

**New Jersey Association of Railroad Passengers
Statement to the
Planning and Economic Development Committee,
North Jersey Transportation Planning Authority, Inc.
August 29, 2005**

The New Jersey Association of Railroad Passengers (NJ-ARP) urges the North Jersey Transportation Planning Authority, Inc. (NJTPA) to reject the Locally Preferred Alternative (LPA) of the ARC Trans-Hudson Express Tunnel Project proposed by NJ Transit (NJT).

NJ-ARP has been a persistent advocate recommending additional trans-Hudson River rail transit capacity to meet growing demand. No new rail trackage has been added across the Hudson River since the existing Penn Station rail tunnels were completed in 1910. But west of Hudson population has tripled; highway tunnel and bridge crossings are congested and operating at capacity, and no new highway lanes can be added given cost and environmental considerations. Relief is certainly called for.

Recall that the driving force behind the initiation of the Access to the Region's Core (ARC) project was to permit New Jersey residents to access rapidly expanding job site locations in East midtown Manhattan in close proximity to Grand Central Terminal (GCT). Data collected by the Port Authority revealed that about 70% of midtown office space is within a ten-minute walk of that landmark station.

In that context, NJ-ARP believes that the current NJT Locally Preferred Alternative (LPA) is seriously flawed and should be rejected by NJTPA.

NJ-ARP strongly supports the plan's provision for two additional tracks under the Hudson River to New York's Penn Station (NYP), but disagrees with other elements of the plan, especially the proposed deep level station beneath 34th Street in Manhattan.

Not only is this plan costly and inconvenient for rail passengers, but constructing a subterranean annex station contiguous to Macy's --some 125 feet below 34th Street in Manhattan -- will also pose significant risks to passengers in this age of concerns about security. In our opinion, it would be appropriate to sever the deep-level 34th Street Station from this project and terminate the tunnel in a fashion that would permit its future extension once transit planning agencies develop a regional solution for metropolitan area mobility in concert with one another. Further, evaluation of other plans to substantially increase Penn Station capacity in the short-run, such as through running between the MTA's New Haven line and NJT's Northeast Corridor, have not been addressed.

We would urge all parties and stakeholders to review the original tenets of the ARC project and re-examine other methods and solutions to provide a direct rail link between Penn Station and Grand Central Terminal. This has become even more critical and appropriate given the recent rise in the cost of motor fuels.

During the Major Investment Study (MIS) phase of the Access to the Region's Core (ARC) project, three final options were selected for detailed examination. All three options included identical infrastructure in New Jersey and a pair of new tunnels under the Hudson River. Alternative "P" called for a deep cavern station under the existing Penn Station, a plan similar to NJT's current recommended "preferred" plan. In

Alternative "S", the new tunnels would tie into existing tracks in the southern portion of Penn Station, and then continue east in new tunnels under 31st Street and under the East River to an expanded storage yard at Sunnyside Yard. The third option, Alternative "G", was similar to Alternative "S" as far east as Park Avenue in Manhattan, but then would turn north and tie into existing tracks in the Lower Level of Grand Central Terminal. This option is strongly supported by NJ-ARP and transit advocates because it would bring passengers to the East Midtown area, where a large number of NJT rail passengers are headed.

Attached Exhibits 2 and 3, derived from data contained in the ARC MIS 2003 Summary Report, compare key evaluation measures of each of these options. In each case Alternative "G" outperforms the other options, and we believe, should be the clear choice. It produces the highest number of peak hour passengers and diverts the greatest number of auto trips from crowded trans-Hudson highways. It is the only option that saves travel time for passengers headed to the East Midtown area. Surprisingly, this superior performance is achieved with the lowest operating and capital cost, and with the highest projected passenger revenue.

Yet in the Scoping Report for the Draft Environmental Impact Study (DEIS), Alternative "G" has been rejected. To NJ-ARP, this is a mistake. Exhibit 1 lists the four reasons NJT cites for rejecting this alternative. Each reason is contradicted by a response based on NJT's own discussion of alternatives and the resulting findings presented in the 2003 Summary Report.

Transit advocates have concluded that New Jersey Transit selected an alternative that does not require the full active cooperation of New York State's Metropolitan Transportation Authority. Going it alone results in a costly, but inferior plan. With new political leadership expected in both states, planners at NJT and MTA should be working toward common, cost-effective solutions that are in the travelers' best interests. In the meantime, NJT could move forward on those elements of its transit plan that still permit the ultimate completion of Alternative "G". These would include the new tunnels tying into existing tracks at Penn Station and significant access improvements to existing platforms at the station. Also, to relieve overcrowding in the near term, NJT should seek common ground with MTA to advance through running at Penn Station -- a facility ideally suited for this mode of operation. Through running has the potential for increasing existing tunnel capacity by 25 to 50%.

Several refinements in the West of Hudson elements of the preferred alternative are also needed. In particular, options to the loop plan at Secaucus should be explored. A direct connection would save travel time, and should be less costly. This is especially important to transit riders from Bergen and Passaic Counties. Furthermore, planning for additional capacity across the Hackensack River and west to Newark must be fully integrated and not segmented in this DEIS process. Without this capacity, the new tunnel will fail to reach its full potential.

NJTPA, together with the New York Metropolitan Transportation Council (NYMTC), its equivalent planning agency east of the Hudson, can advance regional transit options and solutions that meet the needs of the riding public and rise above narrow transit agency prerogatives.

