



NORTHEAST CORRIDOR COMMISSION

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Ms. Amishi Castelli, Ph.D.
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Re: Environmental Impact Statement for the Hudson Tunnel Project

The Northeast Corridor Commission (“the Commission”) is pleased to submit comments on the scope of the Federal Railroad Administration’s (“FRA”) and New Jersey Transit Corporation’s (“NJ TRANSIT”) Environmental Impact Statement (“EIS”) for the Hudson Tunnel Project. The Commission was authorized by the U.S. Congress and codified at 49 U.S.C. § 24905 to create a forum for cross-agency planning and decision-making. The Commission is composed of one member from each of the Northeast Corridor (“NEC” or “the Corridor”) states (Massachusetts, Rhode Island, Connecticut, New York, New Jersey, Pennsylvania, Delaware, and Maryland) and the District of Columbia; four members from Amtrak; and five members from the United States Department of Transportation.

The NEC serves workers, residents, and visitors in the Northeast and beyond. Each day, its 457-mile main line between Boston, Massachusetts and Washington, DC carries over 700,000 commuter rail and 40,000 Amtrak passengers on over 2,000 trains. At the center of this vital asset is the 106-year-old tunnel under the Hudson River, which is both beyond its useful life and degrading at an accelerated rate due to salt water inundation during Superstorm Sandy in 2012. Though the tunnel most immediately affects its 200,000 weekday users, its condition impacts service performance across the entire NEC network.

The Commission’s top priorities for the Corridor are:

- Maintaining safe and reliable rail transportation at 2016 service levels;
- Achieving a state of good repair; and

- Investing to improve reliability, performance, connectivity, and capacity to deliver improved rail services.

The Proposed Action to construct a new tunnel under the Hudson River and rehabilitate the existing tunnel will address all three of the Commission's top priorities, while improving the resiliency of the transportation network. With or without investment in a new crossing, existing infrastructure must be shut down for extended periods of time to overhaul its outdated and damaged systems, limiting passenger carrying capacity with dramatic impacts on the economies of New Jersey, New York and beyond. The Proposed Action would sustain existing service, help achieve a state of good repair at the river crossing, and improve performance of the railroad for hundreds of thousands of daily users.

In examining the No Action (No Build) Alternative, the Commission encourages FRA and NJ TRANSIT to quantify and underscore the negative impacts of not proceeding with the proposed investment program. The NEC operates as a system where delays in one location have ripple effects impacting commuter and intercity rail passengers throughout the network. Nowhere is this vulnerability more real than in the Hudson River Tunnel, the NEC's most densely traveled stretch with up to 24 trains per hour on a single peak-direction track.

Failure to invest in a new crossing and rehabilitate the existing tunnel would further reduce service reliability on the NEC where delays due to infrastructure condition and rail congestion already cost the U.S. approximately \$500 million annually in lost productivity. Potential capacity reductions would push additional travelers onto the already congested highway, transit, and aviation networks, resulting in overcrowding and delays on those modes and subsequent lost productivity.

This EIS is an important step forward for a project of significance for the NEC, the region, and the country. The Commission urges expedited action given the serious consequences of a failure to invest for a wide range of residents, businesses, and travelers.

Sincerely,

A handwritten signature in black ink, appearing to read "James P. Redeker". The signature is fluid and cursive, with a large initial "J" and a stylized "R".

James P. Redeker
Chair, Northeast Corridor Commission
Commissioner, Connecticut Department of Transportation