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Public Scoping Update Meeting
Tuesday, February 26, 2008
Performing Arts Center, Purchase College

TAPPAN ZEE BRIDGE/I-287
ENVIRONMENTAL REVIEW

TZB-200E

Scoping Update Comment Form

You are invited to comment on the Tappan Zee Bridge/I-287 Corridor Project and the accompanying Scoping Update Packet in the space below. Note that in compliance with NEPA and SAFETEA-LU Section 6002, public comments are being specifically requested on the included purpose and need (Section 3.0 Appendix A), range of alternatives (Section 4.0), assessment methodologies (section 6.0), and coordination plan (Section 5.0 Appendix B).

SEE ATTACHED LETTER DATED MARCH 22, 2008
FROM JOHN V. MADDEN TO MICHAEL P. ANDERSON.

Name: JOHN V. MADDEN, P.E.

Interest Represented: CONSUMERS IN BROOKLYN, QUEBENS & L.I.

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Please add my name to the Tappan Zee Bridge/I-287 Corridor Project Mailing list.

Comments can be submitted in writing through March 31, 2008 to the address listed below:

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March 22, 2008

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RE: Tappan Zee Bridge/I-287 Environmental Review

Dear Mr. Anderson,

I have reviewed the February 2008 Scoping Update Packet. I am writing to ask that the design of the rail line, as pertains to Alternatives 4A through 4D of the above project, be revised to specifically state that the new rail bridge across the Hudson River, the rail line in Westchester and Rockland Counties, and associated tunnels, overhead and undergrade bridges in those Alternatives be designed and constructed to:

1. Support the unrestricted movement of 315,000 pound gross weight railcars, not just 263,000 pound gross weight railcars as proposed in the February 2007 public documents; and
2. Have a minimum height above the top of rail (ATR) of 22'-0" (in accordance with NYS Railroad Law) or 23'-0" (in accordance with the American Railway Engineering and Maintenance of Way Association industry recommended practice), not just a height of 17'-9" ATR and Association of American Railroads Plate "C" rail equipment (15'-6" ATR) as contained in the February 2008 Scoping Update Packet; and
3. Utilize either no electric traction or use overhead catenary instead of 3rd rail electric propulsion. The 3rd rail electric traction, which is unique in the Nation to just the New York metropolitan area commuter railroads, will introduce a new horizontal clearance restriction where one does not now exist, on this new connection to the National rail network.

Construction of a new railroad crossing of the Hudson River, only 25 miles north of New York City, to a sub-standard weight carrying capacity and to a sub-standard vertical clearance above the tracks would be a mistake of colossal proportions, the effects of which would reverberate for the movement of rail freight into the Bronx, Queens, & Brooklyn Boroughs and Suffolk & Nassau Counties for the rest of the 21st Century.

Below is the discussion as to why I make these recommendations. It has to do with the price of consumer goods in Brooklyn, Queens and on Long Island.

The Price of a 2 x 10 and the New Tappan Zee Bridge

A recent visit to the Home Depot website (www.homedepot.com) shows that the price for one 2 inch by 10 inch by 16 foot long pressure treated piece of lumber (stock number 53858 16) is \$15.97 at the Home Depot stores in Newark, NJ, Bloomfield, NJ and Jersey City, NJ. The price for the same 2x10x16 at the Home Depot stores in Deer Park, Smithtown, and Farmingdale in Suffolk County, NY is \$24.97. Thus, the residents of Suffolk, Nassau, Queens and Brooklyn pay 56% more for the same piece of lumber. Why do the things which people buy cost more on Long Island? It has to do with weight and height...

Lumber is shipped by rail from Canada and the Pacific Northwest on what are called "bulkhead" flatcars. These are flatcars, with high ends, on which bundles of lumber are placed from either side and strapped down for the trip to the east. The railcars, when fully loaded, are at a maximum gross railcar weight of 286,000 pounds. They are about 60 feet in length. (By way of comparison, a fully loaded highway tractor-trailer combination is a maximum legal weight of 80,000 pounds and, with the new standard 53 foot trailer, is over 60 feet long.)