NJ-ARP urges NJTPA to reject NJT's "Locally Preferred Alternative" and instead to require formulation of a plan that takes the first steps leading to the real winner and key objective of the ARC project: the Penn Station New York - Grand Central Terminal connection.

NJT Mistaken in Eliminating Alternative G for Consideration as Locally Preferred Alternative
 (Regional Rail Working Group – 08/29/05)

After nearly ten years of planning, the Access to the Region’s Core (ARC) project identified three final alternatives, G, P and S, for detailed evaluation. The results of this analysis are summarized in the ARC Major Investment Study (MIS) 2003 Summary Report. The evidence developed in the analysis overwhelmingly shows that Alternative G, with its connection from Penn Station New York (PSNY) to Grand Central Terminal (GCT), provides the most benefit to trans-Hudson travelers at the lowest cost of the three alternatives considered (see Exhibits 2 & 3).

Yet in the May 2004 Draft Environmental Impact Statement (DEIS) Scoping Document, Alternative G was eliminated from the DEIS process and given no consideration to become the Locally Preferred Alternative (LPA) for four key reasons. Regional transit advocates take strong exception to this decision, given that each concern was addressed in the MIS report. Exhibit 1 below lists each reason and cites specific findings in the MIS report that contradict these reasons.

Exhibit 1

Responses To Reasons For Eliminating Alternative G

<u>Reason for Eliminating Alternative G*</u>	<u>Response Based on MIS Findings**</u>
1. Lowest additional trans-Hudson AM peak hour train service.	Capacity of 34 eastbound NJT trains in the AM peak hour is adequate to handle 2020-projected demand, with 20 trains through PSNY to GCT and 14 to PSNY. If needed, additional PSNY trains could be accommodated in the existing Hudson River tunnels.
2. Constructability impact of the physical breakout at the southern end of GCT.	GCT was designed to be expandable south under Park Ave – it is physically feasible to break out of the lower level of GCT Tracks 105-112. Level of impact on subways, buildings & support facilities and mitigation not identified.
3. Disruption created by relocation of southbound Lex. Ave. subway local track, with construction affecting a short stretch of subway platform.	Required relocation is feasible. Construction would cause temporary service impacts to the Lexington Ave. Line. Level of impact and mitigation not identified.
4. Impacts, delays and risks associated with property acquisition and easements required to construct the tunnel segment between Penn Station New York and GCT.	Penn Station was designed to be expandable east under 31 st St. – easement and space exist under 11 Penn Plaza for connection to 31 st St. tunnels. No property acquisition concerns identified in report. (Easements for proposed Trans-Hudson Express station under 34 th St. and Macy’s and connecting tunnels would be much more extensive.)

* Source: ARC DEIS Final Scoping Document, May 2004 cover date.

** Source: ARC MIS 2003 Summary Report, Web creation date 11/06/03.

Alternative G will attract the most trans-Hudson riders and divert the most travelers from autos and all other modes to rail. Alternative G is the only alternative that will bring passengers into GCT (more than 1/3 are projected to prefer GCT); an estimated 23,000+ hours will be saved by these travelers each weekday, more than 3,000 work years annually.

Exhibit 2					
Transportation Impacts (2020) Comparison* – Alternatives G, P & S					
	No Build	Alternative G (to GCT)	Alternative P (to Penn Sta.)	Alternative S (to Sunnyside)	Best Alternative
2020 Trans-Hudson Passengers – AM Peak Hour	28,539	37,759	36,944	35,353	G
GCT Trans-Hudson Passengers – AM Peak Hour	0	13,415	0	0	G
Auto Diversions to Rail – Avg. Weekday Travelers	Base	9,402	5,614	4,192	G
All Modes Diversions to Rail – Avg. Weekday Travelers	Base	36,204	24,321	18,927	G
Time Savings for GCT Trans-Hudson Passengers – Hours per Avg. Weekday**	0	23,678	0	0	G
* Source: ARC MIS 2003 Summary Report, Web creation date 11/06/03. Alt. P with tail tracks used in all comparisons.					
** Travel time savings = ARC MIS 2003 Summary Report Alt. G AM peak hour trans-Hudson passengers to GCT (13,415) x NYMTC CBD 2001 Hub Bound Travel Report ratio of 2-way 24-hour to AM peak hour trans-Hudson rail passengers (139,038/19,693 = 7.06) x 15 minutes (.25 hours) saved per passenger = 23,678 Hours/Avg. Weekday.					

Alternative G is estimated to cost the least to construct; to produce the most passenger revenue; and to be the least costly to operate and maintain. Incremental operating revenue for Alternative G would equal or exceed incremental costs, reducing NJ Transit's operating deficit. In contrast, other alternatives would require increased annual operating subsidies of \$24-\$74 million.

Exhibit 3					
Financial Impacts (in 2000 \$) Comparison* – Alternatives G, P & S					
	No Build	Alternative G (to GCT)	Alternative P (to Penn Sta.)	Alternative S (to Sunnyside)	Best Alternative
Construction Cost	Base	\$2.9-\$3.1 B	\$3.3-\$3.6 B	\$3.2-\$3.4 B	G
Annual Incremental Operating & Maintenance Cost	Base	\$43-\$54 M	\$94-\$115 M	\$57-\$71 M	G
Annual Incremental Passenger Revenue	Base	\$54 M	\$41 M	\$33 M	G
* Source: ARC MIS 2003 Summary Report, Web creation date 11/06/03. Alt. P with tail tracks used in all comparisons.					