

# INSTITUTE FOR RATIONAL URBAN MOBILITY, INC. (IRUM)

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Re: Comments on draft of scoping document for the preparation of an Environmental Impact Statement for the proposed Empire Station Complex Project

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.

As the draft scoping document points out, “Alternatives” to the Proposed Project are required under SEQRA. At present, only three alternatives are to be analyzed, as described in the draft:

1. No Action Alternative,
2. No Unmitigated Significant Adverse Impacts Alternative
3. Reduced Density Alternative.

Missing in this list is the alternative, championed by IRUM and many other rail advocates, to connect the new Hudson Tunnels to existing tracks and platforms at Penn Station and then to connect them to tracks in the lower level of Grand Central Terminal.

This alternative - Alternative G - was one of three final options developed in the “2003 Access to the Region’s Core (ARC) Major Investment Study”:

[https://www.irum.org/20031125\\_ARC\\_MIS\\_Summary\\_Report.pdf](https://www.irum.org/20031125_ARC_MIS_Summary_Report.pdf)

It was also the subject of an exhibition hosted by the Municipal Art Society at their Urban Gallery:

<http://www.rrwg.org/connectr.pdf>

The two statewide rail advocacy organizations – the Empire State Rail Passengers Association (ESPA) and the New Jersey Association of Rail Passengers (NJ-ARP) – co-sponsored this event.

The connection alternative would avoid any significant property taking in the vicinity of Penn Station by using existing tracks and platforms in the southern portion of the station and by tunneling under 31<sup>st</sup> Street and Park Avenue South to connect to the existing lower level of Grand Central. This connection would allow west-of-Hudson commuters, nearly half of all suburban commuters to the Manhattan Central Business District (CBD), to have a direct one-seat ride to their workplaces in East Midtown

without transferring to crowded subways at Penn Station. The Alternative was developed in great detail by PB Engineering, at the time NY's largest engineering firm.

IRUM urges EDC to include this alternative in the scoping of its EIS.

The year after the 2003 Summary Report was issued the ARC project engineering team recommended that the new Hudson Tunnels should bow south to gain additional clearance for tunneling boring machines under the Hudson River and then bow back north. This "bow" led IRUM to consider a routing for the new tunnels that would continue the bow to the south and then head west to connect with existing NJ Transit tracks just south of the Hoboken Terminal. A new online station at this location would make the new tunnels considerably more useful, providing access to the Hoboken-Jersey City waterfront business district, the state's largest in terms of class A office space and would permit a transfer to the Hudson-Bergen light rail line.

In the past two decades many transit systems around the world have integrated their commuter rail lines into coordinated Regional Rail Systems. This is a real opportunity to do likewise in the NY-NJ-CT metropolitan area, and reframe NYC's suburban rail system, with its two major terminals located in the heart of the core of Manhattan.

EDC's Penn Station Complex including the expansion to the south will cost substantially more to construct than the Penn Station-Grand Central link. The costly land-takings needed on Manhattan's West Side can only be offset by substantial increases in permitted density – "zoning for dollars" of dubious legality.

Planning for transportation and land use should be part of a comprehensive planning process for the entire Manhattan Central Business district (CBD). Some 90% of the users of the EDC's proposed expansion of Penn Station to the south will be West-of-Hudson commuters - the current EIS process includes no provision for citizen participation for these individuals. Details of IRUM's position are described in the letter submitted to the two Governors:

[https://www.irus.org/20200526\\_Letter\\_to\\_NYGovernorNJGovernor.pdf](https://www.irus.org/20200526_Letter_to_NYGovernorNJGovernor.pdf)

IRUM is urging elected officials, whose constituents would benefit from this connection, to insist that this alternative be included in the scope of this EIS. These officials should insist that all relevant data and analysis from the "2003 Access to the Region's Core" Study conducted by the PANYNJ, NJ Transit and MTA be made available to the public. Some 1,600 pages of technical information have been withheld from the public, including the engineering details like the recommended plan and profile, rock conditions, construction challenges and a host of other information. A commitment to full disclosure and transparency is essential to gaining the resources to advance this project.

Sincerely,



George Haikalis, President, IRUM