

INSTITUTE FOR RATIONAL URBAN MOBILITY, INC.

George Haikalis
President

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June 13, 2019

Mr. Andrew Brooks, FAA, Environmental Program Manager
Environmental Program Manager, Eastern Regional Office
AEA-610, Federal Aviation Administration
1 Aviation Plaza
Jamaica, NY 11434

Dear Mr. Brooks:

Re: Comments on proposed LaGuardia Airport Access Improvement Project Environmental Study

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. IRUM has long supported sensible, equitable and sustainable alternatives to the current auto-dominated ground access systems to the airports serving the 23 million person NY-NJ-CT metropolitan area, the nation's largest.

IRUM appreciates the opportunity to comment on the proposed scoping of the LaGuardia Airport Access Improvement Project Environmental Study and urges the FAA to withhold approval of the current scoping document published in the May 3, 2019 Federal Register until concerns raised in this letter are addressed.

While the description of the thirteen alternatives outlined in FAA's May 3, 2019 letter is helpful, IRUM believes that the specific modifications to these alternatives outlined in this letter would enhance the analysis needed and speed the completion of the Environmental Impact Statement (EIS).

IRUM also notes that the notices for the two public hearings on the scoping document, held on June 5, 2019 and June 6, 2019 were, extremely limited and offered little time for interested parties to participate. Furthermore, the "poster session" type of hearing greatly limits interaction among participants and degrades the value of a public hearing.

Ground access improvements to the region's major airports are of great concern to the entire region and a broader effort should have been made to reach affected individuals, organizations and other stakeholders.

To resolve these concerns, IRUM urges the FAA to invite New York City officials, together with representatives of other affected public agencies in the metropolitan area and interested citizens to participate in a comprehensive environmental review of the full range of all credible ground access and land development alternatives as described in the May 3, 2019 draft EIS, including the modifications to these alternatives that are described in this letter. IRUM urges the FAA make the changes in the scoping document outlined in this letter to better describe several of these alternatives which need additional clarification:

PANYNJ proposal to construct a new "AirTrain" link between LGA Airport and the MTA Willets Point #7 subway station and the adjacent LIRR rail station, identified as Alternative One, is one of thirteen described in the current proposed scope.

Alternative One – sponsor’s proposed action

It is very important to define the specific “automated peplemover technology” proposed in this action. It should be noted that during the discussion and the ULURP that preceded the initial JFK AirTrain project in 1999, Queens Borough President Claire Shulman insisted that this technology not preclude the operation of a “one-seat ride” rail service using AirTrain tracks and LIRR tracks between JFK Airport and Manhattan. The well-regarded engineering firm AECOM conducted this study which is posted on the IRUM website:

https://www.irum.org/200102_JFK_One-Seat_Feasibility_Study_MTA.pdf

IRUM urges the PANYNJ to commit to a similar compatibility for its proposed LGA peplemover.

Alternative Two –Use of Other Existing Airports: Transfer or shifting of aviation activity to another existing public airport (or airports) in the New York metropolitan area.

First, the NY-NJ-CT region lacks a coherent metropolitan transportation planning process that can address this regional-scale issue. The current MAP Forum lacks resources to conduct even a skeletal effort, and its public outreach effort is seriously deficient. There is no comprehensive regionwide aviation system plan and attempts to use the PANYNJ to prepare such a plan are seriously flawed because that agency is controlled by two individuals – the Governors of NY and NJ with no significant participation by units of local government and the general public.

This alternative not only requires a careful analysis of the ability of the region’s other existing airports to accommodate current and future aviation demand, but also the ability of the existing LGA airport site to be repurposed for alternative uses.

One of the region’s most serious problems is a lack of affordable housing. This 680 acre site could easily accommodate over 30,000 units of housing, if built at the density of Coop City in the Bronx, which has 16,000 housing units on a 338 acre site. Even more housing could be developed in Queens and on Rikers Island if LGA were repurposed for housing. This should be part of the analysis that would be included in an EIS.

A number of major airports throughout the world have been repurposed, and most recently the planning process has begun for Berlin-Tegel, currently its main airport. The author of this letter has proposed a similar plan, which is described a May 8, 2015 NY Times oped:

<https://www.nytimes.com/2015/05/08/opinion/dont-rehab-la-guardia-airport-close-it.html>

A comprehensive site plan for the reuse of this valuable real estate asset would be needed.

The degree that air passengers at LGA can be shifted to other regional airports requires a careful analysis of their capacity to handle this load, a review of strategies to enhance ground access to these airports and a comprehensive analysis of the environmental and economic consequences of such a shift, among many other factors.

One such analysis was conducted in 1971:

https://www.irum.org/1971_Inter-Airport_Shuttle.pdf

At present, the approach to regional aviation systems planning is a classic example of “segmentation”, clearly a classic violation of NEPA.

Efforts to enhance access to JFK have been made on an *ad hoc* basis:

<https://www.irum.org/OTA-Capstone-Final-Report-v2.pdf>

Some planners have characterized planning for the NY-NJ-CT metro area as a “mockery of ad hockery”.

Alternative Three—Use of Other Modes of Transportation: Use of other modes of transportation, including automobiles, buses, ferry service, existing passenger trains, proposed high-speed rail facilities or other emerging transportation technologies.

The three commuter rail lines that serve the metro area are the “sleeping giant of regional mobility”. IRUM has long called for remaking these lines into comprehensive *regional rail system* with integrated fares, frequent service and through running, first at Penn Station and then by connecting Penn Station and Grand Central Terminal. IRUM presented some of these comments to senior planning officials at the PANYNJ on January 15, 2019:

https://www.irum.org/20190115_Why_PA_Should_Support_Regional_Rail.pdf

A comprehensive plan for regional rail and for regional aviation systems is needed for this region to compete with its global rivals.

