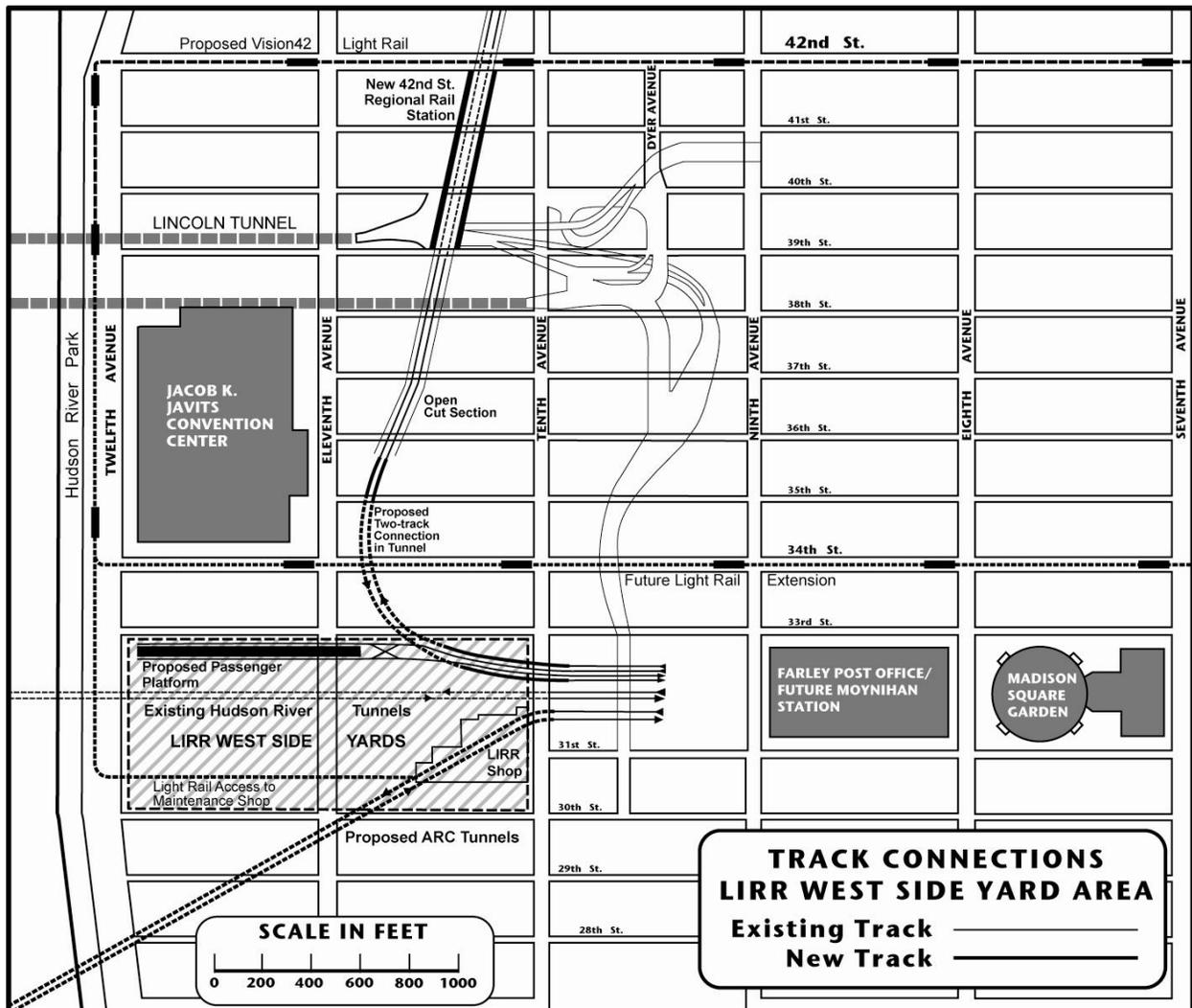


Figure Six – Plan at West Side Yard

E-Mail: [geo@irum.org](mailto:geo@irum.org)

Title: President

First name: George

Last name: Haikalis

Company: Institute for Rational Urban Mobility

Address 1: One Washington Square Village #5D

Address 2:

Town/city: New York

State: NY

Zipcode: 10012

Comment or question: IRUM strongly USDOT to extend the comment period for at least another 30 days to allow affected citizens and local units of government to carefully consider other options.

Please let me know if you agree to extend the comment period?

Thanks you

End of message



May 16, 2016

Amishi Castelli, Ph.D.  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

RJ Palladino, AICP, PP  
NJ TRANSIT Capital Planning  
One Penn Plaza East, 8th Floor  
Newark, NJ 07105

Messrs. Castelli and Paladino

Newark Regional Business Partnership (NRBP) supports in the strongest terms possible the Hudson Tunnel Project (HTP) which is absolutely essential to preserve and enhance the competitiveness of the Newark region, economic health of New Jersey and talented workforce for New York City. The project also has national significance for the value it brings to intercity travel in a corridor that is among the most densely populated and economically valuable in the entire country.

It is imperative that the project's Environmental Impact Statement (EIS) be prepared expeditiously so that HTP can move forward in two years or less. The engineering and construction of HTP is a complicated and time consuming undertaking which we cannot afford to have delayed by a protracted EIS.

Hundreds of thousands of riders each day rely upon the existing trans-Hudson tunnels to get them to work so they can provide for their families. The construction of the new tunnels allows the existing tunnels to be removed from service for extended periods so they can be rebuilt without a significant reduction of rail capacity. An important result of this project is to achieve a state of good repair for the two existing tunnels which are suffering from old age and the harmful effects of being flooded by Super Storm Sandy.

NRBP is a broad-based membership organization which represents 435 businesses, organizations and institutions employing more than 140,000 people in New Jersey. We are committed to providing our members with the connections, information and advocacy they need to be successful while revitalizing the state's largest City and improving the economic competitiveness of the Newark region.

HTP is a project that must move quickly to construction to ensure that our region's ability to compete globally is not further compromised. We need this project to progress now.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chip Hallock", is written over a faint, larger version of the same signature.

Chip Hallock  
President & CEO



# Hudson Tunnel Project

## Public Scoping Meetings

Thursday, May 19, 2016  
Union City High School, 2500 Kennedy Boulevard, Union City, NJ

Please use this comment form to let us know your thoughts.

Name (required): Dennis Hart  
Organization/Affiliation: Utility and Transportation Contractors Assoc. of NJ  
Street Address: PO Box 728  
City: Allenwood State: NJ Zip Code: 08720  
Email: dennis@utcanj.org

Comments: The UTCA of NJ and over 1200 corporate members fully support the Hudson Tunnel Project. The availability of a reliable tunnel is of utmost importance to the regional and state economy as well as quality of life. The existing tunnels are in such sad shape that the inevitable closure for repairs will cripple the economy.

Please leave this form with us today or submit by email or mail to NJ TRANSIT's Project Manager by May 31, 2016:

Email: [RPalladino@njtransit.com](mailto:RPalladino@njtransit.com)

[Amishi.Castelli@dot.gov](mailto:Amishi.Castelli@dot.gov)

Mail: Mr. RJ Palladino  
NJ TRANSIT  
One Penn Plaza East  
8<sup>th</sup> Floor  
Newark, NJ, 07105

Ms. Amishi Castelli, Ph.D.  
USDOT Federal Railroad Administration  
One Bowling Green  
Suite 429  
New York, NY 10004

For more information, please visit the project website at: [www.hudson-tunnel-project.com](http://www.hudson-tunnel-project.com).

**Submitted Testimony of**  
**Andrew S. Hollweck, Senior Vice President**  
**New York Building Congress**  
**at a Scoping Meeting for the**  
**Hudson Tunnel Project**  
**May 17, 2016**



The New York Building Congress, a membership organization of New York City's design, real estate and construction industry, believes the Hudson Tunnel Project, a key component of Amtrak's larger Gateway Program, is essential and urges timely completion of the NEPA process.

The Hudson River Tunnels have been called a "project of national importance," by the U.S. Secretary of Transportation. Construction of the tunnels is contingent upon rapid completion of the federal EIS process, which can take many years to complete.

The Building Congress therefore urges the lead agencies to ensure this NEPA process is the fastest ever for a project of this size. The lead agencies should ensure the highest level of cooperation and coordination of approvals among the dozens of involved federal, state, regional and local agencies. Administrative procedures that delay progress should be streamlined, and chapters or sections of the EIS which do not bear directly on project impacts should be reduced or eliminated.

The federal government will use its streamlined NEPA procedures for high-priority projects, a version of which was used successfully on the New New York Bridge Project. However, work on the Hudson Tunnel Project EIS is at an early phase upon entering this process than was the New New York Bridge, creating opportunities for delay and inaction. Given the worsening condition of the two existing tunnels, the FRA and its sister agencies should perform a "lessons learned" exercise from other accelerated NEPA actions to insure approvals are not delayed at any point.

Finally the EIS should consider phasing of construction for the tunnels, if such action will accelerate completion of the tunnel and allow for one of the existing, compromised tunnels to be taken offline and repaired more rapidly. This action should be considered only if there are appreciable benefits to be gained.

Thank you for this opportunity to comment.



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*Building Essential Connections That Drive Business Growth*

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May 25, 2016

Ms Amishi Castelli, Ph.d  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
U.S DOT, Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

Re: Hudson Tunnel Project EIS Scoping Document - Comments

Dear Ms. Castelli:

The Meadowlands Regional Chamber (MRC) has had a long history of transportation advocacy in this region for over 40 years. We are a membership organization representing a broad range of economic interests in the region, from small family businesses to international corporations, to educational institutions and non-profits, and we currently serve over 1100 companies.

Transportation and infrastructure issues are a high priority for us, as they provide the foundation for economic opportunities and prosperity for our members and the community at large. We are thus very encouraged to see an interagency effort to expedite the EIS for the Hudson Tunnel Project.

We are also in agreement with the priority given to the new Hudson Tunnels within the larger Gateway project. This is the most urgent aspect of the project. The loss of one or both tunnels to emergency repairs would be devastating to the workforce and to commerce in the region. It is vital to maintain the rail capacity between New York and New Jersey and ultimately to increase it, when both the new and old tunnel pairs are in operation, to support continued economic growth. While our focus in the Meadowlands district, we recognize the essential economic linkages that must be maintained with New York, as well as with the larger region and nation. The no-build alternative is no alternative if the New York metropolitan region and the Meadowlands are to survive in the 21<sup>st</sup> century.

While acknowledging and supporting the vital importance of the Hudson Tunnel Project, we cannot neglect other aspects of Gateway that are critical for New Jersey and the Meadowlands. They must remain in our focus as study of the broader Gateway project continues. These features include:

- **An Amtrak stop at the Frank Lautenberg Station.** This is a critical issue for the MRC and its membership, particularly in light of the economic connection between New York and Northern New Jersey, and the continued development of Meadowlands destinations such as the Meadowlands Sports Complex and American Dream. Development around the station continues to grow, including both industrial and residential projects. A Northeast Corridor stop at Secaucus would provide regional connections to New Jersey Transit rail lines and Metro-North, within New York, New Jersey and beyond.
- **The Bergen Loop.** This improvement would benefit thousands of New Jersey rail commuters by providing a direct connection to Penn Station.
- **The Portal Bridge.** This 100-year old structure experiences malfunctions that block rail traffic. Completion of both the North Bridge and South Bridge replacements are integral to increasing capacity of the rail system over the long-term, consistent with the final four-track configuration of the Hudson Tunnel system.

The MRC strongly supports the Hudson Tunnel Project, the heart of the Gateway project, and views the project as essential to the region and the nation. However, we do not want our elected or agency officials to lose sight of the long-term improvements beyond the tunnel that strengthen the regional rail network in New Jersey. Increased capacity and an upgraded network must remain as the ultimate goals.

Finally, we urge that a stop at Secaucus continue as an integral part of the project as the environmental impact studies and project design are finalized. Further, these studies should also review the potential for implementing this stop in the near future, not waiting until the completion of the Gateway project. This essential piece in realizing the potential of the Lautenberg Station as a critical regional hub must be recognized and implemented as soon as possible.

We appreciate this opportunity to comment, and offer to meet at your convenience to discuss the MRC's perspective on the Hudson Tunnel Project and larger Gateway plan.

Respectfully,



James Kirkos  
Chief Executive Officer

JK/lt

**From:** [debbie@nynjbaykeeper.org](mailto:debbie@nynjbaykeeper.org) [mailto:[debbie@nynjbaykeeper.org](mailto:debbie@nynjbaykeeper.org)]  
**Sent:** Tuesday, May 31, 2016 4:55 PM  
**To:** Team at Hudson Tunnel Project <[team@hudsonunnelproject.com](mailto:team@hudsonunnelproject.com)>  
**Cc:** 'Andrea Leshak' <[andrea@nynjbaykeeper.org](mailto:andrea@nynjbaykeeper.org)>  
**Subject:** Hudson Tunnel Project: EIS Scoping Document

Please accept these comment on the Hudson Tunnel Project Environmental Impact Statement Scoping Document on behalf of NY/NJ Baykeeper.

NY/NJ Baykeeper appreciates the opportunity to comment on the proposed project and the level of staff and information that was available at the public information sessions.

Recent news coverage and a report by "Common Good" has focused on the perceived costs and delays of completing required the environmental reviews of this project. However, this is a tired argument that still gets dragged out to pit the environment versus progress. Many of the impacts on our most vulnerable communities come to light under the environmental review process. These communities bear the brunt of our region's "progress" and protections need to be in place to ensure that the burdens are not exacerbated.

We should not forward the idea that we can save money on the backs of low income communities and communities of color, who are at forefront of much of the infrastructure rehabilitation and construction.

The Scoping Document proposes an ambitious, yet reasonable, timeframe for completing the NEPA process for this project. NY/NJ Baykeeper received assurances during the public information session that corners would not be cut in the NEPA process to achieve this timeframe or that there would be any move to accelerate this timeframe. We will be monitoring the project to ensure this does not happen.

With respect to the environmental analysis to be included in the EIS:

- **Social and Economic Conditions:** Care must be taken to analyze all impacts to impacted neighborhoods. This should include analyses of air quality (from stationary and mobile sources; dust and other construction-generated air pollution); noise; vibration (especially any potential structural impacts to homes and local businesses); times of construction (including early morning, evening, night and weekend work); potential to block access, including emergency access, to roadways, parks and other public areas with construction staging areas and other construction activity; and the location of truck, rail and barge routes to move construction equipment or construction debris.
- **Secondary and Cumulative Effects:** The scope of the Project Study Area is very tightly drawn and the Scoping Document takes pains to describe how this project is independent of the larger NEC FUTURE project, however, this should not preclude a full and complete secondary and cumulative impacts analysis in the EIS.

One of the major issues that is unresolved is the ultimate disposal of material excavated for the construction of the new tunnel under the Hudson River. In the past, excavation and construction material has been used to fill wetlands and open waters to make new land for development or otherwise dump on our natural areas as a convenient disposal option. That will not be acceptable for any material generated by this project, whether contaminated or otherwise.

Thank you for this opportunity to comment. Debbie Mans

---

Debbie Mans, Executive Director & Baykeeper  
NY/NJ Baykeeper

52 W. Front St.

Keyport, NJ 07735

732-888-9870 x2  
[debbie@nynjbaykeeper.org](mailto:debbie@nynjbaykeeper.org)

[www.nynjbaykeeper.org](http://www.nynjbaykeeper.org)

Join team that is protecting, preserving, and restoring the Hudson-Raritan Estuary [by clicking here](#)

E-Mail: [jmathews@narprail.org](mailto:jmathews@narprail.org)

Title: President & CEO

First name: Jim

Last name: Mathews

Company: National Association of Railroad Passengers

Address 1: 505 Capitol Court NE

Address 2: Suite 300

Town/city: Washington

State: DC

Zipcode: 20002

Comment or question: Please note: formal comments on the NOI for the proposed EIS have been filed per the Notice instructions to [team@hudsonstunnelproject.com](mailto:team@hudsonstunnelproject.com)

End of message

---

**From:** Jim Mathews [mailto:[jmathews@narprail.org](mailto:jmathews@narprail.org)]  
**Sent:** Tuesday, May 31, 2016 1:58 PM  
**To:** Team at Hudson Tunnel Project <[team@hudsontunnelproject.com](mailto:team@hudsontunnelproject.com)>  
**Cc:** [RPalladino@njtransit.com](mailto:RPalladino@njtransit.com); [Amishi.Castelli@dot.gov](mailto:Amishi.Castelli@dot.gov)  
**Subject:** NARP Comments On NOI For Proposed EIS

To Whom It May Concern:

Attached please find comments on the Notice of Intent for the proposed Environmental Impact Statement on the Hudson Tunnel Project.

NARP appreciates the opportunity to comment.

Best,

JIM M.

JIM MATHEWS

President & CEO

National Association of Railroad Passengers

505 Capitol Court NE, Ste 300

Washington, DC 20002

[\(202\) 408-8362](tel:(202)408-8362)

[www.narprail.org](http://www.narprail.org)



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May 31, 2016

VIA ELECTRONIC MAIL

Amishi Castelli, Ph.D.  
Environmental Protection Specialist  
Office of Railroad Policy and Development/USDOT  
Federal Railroad Administration  
One Bowling Green  
Suite 429  
New York, NY 10004

Mr. RJ Palladino AICP, PP  
Senior Program Manager  
NJ TRANSIT Capital Planning  
One Penn Plaza East, 8th Floor  
Newark, NJ 07105

Dear Dr. Castelli and Mr. Palladino:

The National Association of Railroad Passengers, which represents the tens of thousands of rail passengers who pass through the Hudson tunnels each day as well as tens of millions of fare-paying rail passengers nationwide, appreciates the opportunity to share our vocal support for the Hudson Tunnel Project and for fast-tracking any necessary approvals.

Each day the Hudson tunnels carry a staggering 24,000 riders on 100 Amtrak trains, plus 90,000 weekday riders on 350 NJ Transit trains. Nearly 30% of Amtrak's national annual ridership passes through these tunnels. Not only does this make these tunnels a vital link in the national network, but also a fragile "single point-of-failure" whose neglect carries consequences for the entire U.S. economy. Given the importance of these tunnels to the entire East Coast transportation system and to passenger rail, NARP strongly urges the government to proceed as expeditiously as possible, within the confines of applicable law, to begin desperately needed and long-overdue construction of new tunnels.

We agree with Sen. Cory Booker (D-N.J.) that this is the most important infrastructure project in the greater New York region in decades. But the tunnels' outsize importance to the entire East Coast, and by extension the national rail network, also makes this effort truly a project of national significance. And more worrisome, the already significant risk of serious disruption is growing with every passing day.

Amtrak currently removes one of the two tunnels from service each weekend just for continuing maintenance, resulting in slow, single-tracking operations. Amtrak told us that until new ones are built, this will continue indefinitely. After new tunnels are built, each of the current tubes will be removed from service for a full year for complete rehabilitation. There is a real danger that if one of the current bores becomes permanently damaged or disabled, the throughput of trains would fall some 75%. Last year New York Sen. Charles Schumer (D-N.Y.) described the situation as a potential "transportation Armageddon."

Separating the Hudson Tunnels project from the larger Gateway project helps ease the funding burden, simplifies permitting and design and, crucially, helps to secure the widest possible agreement to proceed from elected and

appointed officials throughout the region – agreement that had been elusive for many years. Anything that jeopardizes long-awaited progress, including the expedited environmental review supported by the New Jersey congressional delegation and Transportation Secretary Anthony Foxx, could increase the risk of transportation meltdown. That in turn could lead to grave economic consequences and a greater reliance on less environmentally responsible transportation modes.

