May 15, 2015

Joseph H. Boardman  
President  
Amtrak  
60 Massachusetts Avenue  
Washington DC 20002

RE Amtrak Gateway project – Resiliency Phase

Dear Mr. Boardman:

Manhattan Community Board #4 (CB4) appreciates the opportunity to comment on Amtrak’s planned Gateway Program, particularly as you initiate the scoping of the Environmental Impact Study (EIS) required under NEPA (National Environmental Policy Act) for the resiliency phase of the project. CB4 supports immediately enhancing the resiliency of the system, and repairing the damage Super Storm Sandy caused to the existing tunnels and mechanical systems as quickly as possible. We also support the overall expanded capacity proposed in the longer term Gateway Program, including an additional tunnel provided it enables a very significant increase in transfer free commutes from New Jersey to their final destination in New York.

The saltwater infiltration in the Hudson River tunnel created damage beyond what can be fixed during the reduced service weekend times currently used to make repairs. Additional capacity is required to enable a full shut down of each of the two existing rail tracks in the Hudson River tunnel both to complete storm damaged mechanical systems and tunnel repairs and a create a more resilient tunnel that can weather (pun intended) the next storm. The resiliency phase thus proposes the construction of two new tracks under the Hudson River, the creation of a new Portal North Bridge in New Jersey to replace the damaged Hackensack River Bridge between Kearny and Secaucus, the replacement of the control systems for substations 41 and 42, and the rehabilitation of the existing tunnels.

- We request that during the EIS, Amtrak studies alternatives to the proposed plan including building a tunnel with a single track (with and without capacity to add a second track in the future). This could result in completing
the project faster and at a lower cost. It would also save expenses since the second track potentially cannot be used to increase capacity until the final design and construction of the Penn Station extension is built, which may be decades away. A single track could be designed to accommodate double decker cars so that capacity could be somewhat increased at the end of that phase for a lower cost.

We share Amtrak’s sense of urgency to begin the resiliency program to prevent the next storm from totally incapacitating the rail system. Separately from the EIS scoping, we encourage Amtrak to investigate how they can, over a 2 to 3 year period, repair and improve the existing Hudson River tunnel to enable the rail system to survive another major storm. Given that the planning and funding required for the defined Resiliency program will require a minimum 10 year effort, likely not achievable before another major storm.

We support the long tem goal of expanding the Trans-Hudson commuting capacity recommended in the Gateway Program. Penn Station sees 150,000 daily train commuters and the Bus terminal has 220,000 bus commuters. Bus commuters are expected to grow by 35% to 337,000 commuters a day by 2040 while the rail is expected to reach 225,000 passengers daily in coming decades 1. Both of those networks are well over capacity, experiencing excessive delays on a regular basis and unable to absorb the explosion in commuters that is anticipated. The Gateway Project overall vision of additional tracks and capacity, new surrounding regional portal bridges and a turnaround at Secaucus Station enabling no-transfer Manhattan trips on the Bergen county and Pascack Valley New Jersey Transit Lines are promising ideas. The Gateway Project meets an important CB4 priority of providing convenient non-bus mass transit for a large proportion of both commuters and regional tourists/travelers. We look forward to working with Amtrak in moving the vision into more defined plans and eventually reality.

We are, however, disappointed that the plan does not include two components that are both priorities for Manhattan CB4 and crucial for a strategic long-term regional transportation network

- **Direct Access to the East Side/East Side subway lines for West of the Hudson River commuters:** Even with creative mitigations, the Penn Station accessed west side subway system (particularly the E train, which goes to the east side from Penn Station) will likely be saturated beyond existing subway lines with the projected Gateway Program growth. Enabling direct commuter lines from New Jersey to the east side will enable more options and thus easier rail commute and avoid oversaturating the subway system;

---

1 Port Authority Master Bus plan, March 2015, Study of the # 7, City Hall, December 2013
Enabling a multi-state subway system by providing a Hudson River rail line for the #7 train extension to the Secaucus/Lautenberg station. Any long-term regional transportation system should enable a multi-state subway system. This will enable more options for commuters and enable further growth than provided by the two current transportation HUBS (Penn Station and Grand Central Terminal).

We also have other important recommendations related to the long-term Gateway Plan:

- Related to the two above recommendations, we urge Amtrak to coordinate their long-term plans with the Port Authority. More specifically, we encourage Amtrak to await the results of the Port Authority’s Long Term Planning for Hudson Crossing Transit Capacity before devising their final long-term plans and to ensure the Gateway Project complements and assists that plan. This is important to ensure the project meets the commuter focus that also reflects the system’s usage.

- We encourage Amtrak to ensure the EIS for the future Gateway phases include the affects a 50% increase in commuters will have on the surrounding mass transit systems - both below (from Penn Station) and above ground subway platforms, entrances/exits, surrounding bus lines, 6th through 9th Avenue sidewalks and street usage and bicycle (include bicycle lanes), pedestrian and vehicular traffic will all be affected.

This impact, particularly related to subways, will need to take in account the cumulative effects of plans to increase by 35% the capacity of the Port Authority Bus Terminal, which shares subway lines and 8th Avenue to disgorge its commuters and should include examining building new subway tunnels for projected substantial impacted lines such as the A, C and, as mentioned above, E trains. It should also examine the requirements for increased 8th Avenue sidewalk capacity and its effect on the number of traffic lanes. Fully understanding the impact will require close coordination with DOT, MTA, DCP, CB4, CB5 and local community groups so the impacts can be analyzed in the context of the other major transportation growth and additional building density.

- While we understand that much of the construction in the CB4 district is close to completion including the concrete casing under the Hudson Yards, or will have minimal above ground impact, such as the recently begun 11th Avenue Viaduct, surrounding Community Board districts, notably CB5, will be impacted and we encourage Amtrak to do substantial planning with CB5 and include active construction noise and traffic impact mitigations.
The CB4 district will be highly impacted by the Amtrak Gateway project, including its initial Resiliency phase. Its impact can be extremely positive by reducing bus and car traffic on our streets and creating a more neighborhood and pedestrian friendly Penn Station area or it can have a negative impact by increasing the crowds on already overcrowded streets and traffic on already jammed roads and creating a regional mass transit system that forecloses creative possibilities that could maximize mass transit use, such as a multi-state subway system.

The outreach to Manhattan Community Boards 4, as well as city and regional agencies, is a good first step. We encourage Amtrak to continue these discussions and ensure an EIS scoping and project planning process that brings together the variety of local communities and local and regional players already active in improving commuters’ experience and creating positive change in the dynamic Penn Station neighborhood.

Sincerely,

Christine Berthet  Jay Marcus    Ernest Modarelli
Chair    Co-Chair, Transportation Planning Committee  Co-Chair, Transportation Planning Committee

cc: Governor Andrew Cuomo
    Governor Chris Christie
    Congressman Jerrold Nadler
    Senators Kristen Gillibrand
    Senator Chuck Schumer
    Congressman Jerry Nadler
    Councilmember Corey Johnson
    State Senator Brad Holyman
    Assemblymember Richard Gottfried
    Wally Rubin, District Manager Manhattan CB5
    Vikki Barbero, Chair Manhattan CB 5