

EJ

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March 3, 2003

Janet M. Mainiero, AICP
Deputy Project Manager
MTA-Metro North Railroad
347 Madison Ave
New York, New York 10017

RE: Alternatives Analysis/Environmental Impact
Statement, Tappan Zee Bridge/I-287

Dear Ms. Mainiero,

These written comments are provided on the above, as I was unable to attend any of the three Public Scoping Meetings on January 14, 15 and 16, 2003.

The purpose of the project as stated on Page 8, paragraph 3.1 is "...to address the mobility needs on the Tappan Zee Bridge/I-287 Corridor." I believe the scope of the AA/EIS is insufficient in that it does not address the modal issue of freight movements in the corridor. The word "freight" is mentioned six times in the document (once in Paragraph 5.2.5 Aviation and five times in Paragraph 5.2.6 Goods Movement) but this is only in the tangential context of Section 5, "Environmental, Socioeconomic and Land Use Impacts". In none of the alternatives discussed in Section 4 is there any mention of the inclusion of rail freight movements on the proposed rail tracks on a new Tappan Zee Bridge (TZB-II) or tunnel; only the movement of passengers is discussed. Are there not trucks which cross the existing Tappan Zee Bridge? Do we not wish to consider providing modal alternatives to the east-west movement of this freight, particularly that which is destined to New York City?

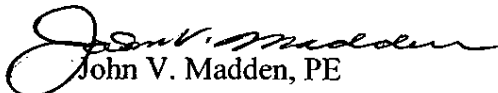
On Page 2, Paragraph 2.1, the focus of the discussion is completely on the number of vehicles moving over the Tappan Zee Bridge, not that which is carried by those vehicles, either individual occupants in passenger vehicles or freight in commercial vehicles. Of the 135,000 vehicles which cross the bridge on an average day, what percentage of them are trucks? More importantly, with respect to the "consumption" of the asset which is the bridge and roadway, what percent of the tonnage crossing the bridge is represented by trucks? These questions are not even considered.

Attached is a discussion of the feasibility of routing rail freight over a proposed TZB-II bridge and connection to existing rail lines & abandoned rail rights of way, which will permit double stack container railcars to reach the Harlem River Yard Intermodal Terminal in the south Bronx.

It is but one possibility. Please consider the inclusion of rail freight movements over a new Tappan Zee Bridge.

If you have any questions, please contact me at 518-457-3632 (day) or 518-439-1708 (evening), or by email at jmadden3@nycap.rr.com.

Sincerely,


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BSIE, MST, MBA

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The Rail Freight Potential of the Proposed Tappan Zee Bridge Replacement

Our assumption is that the proposed Tappan Zee Bridge-II (TZB-II) would cross the Hudson River parallel to and slightly south of the existing Tappan Zee Bridge. We assume that there will be a double track main line across the bridge, with the main line signalized for operation in either direction on both tracks, and that intercity freight trains will utilize this line, probably in the nighttime hours, in addition to MTA-Metro North Railroad commuter rail passenger trains. We assume that this double track rail line would continue east in the I-287 corridor and connect with the MTA-MNR New Haven Line in the vicinity of Port Chester. We have not performed a field inspection of the abandoned/inactive rail lines discussed below. This discussion is from an operational and engineering perspective, and does not address political issue involved with the reactivation of abandoned lines or construction of new connections to existing lines.

1. Double stack container traffic (maximum railcar height of 20'-2") southbound from Selkirk Yard, Albany County (which traffic could originate in the North, the Midwest and in the far West) could depart from the CSX Transportation (CSXT) River Line in the Town of Orangeburg, Rockland County. Part of the abandoned former Conrail(CR) (former Erie Railroad) Piermont Branch runs from this point on the River Line, southeast to Sparkill, then north along the shore of the Hudson River, climbing the east side of Mount Nabo, until reaching an elevation above sea level of about 150 feet. We understand that the minimum height above mean high tide for the lowest part of a structure over the channel of a navigable river is 135 feet. We have not reviewed the potential vertical clearances on the former Conrail Piermont Branch.

The Surface Transportation Board, in the division of Conrail between CSXT and Norfolk Southern Railway (NS) in 1999, granted trackage rights to the Canadian Pacific Railway (CPR) from the Albany NY area south to NYC, via the only existing rail route, the Hudson Line down the east shore of the Hudson River. If an alternative freight route via a new TZB-II to reach NYC were in existence, then the STB could logically grant trackage rights to CPR to operate over the River Line to a new TZB-II.