Accordingly, NARP supports rapid consideration and expedited approval of the Environmental Impact Statement for the Hudson Tunnels Project, and rejects any “No Action (No Build) Alternative” as irresponsible, economically risky and potentially hazardous to passengers using the tunnels each day.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Mathews", with a long horizontal flourish extending to the right.

Jim Mathews  
President & CEO



May 23, 2016

Via email to: [team@hudsontunnelproject.com](mailto:team@hudsontunnelproject.com)

Mr. RJ Palladino, AICP, PP  
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USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004  
[Amishi.Castelli@dot.gov](mailto:Amishi.Castelli@dot.gov)

**Re: Comments on Scoping of the Hudson Tunnel Project EIS**

Dear Mr. Palladino and Ms. Castelli,

Thank you for the opportunity to comment on the scope of the environmental impact statement (EIS) for the Hudson Tunnel Project. We agree with the premise of the scoping document that the deteriorated condition of the current tunnels and the high level of train traffic in this corridor requires the construction of a new tunnel. The Hudson Tunnel Project would dramatically improve the reliability and resiliency of rail connectivity between New Jersey and New York. Given the many travelers and commuters that use the existing cross-Hudson tunnels each day, maintaining this corridor and improving its safety and reliability is essential.

Our comments focus on the use of the proposed new tunnel for ancillary services that could benefit rail passengers and the NJ-NY metropolitan region. We urge the agencies to make the scoping for the tunnel project environmental analysis sufficiently broad so that beneficial ancillary activities are not prevented by a failure to reflect and consider these potential activities in the project's design and environmental review.

Our company is developing the Atlantic Wind Connection (AWC) project – a high capacity submarine cable transmission system that will foster significant offshore wind energy development in the mid-Atlantic region. AWC would make it possible to transmit clean energy to market centers including northern New Jersey and New York; connecting the large clean energy resources offshore with large energy loads.

Robust electric transmission networks are essential to maintaining reliable utility service and resilience in the face of extreme weather and attacks on the grid. Strong power networks are indispensable to the functioning of our modern economy. As neighboring states, New Jersey and New York are linked by power lines as well as train tracks, roads, bridges and tunnels. We can expect that as population and power use grows and old power



plants close and are replaced by new resources it will be beneficial in the future to increase the capacity of electrical interconnections between the states.

The Hudson Tunnel Project would provide a low-cost, low-impact way to improve electrical connectivity between the two states. Power cables installed in conduits in the tunnel would have a small footprint and cable technology is well developed and safe. Co-locating power cables in the tunnel would be less costly than boring holes for cable conduit and plowing cable trenches in the riverbed as now happens when building new electric circuits across the Hudson. And adding a circuit to a tunnel built for another primary purpose, rail in this case, lets society avoid the environmental impact of a stand-alone cable construction project.

Finally, developing ancillary uses for the tunnel right of way - such as electric transmission - can be good for the tunnel's primary users, the riders of Amtrak and NJ Transit trains. The transmission system owner could pay the tunnel owner the up-front cost of accommodating cable in the tunnels (e.g., the cost of laying conduit in the tunnel), and the tunnel owner could also earn a regular, recurring payment (i.e., rent) for the use of tunnel space. This additional income could help offset some of the Hudson Tunnel Project's cost and lower the cost burden that riders must shoulder.

In conclusion, designing the new Hudson tunnel to accommodate power transmission cables is an important action that will make the New Jersey – New York region more resilient to future climate and other threats to the power grid, provide extra revenue that lowers the tunnel's cost to train riders, and lessen the environmental impact of building separate power circuits across the Hudson.

Sincerely,

A handwritten signature in black ink that reads "Markian Melnyk".

Markian Melnyk  
President, Atlantic Grid Development, LLC  
[mmelnyk@atlanticwindconnection.com](mailto:mmelnyk@atlanticwindconnection.com)  
301-256-4423



**New Jersey Association of Railroad Passengers**

P.O. Box 271, Raritan, New Jersey 08869-0271

[www.nj-arp.org](http://www.nj-arp.org)

May 24, 2016

## ***NJ-ARP* strongly endorses Senator Booker's statement to "Get construction going quickly" ...on new Hudson rail tunnel.**

The New Jersey Association of Railroad Passengers (***NJ-ARP***), the oldest state wide passenger rail advocacy organization, strongly supports and endorses New Jersey Senator Cory Booker's recent remarks citing that, "We need to get construction going as quickly as possible" on a new Hudson River rail tunnel. Booker went on to say that "This is the most significant project in New Jersey. That's why I'm pouring my energy and life into this."

***NJ-ARP*** has been a strong and enthusiastic supporter of Amtrak's Gateway Project since its initial announcement on February 7, 2011 at Newark Penn Station. The plan to prioritize the tunnel portion of the overall project in a separate Environmental Impact Statement (EIS) proceeding has been adopted to expedite its construction.

Last week's Federal Railroad Administration (FRA) scoping hearings, both in New York City and Union City, N.J., revealed that Amtrak's \$25 billion Gateway Project has been segmented to facilitate urgent and rapid building of the key Hudson River rail tunnels. The goal of the FRA Environmental Impact Statement (EIS) is to construct "...the new tunnels such that the current ones can eventually be removed from operation and rehabilitated once the new ones enter service. ***NJ-ARP*** concurs with this federal action and believes that federal and state funding sources will be more readily accessible.

The existing rail tunnels were constructed in 1910 and are an integral part of Amtrak's Northeast Corridor (NEC) between Washington, D.C. and Boston, MA. The NEC is the busiest rail line in the nation and each day some 24,000 riders on 100 Amtrak trains and 90,000 weekday passengers on 350 New Jersey Transit trains.

*(Continued on reverse side)*

However the Notice of Intent (NOI) and the scoping meeting explained that increased train services between Newark and New York Penn will not occur "...until other substantial infrastructure capacity improvements are built in addition to a new Hudson River rail tunnel. These improvements will be the subject of one or more separate design, engineering, and appropriate environmental reviews." The NOI states clearly that "...although the [Proposed Action may be an element of a larger program to expand rail capacity (the Gateway Project), it would meet an urgent existing need and will be evaluated as a separate project from any larger initiative."

Amtrak's Gateway Project envisions an expanded four-track railroad from Secaucus Junction to Newark, including the replacement of the decaying Portal and Sawtooth bridges, and a six track capacity expansion of New York Penn Station beneath 31st Street to accommodate additional New Jersey Transit and Amtrak trains.

Despite the announcement that no additional trains would be added to current services even after the new twin bores are completed, an even more dire circumstance could occur if either of the century old tunnels are removed from service because of their unexpected physical deterioration, another super storm, or the inability of governmental agencies to fund their ongoing rehabilitation. Without them, there will be "Transportation Armageddon" as New York Senator Chuck Schumer recently was quoted as saying.

**NJ-ARP** concludes and agrees that a new Hudson River rail tunnel is needed as soon as practicable just to maintain the passenger rail service that is now provided. **NJ-ARP** commends Senator Booker on his strong involvement and urges all elected leaders to devise a financing package to permit this project of national significance to begin as expeditiously as possible.

–Albert L. Papp, Jr., **NJ-ARP** Director (973) 762-1831



# Hudson Tunnel Project

## Public Scoping Meetings

Tuesday, May 17, 2016  
Hotel Pennsylvania, Gold Ballroom, 3rd floor,  
401 7th Avenue at W. 33rd Street, New York, NY

Please use this comment form to let us know your thoughts.

Name (required): John Petron  
Organization/Affiliation: Local 149  
Street Address: 965 East 221 St  
City: Bronx, A State: NY Zip Code: 10469  
Email: john.p.5@hotmail.com

Comments: With the recent trains coming off the rails  
in the D.C. area how vital is it for us to  
strengthen the infrastructure of the city?

Please leave this form with us today or submit by email or mail to NJ TRANSIT's Project Manager by May 31, 2016:

Email: [RPalladino@njtransit.com](mailto:RPalladino@njtransit.com)

[Amishi.Castelli@dot.gov](mailto:Amishi.Castelli@dot.gov)

Mail: Mr. RJ Palladino  
NJ TRANSIT  
One Penn Plaza East  
8<sup>th</sup> Floor  
Newark, NJ, 07105

Ms. Amishi Castelli, Ph.D.  
USDOT Federal Railroad Administration  
One Bowling Green  
Suite 429  
New York, NY 10004

For more information, please visit the project website at: [www.hudsontunnelproject.com](http://www.hudsontunnelproject.com).



**TESTIMONY FROM THE ASSOCIATION FOR A BETTER NEW YORK BEFORE  
THE FEDERAL RAILROAD ADMINISTRATION & NJ TRANSIT PUBLIC SCOPING  
MEETINGS**

May 17, 2016 & May 19, 2016

The Association for a Better New York (ABNY) is among the city's longest standing civic organizations advocating for the policies, programs and projects that make New York a better place to live, work and visit. We represent the broad fabric of New York's economy and our membership includes New York's most influential businesses, not-for-profits, arts & culture organizations, educational institutions, labor unions and entrepreneurs. Today, we are adding our voice of support for the completion of the Gateway Hudson Tunnel project.

We believe that the funding and building of the new passenger rail tunnel connecting New York and New Jersey, known as the Gateway Tunnel, is crucial to ensuring improved current services and to creating new capacity. The over 100 year old, one-track-in, one-track-out tunnel that Amtrak, NJ Transit and millions of passengers currently rely on cannot stand as the major rail link under the Hudson. It is well beyond capacity, dangerously in need of repair, and chronically causes delays throughout the transportation system linking the most vital economic region in the country.

A new, two-track Hudson River Tunnel will increase track, tunnel, bridge, and station capacity, will update and modernize existing infrastructure such as the electrical system that supplies power to the roughly 450 weekday trains using this segment of the Northeast Corridor, and will rebuild and replace the damaged components of the existing, century-old Hudson River tunnel, which was inundated with sea water during Super Storm Sandy. By eliminating the bottleneck in New York and creating additional tunnel, track, and station capacity in the most congested segment of the NEC, the Gateway Program will provide greater levels of service, increased redundancy, added reliability for shared operations, and additional capacity for the future increases in commuter and intercity rail service.

As cities and nations around the world invest in the modernization of their transportation infrastructure, it is time New York and New Jersey also step in to strengthen the resilience of the Northeast Corridor by completing the Gateway Tunnel project. Thank you for taking our view into consideration.

Contact Info: Angela Pinsky, Executive Director, Association for a Better New York  
355 Lexington Ave, 8<sup>th</sup> Floor  
New York, NY 10017

**From:** Donnie Maley [mailto:[dmaley@nec-commission.com](mailto:dmaley@nec-commission.com)]  
**Sent:** Tuesday, May 31, 2016 7:00 PM  
**To:** Team at Hudson Tunnel Project <[team@hudsontunnelproject.com](mailto:team@hudsontunnelproject.com)>  
**Cc:** Mitch Warren <[mwarren@nec-commission.com](mailto:mwarren@nec-commission.com)>; Rob Padgette <[rpadgette@nec-commission.com](mailto:rpadgette@nec-commission.com)>  
**Subject:** Hudson Tunnel Project Scoping Comment

Good evening,

Please find attached a comment on the Hudson Tunnel Project Environmental Impact Statement from the chair of the Northeast Corridor Commission, James Redeker.

Thank you,

Donnie Maley

**Donnie Maley**

Director, Planning

Northeast Corridor Commission

840 First Street NE, Suite 440

Washington, DC 20002

[202.847.0283](tel:202.847.0283) (o) | [202.604.2727](tel:202.604.2727) (c)



**NORTHEAST CORRIDOR COMMISSION**

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May 31, 2016

Mr. RJ Palladino, AICP, PP  
Senior Program Manager  
NJ TRANSIT Capital Planning  
One Penn Plaza East – 8th Floor  
Newark, NJ 07105

Ms. Amishi Castelli, Ph.D.  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

Re: Environmental Impact Statement for the Hudson Tunnel Project

The Northeast Corridor Commission (“the Commission”) is pleased to submit comments on the scope of the Federal Railroad Administration’s (“FRA”) and New Jersey Transit Corporation’s (“NJ TRANSIT”) Environmental Impact Statement (“EIS”) for the Hudson Tunnel Project. The Commission was authorized by the U.S. Congress and codified at 49 U.S.C. § 24905 to create a forum for cross-agency planning and decision-making. The Commission is composed of one member from each of the Northeast Corridor (“NEC” or “the Corridor”) states (Massachusetts, Rhode Island, Connecticut, New York, New Jersey, Pennsylvania, Delaware, and Maryland) and the District of Columbia; four members from Amtrak; and five members from the United States Department of Transportation.

The NEC serves workers, residents, and visitors in the Northeast and beyond. Each day, its 457-mile main line between Boston, Massachusetts and Washington, DC carries over 700,000 commuter rail and 40,000 Amtrak passengers on over 2,000 trains. At the center of this vital asset is the 106-year-old tunnel under the Hudson River, which is both beyond its useful life and degrading at an accelerated rate due to salt water inundation during Superstorm Sandy in 2012. Though the tunnel most immediately affects its 200,000 weekday users, its condition impacts service performance across the entire NEC network.

The Commission’s top priorities for the Corridor are:

- Maintaining safe and reliable rail transportation at 2016 service levels;
- Achieving a state of good repair; and

- Investing to improve reliability, performance, connectivity, and capacity to deliver improved rail services.

The Proposed Action to construct a new tunnel under the Hudson River and rehabilitate the existing tunnel will address all three of the Commission's top priorities, while improving the resiliency of the transportation network. With or without investment in a new crossing, existing infrastructure must be shut down for extended periods of time to overhaul its outdated and damaged systems, limiting passenger carrying capacity with dramatic impacts on the economies of New Jersey, New York and beyond. The Proposed Action would sustain existing service, help achieve a state of good repair at the river crossing, and improve performance of the railroad for hundreds of thousands of daily users.

In examining the No Action (No Build) Alternative, the Commission encourages FRA and NJ TRANSIT to quantify and underscore the negative impacts of not proceeding with the proposed investment program. The NEC operates as a system where delays in one location have ripple effects impacting commuter and intercity rail passengers throughout the network. Nowhere is this vulnerability more real than in the Hudson River Tunnel, the NEC's most densely traveled stretch with up to 24 trains per hour on a single peak-direction track.

Failure to invest in a new crossing and rehabilitate the existing tunnel would further reduce service reliability on the NEC where delays due to infrastructure condition and rail congestion already cost the U.S. approximately \$500 million annually in lost productivity. Potential capacity reductions would push additional travelers onto the already congested highway, transit, and aviation networks, resulting in overcrowding and delays on those modes and subsequent lost productivity.

This EIS is an important step forward for a project of significance for the NEC, the region, and the country. The Commission urges expedited action given the serious consequences of a failure to invest for a wide range of residents, businesses, and travelers.

Sincerely,



James P. Redeker  
Chair, Northeast Corridor Commission  
Commissioner, Connecticut Department of Transportation

May 17, 2016

Ms. Amishi Castelli, Ph.D.  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

Mr. RJ Palladino, AICP, PP  
Senior Program Manager  
NJ TRANSIT Capital Planning  
One Penn Plaza East – 8th Floor  
Newark, NJ 07105

RE: Comments on Hudson Tunnel Project Scoping

Dear Ms. Castelli and Mr. Palladino,

Regional Plan Association (RPA) appreciates the opportunity to offer comments to Federal Railroad Administration and New Jersey Transit on the Hudson Tunnel Project scoping.

To unlock the full potential of the new tunnels, better serve commuters and contain costs, RPA recommends that the Hudson Tunnel Project scope incorporate the following operational and design elements:

**1. Accommodate future freight - passenger mixed operations.**

- The study should determine the height, width and grade requirements necessary to allow for the future operation of freight rail, double-stack containers (20'2" clearance, with buffer likely closer to 22') through the tunnels during off-peak/overnight periods, and how they can be accommodated.
- Once the two new tunnels are completed and the North River tunnels are rehabilitated, there will be sufficient capacity to support overnight freight service.
- Running freight through Gateway may be a far more efficient means of moving long-haul intermodal and bulk commodities from New Jersey to geographic Long Island than existing truck and rail options. Overnight freight service would utilize idle rail capacity, reduce roadway congestion and contribute revenue through track access fees paid by the private railroads.

- 2. Tunnel alignments should improve rail to local transit (subway/bus) connections and accommodate future through-running service, providing direct commuter rail connections between New Jersey, New York City, Long Island, the Hudson Valley and Connecticut.**
  - The alignment of the new tunnels should prioritize the needs of commuters, improving connections between rail and subway platforms at Penn Station New York - the tunnels should be sited closer to subway stations.
  - Alignments that promote through-running of commuter rail services and more direct connections to urban transit should be evaluated, even if those alignments don't "align" with current block 780 proposal.
  - Tunnel alignments that are evaluated should not be limited to only alignments that support existing tunnel boxes constructed as part of the Hudson Yards development and the block 780 proposal. All feasible alternatives must be explored.
  
- 3. Explore project design and delivery alternatives that will lower the capital costs of the project.**
  - Assess the costs and benefits of shorter full service closures at work sites compared to extended partial closures.
  - All alternatives studied in the EIS should consider constructability issues and aim to create a work site, timeline and project design that is as efficient and cost effective as possible.
  - The project team should, for instance, preference alternatives that would result in a site that is more accessible (porous) even if this means some increase in surface disruption, and evaluate means of accommodating construction work windows by providing greater flexibility in existing service plans.
  
- 4. Design of passenger areas (Penn South or other) should be incorporated into the plans for the tunnel and track level.**
  - Although the rapid deterioration of the North River tunnels calls for expediency, the alignment of the tunnels will dictate what capacity improvements are eventually implemented at Penn Station. Ignoring this fact will limit the options available at Penn Station and could result in a subpar outcome for commuters.
  - The tunnel alternatives should be paired with various station options, including, but not limited to the existing Amtrak block 780 concept.
  
- 5. Assess the diversion of passengers from other trans-Hudson travel modes, bus and car, with additional tunnel capacity and any service plan changes for through-running and one-seat rides.**
  - RPA understands that the Hudson Tunnel Project is not a "new capacity" project but instead a replacement and rehabilitation effort. However, it is clear that once completed, the tunnels will pave the way for new commuter rail capacity. How much new capacity is created will depend on whether new Penn Station capacity is configured for through-running from the outset or not, among other factors.

- The EIS should estimate a range of the new capacity that the four tunnels could eventually deliver under different assumptions. This information could be used to better plan for additional rail improvements in New Jersey and in properly planning the Port Authority Bus Terminal replacement in midtown Manhattan.

Richard Barone, RPA's Vice President for Transportation, will gladly discuss this effort with you further. He can be reached at [rbarone@rpa.org](mailto:rbarone@rpa.org) or at 212-253-2727.

### **Who We Are?**

RPA is America's most distinguished urban research and advocacy organization. RPA works to improve the prosperity, infrastructure, sustainability and quality of life of the New York-New Jersey-Connecticut metropolitan region. Some of the region's most significant public works, economic development and open space projects have their roots in RPA ideas and initiatives, from the location of the George Washington Bridge to the revitalization of downtown Brooklyn, Stamford and Newark to the preservation of open space and development of parks in the Palisades, Governors Island and Gateway National Recreation Area. RPA has pursued these goals by conducting independent research, planning, advocacy and vigorous public-engagement efforts. Every year, the most pressing challenges facing the region are debated at RPA's spring conference, the Assembly, which draws leaders and professionals from government, business, civic groups and the media. A cornerstone of our work is the development of long-range plans and policies to guide the region's growth. Since the 1920s, RPA has produced three landmark plans for the region and is working on a fourth plan that will tackle the urgent challenges facing our region, including climate change, fiscal uncertainty and declining economic opportunity.

