

Additional Comments on Supplemental Draft Environmental Impact Study (SDEIS) for the Access to the Region's Core (ARC) Study – submitted April 28, 2008

The following comments expand on a statement made at the March 31, 2008 hearing on the ARC project. They focus on the reasons for eliminating the direct track connection into Penn Station. With this connection the deep cavern station some 175 feet under 34th Street, with its serious adverse environmental consequences, becomes redundant and can be avoided. As FTA Administrator James Simpson and Regional Plan Association have pointed out, a direct connection to Manhattan's East Midtown greatly increases the benefits of the new Hudson River rail tunnels. This impact has not been considered in the DEIS or the SDEIS, and is a fundamental shortcoming of this EIS procedure.

Should the tunnels be extended to the Grand Central area, some 40% of the peak hour Hudson River tunnel users would chose trains taking them directly to their destinations. Since peak hour train services is roughly divided equally between the existing tunnels and the new tunnels, nearly 80% of the passengers on trains passing thru Penn Station would remain seated, continuing on to their destinations in East Midtown. With an extension to East Midtown a new deep cavern station under 34th Street becomes a costly white elephant. The more sensible alternative would be to build the track connection to Penn Station and then continue the route east under 31st Street and north under Park Avenue, as described in the MIS phase of this study. Since critical information about this extension has been withheld from public examination, the EIS process is fundamentally flawed in condemning this alternative.

The key missing environmental analysis is the additional energy cost and CO emissions required to construct and operate the deep cavern station, which would be made largely redundant by an extension east to East Midtown.

Finally, as IRUM mentioned in its March 31, 2008 statement, the adverse environmental impacts of the direct track connection are relatively modest, as described in the DEIS, and can be mitigated. Compared to the far more serious consequences of the Deep Cavern station, which could be eliminated as part of a plan to continue rail service to East Midtown, it is the deep cavern station, not the track connection, that should be dropped. One important point on the consequences of the connection is that the approximately 1,732 foot segment of 3% grade needed to avoid an extensive cofferdam construction in the riverbed is not an unusual for lines served by electric rail cars typically used for regional rail service in the NY area. The new LIRR East Side Access Project includes a 4,195 segment of 3% grade to climb from the 63rd Street tunnel under Northern Boulevard in Queens to the LIRR Mainline at Sunnyside. A Penn Station-Grand Central connection may well use such a grade and once in the Lower Level of Grand Central terminal thru-routed trains would encounter a 600 ramp with a 2.7% to 3% grade to reach the Park Avenue tunnels continuing north. Since the details of the MIS connection plan have been withheld from public view it is not possible to compare these alternatives.

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