

## Supporting information regarding views of the National Association of Railroad Passengers on New Jersey Transit's Access to the Region's Core

### List of Contents:

- I. New Tunnels *Must* Link to Penn Station
  - II. Why any tunnel project that does not include an NYP link should be rejected
  - III. FTA Cost Effectiveness Index
  - IV. Connection between Penn Station and Grand Central ("Alternative G")
  - V. Not a new issue for us
- Appendix A. Final EIS Discussion of Connection and the No. 7 Subway Extension  
Appendix B. Gradients

### **I. New Tunnels *Must* Link to Penn Station**

While there is widespread agreement that two more Hudson River tunnels are needed, the public is largely unaware of the limited utility of what is planned. The public will be outraged when the truth is more widely known, and especially in response to service interruptions the connection might have avoided.

Failure to build this link would create severe problems for New York-New Jersey trains using Penn Station. This includes Amtrak trains (Acela Express, Northeast Regionals, Keystone Service, *Carolinian*, *Palmetto* and several overnight trains) and about half of New Jersey Transit trains.

Already, single-track operation on weekends required for track maintenance is bumping up against growing service demands. Moreover, single-track operation would continue to cause dramatic problems at random other times due to emergency blockages by disabled trains, and for extended periods in the case of major overhauls of the tunnels.

NJT's plan until June, 2007, included this vital connection between the new tunnels and Penn Station. The abandonment of that connection makes this project unworthy of federal funds.

In Manhattan, the new tunnels would link *only* to a new, dead-end NJT terminal 175 feet under 34<sup>th</sup> Street and 14 stories below and 200 feet north of Penn Station. Moreover, the capacity of this planned, new terminal has been reduced from eight tracks to six, and effective capacity and reliability further reduced by elimination of the tail tracks on both levels because New York City has prohibited NJT from coming within a 200 foot radius of the century old Water Tunnel #1 under Sixth Avenue. We are not aware that NJT has reduced its ridership projections to be consistent with the project's downsizing.

There are at least four potential ways to solve the problem, using U.S. DOT's substantial leverage to "encourage":

- NJT to revisit its earlier plan involving a routing *above* the #7 extension and some cut-and-cover construction.

- New York City to modify the elevation of the #7 subway extension;
- Enhancing capacity of Penn Station and planning for a Penn Station-Grand Central link (see section IV), Alternative G in the 2003 Major Investment Study.
- NJT and possibly Amtrak to accept a steeper gradient than they would prefer;

With regard to the second bullet, the Final EIS (FEIS) states that, from an engineering standpoint, modifying the elevation of the #7 subway by five to 12 feet would permit restoration of the vital connection to NJT's existing plans. However, "the modification would add a minimum of 1.5 to 2 years to the schedule for completing the No. 7 Line project, which is unacceptable to the City of New York and MTA." See Appendix A for more of the relevant FEIS text. (The #7 subway extension is being built without federal funds.)

The FEIS does not say *when* NJT revealed its changed plans to the City of New York or Amtrak. Timing of those revelations would give an indication of how seriously one should take NJT claims that they really wanted the link and did everything reasonable to make it happen. NJT announced the change in late June, 2007, and the agency presumably was aware of the possible change and its implications for the link well before then.

**It is outrageous that a "project for the centuries" will be substandard because today's officials are unwilling to accept or enforce such a small delay.**

The current NJT plan, though nominally designed around the needs of New Jersey-Manhattan commuters, contains serious problems for them, notably:

- the length of time it will take to travel between the surface and the proposed deep cavern station, estimated to be four or five minutes in each direction;
- the continued dependence of NJT and Amtrak trains using Penn Station on two, century-old tunnels, with a lack of redundancy in the event one or both 1910 bores close for any reason. (Penn Station will continue to be a major terminal for both NJT and intercity trains.)
- safety and security issues associated with any attempt at a quick evacuation of large numbers of people from 175 feet below ground.

## **II. Why any tunnel project that does not include an NYP link should be rejected**

- (1) Today's security-conscious world cries out for the redundancy and operational flexibility of the pre-June, 2007 plan. Consider the implications of having the existing tunnels (used by both Amtrak and NJT trains) disabled either temporarily or, heaven forbid, for days or months. Under the present plan, it would be impossible to maintain any kind of run-through service—either *existing* intercity service, or *needed* services within the region (for example, Trenton-Stamford; Long Island-New Jersey).
- (2) As then-Amtrak President & CEO Alex Kummant stated in his April 28 letter to NJT, "Failure to construct two short connections into Penn Station in Manhattan

from the proposed ARC tunnels constitutes...a breach in long established goals to expand Northeast Corridor operational capability. **Considering the very substantial, and even unprecedented, projected increase in the number of passenger trains operating over the entire Northeast Corridor (as documented by all NEC users in Phase I of the Northeast Corridor Master Plan),** and with such projected increases centered upon travel to Manhattan, Amtrak has real concerns that the existing NEC trans-Hudson rail tunnels will prove inadequate to sustain operations in the future” (bolding added).

- (3) New York City arguably has the world’s greatest untapped potential for intense development of intercity rail services to relieve air congestion. That potential will remain largely unrealized if the ARC project goes forward as currently conceived. Amtrak has been reduced to arguing with New Jersey Transit over access to “slots” and to saying that they will require fifth and sixth tunnels. However, it seems more likely that, as stated in NJT’s summary of Amtrak’s position at page 18-24 of the Final EIS, “the new ARC tunnels will likely be the last rail tunnels constructed under the Hudson River for many generations.”
- (4) Maintenance is basically limited to 55-hour weekend windows, yet growing demand for weekend service—both commuter and intercity—is bumping up against those windows. Again quoting Kummant: “Amtrak further regrets the loss of numerous advantages the joint connection to Penn Station would have provided to security, operational redundancy, and maintenance flexibility to minimize service outages. The ARC tunnels, now providing sole benefit to NJ TRANSIT services, can no longer be considered part of a broader integrated Penn Station terminal system intended to accommodate day-to-day requirements under widely varying conditions and very large train volumes.”

