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October 18, 2002

Mr. Anthony J. DeJohn, P.E.
Parsons Brinckerhoff, FG
506 Carnegie Center Boulevard, 2nd floor
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Dear Mr. DeJohn:

Please accept this letter as a follow-up to my verbal comments given at the Bergen Arches Task Force meeting held on October 10, 2002 at City Hall in Jersey City. While the draft Final Report is comprehensive and the result of an extraordinary amount of research and data collection, I make the following observations and comments:

- , NJ Route 169 has been renamed NJ Route 440 (page 15).
- , NJ Transit is currently preparing an MIS to route the Hudson Bergen Light Rail system to Tenafly instead of the Vince Lombardi rest area in Ridgefield Park. Removing a large park and ride lot as the northern terminus for the project could have a significant impact on other transit projects around the region. This should be reflected on page 16.
- , Representatives of the Conrail successor agencies (CSX&NS) have stated on numerous occasions that their agreement for the conveyance of the Bergen Arches to NJ Transit is for a transit related project only. This should be reflected somewhere in the document, perhaps pages 4, 21 or 51.
- , The travel patterns at the screenline (pages 35-37) should reflect actual destinations for the "Other Areas" category besides the "Holland Tunnel" or "Downtown Jersey City". The (12% / 15%) for "Other Areas" will have a significant impact on the vehicular and ridership counts documented later in the report. I suspect these other destinations include Hoboken and Weehawken.
- , The Bus and High Occupancy Vehicle description (page 77) states that HOV facilities are only limited during peak periods (6:30 a.m. to 8:30 a.m.). This assumption should also be stated beforehand in the description on the Mixed Mode Alternative (page 66).

Next, I have serious concerns about both the weights of the criteria and the scores of the alternatives. During the technical advisory meeting held on September 18, 2002 at your offices in Princeton and in a subsequent letter, I questioned the weights and criteria of the five various categories.

At the time, there were five sets of criteria, each worth a total of 100 points. I didn't think it was appropriate to diminish the importance of "Air Quality" to a value of 20 points, or just 4% of the total score. I understand that the issue of "Air Quality" has been given an additional weight of 10 points, however, the total score for all five categories has subsequently been increased to 620 points. Thus, the weight of "Air Quality" has increased only modestly from 4% to 4.8% of the total possible score.

In addition, the total weights for "Accessibility" (Table 19A) and "Mobility" (Table 19B) have been increased from a total weight of 100 points each at the September 18, 2002 technical meeting to total weights of 200 points each at the October 10, 2002 Task Force meeting. On a purely statistical basis, the total weights of "Accessibility" and "Mobility" jumped from 20% each, of the total weight at the September 2002 to 32% each at the October 2002 meeting.

Moreover, the total respective weights for "Feasibility" (Table 19C) and "Stakeholder Support" (Table 19D) were subsequently decreased from 100 points each, or 20% each, of the total weight, at the September 2002 meeting to 70 points and 50 points respectively at the October 2002 meeting. These diminishing point values translate into a decline of the total weight of "Feasibility" from 20% to 11%. And, the total weight for "Stakeholder Criteria" had an even steeper decline from 20% to 8% of the total value.

In terms of specific weights, I recommend the following:

- , For the "Accessibility" category (Table 19A), the total combined weight for enhanced road access (truck, automobile and bus) is 90 points. The total combined weight for enhanced passenger rail access is 80 points. There should not be a "road bias" inherent in the study and the weights should be adjusted to level the "playing field".
- , Under the "Mobility" category (Table 19B), "Reduction in peak period congestion over future "no build" conditions (in terms of VHT)"-- has a weight of 40 points; while the next criteria "Decrease in total vehicle trips over "no build" conditions has a weight of 10 points. Again, there appears to be a slight bias in these weights for the selected criteria. The weights should be re-evaluated to be level and fair.
- , The "Stakeholder Criteria" category seems to be weighted awfully low, with a combined total weight of just 1/4 of the "Accessibility" and "Mobility" categories respectively. Figures 12 and 13 (pages 80-81) demonstrate that there is no discernable difference between alternatives on a regional basis. Therefore, community preference and support should be given an even greater emphasis. In other words, the local community is not being asked to bear an imposition for the "benefit" of the entire region.

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To reiterate a point from my previous correspondence, the “Air Quality Impact” (Table 19E) should be given greater weight and emphasis. A total of 30 points out of 620 total diminishes the importance of the issue. Again, the US EPA recently found that New Jersey had the third worst air quality in the nation. Hudson County is in a “severe non-attainment area” according to the Clean Air Act Amendments. And, any transportation project must withstand the scrutiny of the SIP/TIP conformity analysis by the NJDOT and NJTPA.

Finally, in terms of specific scores for the alternatives, I make the following observations:

The Transit alternatives considered assumed origin/destination trips to downtown Jersey City at the eastern terminus only. However, the aforementioned 12% / 15% of trips to “Other Areas” (page 35) from the screenline can be a significant source of future trips to other destinations, particularly Hoboken and Weehawken. Roadway alternatives to the waterfront would further induce drivers to use Hoboken as a “by pass” to the Lincoln Tunnel. This is already happening.

More importantly, a transit alternative through the Bergen Arches would allow riders destined to north Hoboken and Weehawken to access the Hudson Bergen Light Rail system to north Hudson. These numbers are simply not reflected in the report. The addition of these potential riders could have a significant impact on the study’s finding and recommendations.

The first category under “Mobility” in table 19B measures the regional highway performance for “The impact on travel demand over future ‘no build’ conditions in terms of (VMT)”. All alternatives involving roadway and peak period HOV facilities should register an increase in VMT according to this criteria. Peak period hours are only from 6:30 a.m. to 8:30 a.m. This criteria is deceptive in one important regard, the study assumes HOV utilization is for peak periods only. Hudson County is already the subject of “Peak Spreading” (page 115), a phenomenon whereby commutes are already spread out to later hours (9:00 a.m., 9:30 a.m. or even later). If HOV restrictions end at 8:30 a.m. there will be many more SOV cars queuing up to get to the waterfront and tunnels.

The same can be said for the impact to VMT for the “Local Highway Network Performance”. The roadway and mixed use alternatives with time restricted HOV usage should register an increase in VMT. This individual category considers all roadway alternatives as a small impact.

If you have any questions, please feel free to call me anytime. Thank you for your consideration.

Sincerely,

Stephen D. Marks

c. Hon. William Gaughan, Task Force Chairman
Suzanne Mack, Task Force Co-Chair
Jody Barankin, NJDOT
Colette Santasieri, NJTPA
John Lane, Hudson County Engineering

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