**From:** Jim Tripp [<mailto:jtripp@edf.org>]

**Sent:** Tuesday, May 31, 2016 5:37 PM

**To:** [RPalladino@njtransit.com](mailto:RPalladino@njtransit.com); Castelli, Amishi (FRA); [RPalladino@njtransit.org](mailto:RPalladino@njtransit.org)

**Cc:** [jcolangelo-bryan@njtransit.org](mailto:jcolangelo-bryan@njtransit.org); [petra.messick@amtrak.com](mailto:petra.messick@amtrak.com); [joseph.boardman@amtrak.com](mailto:joseph.boardman@amtrak.com); Mary Barber

**Subject:** Hudson Tunnel Project

Attached are comments from the Environmental Defense Fund on the Hudson Tunnel Project EIS Scoping Document dated April 2016. We consider the Tunnel Project as a major component of the whole Gateway project to be of huge environmental and economic importance and benefit to the NY NJ metropolitan area and the Northeast Corridor. Any delay in completing it would have egregious consequences. The alternative that we would urge upon you would be all of the actions that can be taken to expedite its design, review and completion.

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May 31, 2016

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USDOT Federal Railroad Administration  
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New York, NY 10004  
[Amishi.Castelli@dot.gov](mailto:Amishi.Castelli@dot.gov)

Re: Hudson Tunnel Project

Dear Mr. Palladino and Ms. Castelli

We have reviewed the “Hudson Tunnel Project Environmental Impact Statement Scoping Document” dated April 2016. The Tunnel Project is part of a larger Northeast Corridor (“NEC”) program of investments described in the Gateway Program Feasibility Study. We strongly endorse this project and urge that the engineering design, environmental review and construction of this critical project move forward at the most ambitious conceivable schedule.

Completion of the engineering design and construction of the Tunnel Project is perhaps the most vital major infrastructure project in the NY NJ metropolitan area and the NEC. The existing tunnels, as the Scoping Document describes, are 100 years old and suffered damage during the Sandy Hurricane that can only be fully repaired and renovated with their closure. But their controlled closure is not feasible until the new Tunnel Project is completed and becomes fully operational. Any delay in completing this project is thus playing Russian Roulette with the economy and environment of the NY NJ metropolitan area and the entire NEC. The Scoping Document does not provide any specific probability for a multi-day or longer closure of the existing two-track tunnel if a large repair necessity occurs, but we can reasonably assume that as the years tick by the likelihood of such a prolonged closure or curtailment that would seriously disrupt service grows larger.

The environmental, let alone economic and social, consequences of a curtailment of use of the existing tunnel that would decrease capacity by 75%, let alone closure, for even one day, let alone multiple days or weeks or longer, would be catastrophic. The resulting traffic congestion, traffic emissions associated with that congestion, fuel wastage and resulting air pollution and CO2 emissions in the trans-Hudson area and throughout the NEC would be horrendous. Any delay in completing the Tunnel Project, including the tunnel itself, additional tracks in the Hackensack Meadowlands area east of the Secaucus Railroad Station and modifications to connecting rail infrastructure at Penn Station New York increases the probability of potentially severe environmental consequences.

For these reasons, while there are impact and alternatives issues that the EIS should address, there is ample justification for this EIS process to move forward as expeditiously as possible. A schedule that envisions release of the draft EIS by the end of 2016 and final EIS within 12 months would be reasonable. In addition, with all of the alignment evaluation, engineering work and environmental impact assessment that was undertaken for the ARC project, it makes sense for the Hudson Tunnel Project to take advantage of that work, including use of the alignment that Amtrak and NJ Transit considered for the ARC tunnel with whatever modest modifications are appropriate. It should be altogether possible to expedite the NEPA review process and make it fully coterminous with the planning and engineering design process currently underway. In any event, it would be an unfortunate misuse of NEPA if that law were used as justification for any kind of delay in completing this project. In addition, The Federal Railroad Administration, Amtrak, NJ Transit, the NY NJ Port Authority and other competent agencies and ultimately the Congress, in addition to arranging the funding for this project, should consider ways of expediting the construction process.

The Scoping Document is basically fine. Our one suggestion would be a no-holds barred assessment of the consequences of curtailment or disruption of use of the existing tunnel before the Tunnel Project becomes operational. This is not an assessment of the Future Without Action. It would be an assessment of the consequences of any kind of delay in completing the project. The EIS should consider as an alternative all of the potential but reasonable actions that could be taken to accelerate completion of planning and design work and initiation and then completion of construction compared to the schedule contemplated. We understand that the Tunnel Project will not expand tunnel and NEC capacity initially because of the necessity to close and thoroughly renovate and repair the existing tunnel. But we do look forward to the day when both the new and old tunnels are working efficiently with the additional capacity, resiliency and redundancy that this combined trans-Hudson rail tunnel capacity would provide.

Sincerely,

James T. B. Tripp, Senior Counsel  
[jtripp@edf.org](mailto:jtripp@edf.org)

Mary Barber, Director NJ Clean Energy  
[mbarber@edf.org](mailto:mbarber@edf.org)



May 17, 2016

Mr. RJ Palladino, AICP, PP  
Senior Program Manager  
NJ TRANSIT Capital Planning  
One Penn Plaza East – 8th Floor  
Newark, NJ 07105

Ms. Amishi Castelli, Ph.D.  
Environmental Protection Specialist  
Office of Railroad Policy and Development  
USDOT Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

The Partnership for New York City represents the city's business leadership and its largest private sector employers. We work together with government, labor and the nonprofit sector to promote economic growth and maintain the city's position as a global center of commerce and innovation. The region's transportation system is critical to continued economic growth and there is no infrastructure project more important for businesses and commuters on both sides of the Hudson River than the Gateway Program.

The Gateway Program's **Hudson Tunnel Project** is vital to our region and will contribute in important ways to its long-term economic future. The existing tunnels – the only rail links between New York City and New Jersey – are 105 years old, deteriorating, and in urgent need of substantial renovation. Every workday, the tunnels provide nearly 100,000 individual trips each way between New Jersey and New York City and ridership is expected to double by 2040. If the tunnels shut down for even just one hour, it would cost New York City employers at least \$5.9 million in lost productivity. The project must remain on track in order to repair the existing tunnels, improve current services, and create new capacity, which will provide relief to commuters in the region who endure daily transit delays as a result of aging infrastructure and inadequate capacity.

We must do everything possible to ensure that all aspects of the program move forward on an accelerated basis.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathryn S. Wylde'.

Kathryn S. Wylde

**General Public**

---

E-Mail: [jadler2@yahoo.com](mailto:jadler2@yahoo.com)

Title:

First name: Jonathan

Last name: Adler

Company:

Address 1:

Address 2:

Town/city:

State:

Zipcode: 10024

Comment or question: Who will actually own and be responsible for the new tunnel. Existing tunnel and ROW is owned by Amtrak but NJTransit is leading process as well as uses the tunnel much more than Amtrak. If not decided early on the project will see enormous increased costs just by having too many individuals involved for commenting and management.

Also your site doesn't even let people put in comments.

End of message

E-Mail: [mjmax227@hotmail.com](mailto:mjmax227@hotmail.com)

Title: Ms

First name: M

Last name: Barry

Company:

Address 1: 1595 Hitchcock Road

Address 2:

Town/city: Wantagh

State: Ny

Zipcode: 11793

Comment or question: Congress gave Port Authority of NY NJ its power but no one is watching this dysfunctional agency ??? The Port Authority of receives federal funding grants for DOT 49 CFR part 40 for testing, training and grants for PANYNJ . The PA are not in compliance with DOT and FTA drug and alcohol testing (49 CFR Part 40 and part 655) is a continued receipt of federal funds under Sections 5307, 5309, or 5311 but still receive MILLIONS? Annual compliance is required for all covered employees.

End of message

E-Mail: [bhujle87@rocketmail.com](mailto:bhujle87@rocketmail.com)

Title:

First name: Nihal

Last name: Bhujle

Company:

Address 1: 2 Brookview Ct.

Address 2:

Town/city: Holmdel

State: NJ

Zipcode: 07733

Comment or question: Does NJTransit know how frustrating websites like this are to riders? The Governor canceled the last tunnel in 2010, and here we are in 2016, and you are once again talking about beginning the planning for a tunnel. Meanwhile, I sit in congestion every morning between Newark Penn and NYP. And the current tunnels are suffering from damage from Sandy and may have to be shut down for repair.

Politically, you probably can't acknowledge the mistake (planning to construction start to cancellation) of ART on this website. And how the NJ share of the money was diverted to road projects. But don't think riders forgot what happened last time we tried to build a tunnel.

Nihal Bhujle

Holmdel, NJ

End of message

From: Ramon Carreras [mailto:[rcarreras.01@gmail.com](mailto:rcarreras.01@gmail.com)]  
Sent: Tuesday, May 31, 2016 9:43 PM  
To: Team at Hudson Tunnel Project <[team@hudsonstunnelproject.com](mailto:team@hudsonstunnelproject.com)>  
Subject: Scoping Comments

In terms of the scope of this project, I think its good from the standpoint of reliability. As a commuter that has had the experience of infrastructure problems (Ice Patrol, Power Issues, etc) the reliability train services through the tunnels has become a concern. I think that getting the construction of new tunnels completed so that the existing North River tunnels can be renovated is more important. While I do have concerns about capacity in the future, that should be considered as a medium term concern to be addressed by the overall Gateway project, as additional issues such as Portal Bridge replacement and adjustments to New York Penn Station will be required to support any additional train services after the North River tunnels have been renovated. I'm hoping this project, as the potentially most complex and expensive piece of the puzzle, will be the jumpstart to and force through the additional investments required for the additional capacity that will remain after the North River tunnel renovation is completed.

Thanks you,  
Ramon Carreras  
West Orange, NJ

05/17/16 submitted at Hudson Tunnel EIS Scoping Public Meeting

**Create Gateway Regional Citizens Liaison Committee NOW!**

Statement by Joseph M. Clift\* to the NJ Transit Board of Directors, May 11, 2016

Good morning Mr. Chair, members & Interim Executive Director. I am speaking today solely for myself, as an advocate for regional rail service and as a past LIRR Director of Planning. I am a 35-year resident of Manhattan and a frequent user of NJ Transit rail services. A brief description of my past work in the rail transportation industry is provided below.

I have one ask today:

**Create a Regional Citizens Liaison Committee (RCLC) for the entire Gateway Project immediately, covering all elements of Gateway, beginning with the Hudson Tunnel Project EIS.**

RCLC's for both the Access to the Region's Core (ARC) and Portal Bridge Capacity Projects provided an avenue for two-way communications between NJT and interested parties, including rail advocates. The information gained through this process enabled rail advocates to alert decision makers to design flaws and budget problems and forced project planners to address issues that would otherwise have been ignored.

The RCLC's also provided a very useful additional source of information for the general public and the reporting media, enabling increased coverage of these key projects.

The Gateway RCLC should begin with coverage of the Hudson Tunnel Project EIS, which has public scoping meetings scheduled for next week – Tuesday, May 17, in Manhattan and Thursday, May 19, in Union City (please see flyer on opposite side of this page).

**Although the word "Gateway" is not mentioned in the Hudson Tunnel Project flyer, this is the first phase of Gateway, and a Gateway RCLC should cover it.**

Unfortunately, to date, NJT has done the opposite of setting up an RCLC for Gateway, beginning with providing no publicity for the Hudson Tunnel Project scoping meetings, instead of alerting the public to them with seat flyers, press releases, and clear alerts on the NJT website.

I could not find any mention of the Hudson Tunnel Project anywhere on the NJT website.

I close with my one ask: **Create a Regional Citizens Liaison Committee (RCLC) for the entire Gateway Project immediately, covering all elements of Gateway, beginning with the Hudson Tunnel Project EIS.**

Thank you for this opportunity to comment.

\* Joseph M. Clift served as Director of Planning and Director of Strategic Planning for the Long Island Rail Road and Manager of Operations Improvement and Strategic Planning Analyst for Conrail. He holds a B.S. degree from the Massachusetts Institute of Technology and an M.B.A. from the Stanford Graduate School of Business. Contact info: jmclift@alum.mit.edu, 212-245-6299.

**From:** Joseph Clift <[jmclift@hotmail.com](mailto:jmclift@hotmail.com)>

**Date:** May 31, 2016 at 11:59:16 PM EDT

**To:** "RPalladino@NJTransit.com" <[rpalladino@njtransit.com](mailto:rpalladino@njtransit.com)>, "Amish.Castelli@dot.gov" <[amish.castelli@dot.gov](mailto:amish.castelli@dot.gov)>,

**Subject:** J.M.Clift Comments- Scope Of HTP EIS

**Reply-To:** <[jmclift@alum.mit.edu](mailto:jmclift@alum.mit.edu)>

J.M.Clift Comments on scope of HTP EIS:

Attached please find my comments on the Scope of Work for the Hudson Tunnel Project (HTP) Environmental Impact Statement (EIS).

As a regional rail advocate, I look forward to participating in frequent face-to-face two-way dialogues with study staff, hopefully beginning within 30 days of this submission, in line with the stated goals of the Public Involvement Plan for this EIS found on page 13 of the April 2016 Scoping Document:

- To provide an opportunity and a mechanism for public participants to engage early and often in the development of the EIS and give relevant input to the Proposed Action.
- To focus public input in a structured manner that ensure any decisions are made with the benefits of robust public involvement.
- To ensure that elected officials, agencies, stakeholders, and the general public are adequately informed about the Proposed Action and its implications for their communities and to identify potential issues

Thank you.

Regards, Joe 212.245.6299 [jmclift@alum.mit.edu](mailto:jmclift@alum.mit.edu)

Joseph M. Clift Comments, 05/31/16  
Hudson Tunnel Project (HTP) Environmental Impact Statement (EIS)

Include or change the Scope of Work for the HTP EIS as follows:

1. Change Goal #4:
  - a) Change “Do not preclude future trans-Hudson rail capacity expansion projects” to “Maximize the opportunity to build cost-effective trans-Hudson rail capacity expansion and service quality improvement projects.”
  - b) Change “Allow for connections to future capacity expansion projects . . . .” to “Allow for the most-cost effective connections possible to future rail capacity expansion and service quality improvement projects . . . .”
2. Add a sixth Goal:
  - a) Maximize the opportunity to add peak hour trans-Hudson train capacity in increments by providing an alignment that makes possible building a series of smaller scope projects, each adding some train capacity.
3. Include in the alignments evaluated the 01/17/07 Access to the Region’s Core (ARC) Draft Environmental Impact Statement (DEIS) alignment:
  - a) The 4-track ARC DEIS alignment was accomplished by designing a “duck-under” in the alignment of the north (typically westbound) tube of the two new trans-Hudson tubes that took the tube under the two existing NEC tracks just west of their Bergen Portal and onto the north side of the NEC to become a new outbound local track; the south tube (typically westbound) connected with a new track on the south side of the NEC to become a new inbound local track.
  - b) This alignment is the only one developed to date that creates a 4-track North East Corridor (NEC) west of the old and new Hudson River tunnels.
  - c) A single 4-track railroad is far more flexible & higher capacity than two separate 2-track railroads.
  - d) Upgrading a 2-track railroad into a 4-track railroad can be done in a series of smaller scope projects that each provide an incremental increase in trains capacity, reliability and/or redundancy.
4. Include in the evaluation of alignments the costs & independent utility off:
  - a) Building both tubes as a single project.
  - b) Building the two tunnel tubes as separate projects.

With scarce capital funds, it would make good sense to build only one new tunnel tube initially and spend the cost of the second on improvements to the west that add peak hour train capacity, provided that one tube connected to a 2-track tunnel box that begins at 12<sup>th</sup> Avenue in Manhattan would provide sufficient peak-hour train capacity to allow one of the existing tubes to be taken out of service for rehabilitation, then the other.
5. Evaluate all tunnel alignments with how they impact the performance of the total set of possible trans-Hudson improvement projects east and west of the tunnel: increased train capacity, improved schedule reliability and additional redundancy.
6. Create a Public Involvement process that provides frequent face-to-face two-way dialogues with study staff, similar in function to the Regional Citizens Liaison Committees (RCLC) that were formed in connection with the ARC and Portal Bridge Projects, hopefully beginning within 30 days of this submission, in line with the stated goals of the Public Involvement Plan for this EIS found on page 13 of the April 2016 Scoping Document:
  - To provide an opportunity and a mechanism for public participants to engage early and often in the development of the EIS and give relevant input to the Proposed Action.
  - To focus public input in a structured manner that ensure any decisions are made with the benefits of robust public involvement.
  - To ensure that elected officials, agencies, stakeholders, and the general public are adequately informed about the Proposed Action and its implications for their communities and to identify potential issues.

E-Mail: [daniel.b.and.r@outlook.com](mailto:daniel.b.and.r@outlook.com)

Title: Dr.

First name: Robert

Last name: Daniel

Company:

Address 1: 2-B Buckingham Road

Address 2:

Town/city: West Orange

State: NJ

Zipcode: 07052

Comment or question: First, GOAL 4 is extremely important. This project must allow connections to future expansion projects by connecting to the Lautenberg station and connections to station expansion projects in the area of PSNY.

Second, the Proposed Action, as described on page 8 must be CONSISTENT WITH GOAL 4 by assuring that the end points or "termini" meet the existing rail complex at PSNY and the interlocking near Secaucus station.

End of message

**From:** subway-buff@mindspring.com [mailto:subway-buff@mindspring.com]

**Sent:** Sunday, May 08, 2016 11:33 PM

**To:** Team at Hudson Tunnel Project <team@hudsontunnelproject.com>

**Subject:** Hudson Tunnel Proejct

Please keep me updated. I found a throughput and operational weakness in the ARC plans and my revised proposal became the LPA. While I am no longer living in Metro NYC for now, I do plan on moving back to metro NYC and will review any documentation to find possible changes. I am a retire NYCT Station Agent have personal experience on how infrastructure issues snarl rail service. To summarize: The originally proposed Yard lead lead with the duck under proposal; would be a major choke point on the likes of County, Ham, Fair, and Hunter. NJT already has plans to address the issues at Hunter and County. NJT also built Morrisville Yard to address issues at Ham and Fair. My accepted change involved changing the two track yard leads to one track, becoming two tracks after leaving the main line. I served on the CLCs for ARC and for the Portal Bridge.

Peggy Darlington  
113 W Oates Ave

Winchester, VA 22601

An internet search will give you a link to my comments and how my proposal became the approved proposal before the project was canceled.

E-Mail: [brucewhain@gmail.com](mailto:brucewhain@gmail.com)

Title: Mr.