### **III. FTA Cost Effectiveness Index**

We understand the pressure on NJT from FTA criteria which focus on travel minutes saved and ignore reliability and redundancy: anything increasing project costs without saving more minutes makes the project weaker when measured against FTA criteria. But these criteria are wholly inappropriate when applied in a post-9/11 world to a key strategic asset in such a densely populated area.

### **IV. Connection between Penn Station and Grand Central (“Alternative G”)**

The New Jersey Association of Railroad Passengers argues that creation of this connection, “Alternative G” in the 2003 Major Investment Study, combined with some capacity enhancements at Penn Station, would eliminate the need for NJT to build the three track over three track "deep cavern" terminal.

According to the 2003 MIS, there is sufficient track capacity on the lower level of Grand Central Terminal to absorb NJT trains that would be through-routed to that station. Moreover, the original ARC scoping document highlighted the fact that 70% of job sites on the east side of Manhattan are within a 10 minute walk of Grand Central, the same

criteria for Penn Station is only 36%. Even if these percentages change as the area near Penn Station develops, NJT's present plan will force a huge proportion of New Jersey commuters to fend for themselves to make their way to the East Side of Manhattan on already overcrowded transportation facilities.

The National Association of Railroad Passengers is intensely frustrated that the documentation of this so-called "Alternative G" remains under wraps after five years. The only thing made public from the 2003 Major Investment Study is a 31-page "Executive Summary." We have tried and failed to get FTA (including at the Administrator level) to force NJT to release the full report, but the response is always "it is just a draft and not appropriate for release."

We have been told that this is a 1,600 page document and, despite application through New Jersey's Open Public Meeting Records Act, have been unable to secure its release. This study was conducted using public funds for the benefit of the public and the public should have access to its analysis that led to its conclusions.

Given the huge dollar amounts and long-term opportunity costs involved, it is not reasonable to ask the public to assume that the 2003 report contains a rational basis for eliminating Alternative G, and that NJT's response to pro-Alternative G "Comment 9-D" at pages 18-19 and 18-20 of the recently-released ARC Final EIS is objective.

## **V. Not a new issue for us**

In conclusion, I need to note that we have been working on this concern for a long time, going back to January meetings with FTA officials, and our New Jersey colleagues have at this for 15 years. We are not Johnny-come-latelys and turn to you only out of exasperation at how the project is unfolding.

## **Appendix A. Final EIS Discussion of Connection and the No. 7 Subway Extension**

From ARC Final EIS, page 2-7 (bolding added; PSNY = Penn Station New York; NYPSE = the separate, new 34<sup>th</sup> Street terminal NJT plans)

"At meetings in July 2008, NJ TRANSIT and Amtrak evaluated a conceptual connection that would avoid impacts to the No. 7 Line...A second conceptual connection was developed that assumed that the No. 7 Line subway extension final design could be modified in a way to avoid both the PSNY Connector and ARC NYPSE tunnels in order to achieve an operationally feasible connection with a maximum grade of 2.1%. Review of this alternative deemed that while it is feasible from an engineering perspective, the concept required elimination or lowering of the No. 7 Line subway extension by 5 to 12 feet. The alternative would also result in significant cost and schedule impacts to both ARC and the No. 7 Line project. MTA's Capital Construction Corporation stated at a meeting in August 2008 that the modification would add a minimum of 1.5 to 2 years to the schedule for completing the No. 7 Line project, which is unacceptable to the City of New York and MTA.

"The alternative connection to PSNY was also limited in terms of its connectivity to tracks within PSNY in order to achieve the 2.1% maximum grade. The environmental impacts resulting from construction of this alternative would include disruption to the Hudson River bottom and cut-and-cover construction from Hudson River Park through the west side of Manhattan. MTA was also concerned about the vertical clearance between the tunnel and LIRR West Side Yards, and the proposed development sites on the Eastern Rail Yards. The tunnels would require the relocation of the LIRR maintenance building, and would delay the agreement for developing over the rail yard. Both of these impacts were unacceptable to MTA.

"Although additional alternatives to make the connection from the new Build Alternative tunnels to PSNY...were evaluated at the request of Amtrak and FRA, none were found that could address the various constraints that had been identified in the original analysis. Therefore, the PSNY Connector was not reinstated as a component of the Build Alternative."

## **Appendix B. Gradients.**

The following comments are included in case the question of how steep a grade is acceptable is seen as reducing the utility of the project (for example, as ruling out the connection between the new tunnels and Penn Station).

Some organizations adhere rigidly to "ideal" engineering standards even when the result is a substandard project that ignores a strong business case for a steeper grade. NJT claims its locomotive-powered trains have trouble making existing 2% grades. However, if NJT has contemplated for over a year having no connection at all, they presumably could develop an operating plan that minimizes use of the connection by trains with locomotives.

There are 4% grades used by diesel-powered commuter trains in Ogden, Utah, and electric commuter trains in Philadelphia (outbound from Center City to the airport).

NJT has a standard maximum of 2% (more conservative than Amtrak's standard), although 3% was considered during the project study phase and later rejected.

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