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Federal Aviation Administration

Subject: LGA Access Improvement Project Draft EIS

The Advanced Transit Association (ATRA) commends the FAA on the very comprehensive Draft EIS for the La Guardia Airport Access Improvement Project. In addition, we welcome the fact that the study recognizes Personal Rapid Transit (PRT) as being an example of Automated People Mover (APM). Furthermore, we accept the conclusion that APM is the best solution and we support the conservative assumptions in the analysis. However, we do feel the need to point out that, in our opinion, the study is overly conservative. Please allow us to expound upon this conclusion.

To say that PRT is an example of APM is somewhat like saying a small business jet is an example of jet aircraft. To base an EIS on all APMs is like basing an EIS on all aircraft. We do not believe you would undertake an EIS for an international airport capable of accommodating A-380s when all that is needed is a general aviation airport for small business jets. Why do one for APMs when all that is needed is PRT (or perhaps Group Rapid Transit (GRT))?

The following table illustrates some differences between the assumptions in the DEIS for APM and what is currently available from Automated Transit Network (ATN – an umbrella term for PRT and GRT) systems already in public service.

Characteristic	APM	ATN	Notes
Bi-directional hourly capacity	30,000 (our estimate)	5,000 – 14,000	Hourly demand assumed = 18,271/10 = 1,827
Car length x width	40 – 100 x 8 - 10	12 – 20 x 5 - 7	
Cars per train	2 - 5	1	
Capacity per car incl. luggage	40 - 110	4 - 16	See Note 1
Headway - max wait time (mins)	4 - 15	1 - 8	
Travel time	6	4 - 7	
Total maximum trip time	10 - 21	5 - 15	
Offline intermediate stations	No	Yes	See Note 2
Nonstop trip	No	Yes	
Top cruising speed (mph)	45	25 - 43	
Typical trains in operation	3 - 4	100 - 500	
Typical cars in operation	6 - 20	100 - 500	See Note 3
Traction power	Wayside	Wayside or Battery	
Guideway width	35	16	

Note 1. Social Distancing

Small four- or six-passenger vehicles can be readily subdivided into two compartments using removable plexiglass (or similar) dividers to facilitate social distancing. Boarding passengers can maintain distancing and be made to wait until alighting passengers have left. Distancing is much easier to enable when there is a steady flow through a station as opposed to surges of people arriving and departing.

Note 2

ATN’s offline station capability allows intermediate stations to be added without slowing through traffic. This allows many small stations to be used in place of a few large ones. In this application it may be worth considering the increased level of service that would result were airport stations located at Terminal C, East Parking Garage, Terminal B and West Parking Garage. In addition, consideration could be given to an alignment south of Grand Central Parkway which could include two or three neighborhood stations connecting these communities to both the Airport and Willets Point. Note that vehicles carrying passengers between Willets Point and the Airport need never stop at these stations.

Note 3

While ATN requires many more vehicles, the total vehicle weight of the two systems would be roughly similar. ATN O&M costs are generally similar to, or less than, APM on a per-passenger basis. The much lower vehicle weights result in much smaller, less expensive and obtrusive infrastructure. The more frequent service enabled by more vehicles not only reduces wait times but also reduces platform sizes.

In response to any concern about ATN “not being proven” we would like to point out that the 2getthere Rivium ATN system has been in public service using its second-generation 22-passenger vehicle since 1999. 2getthere’s first-generation vehicle was deployed at Schiphol Airport and its third-generation vehicle is being deployed at Brussels Airport. Other ATN systems have been in public service in Abu Dhabi (since 2010), Heathrow Airport (since 2011) and Suncheon, South Korea (since 2014). Other deployments are under development and PRT suppliers are upgrading existing, or developing new, technologies with

increased speeds and capacities.

While we have not studied the DEIS in detail, it is our belief that a system using smaller vehicles with offline stations will both provide a higher level of service at a much lower cost and also result in less environmental impacts. In light of what we believe would be dramatically different results, we feel it would be remiss of the FAA to provide a Record of Decision without also insisting that the opportunity to use ATN be thoroughly explored using up-to-date information and subject matter experts. Please feel free to contact me if you have any questions or require additional information.

Yours sincerely,

A handwritten signature in blue ink that reads "Peter J. Muller". The signature is fluid and cursive, with a large initial "P" and "M".

Peter J. Muller, P.E., ATRA President