First name: Bruce

Last name: Hain

Company:

Address 1: 90-10 150th Street

Address 2:

Town/city: Queens

State: NY

Zipcode: 11435

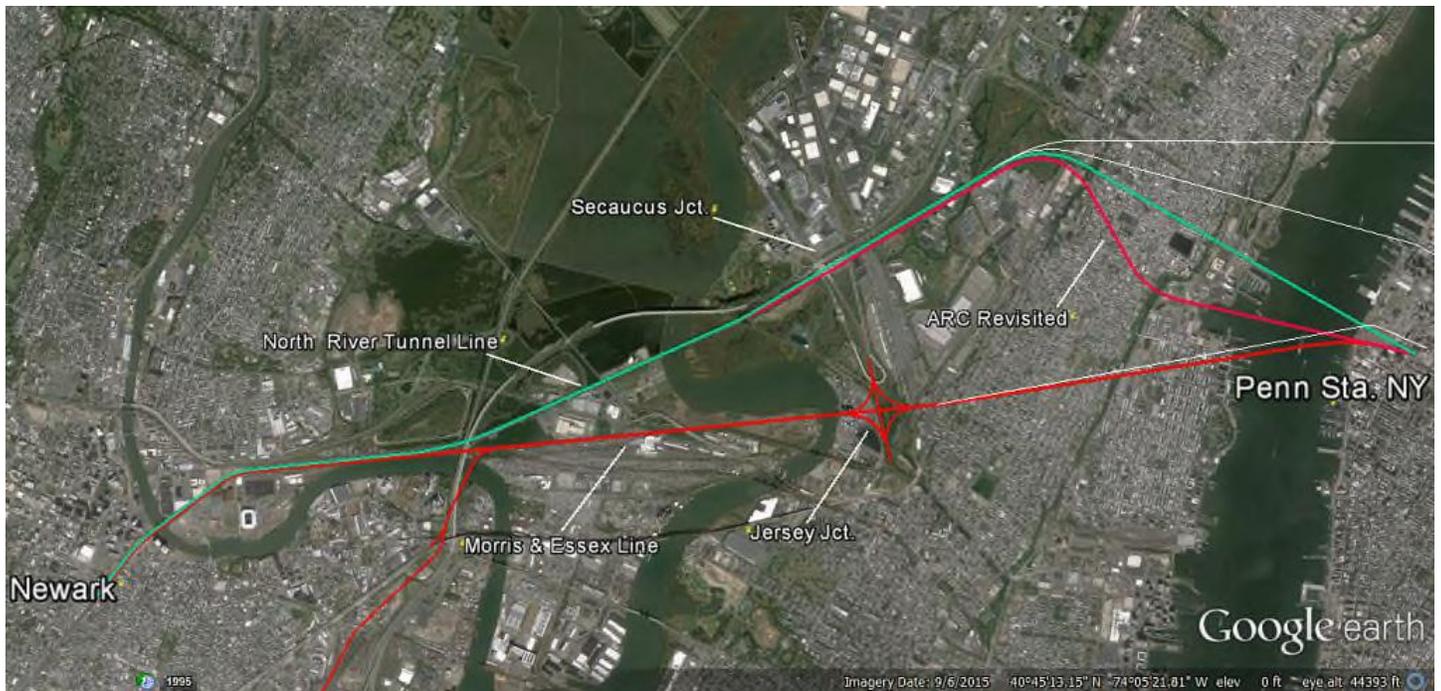
Comment or question: Would it be possible to send my comment by email? I have been having much computer trouble lately and there is some question whether I am able to get a document printed and sent by the May 31 deadline.

End of message

**From:** bruce hain [mailto:[brucewhain@gmail.com](mailto:brucewhain@gmail.com)]  
**Sent:** Tuesday, May 31, 2016 9:49 AM  
**To:** Team at Hudson Tunnel Project <[team@hudsontunnelproject.com](mailto:team@hudsontunnelproject.com)>  
**Subject:** Hudson Tunnel Comment

#### HUDSON TUNNEL COMMENT - MAY 31, 2016

It's not possible to discuss the Hudson Tunnel Project without considering other rail entities both existing and proposed, therefore I hope you will forgive me for mentioning a few other things in constructing an argument for my preferred alternative. If you have a fancy email you should be able to enlarge the images by clicking on them. If not, I hope you will use your browser's size adjustment to get a better look.

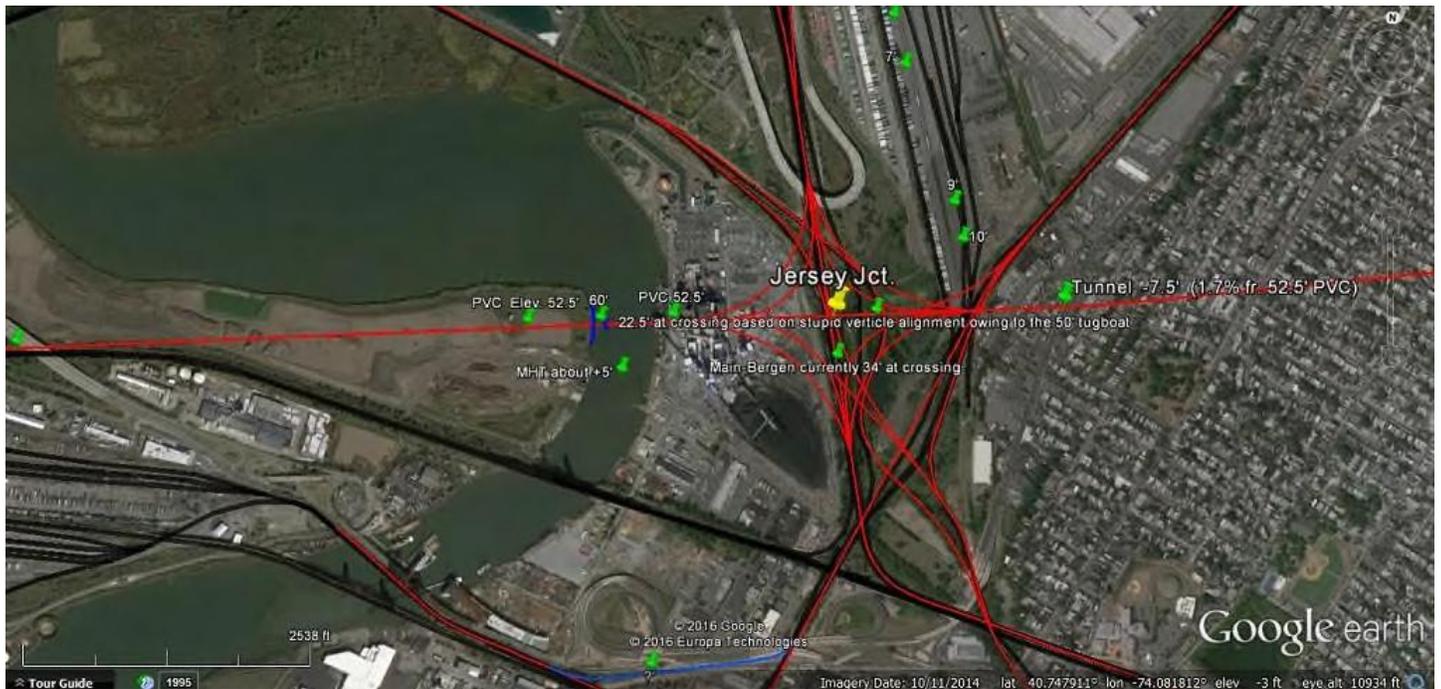


#### PENN STATION LINE

The Penn Station Line would be an extension of the Morris & Essex Line. Continuing east on a tangent where the line currently turns south before crossing the Lower Hackensack Bridge, the extension would proceed over a new bridge and through a station with four-way grade separated interchange. It would then enter a tunnel directly east of the station, proceeding to Manhattan. In this way the two rail hubs in Manhattan would each have a dedicated station in the Meadowlands providing full connectivity: Lautenberg Station, allowing transfer within the station, and Jersey Junction (pictured above) providing four-way connectivity, with local service and parking for Jersey City passengers. A one-seat-ride for lines to the north would be provided by the interchange at "Jersey Junction".

The new line would save four fifths of a mile versus the existing one, and about a mile versus the current Hudson Tunnel Project plan. The tunnel envisioned here would be of the two-track single tube variety, allowing nighttime double stack freight to use a center track straddling the other two. The single tube arrangement is gaining some currency in other parts of the world and suitable tunnel boring machines are not difficult to find. Having direct freight access to Manhattan, and eventually on to Brooklyn, Staten Island and Bayonne, would solve a lot of problems, making the single-tube dual-purpose investment well worth the cost, though the connection in Manhattan is not simple. (see below)

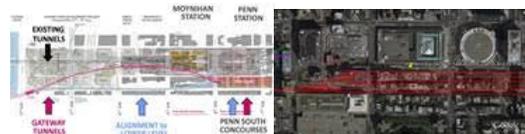
The three thin, white lines leading across the Hudson (above) are, from top to bottom: 1.) A 59th Street work-around for the East Side Access Project with a station at Columbus Circle, allowing for high volume interchangeability of equipment between Long Island and points west by way of the 63rd Street Tunnel. Considerable unbuilt space in the area of 59th & 5th provides a fortuitous opening for smooth connection to the Grand Central line located under Park Avenue. 2.) The logical expectation - given the goals of the original ARC Project: a 45th Street line, 6.5 miles long, serving GCT and the new "Olympic Village" in Queens, allowing for high volume interchangeability of equipment between Long Island and points west. 3.) Jersey Junction-to-Penn Station and Penn Station North. (It's necessary to know, when planning the first tunnel, that a second one is likely to follow at some point.)



### JERSEY JUNCTION

The Jersey Junction configuration provides seamless connection to all commuter rail lines existing or contemplated in New Jersey, plus access from Jersey City and Lower Manhattan by way of the Bergen Arches, and the Hoboken Ferry Terminal with extensive station trackage. Thus it must be considered the essential "given" in contemplating any future-oriented scheme for commuter rail in the New York-New Jersey region - though it would not be necessary to build the whole station/interchange concurrently as a single grand project. A lot of it already exists. In 1996, as my action to turn the planned 9-mile NERL Project into a 1-mile, 45%-at-grade extension of the Newark City Subway without grade crossings (finally realized at-grade as the NERL First Operable Segment [sic.]) was entering its 3rd year, I attended one of the first scoping meetings for the New Jersey ARC Project, and presented at least one copy of my 8-1/2 x 11 tracing from a Hagstrom map, showing the god's-eye-shaped Jersey Junction, with a line to Penn Station and another line branching from the Bergen Hill curve, to Grand Central. It was suggested (and fully expected by many, I believe) that an NJ Transit line to Grand Central would be built first.

Neither of the alignments was mentioned in any scoping document that I know of. In any case it is not necessary to remove the entire Hudson Generating Plant in order to arrange a right-of-way through the property, although there are those who might consider this a good idea. But a plan to make PSE&G whole while introducing modernized generating facilities in a slightly altered configuration is hardly unimaginable. The grade configurations at the site seem to work extraordinarily nicely - as if planned - provided the awkward sixty-foot-top-of-rail bridge, based no doubt on transit-agency-requested regulatory guidance from the Coast Guard re. a certain 55-foot-tall tug boat, is omitted. Otherwise, a 1.7-to-2% grade would be required for the east-west line within the station, among other undesirable "fixes". The sacrifice in speed and energy-efficiency made of what is still the busiest and most important rail line in the hemisphere would be an absurdity - more so if applied to other rail bridges in the area as currently planned. Better a lock, with a chamber beneath it that could be pumped out prior to passage of the oversized river traffic. Or a bridge at Little Ferry, to carry pressurized sludge across the river to waiting tank cars, and make the trip to the PVSC processing facility by rail.



AS PLANNED

MY VERSION

### PENN STATION SOUTH

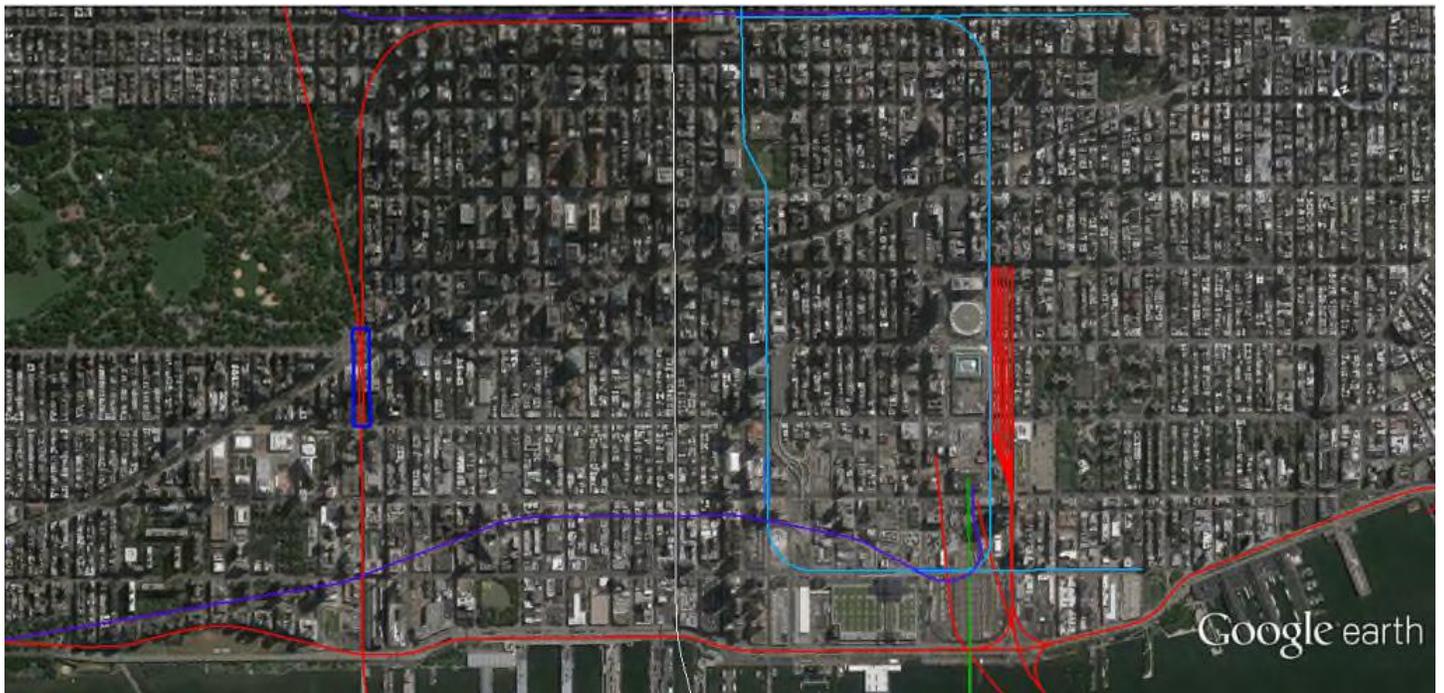
*(Please excuse the seemingly off-topic digression but the design of the station and access to it affects that of the tunnel, as does the following.)*

Thank goodness the Feds saw the danger in time and moved to protect access to their Penn Station property, because otherwise it probably wouldn't have gotten done. Nevertheless, "the Box" (as the the Feds' project designed to prevent the blocking of access to Penn Station in the event the existing tunnel goes down is called) can give rise to some misconceptions. In the AS PLANNED illustration, designers have come up with an elegant solution, albeit to a problem that doesn't exist. Except in the instance of the required repair work on the old tunnel, the new tunnel would, as a matter of course, be used exclusively by traffic from the new station, save in certain instances (if my alignment is used) of high-speed Amtrak service from Penn proper or Moynihan - or in emergency.

The AS PLANNED design suggests attempting to Y trains from Sunnyside through Penn Station proper, then backwards to Penn Station South. It is somewhat puzzling that the 30th Street right-of-way giving access to the station appears planned only to be developed at some later date when a "Lower Level" proposed for high-speed service is planned. (?) This, in turn, is seen as justification for backing the station across 7th Avenue into conflict with a historical structure of some considerable architectural significance - again ...apparently with the aim of building yet another tube (or two?) to Sunnyside. It is highly unlikely there will be another tube to Sunnyside this century, and the structure in question could not possibly be replaced with anything comparable any time soon. There are not many streets in the world that have 30-story buildings as far as the eye can see. And besides, a new station on the 7th Avenue Subway, giving end-of-platform access to Penn South along the length of its station there, would be extremely desirable.

The lines representing tracks in the AS PLANNED Penn Station South illustration are deceptively thick, giving the impression there is only room for seven tracks. I get twelve - with five 25' foot platforms and two narrower ones. The advantages of extending the tangent platform tracks west for a total length of 2050' each are manifold. This way the station can accommodate 24 twelve-car trains - 48 with elevators, and possibly high rail facilities beneath. The elevators would need to be versatile as regards having two lengths of trains, and separate mechanism to manage positioning of wires would be required initially. The additional properties in the way consist of a few nondescript 1990's apartment houses, only one of which is more than six stories tall. Except for the row houses the rest is urban blight for which commercial and academic owners would offer little resistance, provided a program is timely put in place to make them whole without broadsiding it first. The situation between 7th and 8th Avenues is far worse.

Serving the dense development now rising at Hudson Yards with a small additional above-ground facility is certainly in order, if only to dilute the crowding further east. Availability of access along the length of the station would create its own necessity. People will relieve the dense centralized crowding if given the opportunity, creating a new, more desirable version of the 33rd Street Passage at mezzanine level.



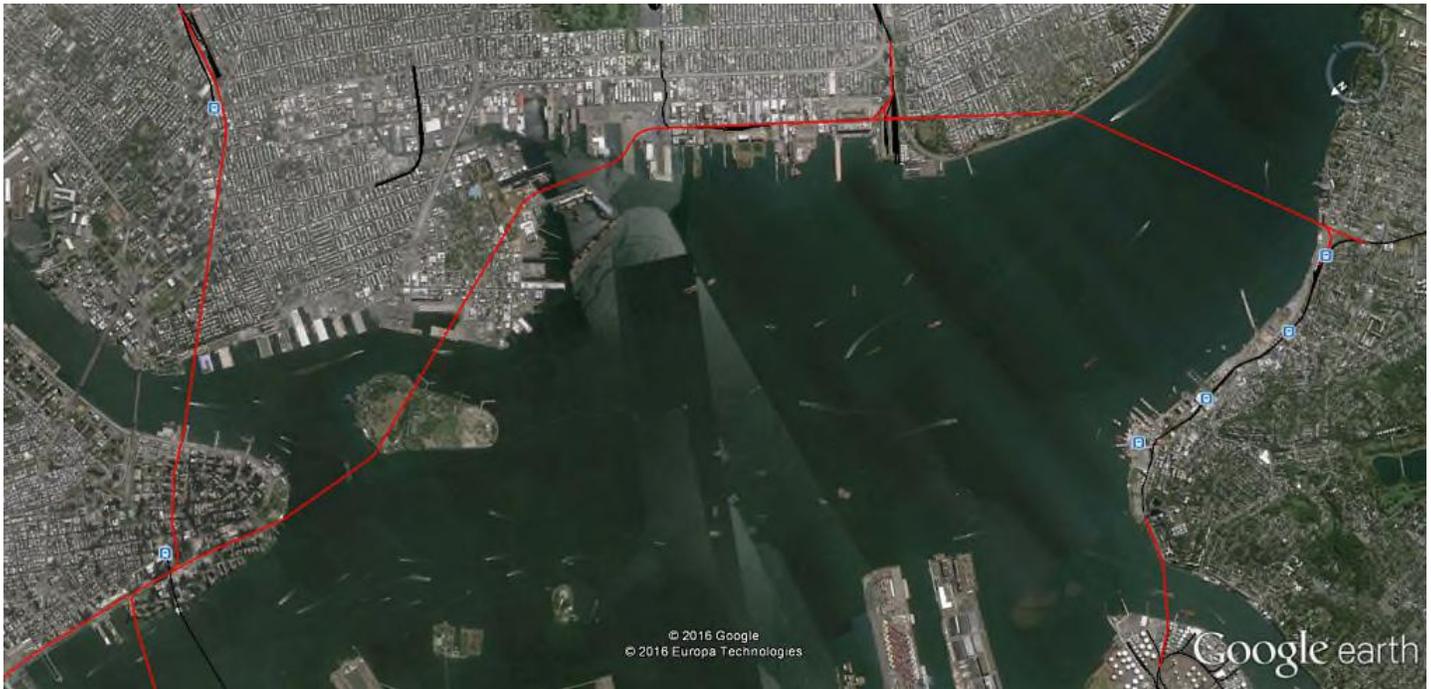
### MIDTOWN CONFIGURATION

The trans-Hudson tunnel contemplated here would be connected to a West Side Line running beneath the West Street-Hudson River Greenway. As cut-and-cover operations go this one would be comparatively simple. As the West Side's main artery, this boulevard is begging for a four-track line. Branching from the Empire Line under Riverside Park, the West Side Line would have ten passenger stations located between 65th Street and the Financial District: Drumpf Place, Ocean Terminal North, Ocean Terminal South, Javits Center, 23rd Street, 14th Street, Christopher Street, Canal Street (perhaps emerging for air here) then a possible high volume Ferry Terminal, and Financial District. In addition, the requisite Multimodal Goods (and Recycling) Transfer Facility would need to be located somewhere diplomatically along the North River Waterfront. Thus at last would be avoided the 275-mile-round-trip to Selkirk, with potential for a first rate high volume facility.