Bulkhead flatcars of lumber reach Brooklyn, Queens, Suffolk and Nassau in one of only two ways. Most of the freight railcars move from the Albany, NY area (about 142 miles north of NYC) down the Metro North Railroad (MNR) Hudson Line and across the one freight track on Amtrak's Hell Gate Bridge from Oak Point Yard in the south Bronx to Fresh Pond Yard in Queens. These move either in CSX Transportation (CSXT) or Canadian Pacific Railway (CPR) freight trains. Other bulkhead flatcars move from Norfolk Southern Railway (NS) in Greenville, NJ across New York Bay to Bay Ridge, Brooklyn on the railroad car barge service, which is operated by New York New Jersey Rail (NYNJ). NYNJ Rail makes local railcar deliveries on the Brooklyn waterfront and to the New York and Atlantic Railway (NYAR), who also receives railcars from CSXT and CPR, and makes local deliveries to freight customers on the Long Island Rail Road (LIRR).

Because the maximum gross railcar weight permitted on the LIRR is only 263,000 pounds, however, a fully loaded 286,000 pound bulkhead flatcar cannot then be moved in Brooklyn, Queens, Suffolk and Nassau! Lumber shippers, therefore, have two choices. One alternative is that they must intentionally load the railcar in Canada or the Pacific Northwest with less lumber than the railcar's maximum carrying capacity to get in under the 263,000 pound limit. (The price they pay for the shipping is about the same if they fully loaded the railcar.) The other alternative is that they move the 286,000 pound railcar eastward as far as Wilkes-Barre/Scranton, PA or Newark, NJ, unload the lumber, and reload the lumber on trucks.

The trucks then move on the highway system across the Hudson River on the George Washington or Verrazanno-Narrows Bridges or through the Holland and Lincoln Tunnels

and the trucks move across the East River on the Triborough, Bronx-Whitestone or Throgs Neck Bridges, or through the Queens Midtown or Brooklyn Battery Tunnels.

Regardless if the shipper underloads the bulkhead flatcar so it may move on the LIRR or pays the extra trucking cost and tolls for three or four trucks to move the one bulkhead flatcar of lumber from Wilkes-Barre/Scranton, PA or Newark, NJ to Queens, Brooklyn, Suffolk and Nassau, it costs more than it would if a fully loaded bulkhead flatcar of lumber moved to destination on Long Island, with a very short truck trip to the Home Depot. That is why people pay 56% more for their lumber on Long Island.

The 56% higher cost for lumber because of railcar weight restrictions is only one example. On Long Island, bricks for your house, paving stones for your driveway, concrete for your sidewalk, stone for your highways, canned goods for your cupboard and beer for your refrigerator, all cost more for the same reason.

Besides the railcar weight issue discussed above, the other impediment to the movement of more freight by rail into the Bronx, Queens & Brooklyn Boroughs and Nassau & Suffolk Counties is height. Most of the rail network in Bronx, Queens, Brooklyn, Nassau and Suffolk is limited to a railcar height of 15'-6" (AAR Plate "C"), which is below the smallest general industry railcar being manufactured now of 17'-0" height (AAR Plate "F") and 286,000 pound gross railcar weight. (By way of comparison, the legal maximum height for a highway tractor-trailer combination is 13'-6".) Through targeted, State-funded clearance improvements at specific bridges over rail lines, the AAR Plate "F" railcar (17'-0" ATR) can reach as far as Fresh Pond in Queens, but movement to customers elsewhere on the Island is either not possible or requires special permission on a case-by case basis from the LIRR for each individual railcar to be moved.

NYSDOT is funding the repair or replacement of the deficient railroad bridges on the LIRR so that they can carry the 286,000 pound gross weight railcars. It is a slow process, as the focus of the LIRR is on passenger movement and projects for rail freight are not a priority. NYSDOT continues to work with New York City and other local municipalities, the MNR and LIRR to fund targeted clearance improvements to bridges over rail lines. MNR has cooperated in this endeavor. This cooperation has just achieved a clearance for "trailer-on-flatcar" equipment (17'-3" ATR) on two Main Tracks on the Hudson Line to reach the NYSDOT-owned Oak Point Link and Harlem River Yard in the south Bronx, although that service has not yet started.

Failure to construct the new Tappan Zee rail bridge and rail line to a minimum of 315,000 pound gross railcar weight carrying capacity and to a vertical clearance of 22'-0" or 23'-0" ATR, even if we cannot now reach NYC and Long Island with equipment of that weight and clearance envelope, will undermine projects currently underway to achieve the goal of increase gross railcar weights beyond the existing 263,000 pounds and vertical clearance beyond the existing AAR Plate "C" (15'-6" ATR) in areas of Bronx, Queens, Brooklyn and Long Island.

United Parcel Service and the US Postal Service ship most of their package and mail from the west to the NYC market in highway trailers loaded on Intermodal flatcars. These "piggy-back" or "trailer-on-flatcar" (TOFC) railcars are about 90 feet long and are

17'-3" high when loaded with a trailer. Any trailers destined for the Bronx, Queens, & Brooklyn Boroughs and Nassau & Suffolk Counties have to be unloaded from the Intermodal flatcar in New Jersey, coupled to highway tractors, and then they add to the traffic moving across the bridges, tunnels and highways as above.