One example of a regional rail alternative, recently proposed by Alexander Garvin, a well-regarded urban planner, is “LGAX”. This plan would provide a high-speed one-seat ride rail link between LGA and Grand Central Terminal and Penn Station using the Hell Gate right of way adjacent to an industrial area along 30th Avenue in Queens:

https://www.irum.org/20190605_LGAX_Presentation.pdf

This option should be part of this environmental review. It would be a superior alternative to the seriously flawed proposed \$1.5 billion AirTrain shuttle to Willets Point.

Alternative Four—Transportation Demand Management: Use of measures to reduce vehicular travel to and from the Airport.

A “carrot and stick” approach to demand management is the core strategy of a recently approved plan for a Manhattan CBD cordon toll that would provide substantial revenues to fund much needed capital improvements for the City’s subways and buses and region’s commuter rail lines. This same strategy could be applied to roadways leading to the region’s major airports. This alternative should also be considered for pricing the existing AirTrain services at JFK and Newark Airports and the proposed AirTrain services to LGA. Instead of perversely “penalizing” air passengers, visitors and employees “who are doing the right thing” by using public transit, all fares on AirTrain should be eliminated and revenues made up by charging motorists who currently pay nothing to use the costly array of roadways that serve the terminals. Congestion pricing technology can be applied to these airport roadway users.

Alternative Five—Off-Airport Roadway Expansion: Increase the capacity of roadways surrounding and providing access to the Airport, potentially including I-495, the Brooklyn-Queens Expressway (BQE), the Grand Central Parkway, Queens Boulevard, and/or Astoria Boulevard.

A number of proposals are being advanced to eliminate highways like portions of the BQE and the Sheridan Expressway. Additional highway closings, in consultation with affected communities, should be considered as part of this alternative.

Alternative Six—Subway Extension from Astoria Boulevard Subway Station: Elevated Above Grand Central Parkway: Construction of an elevated subway structure that would extend service of the NYCT N and W Lines eastward from the existing Astoria Boulevard Subway Station to a new station at the Airport; the alignment would be along Grand Central Parkway.

Alternative Seven—Subway Extension from Astoria-Ditmars Boulevard Subway Station: Elevated Above 19th Avenue: Construction of an elevated subway structure that would extend service of the NYCT N and W Lines eastward from the existing Astoria-Ditmars Boulevard Subway Station to a new station at the Airport; the alignment would generally be along 31st Street north, 19th Avenue east, and Grand Central Parkway east.

Alternative Eight—Subway Extension from Astoria-Ditmars Boulevard Subway Station: Tunnel Beneath 19th Avenue: Construction of an underground subway structure that would extend service of the NYCT N and W Lines eastward from the existing Astoria-Ditmars Boulevard Subway Station to a new station at the Airport; the alignment generally would be in a tunnel beneath 31st Street north, 19th Avenue east, and Grand Central Parkway east.

For each of these three alternatives, IRUM recommends that two on-airport rapid transit stations be considered, one at the Central Hall Station and the other at East Station. “On-airport” passengers should be allowed to use this service without payment of extra fares. MTA’s new fare payment system can be designed accordingly.

For Alternatives Seven and Eight consideration should be given to the addition of a third on-line subway station adjacent to the historic Marine Air Terminal as detailed plans for its reuse are being developed. Also, the detailed plan and profile of these subway extensions should be developed in consultation with community residents, transit agencies and interested members of the public. New soft-soil tunnel boring machine (TBM) technology should be considered for alignments that would pass under runways or taxiways.

Alternative Nine—Fixed Guideway from Astoria Boulevard Subway Station: Construction of a fixed guideway APM system that would provide service from the existing Astoria Boulevard Subway Station to a new station at the Airport; the alignment generally would be along Grand Central Parkway east.

Alternative Ten—Fixed Guideway from Woodside LIRR and 61st Street-Woodside Subway Station: Construction of a fixed guideway APM system that would provide service from the existing LIRR Woodside Station and the NYCT 7 Line at the 61st Street/Woodside Subway Station to a new station at the Airport; the alignment generally would be along the existing railroad right-of-way north and then parallel the BQE north to the Grand Central Parkway east.

Alternative Eleven—Fixed Guideway from Roosevelt Avenue-Jackson Heights Subway Station: Construction of a fixed guideway APM system that would provide service from the existing NYCT 7, E, F, M, and R Lines at Roosevelt Avenue/Jackson Heights Subway Station to a new station at the Airport; the alignment generally would be along Broadway northwest to the BQE and then parallel the BQE north to the Grand Central Parkway east.

Alternative Twelve—Fixed Guideway from Jamaica Station Transportation Hub: Construction of a fixed guideway APM system that would provide service from the existing NYCT

E, J, and Z Lines at Jamaica Station transportation hub to a new station at the Airport; the alignment generally would be along city streets to the Van Wyck Expressway and would continue northwesterly along the Van Wyck Expressway and Grand Central Parkway.

These four alternatives should have two on-airport stations like Alternative One. All four of these alternatives should use compatible Automated People Mover technologies that would, like the JFK AirTrain, permit one-seat ride services on regional rail lines.

Alternative Thirteen—No Action Alternative: Under this alternative, the Port Authority would take no action to develop an APM system or other alternative form of transportation to and from the Airport.

IRUM would be happy to discuss these alternatives in more detail as you prepare the scoping document.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Haikalis", written in a cursive style.

George Haikalis, President, IRUM