The advantages of the Trans-Hudson - West Side configuration are, again, manifold. In the absence of future Jersey Junction-to-Atlantic Avenue service and extension of service to Brooklyn and Staten Island, a temporary end-point-terminus opposite the World Financial Center, combined with the above enumerated stations south of 34th Street, would do much to take the strain off existing north-south transit facilities and their associated Midtown amenities - with custom tailored trips offering up to six options on the Manhattan side. West Street, opposite and south of the World Financial Center, offers a rare opening for addition of substantial terminal trackage with a strictly limited price in terms of displacements. The temporary terminus and nascent second-rank Manhattan hub at this location would lend itself well to several supra-regional schemes, including express service to Albany if only they had a train station. But commuter service both in New Jersey and along the Hudson - including its growing intractable ramifications in Midtown - stand to benefit greatly in terms of direct access, travel times, convenience and capacity.

In order to make the necessary trans-Hudson - West Side partially-subaqueous connection, a lead from the West Side Line might best be bored in a north-westerly direction up to the bulkhead, with the remaining curved section sunk in place and connected ex post facto to both shield-bored trans-river tube and the bulkhead arrangements. The single-track connecting tube need not have the full diameter profile of the trans-Hudson tunnel but should have clearance for double stack freight. Compensation for the grade difference between the tunnel-30th Street line as against the slightly-below-grade West Side Line would require a third or fourth track for each of the two main rights-of-way running for some distance from the point of intersection. *(Due to some ongoing computer difficulties starting with a sudden hard drive failure in March a lot of things were lost, and the West Side Line tunnel connections as shown are either distorted or missing. I did a quick coverup. Nothing, in any case, is to scale - and we hope to do better next year.)*

The No. 7 line, pictured ominously in some drawings as being extended in a transverse alignment running along 30th Street rather than 31st as originally planned, would be put to best use if extended yet again - with a station at 31st and Eighth for Penn Station service - then continuing right back to Grand Central. Thus, a high-capacity Midtown bi-directional quasi-loop service connecting the three big transit hubs would be realized, pending some resolution regarding space restrictions versus walking distance at the bus terminal. This would depend on making the grade difference so as to run above the ESAP tail tracks on the west side of Park Avenue, as the other side is taken up by the East Side IRT line. In addition to that under Eleventh Avenue, another set of tail tracks running south on Park Avenue would afford some additional flexibility for the probably-two-track stub-end station at Grand Central - hopefully with extra-wide platforms. The astounding fact that no alternative with a fourth tube for the Lincoln Tunnel has yet been mooted in conjunction with the current PABT Rebuild Study frenzy, augers well for a satisfactory resolution regarding the space restrictions at the bus terminal.



### FINANCIAL DISTRICT - GOVERNORS ISLAND - BROOKLYN - STATEN ISLAND - BAYONNE

A tunnel with the same profile and track configuration would connect the Financial District to Governor's Island and thence to Red Hook, where the line would surface at a station to the south and be carried on a dedicated right-of-way and swing bridge arrangement over the Gowanus Inlet. At this point, and in Red Hook as well, grading schemes could be developed to allow freight service at and immediately below grade, and possibly above, in order to avoid contact with traffic and pedestrians not on restricted private property. Between the two buildings of the Army Terminal, with Cass Gilbert's arch bridges, is one place where a passenger station would be ideal, though exigencies of grade configuration and usage priority might rule this out. The adjacent yard and facilities are not particularly compatible with the transverse line as drawn and perhaps a reconfiguration is in order. The Narrows Tunnel as shown is at a location considerably narrower than that of the one planned in the 1920's though the approach on the Brooklyn side would require considerable tunneling as well.

Passenger Stations South of the Financial District: Governor's Island, Red Hook, Bush Terminal, Army Terminal, Owl's Head, and possibly a few more.

The alignment least likely to be feasible as shown on the map above is that of the Atlantic Avenue Line, and in seeking to thread the line, through John Street this time (a dicey proposition) in order to have it pass next to Calatrava's station not five hundred feet from the just-opened Fulton Street Transportation Center, the question arises: Have planners gotten the foremost railroad architect of his generation to build a train station in the wrong place?

The St. George - Bayonne Lift Bridge (lower right) would close the circuit (admittedly with some possible degree of intermittancy) obviating the Cross-Harbor Freight Tunnel, and making a start on bringing the state of passability by rail in Bayonne back to something approaching marginally acceptable standards for transport and defense purposes that affect us all.

The Cross Harbor Tunnel on the other hand, seems intentionally designed for its especially lengthy subaqueous configuration, running between two widely separated points in the harbor, and aided considerably by its serpentine alignment. Given the likely take, measured in car float receipts during the past twenty years, I don't see that such a tunnel has much practical use. And it fails in providing service to Manhattan, where the densest concentration of population, commerce, and consumerism obtains.

When considering the region's rail transit needs I have endeavored to plot alignments that take the shortest, most direct route possible - because this characteristic is the most important thing in rail transportation planning and the essential difference between rail transportation and other terrestrial modes. To design rail transportation with other than the most direct route possible, or with grade crossings, in the 21st Century, is not rail transportation planning. It is something else.

*This comment will be permanently displayed at <http://brucehain0.wix.com/rail-nyc-access>.*

Bruce W. Hain  
90-10 150th Street  
Queens, NY 11435  
646-710-0869

E-Mail: [HENRIHEDAYA@AOL.COM](mailto:HENRIHEDAYA@AOL.COM)

Title:

First name: HENRY

Last name: HEDAYA

Company: Kids Cuts 72 LLC

Address 1: 320 EAST 65TH STREET

Address 2: 225

Town/city: NEW YORK

State: Ne

Zipcode: 10065

Comment or question: I WOULD LIKE TO KNOW WHAT IS THE DIFFERENCE BETWEEN THE HUDSON TUNNEL PROJECT AND THE GATEWAY PROGRAM? AND IF EITHER PROJECT HAS ANY PLANS TO CONSTRUCT ANY NEW TUNNELS UNDER 34TH STREET EAST TO SIXTH AVE TO EXPAND ENTRANCES TO PENN STATION OR IS THE PLAN JUST TO EXPAND PENN STATION WEST INTO THE FARLEY POST OFFICE?

End of message



# Hudson Tunnel Project

## Public Scoping Meetings

Thursday, May 19, 2016  
Union City High School, 2500 Kennedy Boulevard, Union City, NJ

Please use this comment form to let us know your thoughts.

Name (required): Sebastian Jaramillo  
Organization/Affiliation: \_\_\_\_\_  
Street Address: 3126 Summit Avenue  
City: Union City State: N. J. Zip Code: 07087  
Email: sebas2001@live.com

Comments: I was told by my biology teacher (Julith Barrios Ph.D.) that on the bottom of the Hudson River, multi-carbon compounds occupy most of the seabed. Once stirred, the organisms in the river then consume the compounds and undergo biological magnification. I believe that this would damage the river's ecosystem. If this tunnel is absolutely necessary, find a way to take the compounds out of the water. Also, if possible, please add a barge route. Thank you!

SSB

Please leave this form with us today or submit by email or mail to NJ TRANSIT's Project Manager by May 31, 2016:

Email: [RPalladino@njtransit.com](mailto:RPalladino@njtransit.com)

[Amishi.Castelli@dot.gov](mailto:Amishi.Castelli@dot.gov)

Mail: Mr. RJ Palladino  
NJ TRANSIT  
One Penn Plaza East  
8<sup>th</sup> Floor  
Newark, NJ, 07105

Ms. Amishi Castelli, Ph.D.  
USDOT Federal Railroad Administration  
One Bowling Green  
Suite 429  
New York, NY 10004

For more information, please visit the project website at: [www.hudsonstunnelproject.com](http://www.hudsonstunnelproject.com)

**From:** K207 [mailto:[naydenk2@gmail.com](mailto:naydenk2@gmail.com)]  
**Sent:** Wednesday, May 18, 2016 10:43 AM  
**To:** Team at Hudson Tunnel Project <[team@hudsonunnelproject.com](mailto:team@hudsonunnelproject.com)>  
**Subject:** EIS Scoping Document Comment

Please, find below my comments.

Nayden Kambouchev

\*\*\*\*\*

Any build alternatives considered should be designed in a manner not precluding future expansion projects. Unfortunately this appears to not have been followed during the initial building of the Secaucus Junction Station and its related infrastructure. As a result either relatively new infrastructure (only about 15 years old) will need to be redone or an operational chokepoint will need to be tolerated.

There are three single track steel bridges over the Norfolk Southern's yard tracks east of Secaucus Station. The three bridges allow access to the four tracks at the station. Unfortunately the physical configuration of these bridges is such that a fourth bridge for a fourth track cannot be placed between the existing bridges without moving at least one of the three existing bridges. A new bridge cannot be placed south or north of all existing bridges because they will not be able to access any of the existing tracks at the station. As a result unless the existing bridges are reconstructed/moved we will end up with a four track station and a four track railroad from east of these bridges to Penn Station and a three track choke point in between. With the eventual quadtracking west of Secaucus Junction to Newark, this choke point will become quite of an operational constraint. This could have been avoided if the middle of the three bridges had been built as a two track bridge with only one track installed. Or they could have still built a single track middle bridge while leaving enough space for another single track bridge so that the section over the Norfolk Southern's yards could be quadtracked easily. This was not done, so now we need to demolish and rebuild something that was built only about 15 years ago at a cost of probably about \$100 million. While there are other ways to solve this issue, they all involve reconstructing the station itself which will not be cheap either.

In the opinion of this commenter, there is no need for more tracks at the station itself. Four tracks can handle doubling or tripling of the station users and even that is not expected to ever occur if the Bergen Loop gets built eventually. While there is no need for more tracks at Secaucus Junction, this commenter realizes that due to physical limitations of the existing structures, bypass tracks or additional tracks might become necessary in the future. Please, plan and design any and all infrastructure including bridges being built for this project in a manner that does not preclude the addition of bypass tracks both to the south and the north of the station in a way similar to the one described above. Future planners and taxpayers would thank you!

Please, also address the issue of the three bridges in the build alternatives considered in the Environmental Impact Statement.



# Hudson Tunnel Project

## Public Scoping Meetings

Tuesday, May 17, 2016  
Hotel Pennsylvania, Gold Ballroom, 3rd floor,  
401 7th Avenue at W. 33rd Street, New York, NY

MAY 18, 2016

Please use this comment form to let us know your thoughts.

Name (required): ALICE F. LA-BRIE  
Organization/Affiliation: FORMER US DEPT STATE FOREIGN SERVICE  
Street Address: 101 WEST 147TH ST APT-18A  
City: NY (HARLEM) NY State: NY Zip Code: 10039  
Email: alice.labrie@hotmail.com 212 283 2944

Comments: I attended as concerned citizen-TAXPAYER, Public Transit Dependent. I am happy to learn there will be two terminals across the Hudson and the new one could be accessed by a walking thru evacuation from New York-Manhattan in the event of a terrorist attack calling for evacuation remembering the 9/11 attack evacuation from lower Manhattan. I am very proud of and thankful for my government, City, State, Federal for its many services to enjoy a good quality of life with safety. Thanks to all for a public attendance opportunity.

Please leave this form with us today or submit by email or mail to NJ TRANSIT's Project Manager by May 31, 2016:

Email: [RPalladino@njtransit.com](mailto:RPalladino@njtransit.com)

[Amishi.Castelli@dot.gov](mailto:Amishi.Castelli@dot.gov)

Mail: Mr. RJ Palladino  
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Newark, NJ, 07105

Ms. Amishi Castelli, Ph.D.  
USDOT Federal Railroad Administration  
One Bowling Green  
Suite 429  
New York, NY 10004

For more information, please visit the project website at: [www.hudsonstunnelproject.com](http://www.hudsonstunnelproject.com).



**ALICE F. LA BRIE**  
101 West 147<sup>th</sup> Street Suite 18A  
New York, NY 10039, USA  
212-283-2944 Cell 917-586-4733

**Alice La Brie's background includes time with the U.S. Department of State Foreign Service, posted to Political and Economic Sections of embassies in Turkey, where she wrote for the embassy newsletter, The Sultanate of Oman and Sweden, with contracted assignments at the U.S. Mission to the UN in the Protocol and Political Sections under Ambassadors Richard C. Holbrooke, John Negroponte and Zalmay Khalilzad.**

**In addition to her Foreign Service experience, Ms. La Brie's New York credits include television Producer-Writer beginning with game show Producers Goodson Todman Productions, Associate Producer of PBS' pioneering Emmy nominated "SOUL!" show, archived at the Smithsonian Institute for its historical place in television history, Producer-Writer of a legendary national special for Madison Square Garden TV Productions, and former Co-Owner while married to legendary broadcaster Hal Jackson, of Hal Jackson Productions' "Talented Teens International", which she created, produced and syndicated for television from remotes in Atlanta and Hollywood, with Pepsi-Cola as sponsor, featuring popular Motown recording artists. She was a Green Room Coordinator for Disney-ABC "Good Morning America Weekend". While in Los Angeles, she worked in features and television at Warner Bros.**

**She is a Commentary writer published in national newspapers, with Op-Ed aired on syndicated television and talk radio.**

**Ms. La Brie holds membership in the New York Press Club, several Museums and historical societies, including the Museum of American Finance and the American Civil War Museum, with an interest in American History, political and civic affairs, Public Transit, Infrastructure and Tourism Marketing, for the impact on the viability of the city, state and country.**

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# CRAIN'S

## NEW YORK BUSINESS®

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Crain's New York Business • May 23, 2005

### LETTERS TO THE EDITOR

#### **How to prevent further delays**

For God's and the taxpayer's sake, disband the Lower Manhattan Development Corp., which has served its public relations pur-

pose, and let the Port Authority of New York & New Jersey assume all responsibility for the rebuilding of the site, including the memorial ("Building leaders vent frustration over delays," May 9). Enough of this embarrassing inefficiency.

ALICE LA BRIE  
*Manhattan*

**Alice F. La Brie**  
101 West 147th St. #18A  
New York, NY 10039 USA  
212-283-2944 [alicelabrie@hotmail.com](mailto:alicelabrie@hotmail.com)

# Building leaders vent frustration over delays

## Freedom Tower redesign will put off start of foundation; backlog growing

BY ANNE MICHAUD

Tishman Construction Corp., the construction manager of the World Trade Center site, was about to announce a builder for the Freedom Tower foundation when word came that the New York Police Department had security concerns.

That was a month ago. Now, as the Freedom Tower project heads back into a planning phase to address the NYPD's criticisms, Tishman will go back to the drawing board. The bidding process for the foundation must be redone.

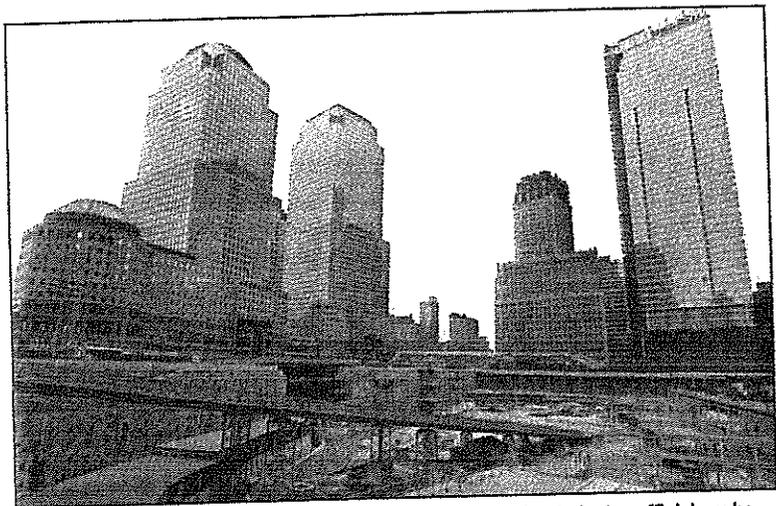
"We would have been starting

work about now if the latest developments had not occurred," says Richard Kielar, a company senior vice president.

Industry executives and labor officials are frustrated by the slow pace of work at Ground Zero and at dozens of other project sites in lower Manhattan and on the West Side. They're concerned about a World Trade Center tower that would provide retail space, and the New York Jets football stadium.

### Schedule needed

"We look at the backlog and wonder when these projects are going to come on line," says Lou Coletti, president of the Building Trades Employers' Association. "It's going to impact our staffing. We have to move beyond the concept and design phase and get a firm schedule of when these projects are going to begin."



AP/WIDE WORLD PHOTOS

**CALL TO ACTION:** The frustration is a shift for construction industry officials, who have largely applauded Mr. Bloomberg's leadership on development projects.

This sense of irritation is a shift for industry executives, who had largely been happy with the way the Bloomberg administration has

championed development. Last month, Mr. Coletti's group honored Mayor Michael Bloomberg at its annual dinner. A laudatory slide

show celebrated the many big projects the mayor has pushed, including the stadium on the West Side and residential towers for the northern Brooklyn waterfront. Today, Mr. Coletti is writing frustrated letters to the mayor, Gov. George Pataki and state legislators.

### Building Congress speaks up

The New York Building Congress, another industry organization, sent a letter to Mr. Pataki two weeks ago, calling attention to the lack of progress in finding tenants for 7 World Trade Center, building the Freedom Tower and keeping Goldman Sachs interested in locating a headquarters at the site.

"When you add it up," says Building Congress President Richard Anderson, "it's not an encouraging picture. But we're looking for the governor to take the lead in resolving the problems." ■

Alice F. La Brie  
101 West 147th St. #18A  
New York, NY 10039 USA  
212-283-2944 alicelabrie@hotmail.com

E-Mail: [sonny92@aim.com](mailto:sonny92@aim.com)

Title: Jr

First name: Mark

Last name: Lacari

Company:

Address 1: 1 Sawyer Avenue

Address 2:

Town/city: Staten Island

State: NY

Zipcode: 10314

Comment or question: We need to start building this thing right now. I have seen the damage for myself while riding NJT last year and it is not good at all. The more we drag out feet on this issue, the worse it will get. I said before at the NEC Future meeting back in December of 2015 and I will say it again, if we do not take the necessary steps to make projects like this happen, we deserve to fail and suffer the consequences for our action.