All the automobiles, SUV's and pick up trucks which are shipped east for the NYC market are shipped by rail on "enclosed multilevel" flatcars. You may recognize these enclosed multilevel flatcars in New Jersey by their tall silver sides and rounded top. These railcars are loaded at origin automobile assembly plants by driving the vehicles up on ramps at the end of a string of these railcars, and the vehicles are locked down on the first, second and third level of the railcar. The end doors are then closed and locked, to protect the vehicles from weather, theft and vandalism while they are in transit. These multilevel flatcars are 19'-0" high (AAR Plate "J") and about 90 feet long. Third rail electrification will not infringe upon the AAR Plate "J" clearance envelope and these conventional enclosed multilevels will clear the third rail. Each railcar holds about 15 automobiles on three levels or 8 to 10 SUVs/pickup trucks on two levels. (By way of comparison, each open auto rack truck holds about 6 to 10 vehicles, depending upon the mix of autos, SUVs and trucks for the particular dealer.) New high capacity enclosed multilevels (e.g., "Auto-Max") carry two levels of automobiles and SUVs/pickup trucks on the third level. These high-capacity enclosed multilevels are AAR Plate "K" (20'-3" ATR) and third rail electrification will prevent their movement.

Almost all of the new cars, SUVs and pick up trucks which the residents of NYC, Suffolk and Nassau Counties buy (about 300,000 vehicles annually) arrive in Northern New Jersey on these enclosed multilevel flatcars. In Northern New Jersey the vehicles are unloaded, reloaded onto open auto rack trucks, and then add to the traffic moving across the bridges, tunnels and highways as above. This trucking costs more than it would if the new vehicles were moved on rail closer to the automobile dealerships in the Bronx, Queens, & Brooklyn Boroughs and Nassau & Suffolk Counties, before they were transferred to auto rack trucks.

After you next buy any electronic goods such as a TV or DVD, or buy an appliance such as a refrigerator, washer or dryer, or even buy clothes, look at the label where the product was manufactured. All of the goods you buy in department stores or big box retail stores, which are manufactured in the Pacific Rim countries such as Japan, South Korea, China, Taiwan, Indonesia, etc. arrive in West Coast ports in ocean shipping containers. At the seaports, they are then loaded two high on special "double stack" railcars for the movement east by rail to the NYC market. These double stack railcars are 20'-3" high (AAR Plate "H") when loaded with two of the tallest ocean shipping containers (9'-6" each container). Depending upon the contents (articles of clothes vs. pairs of pliers, for example) the maximum railcar gross weight of a double stack railcar may range from the 286,000 pound discussed above for lumber to a high of 315,000 pounds. These railcars may be about 90 feet long, or may have 60 foot long platform cars semi-permanently coupled together in a string of 3 or 5 platforms, ranging from 180 to 300 feet total length.

In New Jersey, any shipping containers destined for NYC, Nassau or Suffolk have to be transferred from the Intermodal railcar to a trailer chassis, coupled to a highway tractor, and then added to the traffic moving across the bridges, tunnels and highways as above.

TOFC, Enclosed Multilevel Railcars and Double Stack Railcars all arrive in northern New Jersey either through New York State on CSXT via Buffalo and Albany or through Pennsylvania on NS via Pittsburgh and Harrisburg.

When you next drive on the Tappan Zee Bridge, the Cross-Bronx Expressway or the LIE, notice all the colorful shipping containers marked "Maersk", "COSCO", "P&O", "Ned Loyd", etc. being hauled by truck tractors in the same traffic in which you drive.

What does the price of a 2x10, food, clothing, automobiles and appliances have to do with the new Tappan Zee Bridge?

The NYSDOT's Tappan Zee/I-287 Corridor Project Team has held Public Information Meetings to explain the proposed scope for repair or replacement of the 50-plus year old Tappan Zee Bridge and for transportation Alternatives in the corridor. The Team has also solicited verbal and written public input in the design and selection of Alternatives. Of the seven proposed Alternatives in the corridor between Suffern in Rockland County and Port Chester in Westchester County, four Alternatives include a new double track rail line from Suffern across the Tappan Zee Bridge, with the primary use of that line for commuter rail. (www.tzbsite.com/)

In the documents from the previous Public Information Meetings in February 2007, (one of which I attended in Nyack) the design of the new Tappan Zee Bridge and the rail line in the corridor would only be to a maximum gross railcar weight of 263,000 pounds. The maximum height under the highway bridges and through the tunnels in the corridor would be only 17'-9". (As I have noted, NYS Railroad Law requires a minimum of 22'-0" vertical clearance in new construction or rehabilitation; the AREMA recommended practice is 23'-0".)