The NS Southern Tier Line from Buffalo to Suffern is also cleared for double stack container railcars. The NS Suffern Industrial Track connects to the Southern Tier Line at Suffern and runs east. Using portions of the Suffern IT, the New Jersey Transit (NJT) Pascack Valley line from Spring Valley to the vicinity of Nanuet, and the abandoned former CR Piermont Branch from Nanuet to Orangeburg, a connection could be established from the Southern Tier Line to and across TZB-II. Potentially, this would give NS direct access to NYC as far as the Harlem River Intermodal Terminal in the Bronx, so as to compete directly with CSXT and CPR. We did not review the overhead structures for vertical clearance on this route nor review the number of highway-rail grade crossings which would have to be reactivated.

Double stack container traffic northbound from Oak Island Yard, Hudson County, New Jersey,

could depart the CSXT River Line in North Bergen, Hudson County, NJ. The Conrail Shared Assets Area (CSAA), which is jointly owned by CSXT and NS, operates the Northern Running Track from this point, north towards Sparkill and connection to the former CR Piermont Branch there. We have not reviewed the vertical clearances on the Northern RT.

2. We acknowledge that, south of Selkirk, NY, there are no rail lines east of the Hudson River which are capable of handling double stack container railcars. This is due to both the vertical clearance obstructions on the Hudson and Harlem Lines and to the third rail which provides electric power for the MTA-MNR commuter trains south of Croton-Harmon on the Hudson Line and Brewster-North on the Harlem Line.

To achieve entry of double stack container railcars into NYC, we propose a partial reactivation of the abandoned former CR (former New York Central) Putnam Industrial Track as a signalized, single track route of 25 MPH, with at least one Controlled Siding, where trains can meet and pass one another in opposite directions. The reactivation would be for about 14 miles total, from where the New York State Thruway (I-87) crosses the Putnam IT right of way in the vicinity of Elmsford, south past "BN" yard in the Bronx and past the existing connection of the Putnam IT to the Hudson Line. The new route would continue south and connect to the new "CP-8" on the Hudson Line, where the NYS Department of Transportation-owned Oak Point Link Running Track connects from the south. After crossing CP-8 from the east side connection with the Putnam IT, to the west side connection to the Oak Point Link IT, a double stack train would continue south to the Harlem River Yard Intermodal Terminal.

On the reactivated portion of the Putnam IT, there are about 15 bridges whose vertical clearances would have to be verified. Historically, however, the New York Central Railroad used the then-Putnam Division as a "high and wide" route for oversized railcars into New York City. There are about 4 highway -rail grade crossings which would have to be reactivated. As much of the portion of the Putnam IT in Westchester County has been converted to use as a bicycle path, any reactivation of the Putnam would have to plan for a ROW to include a bicycle path, to ameliorate local concerns.

All the Harlem River highway bridges over the Oak Point Link RT are programmed for rehabilitation or replacement by the City of New York, and the resulting bridges will all have a minimum vertical clearance sufficient for double stack container trains. The one railroad bridge over the Oak Point Link RT is the MTA-MNR Harlem River Railroad Bridge, which carries the Hudson Line over the Oak Point Link RT. This bridge would have to be modified. With the exception of the CP-8 interlocking itself, there will be no third rail electrification on this freight route to Harlem River Yard. If MTA-MNR were to retain CP-7 in service for crossing over their electrified trains, and if MTA-MNR removed the third rail at CP-8, then this last obstacle to double stack container railcars would be eliminated.

3. We see rail freight use of the TZB-II as a complementary alternate route to the proposed Cross-Harbor Rail Freight Tunnel from Greenville, Union County NJ or Staten Island to

Brooklyn and not as a replacement for the tunnel.

4. We recommend that there be constructed a double track connection between the proposed Suffern-Port Chester Line and the Harlem Line in White Plains. (The elevation difference between the Suffern-Port Chester Line and the Hudson Line is too great for a rail connection.) Connection to the Harlem Line will permit a single seat ride from Orange and Rockland Counties to NYC. Another Benefit of the TZB-II and the connection to the NS Southern Tier Line at Suffern, is that this would support the extension of passenger service between Binghamton and NYC, with almost all the service within New York State.

5. In conclusion, we believe that the construction of a new Tappan Zee Bridge is an historic opportunity to provide a cross-Hudson River rail freight line to reach New York City. This new freight rail crossing would be much closer to NYC than the next Hudson River rail crossing, which is about 130 miles north of NYC at Castleton, NY.