End of message

E-Mail: [peirce.marston@gmail.com](mailto:peirce.marston@gmail.com)

Title:

First name: Peirce

Last name: Marston

Company:

Address 1:

Address 2:

Town/city:

State:

Zipcode: 07086

Comment or question: What steps are being taken to include potential future use by freight rail and/or future connections to Grand Central Terminal (either to Metro North or East Side Access)?

End of message

**John F. McHugh**  
**Attorney at Law**  
**233 Broadway, Suite 2320**  
**New York, NY 10279**

**Office: 212-483-0875**

**Fax: 212-483-0876**

May 17, 2016

COMMENTS ON THE GATEWAY TUNNEL PROJECT

Absent a period of higher education and initial employment in the United States Department of Justice and by the U.S. Attorney in Manhattan, I have been a lifelong resident of Northern New Jersey. Despite this, I have been involved in the transportation issues of the City of New York since being appointed to a Citizens Advisory Committee to an MTA management study, as a railway expert, by the office of New York Governor Malcom Wilson in 1977. North Jersey citizens understand that New York City is our primary employer as even those who work within that state live off revenue generated in New York. Thus, the economic health of the City and of Northern New Jersey are linked. Neither can prosper alone.

This region has two major transportation issues. Both relate to crossing the rivers which lie both between the States and between Manhattan Island and all that lies to the east. Unlike all other major American cities, this nation's rail freight network does not reach the City of New York efficiently. This issue has been the subject of major discussion since the mid 1800,s. The first proposal for a tunnel was made in 1880. Today, due to age and damage from Hurricane Sandy, the only two single track heavy rail passenger tunnels which connect New Jersey to New York need to be supplemented so they can be repaired.

We are now engaged in Environmental Impact Studies of two Cross Hudson rail tunnels. One is a freight only tunnel that would connect the Bay Ridge Line in Brooklyn to the North American land based railroad network. The Gateway project, as envisioned, would simply connect the Northeast Corridor in New Jersey to an enlarged Pennsylvania Station. The Gateway plan, as critical as it is to the region due to the condition of the

existing tunnels, replicates every mistake made in building the original Pennsylvania Station Terminal and Tunnel railroad. It is to be designed to accommodate only rail cars used for passenger services in 1890.

This region's major strategic problem is the lack of rail freight access across the region's rivers connecting the national rail system to this city and the region east and northeast of the City. That region is the home to 12 million people and that population is growing. This lack of efficient rail freight access forces all the supplies needed to sustain this large and growing population onto the region's highways, already some of the most congested on earth.

Worse is that only ten lanes of highway, connecting this region with New Jersey, are available to handle all of that freight. The George Washington bridge has only eight lanes that can be used by trucks. The Goethals Bridge, which trucks must use to access the Verrazano Narrows Bridge, is too narrow for trucks to use both lanes allocated to each direction. Thus, this, the only other way across the rivers in the Port District for standard sized trucks is restricted to one lane in each direction. None of our tunnels is high enough to handle a standard highway trailer which is 13'6" high. The Lincoln, the newest and largest, is restricted to 13'.

The current result of this situation is that residents adjacent to highways connecting to the George Washington Bridge are subjected to tremendous loads of pollution. We do not have statistics for Bergen County, but we do know that Bronx County, where numerous truck routes also converge to access the George Washington Bridge, has the highest rates of cardio vascular disease including asthma in the United States, diseases proven to be caused by exhaust gasses generated by trucks.

While we are looking at two projects, one for passenger trains and one for freight to solve two problems, the simple solution is to combine the two. A two track tunnel has a huge capacity, well able to handle passengers and freight. Indeed, either a freight or passenger tunnel will sit nearly empty and lightly used for nearly half a day. A joint facility using more of that capacity will generate far greater public benefits per dollar invested.

To be fully useful the new tunnels must have clearances that accommodate Double Stack container cars. The new tunnel must continue

across Manhattan and under the East River to connect logically to the rail system on Long Island. The line to Newark must just also connect to the existing Iron Bound freight line just across the Passaic River.

The recently completed Cross Harbor Rail Freight-Tier 1 study conducted over ten years by the NYNJ Port Authority demonstrated for fourth time in twenty years that moving freight by rail from New Jersey to Long Island in a tunnel is preferable on all levels of public benefit to any alternative, in particular in reducing truck traffic in Northern New Jersey and east of the Hudson. In addition, unlike passenger service, freight can pay its way deferring some of the costs of the project.

In the last few years, a major chain store located a rail served lumber distribution facility on Long Island and experienced a significant reduction of costs due to locating that facility nearer to its East of Hudson retail centers. That also took hundreds of heavy trucks off New Jersey's highways and those of the Bronx. This success story has not been replicated as other goods are too expensive and freight rail service to Long Island is limited and slow due to the lack of an efficient route. But this example tells us, build it and they will come.

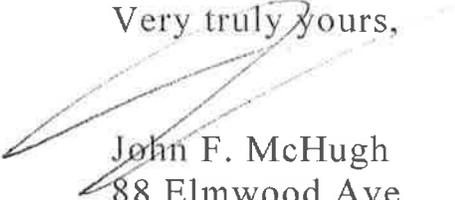
The other strategic issue we need to consider in this age of terrorism is that we depend on the George Washington Bridge too much. There is little to no freight handling infrastructure East of the Hudson due to years of disinvestment due to the near total loss of efficient rail access in the 1950's and 60's. Critically, the only refrigerated food storage in the region is in supermarkets. This is estimated to be about three day's supply. If the bridge is closed for any reason, the 12 million people living East of the Hudson cannot be sustained. There is absolutely no alternative means of supply that can be put in place in three days. The economy of the entire region will either shut down or be reduced to the limit allowed by the supplies that can trickle through our tunnels in small trucks or get in from the North. Thus, New Jersey, New York and the Nation have a huge stake in providing an alternative to this bridge beyond just the goal of ending our excessive use of trucks with all its negative impacts on health and quality of life on both sides of the river.

Beyond the strategic benefit and economic benefits, freight trains using the tunnel would be electric, eliminating all local pollution now generated

by a minimum of the 1,400 trucks a day the Tier 1 study finds would be rerouted from highway to rail by a tunnel.

All of this, however, needs to be fully evaluated before public treasure is devoted to this project.

Very truly yours,



John F. McHugh  
88 Elmwood Ave.  
Ho-Ho-Kus, N.J. 07423

**From:** [aileen1201@verizon.net](mailto:aileen1201@verizon.net) [mailto:[aileen1201@verizon.net](mailto:aileen1201@verizon.net)]  
**Sent:** Wednesday, May 18, 2016 10:23 PM  
**To:** Team at Hudson Tunnel Project <[team@hudsontunnelproject.com](mailto:team@hudsontunnelproject.com)>  
**Subject:** Re: Hudson Tunnel Project E-mail Signup Form

Hello

The Hudson Tunnel rail project is an necessity.

The automobile traffic tunnels and bridges are already at full capacity with too much traffic or very close to it.

The time to start the gateway tunnel is now.

Thank you

Aileen Mishkin

# PAUL PAYTON

67 CANDACE LANE, CHATHAM, NJ 07928-1115

Home: (973) 701-0928 • Office (973) 701-0707 • Cell: (973) 879-0414  
e-mail: bsandpp@verizon.net

May 19, 2016

Re: Hudson Tunnel Project

Sirs:

I strongly support The Federal Railroad Administration (FRA) and NJ TRANSIT in their effort to build and re-build the Hudson Tunnel Project, which would preserve the current functionality of the Northeast Corridor's (NEC) Hudson River rail crossing between New Jersey and New York and strengthen the resilience of the NEC. I would also suggest that alternatives 1 (improvements) or 2 (expansion) as shown on your website would be of significant benefit to the region; however, the major project must be getting these tunnels built now (yesterday would be better!) and also rebuilding and four-tracking the Portal Bridge.

I also believe that the project canceled by Gov. Chris Christie was inadvertently the right move, but for the wrong reasons; the project needs to be built with the potential for additional through service, not to terminate in a stub in Macy's basement. Gov. Christie was also wrong to divert the funds for that project to roads; anything that can be done to reclaim that money and fast-track these tunnels will be of great benefit to the entire region and to the national rail network as well.

Thank you for allowing me to comment.

Sincerely,



Paul Payton

E-Mail: [JEANPUBLIC1@YAHOO.COM](mailto:JEANPUBLIC1@YAHOO.COM)

Title: MR

First name: JEAN

Last name: PUBLIEE

Company:

Address 1: 2 NOTAVILABLE ST

Address 2:

Town/city: FLEMINGTON

State: NJ

Zipcode: 08822

Comment or question: I OPPOSE SPENDING \$86.5 OF TAXPAYER DOLLARS FOR THIS TUNNEL. IT IS A WASTE OF TAX DOLLARS. FIX UP THE OLD TUNNELS. AND STOP PUSHING THESE HUGE TAX SPENDING PROJECTS ON TAXPAYERS IN THIS AREA. THEY ARE ALREADY THE MOST HIGHLY TAXED IN THIS COUNTY AND ALREADY IN NJ HAVE \$19 BILLION DOLLAR DEFICIT AND NATIONALWIDE TRILLIONS OF DOLLARS IN DEFICIT. YOU ARE LOOINMG TO CREATE MORE DETROITS AND ATLANTIC CITY. THERE IS NO MONEY FOR THIS PROJECT. IT NEEDS TO BE PUT OFF.

End of message

—Original Message—

From: Arnold Reinhold [mailto:[agr@me.com](mailto:agr@me.com)]

Sent: Friday, May 27, 2016 7:54 AM

To: Team at Hudson Tunnel Project <[team@hudsonunnelproject.com](mailto:team@hudsonunnelproject.com)>

Subject: Hudson Tunnel Project EIS scoping comment

I support the FRA's decision to separate the construction of a new rail tunnel under the Hudson River from the broader question of increasing trans-Hudson rail capacity, due to the need for prompt repairs to the existing hurricane-damaged tunnels. However it is disheartening to realize, given the time scale of the Hudson Tunnel Project, including the reconstruction of the existing tunnels, that there will likely be no increase trans-Hudson passenger rail capacity until the 2040's. By then real estate prices in Manhattan may be so high as to preclude expanding capacity via the proposed Penn Station South component of the Gateway plan.

I would therefore suggest that Goal 4 of the EIS scope be expanded to at least consider the possibility of using some of the four-tube tunnel capacity that will be available after HTP completion to extend the New York Subway 7 line to the Frank R. Lautenberg Station in Secaucus. Such an extension could allow expanded service from New Jersey to Manhattan without massive new station construction and would gain access to the east side of Manhattan for New Jersey commuters. The study should also consider the possibility that by 2040 computerized train control technology may have matured to the point where subway and commuter rail train sets can safely share track, something that FRA regulations prohibit today.

I am not suggesting a commitment to build the 7 Line extension, merely that the EIS should consider what would be involved in preserving the option to build it and the environmental cost of precluding that option given the potential difficulty in expanding Penn Station capacity in the future.

Respectfully submitted,

Arnold Reinhold

E-Mail: [joseph.sanderson@gmail.com](mailto:joseph.sanderson@gmail.com)

Title:

First name: Joseph

Last name: Sanderson

Company:

Address 1:

Address 2:

Town/city:

State:

Zipcode: 90014

Comment or question: The scoping project and EIS should consider whether the proposed build alternatives would be compatible with future through-running of NJ Transit trains onto the MTA's Long Island Railroad and Metro-North Penn Station Access to create a regional rail network and mitigate terminal capacity problems.

End of message



# Hudson Tunnel Project

## Public Scoping Meetings

Thursday, May 19, 2016  
Union City High School, 2500 Kennedy Boulevard, Union City, NJ

Please use this comment form to let us know your thoughts.

Name (required): Alicia Santamaria  
Organization/Affiliation: Union City High School Student. Union City Resident  
Street Address: 4413 Bergenline Ave. Apt. 3F  
City: Union City State: NJ Zip Code: 07087  
Email: as.alicia8399@outlook.com

Comments: Someone explained to me the plan, but and I fully support the idea. The tunnels that exist are over 100 years old. From living in Union City for 16 years, I have found it complicated to go to New York in other than Public transportation or in a motor vehicle. I suggest a bike lane should be added, along with a walkway. It would be a good form of getting to New York City on any given day, and avoiding traffic too! This tunnel could also possibly be good for the economy and transit of New Jersey.  
- Thank You.

Please leave this form with us today or submit by email or mail to NJ TRANSIT's Project Manager by May 31, 2016:

Email: [RPalladino@njtransit.com](mailto:RPalladino@njtransit.com)

[Amishi.Castelli@dot.gov](mailto:Amishi.Castelli@dot.gov)

Mail: Mr. RJ Palladino  
NJ TRANSIT  
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8<sup>th</sup> Floor  
Newark, NJ, 07105

Ms. Amishi Castelli, Ph.D.  
USDOT Federal Railroad Administration  
One Bowling Green  
Suite 429  
New York, NY 10004

For more information, please visit the project website at: [www.hudsonunnelproject.com](http://www.hudsonunnelproject.com).

E-Mail: [carolynsmith48@comcast.net](mailto:carolynsmith48@comcast.net)

Title:

First name: Carolyn

Last name: Smith

Company:

Address 1: 36 Sunflower Lane

Address 2:

Town/city: Toms River

State: NJ

Zipcode: 08755

Comment or question: New Jersey desperately needs to upgrade and expand the Hudson River tunnels. Trains are the most efficient way to commute. They are also more environmentally friendly than cars. The only downside is that Amtrak has priority over New Jersey Transit on the rails which can sometimes lead to lengthy delays. Let's make the commute as painless as possible so that we can cut down on the cars.

End of message

E-Mail: [spencerscott@hotmai.com](mailto:spencerscott@hotmai.com)

Title: Mr.

First name: Scott

Last name: Spencer

Company: Empire State Gateway

Address 1: 601 W. 19th Street

Address 2:

Town/city: Wilmington

State: DE

Zipcode: 19802

Comment or question: I am requesting that the Empire State Gateway (ESG) which is comprised of twin, multi-span suspension and cable-stay bridges connecting New Jersey, Manhattan and Queens be considered as an alternative to the proposed Hudson River Tunnels. The ESG will provide four tracks, four bus lanes, two Maglev tracks, utility conduits, Skyline trail for pedestrians and bikes, TOD real estate connections, to generate multiple revenue streams and transit capacity for the next 100-200 years.

End of message

**From:** Scott Spencer [<mailto:spencerscott@hotmai.com>]  
**Sent:** Tuesday, May 31, 2016 2:59 PM  
**To:** [amishi.castelli@dot.gov](mailto:amishi.castelli@dot.gov); Palladino, Robert J. (CCAPRJP)  
**Subject:** Empire State Gateway Summary

Dear Ms. Castelli and Mr. Palladino,

As a follow-up to my recorded comments at the May 17th Public Scoping Meeting at the Hotel Pennsylvania in New York, I am submitting a summary of the Empire State Gateway to be considered as an alternative to the proposed new Hudson River Tunnels. As I mentioned in my recorded testimony, the Hudson Tunnels would be a significant multi-billion dollar investment whose capacity could not be fully utilized due to the limitations of Penn Station and the structural and aging limitations of the 100+ year old East River Tunnels.

During a Gateway Project presentation to the New Jersey State Senate in August, 2015, Amtrak stated that although the two new tracks of the proposed Hudson River tunnels represents a 100% increase in trans-Hudson track capacity, service into Penn Station

New York could only be increased 38% due to the limited speeds, track and platform capacity, and LIRR congestion even after the Gateway projects between Newark and New York are completed.

Also it is difficult to see how more than 25% of the costs of the Hudson River Tunnels can be privately financed and repaid by user fees. The Empire State Gateway has a wide range of user fees that can support substantially greater use of private financing and thus free up limited state and federal financing for other critical transportation projects.

As described in the attached the summary, the Empire State Gateway, will create far more multi-modal transportation capacity to better serve the mobility needs of New Jersey, New York and our nation for the next 100-200 years. It utilizes the air rights above I-495 in New Jersey, crosses the Hudson and East Rivers at least 212 feet above high tide, crosses at least 120 feet above the streets of Midtown utilizing the air rights of 38th and 39th Streets and then reconnects with I-495, Sunnyside Yard and the Hell Gate Bridge in Queens completely separating the Northeast Corridor and NJ Transit trains from the LIRR.

As a transit only bridge, the twin bridges of the Empire State Gateway will provide a total of four tracks, four bus lanes, two rights-of-way for the New York - Washington Maglev project, pedestrian and bike access on the Skyline Trails and a utility conduit for water, gas, power and telecommunications.

Due to the need to begin critical rehabilitation of the existing Hudson River tunnels as soon as possible, the prefabricated technology and construct-ability of the Empire State Gateway bridges will allow one of the twin bridges to be completed with 60 months of groundbreaking, placing two tracks and a new Midtown station in service. This would allow one the two tunnels to be removed from service for rehabilitation in the fastest amount of time. Inbound trains could arrive on the two tracks of the Empire State Gateway and outbound trains could depart from Penn Station New York to operate through the single track of the one tunnel still in service. Because of the two tracks of the ESG bridge it could also provide some redundancy if the one tunnel has problems during the rehab of the other tunnel.

I would be pleased to provide your Hudson Tunnel Project team with a 30 minute Powerpoint presentation on the Empire State Gateway project elements, project benefits, revenue streams, transportation elements, engineering elements and real estate elements.

The executive team of the Port Authority of New York and New Jersey have been briefed about the Empire State Gateway and they wish to evaluate its merits as part of the financial and technical alternatives analysis of the EIS process.

I will attach the conceptual drawings of the Empire State Gateway in a following email.

Sincerely,

Scott R. Spencer

Empire State Gateway

[302-354-3577](tel:302-354-3577)

## **EMPIRE STATE GATEWAY Opportunity Summary**

**Project Scope:** The Empire State Gateway (ESG) is comprised of twin, multi-span suspension and cable-stay bridges connecting New Jersey, New York and New England. Each twin bridge (eastbound and westbound) carries four levels of revenue generating, multi-modal capacity in prefabricated segments:

First Level: Utility Conduit for power, water, gas and telecommunications

Second Level: two tracks for Amtrak and New Jersey Transit trains

Third Level: future Maglev track and two EZ Pass lanes for buses, limos, light rail

Fourth level(top): pedestrians and bikes on the Skyline Trail

### **ESG Project Advantages over proposed Gateway Tunnels:**

The \$20 billion twin Gateway Tunnels only builds two tracks under the Hudson River to Penn Station New York. The new tunnels are highly dependent on federal and New York/New Jersey state funding with limited opportunity to generate non-governmental revenue streams to maximize private financing. The two tunnel tracks end at congested Penn Station. The reliability of the new tunnels for Amtrak and New Jersey Transit trains are dependent on the stability of 100+ year old East River tunnels which have the same structural and aging limitations as the existing Hudson River tunnels.

For approximately the same cost, the Empire State Gateway can be built in less time to create a more resilient, multi-modal transportation infrastructure. The ESG will provide greater transportation capacity (4 tracks, 4 bus/transit lanes, future maglev ROW, hiking/biking trail) to relieve congestion with the current Hudson River tunnels, Penn Station, the East River tunnels and the Lincoln tunnels as well as create far greater revenue streams to maximize opportunities for private investment.