The February 2008 Scoping Update Packet does not change these equipment restrictions from February 2007. It further adds that the design will be to accommodate only AAR Plate "C" (15'-6" ATR) and adds third rail electrification. This third rail electrification would prevent movement of AAR Plate "H" double stack cars and AAR Plate "K" high-capacity enclosed multilevels, as the third rail impinges upon the lower quadrants of these clearance envelopes.

Thus the highest railcar which could move across the Hudson River would only be AAR Plate "C" (15'-6") or TOFC (17'-3" ATR, with 6" of dynamic clearance under overhead obstructions) and each railcar's maximum weight would be only 263,000 pounds.

The Scoping Update Packet does not make any compelling argument that third rail electrification is necessary. Under a "no electrification" scenario, commuter rail service from Suffern to Grand Central Terminal (GCT) can be operated by dual-mode (diesel and third rail electric) locomotives as is currently operated from Poughkeepsie to GCT. Cross-corridor service between Suffern and Port Chester to New Haven could also be operated with these dual-mode locomotives. The no electrification scenario would not prevent movement of AAR Plate "H" double stack cars and AAR Plate "K" high-capacity enclosed multilevels.

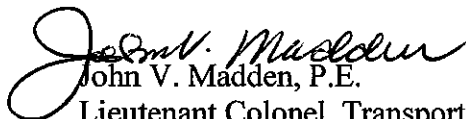
Under the catenary electrification scenario, commuter rail service from Suffern to GCT could be operated by either the dual-mode (diesel and third rail electric) locomotives as discussed above or by MNR's new M-8 Multiple Unit cars, which operate either with a pantograph under catenary or draw power from the electric third rail. Cross-corridor service between Suffern and Port Chester to New Haven could be operated with the dual-mode locomotives as discussed above or by the M-8 MUs. Another option for cross-corridor service is the use of the new dual-mode (diesel and catenary electric) locomotive under design by New Jersey Transit for the Access to the Region's Core ("THE" Tunnel) project. NJT operates the MNR commuter rail service and controls the movement of trains on the Suffern to Port Jervis segment for MNR. The catenary electrification scenario also would not prevent movement of AAR Plate "H" double stack cars and AAR Plate "K" high-capacity enclosed multilevels.

The cost and difficulty of maintaining the track with third rail electrification is greater than doing so under electrified catenary or under no electrification. Thus, construction of the line with third rail electrification would not only introduce a new horizontal clearance restriction where one does not now exist, it would forever impose a higher maintenance cost upon the taxpayers who support MTA.

The design of the proposed Cross Harbor Rail Freight Tunnel between Greenville, NJ and Bay Ridge, Brooklyn will utilize electrified catenary and not third rail. The tunnel also will be designed to accommodate AAR Plate "H" double stack cars and AAR Plate "K" high-capacity enclosed multilevels. The new Tappan Zee Bridge will complement the proposed Cross Harbor Freight Tunnel, by providing new rail freight access from the north and west as the proposed Tunnel provides new rail freight access from the west and south.

The new Tappan Zee Bridge will last for over a hundred years. To build the bridge and its rail line to a sub-standard weight carrying capacity and to a sub-standard vertical clearance above the tracks would be a mistake of colossal proportions and will forever condemn the people of NYC, Nassau and Suffolk Counties to pay more for the things they buy. It should be built to a vertical clearance of 23'-0", built with either with catenary or no electrification, and built to a maximum railcar weight carrying capacity of 315,000 pounds to last the rest of the 21st Century.

Very truly yours,


John V. Madden, P.E.

Lieutenant Colonel, Transportation Corps, US Army (Retired)
Former Industrial Engineer, Consolidated Rail Corporation

CC: Distribution List Attached

John V. Madden is a Civil Engineer 2 in the Freight Bureau of the New York State Department of Transportation. He is a registered Professional Engineer in the State of New York. He holds a Master of Science in Transportation from Northwestern University and a Master of Regional Planning from the State University at Albany. The views expressed in this letter are his and his alone and do not represent the official position of the New York State Department of Transportation, the US Department of Defense or CSX Transportation and Norfolk Southern Railway, the successors to Consolidated Rail Corporation in New York State.

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