### **Project Benefits**

- Four tracks (two tracks on each bridge) provides double the track capacity to New York than the two track Gateway tunnels to Penn Station (PSNY)
- Removes Amtrak trains from Penn Station, Hudson and East River Tunnels
- Avoids congestion of Penn Station and East River Tunnels
- Provides alternative to the limitations of 100 year old East River Tunnels
- Removes buses from I-495 and Lincoln Tunnels
- Generates new real estate projects and increases property values 5% - 10%
- Generates revenue from utility easements
- Generates revenue from user fees
- creates car-free, recreational access, biking and walking commuting between New Jersey and New York and across Manhattan via the Skyline Trail
- Access for future light rail link to New York
- Alignment for future Maglev access to Manhattan

## **Revenue Streams**

- Bus Lane EZ Pass
- Pedestrian/Biking fees
- Amtrak tolls
- NJ Transit tolls
- future Maglev tolls
- 2017 ESG Engineering & Development Fee: \$77.5 million per year (50 cents per current bus and rail passenger)
- fees for telecommunications, power, water, natural gas conduits
- vertical axis, wind turbine power generation
- Transit Oriented Development real estate projects
- extreme urban ziplines
- cellphone/TV/radio antennas

## **Additional Project Details Illustrated in the Empire State Gateway Presentation:**

### **Concept Aerial**

### **Concept Alignment**

### **Transportation Elements**

### **Engineering Elements**

### **Concept Cross-Section**

### **Real Estate Elements**

### **Contact:**

Scott R. Spencer  
Founder  
Empire State Gateway  
302-354-3577  
spencerscott@hotmai.com

---

**From:** Scott Spencer [<mailto:spencerscott@hotmai.com>]  
**Sent:** Tuesday, May 31, 2016 3:04 PM  
**To:** [amishi.castelli@dot.gov](mailto:amishi.castelli@dot.gov); Palladino, Robert J. (CCAPRJP)  
**Subject:** Empire State Gateway

Dear Ms. Castelli and Mr. Palladino,

As I mentioned in my recent email, attached are JPG files of the Empire State Gateway for evaluation in the alternatives process of the Hudson Tunnel Project.

Best Regards,

Scott Spencer

Empire State Gateway

[302-354-3577](tel:302-354-3577)

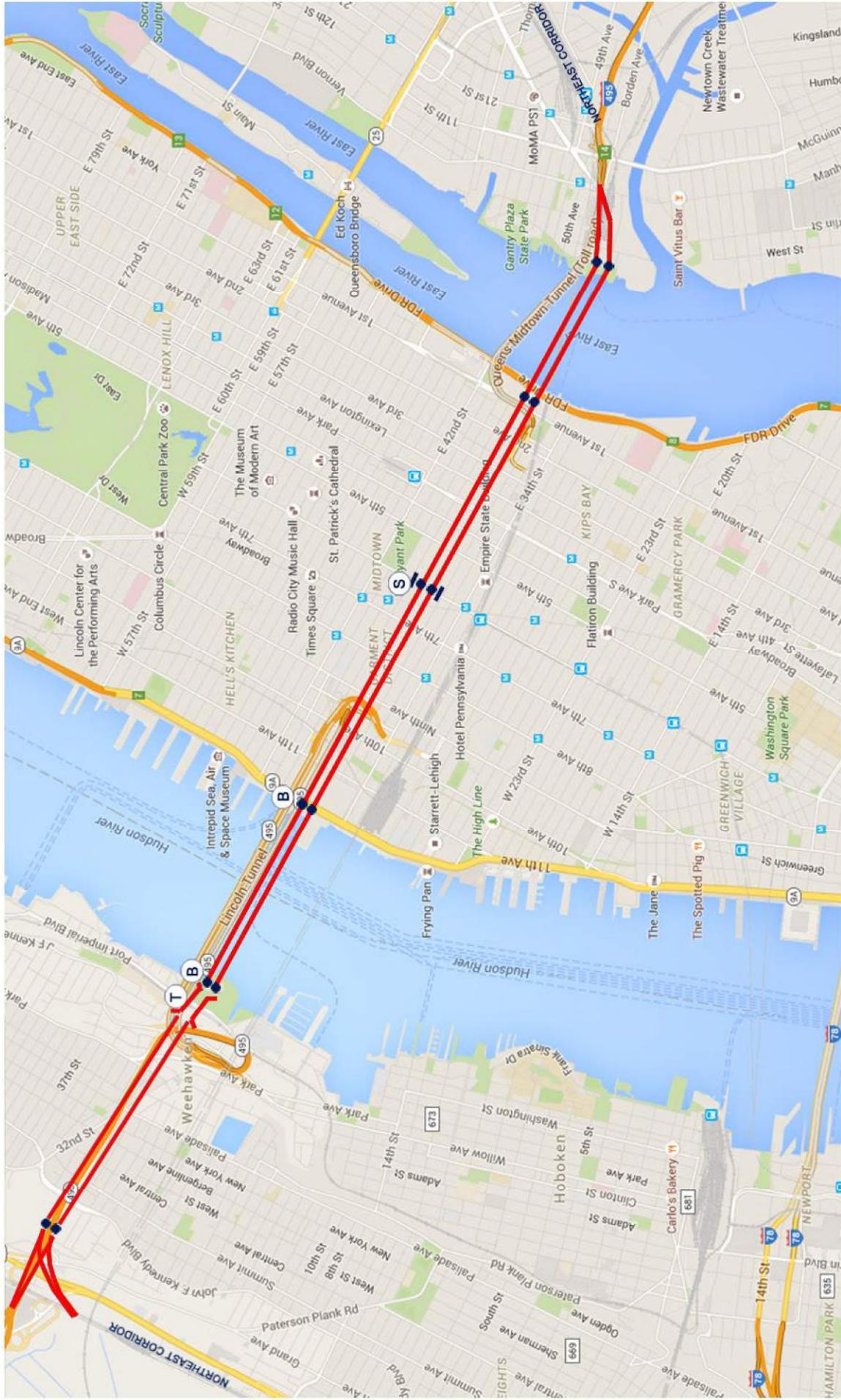


# EMPIRE STATE GATEWAY

CONCEPT AERIAL

NOVEMBER 2015

GRAPHICS BY **T E V E B A U G H A S S O C I A T E S**  
Architecture Planning Interiors



- 1,000 FT SUSPENSION TOWERS
- T WEEHAWKEN TUNNELS
- B SUSPENSION TOWER WITH BUILDING DEVELOPMENT
- S EMPIRE STATE GATEWAY STATION

# EMPIRE STATE GATEWAY

CONCEPT ALIGNMENT

NOVEMBER 2015

GRAPHICS BY **T E V E B A U G H A S S O C I A T E S**  
*Architecture* *Planning* *Interiors*



# EMPIRE STATE GATEWAY

CONCEPT CROSS-SECTION

NOVEMBER 2015

GRAPHICS BY **TEVEBAUGH ASSOCIATES**  
Architecture Planning Interiors

# adrian untermyer

930 SHERIDAN AVENUE 4L • BRONX, NY 10451  
(860) 716-4205 • AUNTERMYER@GMAIL.COM

## Hudson Tunnel Project EIS Scoping Comments

New York, New York  
May 17, 2016

My name is Adrian Untermyer, and I am submitting these comments as a private citizen in an attempt to improve the Hudson Tunnel Project and the Northeast Corridor Rail System as a whole.

The original tunnels were constructed by the Pennsylvania Railroad as a critical component of President Alexander Cassatt's plan for direct access to Manhattan. Completed in 1910, the project included these two tubes, Pennsylvania Station, and four tubes beneath the East River connecting to the Sunnyside Yards and the Long Island Rail Road, which was also controlled by the Pennsylvania. As the saying went, the finished complex stretched "from Sunnyside to the swamps."

By 1970, one railroad still controlled the entire operation. After it went bankrupt, New York State took over trains to Long Island, New Jersey took over trains to the Garden State, and the Federal Government took on the rest. Since then, the complex has been plagued by a profound lack of coordination between these entities.

The U.S. Department of Transportation and Senators Schumer and Booker deserve credit for jumpstarting the project before us today. After decades of neglect, commuters and long-distance travelers deserve the reliability and potential for service expansion that a pair of new tubes could bring forth.

However, the complex will only be as effective as the institutions that rely on them. Even with new tunnels, the Long Island Rail Road, New Jersey Transit, and Amtrak will still bump elbows over the mostly same tracks, cramped platforms, and infrastructure. It is unlikely that decades of dysfunction will disappear after the ribbons are cut.

As such, I urge the railroads, our elected officials, and the general public to use this project as an opportunity to promote the type of cooperation and integration that our current system lacks. Collaboration on the environmental scoping process is an encouraging first step, and should serve as a blueprint as work continues.

However, coordination must not end after this critical project concludes, as operational concerns are ultimately responsible for any asset's overall utility. Running commuter trains between Long Island and New Jersey — rather than terminating them at Penn Station — could double capacity while opening up jobs to those on both sides of Manhattan. Coordinated communications and ticketing could ease crowding and nerves. And other long term options, such as railroad consolidations, would slow the rate of fare increases for riders of all stripes.

I understand that many of these decisions are out of your hands. Nevertheless, I urge you to honor Cassatt's original vision by harnessing every last opportunity for cooperation, collaboration, and consolidation as you complete the planning process for this critical project.



Adrian Untermyer

E-Mail: [billvigrass@verizon.net](mailto:billvigrass@verizon.net)

Title: Mr.

First name: J. William

Last name: Vigrass

Company: Self consultantcy

Address 1: 1813 Cardinal Lake Drive

Address 2:

Town/city: Cherry Hill

State: NJ

Zipcode: 08003

Comment or question: Scott Spencer's Empire State Gateway of twin cable stayed bridges connecting NJ to Manhattan and Queens could be a Public Private Partnership because it will have a number of possible cash flows. It will also provide four railroad tracks, two bus lanes, two Mag-Lev lanes and two pedestrian trails. How may I send you a complete description? It is superior to all tunnel proposals.

Bill Vigrass

[billvigrass@verizon.net](mailto:billvigrass@verizon.net)

End of message

J. William Vigrass  
Transportation Economist and Planner  
1813 Cardinal Lake Drive  
Cherry Hill, NJ 08003-2803  
Home 856-428-7217  
Mobile 856-816-2708  
[billvigrass@verizon.net](mailto:billvigrass@verizon.net)

May 26, 2016

Mr. R. J. Palladino, AICP, PP  
Senior Program Manager  
New Jersey Transit Capital Planning  
One Penn Plaza East 8th floor  
Newark NJ 07105

Dear Mr. Palladinio:

Re: The Empire State Gateway Proposal could be the most important infrastructure project of the 21<sup>st</sup> Century in the US.

Scott R. Spencer of Wilmington, DE has proposed twin bridges carrying three decks of transportation modes between New Jersey, Manhattan and Queens with connection to the Hell Gate Bridge for New England. This proposal is in competition with the official program of two new railroad tunnels from NJ to NYC. Spencer has met with staff of PANYNJ as well as jointly with staff of AMTRAK and NJTransit.

Spencer's Empire State Gateway (ESG) proposal consisting of two cable stayed bridges connecting New Jersey with New York City struck me immediately as the solution that cuts the fabled Gordian Knot. The legend of the Gordian Knot is the historic example of a simple unconventional solution to a very difficult or impossible problem.

**In 333 B.C. Alexander the Great had invaded Asia Minor and arrived in the central mountains at the town of Gordian; he was 23. Undefeated, but without a decisive victory either, he was in need of an omen to prove to his troops and his enemies that the outcome of his mission – to conquer the known world – was possible.**

**In Gordian, by the Temple of the Zeus Basilica, was an ox cart, which had been put there by the King of Phrygia over 100 years before. The staves of the cart were tied together in a complex knot with the ends tucked away inside. Legend said that whoever was able to release the knot would be successful in conquering the East. To the East lay the Kingdom of Persia, the rich centre of the civilized world, ruled by Darius III.**

**His generals gathered round as he struggled with the Knot for a few minutes. Then he asked Aristander, his seer, "does it matter how I do it?". Aristander couldn't provide a definitive answer, so Alexander pulled out his sword and cut through the knot. Alexander went on to conquer the entire known world. (Wikipedia)**

All previous solutions for additional railroad access to Manhattan from New Jersey have been variations of tunnels. New Jersey’s “Access to the Region’s Core” provided a stub end terminal in New York City deep underground that was termed “Macy’s Basement”. It served only NJTransit interest and did not provide AMTRAK with access to New York Penn Station. Recent proposals are for two new tunnels to access Penn Station as well as adding several tracks in what has been termed Penn Station South. This does not address the need to rebuild the four East River tunnels. The twin ESG bridges would soar over the Hudson River at 212 feet above mean high tide and would also pass over the East River sufficiently high to clear navigation. Their estimated cost of about \$20 billion is approximately the same as the two tunnel official proposal. Yet the twin bridges would have four to ten times the capacity of the two tunnels when all of its modes are considered.

Tunneling is very expensive and fraught with unknown difficulties and hazards. Excavation in NYC is very expensive since utilities usually must be moved and sometimes buildings must be underpinned. All this takes time, lots of it. And time costs money. An estimate of \$24 billion has been discussed.

**On the other hand,** Spencer’s Empire State Gateway proposal avoids all the problems of tunneling and of excavation for a Penn Station South. The two parallel cable stayed bridges would quadruple railroad access to NYC, would provide two new bus lanes equivalent to a new Lincoln Tunnel and most dramatically would provide two Mag-Lev (Magnetic Levitation) lanes between NJ and NYC equivalent to two new additional railroad tunnels. This proposal cuts the Gordian Knot for Mag-Lev access to NYC. All previous Mag-Lev proposals have been based on new tunnels at huge cost which probably would deter such a project.

The Empire State Gateway solves railroad access, bus access and Mag-Lev access at one stroke. Let us summarize two proposals:

1. Official proposal	two railroad tunnels	2 lanes
2. Spencer’s proposal	four railroad tracks	4 lanes
	Two bus lanes	2 lanes
	Two Mag-Lev guideways	2 lanes
	Two pedestrian walkways	2 lanes
	Total	10 new lanes

ESG’s railroad access will allow one existing tunnel at a time to be removed from service for reconstruction. Eastbound AMTRAK and NJT trains would use the new aerial approach to NYC, would go onward to Sunnyside Yard, Queens, to a new upper level yard, then descend to lower level and return to Penn Station for the outbound trip. Operation could be kept at near normal level.

Trains to New England and Boston would use a new grade separated viaduct and pass above the Long Island Rail Road tracks at Harold Interlocking that have been a source of delay. A connection would be made with tracks leading to the Hell Gate Bridge.

New direct one-seat service could be added by NJTransit to existing AMTRAK through services.

Additional bus services could be added by NJTransitBus Operations as well as by private operations such as Greyhound and/or Peter Pan or others. A new Port Authority Bus terminal as proposed would not have the capacity to add much service.

Mag-Lev provision is the key to providing means to allow this new mode to access NYC in an economic and efficient manner. This aspect is unique to Spencer's Empire State Gateway. Federal approval has been obtained for a short demonstration facility between Washington DC and Baltimore MD. There is substantial interest at the federal level in Mag-Lev.

Transportation provides access. Access increases land values. Manhattan has the highest land values in the US and the Empire State Gateway with its multiple modes would have a dramatic effect on land values proximate to the proposed multi-modal station that would lie approximately between Fourth and Sixth Avenues and between the two guideways on 38<sup>th</sup> and 39<sup>th</sup> Streets.

Spencer's proposal would sustain New York City's position as the financial capital of the world. Meanwhile financially competitive cities around the world such as London, Paris, Tokyo and Beijing are building additional rail access right now. If NYC does not expand its access, it may well fall behind in world finance. International financiers and businessmen will not put up with inconvenient and slow airport to center city transportation when alternatives in other cities are available. The US can no longer count on being the only viable player. There is nothing like the Heathrow Express in the US, but the ESG could be the key to creating such a link.

The ESG would have several streams of income to support up to 75% of its investment. Included could be: tolls a 50 cents per passenger from railroad, bus and Mag-Lev passengers, a small sum per passenger but in aggregate, significant. Real estate access could be a very significant source of capital for access to the station and related buildings and would be followed by annual rents. Utility rents for beneath the lowest level for fiber optic, electric, natural gas and water would add another cash flow stream. Finally, small tolls for use of the elevated Sky Trail might add a further amount. All of this would add up to a significant sum per year. Spencer has met with investment bankers who have shown interest.

The official two tunnel plan has no such income stream benefits.

This letter can only provide a very brief summary of Spencer's Empire State Gateway plan. Much more can and will be written to describe how it could affect the future of NYC and the North East Corridor.

The multiple benefits of the Empire State Gateway proposal are unique and justify full support by the body politic at state and federal levels.

**"Make no little plans; they have no magic to stir men's blood. "**

Daniel Burnham, architect who planned Chicago and other cities.

Yours truly,

J. William Vigrass, Senior Advisor

w/att. ESG docs. 4 pages.

Empire FRA.05.26.2016  
Rev. 1. 212. 05.20.2016  
Rev.2. 05.21.2016 JWV  
Rev.3 RyAge  
Rev.4 TRAINS  
Rev.5 NYT  
Rev. 6 NJT

E-Mail: [cwallgren@gmail.com](mailto:cwallgren@gmail.com)

Title: Mr.

First name: Christopher

Last name: Wallgren

Company:

Address 1: 131 East 93rd Street

Address 2: Apt 8B

Town/city: New York

State: NY

Zipcode: 10128

Comment or question: Please explain to me why you are only building two more tracks. You are going to be mobilizing for a once in many lifetimes civil engineering effort. It will be very very expensive. And all you'll be doing is guaranteeing the exact same capacity for over a decade, given that the old tubes will be shut down for upgrades? Why not build four tracks and plan for a loooong future, for regular maintenance which requires track time, and for an always growing region? #morethantheimum

End of message

**From:** L W <[duke325@gmail.com](mailto:duke325@gmail.com)>  
**Sent:** Friday, May 27, 2016 11:39:31 AM  
**To:** Castelli, Amishi (FRA)  
**Subject:** Hudson Tunnel Project

Dear Ms. Castelli,

My name is Linden Wallner, and I am a frequent mass transit rider.

I just wanted to know if you have an estimated time of how much time would go by after getting an ROD to begin tunnel boring for the Hudson Tunnel Project?

Also, what are potential funding mechanisms to help pay for actual construction of the Hudson Tunnel Project?

Thank you.

Best regards,

Linden Wallner

## Transcripts

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HUDSON TUNNEL PROJECT :  
PUBLIC SCOPING MEETING :  
NEPA :

-----x

HOTEL PENNSYLVANIA  
GOLD BALLROOM, 3RD FLOOR  
401 7TH AVENUE, NEW YORK, NEW YORK  
TUESDAY, MAY 17, 2016  
Commencing at 4 p.m.

STENOGRAPHIC TRANSCRIPTION OF PRIVATE COMMENTS

REPORTED BY: GARRY J. TORRES

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I N D E X

PRIVATE COMMENTS

ORAL STATEMENTS	PAGE
Joseph M. Clift (Session I, 4:30 p.m.).....	3
Scott R. Spencer (Session II, 7:37 p.m.).....	7

## 1 PRIVATE COMMENT

2  
3 ORAL STATEMENT

4 MR. CLIFT: I have specific comments on the  
5 project. First, it's not the Hudson Tunnel Project, it is  
6 the Hudson Tunnels Project. Tunnels, with an S. It should  
7 be renamed. There are two tunnels they're planning to  
8 build. So it should be Hudson Tunnels Project with an S on  
9 tunnel.

10 Secondly, the scoping document that was on-line  
11 is not paged appropriately for PDF. Every page should be  
12 numbered. The figures are not numbered so everything gets  
13 out of whack. But PDF paging should be exactly as the  
14 paging at the bottom of the pages of any document in the  
15 future.

16 Third small item, Figure 4 in the scoping  
17 document was not orientated. It was landscape-oriented and  
18 in printed out landscape, which means half was cut off on my  
19 computer. They need to pay attention so that everything in  
20 the future is orientated so that when it prints out for a  
21 PDF, you get the entire pages.

22 Fourth, within the scope of the project, looking  
23 at tunnel routings, they need to look at the ARC DEIS, the  
24 Access to the Region's Core Draft Environmental Impact  
25 Statement's routing, which put two additional tracks right

1 on the Northeast Corridor, one on the south side, one on the  
2 north side. And the new tunnels coming from Manhattan were  
3 south of the existing tunnels and the westbound north tunnel  
4 of the two new tunnels ducked under the corridor, came up  
5 and became the local westbound track of a four-track  
6 Northeast Corridor. This has to be studied rather than  
7 simply the separate two-track alignment that came out on the  
8 ARC FEIS. I'm sorry, the ARC FEIS, Final Environmental  
9 Impact Statement.

10 A four-track corridor everyone admits --  
11 including Drew Galloway, G-A-L-L-O-W-A-Y, at Amtrak -- admit  
12 freely that a four-track corridor is far more flexible and  
13 capable than two two-track railways. What else?

14 Oh, outreach. I understand that 90 days after  
15 the Notice to Proceed, the project has to provide -- they  
16 have to provide a coordination plan within 90 days of the  
17 publication of the Notice of Intent to prepare an  
18 Environmental Impact Statement and that should be -- it  
19 should include a Regional Citizens Liaison Committee, RCLC.  
20 We had one for the ARC project. We had one for the Portal  
21 Bridge Capacity Enhancement Project. Those two EIS efforts  
22 had RCLC's for each. We demand one for this. It should  
23 start with the Hudson Tunnel Project and go forward and  
24 include every element of Gateway as it comes up for review.  
25 Without an RCLC, the information regarding the project and

1 how the planning moves forward and EIS moves forward will be  
2 very limited and we must have that. That's it. I think.

3 Continuing for Joseph Clift. Outreach.

4 Outreach to date has been beyond abysmal. It's what I would  
5 call suppressive. There is no indication of this project on  
6 the New Jersey TRANSIT website. None whatsoever. That is  
7 no information on the meetings today and on Thursday.

8 Amtrak, there's nothing on their website. FRA, there's  
9 nothing upfront on their website. Amtrak did finally send  
10 out a notice. If you put in the character string, Hudson  
11 space tunnel space project, you do not get the website for  
12 the project, you do not get anything on Amtrak or New Jersey  
13 TRANSIT or FRA. If you put in the character string, Hudson  
14 Tunnel Project with no spaces, the website pops up and a  
15 document that Amtrak has pops up. There's still nothing  
16 from New Jersey TRANSIT.

17 Also, public participation; there is no hearing  
18 in New Jersey that is rail accessible. The one location on  
19 John F. Kennedy Boulevard is on top of the tunnels, which  
20 seems somewhat ludicrous but maybe from an environmental  
21 justice point of view they had to do that. But they should  
22 have had a hearing in Newark either at New Jersey TRANSIT  
23 headquarters at Penn Station or at the North Jersey  
24 Transportation Planning Authority offices about five-minutes  
25 walk from Penn Station, Newark. But the outreach so far has

1 been absolutely abysmal. And if this is any indication in  
2 the future, this entire two-year EIS process will be devoid  
3 of meaningful public input. Thank you.

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## PRIVATE COMMENT

## ORAL STATEMENT

MR. SPENCER: I'm here today to propose an alternative to the Hudson River Tunnel Project. I'm concerned that the project as proposed has a number of alternatives that -- excuse me. The project as proposed has a number of limitations both financially and technically that could be detrimental to the need for transportation capacity and reliability entering and leaving Newark.

I formerly, was a member of the Access to the Region's Core team and we when evaluated amongst the 100 alternatives, one of the alternatives of the 100 alternatives was this tunnel alignment; was one of the early ones we ruled out because although the new tunnels would create the capacity for as many as 24 trains per hour, the track configuration at Penn Station requiring trains to not exceed restricted speed, could not absorb the capacity of new tunnels. And so there was significant operating limitations for investing in those tunnels.

Now, this project for the near future is not advocating increasing capacity but certainly for the multi-billion dollar investment, the creation of a piece of transportation infrastructure that needs to serve the region for over a hundred years, which would have a robust

1 capability to increase transportation capacity.

2           When we looked at this -- now, this project --  
3 eventually, plans increase capacity when other improvements  
4 in the alignment are done, but they would still run into the  
5 same limitations of slow operating speeds through Penn  
6 Station, New York unless a substantial investment is made in  
7 building Penn Station South, which they are looking to do.  
8 But that has significant challenges in terms of utility  
9 impacts, financial impacts, real estate impacts to build  
10 those additional tracks.

11           Plus, when these tunnels are built -- and the  
12 Hudson River Tunnels are being rehabilitated even when the  
13 Hudson Tunnel Rehabilitation is complete -- there is still  
14 going to be significant reliability issues with the East  
15 River Tunnels, which will need to be rebuilt as well as  
16 additional new capacity across the East River Tunnel, if  
17 you're going to be able to utilize the full capacity of  
18 having four tunnel tracks under the Hudson. So those are  
19 suggested limitations. And another limitation, which we  
20 found out the hard way in 2012 is Superstorm Sandy that over  
21 the next hundred years of the life of this project, there  
22 are going to be superstorms that could have potential risks.  
23 And although there are technologies to plug and seal the  
24 tunnel to protect it from damage, it would still sever the  
25 Northeast Corridor for a number of days until the superstorm

1 surge subsides. So it still puts the Northeast Corridor at  
2 the same risk in terms of reliability and potential damage  
3 since it is a tunnel.

4 Another significant limitation, as I  
5 understand, about this project is, how to even pay for it?  
6 Yes, there is an agreement, understanding that the federal  
7 government will pay half of whatever it costs and the the  
8 States of New Jersey and New York will split the other half  
9 but it's far from determined how those financial  
10 responsibilities will be paid for.

11 As I've been able to understand it, it would be  
12 optimistic to expect that whatever the final costs of these  
13 tunnels are that 25 percent of the costs would be recovered  
14 by user fees. The alternative I want to propose could  
15 easily recover more than 75 percent of its costs, which  
16 would free up critical and limited infrastructure dollars  
17 for other transit projects in the regions.

18 The alternative I want to propose to be  
19 considered in this EIS process is, the Empire State Gateway.  
20 It is comprised of twin-multi-span suspension and cable  
21 state bridges connecting New Jersey, New York and on to New  
22 England through the Hell Gate Bridge. Each twin bridge  
23 eastbound and westbound carries four levels of  
24 revenue-generating, multi-mobile capacity that would be  
25 constructed in prefabricated segments. The first level, the

1 lowest level of the twin bridges would be utility conduit  
2 for power, water, gas and telecommunications. The second  
3 level would have two tracks for Amtrak and New Jersey  
4 TRANSIT. So since we have twin bridges, in each direction  
5 instead of a single track, you would have two tracks in each  
6 direction for Amtrak and New Jersey TRANSIT trains. The  
7 third level would be a deck that would have two E-ZPass  
8 lanes for buses, car service, perhaps and light rail and a  
9 future Maglev track since Maglev on the horizon to be built  
10 between New York and Washington. The fourth level would  
11 allow pedestrian, commuters, recreational use and bikes on  
12 the skyline trail.

13 The Empire State Gateway project has a number  
14 of advantages over the proposed Gateway Tunnels. The twin  
15 Gateway tunnels only builds two tracks under the Hudson  
16 River to Penn Station New York and those new tunnels are  
17 highly dependent on federal and New York/New Jersey State  
18 funding with limited opportunity for nongovernmental revenue  
19 streams to maximize private finance.

20 The two tunnel tracks end at congested Penn  
21 Station and the reliability of the new tunnels for Amtrak  
22 New Jersey TRANSIT trains are dependant on the stability of  
23 the 100-plus-year-old East River Tunnels, which have the  
24 same structural and aging limitations as existing Hudson  
25 River Tunnels. For approximately the same cost, The Empire

1 State Gateway Twin Bridges can be built in less time to  
2 create a more resilient multi-mobile transportation  
3 infrastructure.

4 By the way, it is twin bridges and because they  
5 involve prefabricated segments, one of the twin bridges  
6 could be completed in less than 60 months and that could  
7 open up service in one direction to take one of the two  
8 Hudson River tunnels out to be rehabilitated much faster  
9 than the potential multi-year delays for financing in the  
10 Hudson River Tunnels and potential multi-year delays for  
11 construction. So this is the fastest way to get one the  
12 Hudson River Tunnels out of service to be in critical  
13 rehabilitation.

14 The Empire State Gateway will provide greater  
15 transportation capacity than the Hudson River Tunnels.  
16 There will be a total of four tracks instead of two tracks.  
17 It will add four bus and transit lanes to New York. Also,  
18 right away for future maglev as well as the commuting,  
19 recreational, hiking and biking Skyline trails to relieve  
20 congestion with the current Hudson River Tunnels, Penn  
21 Station, the East River Tunnels and the Lincoln Tunnels as  
22 well as create far greater revenue streams to maxime  
23 opportunities for private investment.

24 So the project benefits of the Empire State  
25 Gateway are; four tracks, which would be two tracks in the

1 each of the twin bridges, which provides double the track  
2 capacity to New York than the two-track Gateway Tunnels to  
3 Penn Station New York. It removes Amtrak trains from Penn  
4 Station and the Hudson and East River Tunnels. They would  
5 serve a new Empire State Gateway Station that should be  
6 located in midtown between 38th and 39th Street and fairly  
7 equidistant between Grand Central Terminal and Penn Station  
8 New York.

9 It would also untangle the Northeast Corridor  
10 from the Long Island Railroad. Now, the Northeast Corridor  
11 would be able to run without being interoperated with Long  
12 Island -- the congestion of Long Island Railroad trains.

13 So it avoids the congestion of Penn Station and  
14 East River Tunnels;

15 It provides an alternative to the limitations of  
16 the 100-year-old East River Tunnels;

17 It removes buses from I-495 and the Lincoln  
18 Tunnels;

19 It generates an increase in real estate values  
20 of at least five and ten percent across Manhattan in the  
21 properties adjacent to the Empire State Gateway Bridges  
22 along 38th and 39th Street;

23 It would generate a number of transit orientated  
24 real estate development projects;

25 It would generate revenue from utility easements

1 and the utility conduits under each bridge;

2           Generate revenue from user fees, from Amtrak and  
3 New Jersey TRANSIT and various Bus passengers and  
4 pedestrians crossing the rivers and create car-free  
5 recreational and walking, biking, commuting access between  
6 New Jersey and New York across Manhattan as well as access  
7 to future light rail to New York and in alignment for  
8 future Maglev access to Manhattan.

9           As I've found in discussions with a number of  
10 investment banks, there are a number of revenue streams that  
11 could recover at least the 75 percent of the project cost.  
12 Those revenue streams includes a bus lane E-ZPass,  
13 potentially, E-ZPass premium tolls at off-peak hours for car  
14 service and taxis to use;

15           Pedestrian hiking and biking fees for those that  
16 would use the skyline trail to cross the Hudson or to cross  
17 the East River -- such pedestrian biking access across --  
18 within Manhattan would be free -- a toll for Amtrak  
19 passengers, a toll for NJ TRANSIT passengers;

20           Future tolls from Maglev operations, and an  
21 early action item could be creating an Empire State Gateway  
22 engineering development fee that would generate at least 77  
23 and-a-half million dollars per year by charging .50 cents  
24 right now per current bus and rail passenger since this  
25 would be on the drawing boards to be built.

1           There would also be fees that would be generated  
2 from telecommunications, power, water, natural gas conduits  
3 under the bridges.

4           There would be revenues generated from vertical  
5 access wind tower power generation as well as the transit  
6 orientated development real estate projects, as well as real  
7 estate owners that will want to build connections adjacent  
8 to their property and the sky line trail that would be an  
9 attribute for their commercial, residential or hotel  
10 properties. And other revenue could be potentially extreme  
11 urban zip line amongst the towers of these bridges, as well  
12 as the suspension towers generate revenue from cell phone,  
13 TV and radio antennas.

14           So that's the input I'd like to give to the  
15 alternative. For the future evaluation, the Port Authority  
16 of New York and New Jersey have been briefed. They have  
17 this documentation and they do want to have it evaluated as  
18 part of the EIS process here. And if any of the project  
19 team has questions and wants additional details on the  
20 Empire State Gateway as an alternative again, my name is  
21 Scott R. Spencer, Founder of the Empire State Gateway and my  
22 contact e-mail is spencerscottty@hotmail.com.

23           Thank you for consideration of this alternative  
24 in the EIS evaluation process.

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C E R T I F I C A T E

I CERTIFY that the witness  
whose deposition is hereinbefore set forth that such  
deposition is a true record of the testimony given by such  
witness.

I further certify that I am not related to any  
of the parties to this action by blood or marriage; and that  
I am in no way interested in the outcome of this matter.



GARRY J. TORRES

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HUDSON TUNNEL PROJECT :  
PUBLIC SCOPING MEETING :  
NEPA - Session One :

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UNION CITY HIGH SCHOOL  
2500 JFK BOULEVARD  
UNION CITY, NEW JERSEY  
Thursday, May 19, 2016  
Commencing at 4 p.m.

STENOGRAPHIC TRANSCRIPTION OF PRIVATE COMMENTS

REPORTED BY: Renee Russo,  
CCR, CRCR, RPR, CRR

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I N D E X

PRIVATE COMMENTS

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of America..... 6

1 PRIVATE COMMENTS

2

3 ORAL STATEMENTS

4 MR. JOE SIVO: I would like to know  
5 what the effect would be on the surface of the  
6 land that this project is going on, under. I  
7 would like to know the effect. Okay. Did I make  
8 myself clear? That's one thing.

9 I heard them say something about the  
10 environmental impact, but I'm not sure that  
11 everything could be controlled by such a massive  
12 project. So being I live in the area that this  
13 tunnel is going to be built, the impact might be  
14 right underneath my house. I'd like to know what  
15 effect it's going to have upon my land.

16 MR. DAVID PETER ALAN: I am David  
17 Peter Alan, A-l-a-n. I live and practice law in  
18 South Orange, New Jersey, and I am chair of the  
19 Lackawanna coalition. We are an advocacy  
20 organization, which represents New Jersey  
21 Transit's rail riders.

22 I am appearing today in my individual  
23 capacity because the issue I am addressing has  
24 not been discussed by your organization.

25 Today, I am complaining about the

1 location of this hearing. As a transit rider, I  
2 had a very difficult time getting here. It took  
3 more than 30 minutes on the bus from Hoboken to  
4 find this place, and once I got off the bus it  
5 took another ten minutes to find the entrance.

6 If New Jersey Transit and the FRA  
7 wanted people who use transit, and many people in  
8 Hudson County do, to find this location or to  
9 find the hearing they would not have picked a  
10 location like this.

11 Instead, they would have picked a  
12 location that was much more accessible by public  
13 transportation, such as a place in Hoboken or a  
14 place in downtown Jersey City or even New Jersey  
15 Transit's headquarters in Newark.

16 I believe that the selection of this  
17 particular herein location was done to discourage  
18 people who use transit from coming to this  
19 hearing and making their views known. I find  
20 this especially perplexing because Tuesday's  
21 hearing was held right across the street from  
22 Penn Station, New York, which is a very easy  
23 location to reach by transit.

24 So I place on the record a request  
25 that the scoping period be extended to allow

1 another meeting of this sort in New Jersey so  
2 that people who use transit can have easier  
3 access than they can to this location.

4                   The Lackawanna Coalition will have  
5 more to say in a supplemental written statement  
6 after our next meeting, but for now this  
7 concludes my remarks for today.

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1 WRITTEN STATEMENT:

2 Statement of the Laborers'  
3 International Union of America (LIUNA) - New  
4 Jersey and the Laborers' Heavy and General  
5 Construction District Council at the Federal  
6 Railroad Administration Scoping Meeting on the  
7 Proposed Gateway program - Hudson Tunnel Projects  
8 May 19, 2016, Union City, New Jersey.

9 LIUNA's Eastern Region represents  
10 45,000 members in New Jersey, New York City, Long  
11 Island and Delaware and which includes 11,000 New  
12 Jersey Laborers' Locals 472 and 172 members who  
13 build and maintain our roads, bridges and  
14 tunnels. We work statewide in New Jersey and  
15 regionally with numerous stakeholders to promote  
16 investment in economic development,  
17 transportation and utility infrastructure.

18 We strongly support the construction  
19 of the Hudson Tunnel Project as part of the  
20 Gateway Program, which will bring vital capacity  
21 expansion to the Northeast Corridor thru (sic)  
22 two new Hudson River tunnels and allow for  
23 continued major regional economic development.  
24 There is a crisis facing our region and it's  
25 (sic) economic security if the existing rail

1 tunnels and interconnecting infrastructure are  
2 not replaced - and replaced as expeditiously as  
3 possible. Whether the focus is on the need, the  
4 economy, jobs creation and retention, safety or  
5 environmental benefits, the data is irrefutable  
6 that the Gateway Program must be undertaken and  
7 completed as soon as possible.

8 We are pleased to be able to  
9 participate in this Scoping Meeting and we hope  
10 that you will seriously consider the points we  
11 make below:

12 THERE IS A COMPELLING NEED TO EXPEDITE  
13 ANY FURTHER ENVIRONMENTAL REVIEWS FOR THE TUNNEL  
14 PROJECTS GIVEN ALL OF THE PRIOR ENVIRONMENTAL  
15 ASSESSMENTS.

16 The Access to the Region's Core (ARC)  
17 project, proposed in the early 2000's, had  
18 undertaken several years of environmental review  
19 for similar tunnels and was fully permitted in  
20 2009. Surely all of this work and several  
21 hundred million dollars of cost to do this should  
22 be utilized to expedite the Gateway Program.

23 FAILURE TO EXPEDITE FURTHER  
24 ENVIRONMENTAL REVIEWS WILL HAVE SEVERAL SERIOUS  
25 CONSEQUENCES FOR OUR REGION.

1           Inspections of the existing tunnels  
2 document that each one will need to be repaired  
3 in the next several years. Closing one without  
4 an alternative would dramatically reduce system  
5 capacity and damage our regional economy.

6           Delaying this project will add  
7 \$billions to construction costs.

8           THE ENVIRONMENTAL BENEFITS OF  
9 EXPEDITING APPROVALS FOR CONSTRUCTION SOONER THAN  
10 LATER ARE SIGNIFICANT.

11           Completion of the Gateway Program will  
12 greatly increase train ridership and  
13 significantly reduce daily car trips and  
14 emissions. We look forward to participating in  
15 this scoping meeting.

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C E R T I F I C A T E

I CERTIFY that the foregoing is a true and accurate transcript of the testimony as taken by and before me stenographically at the time and place aforementioned.

I FURTHER CERTIFY that I am neither attorney for nor counsel to any of the parties; parties of any of the attorneys in this action; and that I am not financially interested in the outcome of this case.

RENEE RUSSO, CCR, CRCR, RPR, CRR  
Certificate No. XI00143700