



Comment Summary Report

Appendix Part 1: A-D

July 2016



**U.S. Department
of Transportation**

**Federal Railroad
Administration**

COMMENT SUMMARY REPORT APPENDIX:

Comments Submitted on the Tier 1 Draft EIS

The Comment Summary Report Appendix contains a compilation of all submissions received on the NEC FUTURE Tier 1 Draft EIS during the public comment period, which began on November 13, 2015 and closed on February 16, 2016. The comments are organized alphabetically by the commenter's last name (or organization name). Due to file size, the appendix has been split into four separate files covering the letters A-D, E-K, L-P, and Q-Z. Personal information for individuals has been redacted to protect their privacy. Other than redacting personal information, the FRA did not edit these original submissions in any way. Typographical or other errors are as they were received from the author via online submission, email, U.S. mail, or public hearing transcript. The FRA makes no representation as to the factual content of submissions received. Responses to the comments will be provided in the Tier 1 Final EIS.

Please refer to the main body of this Comment Summary Report for more information on the Tier 1 Draft EIS public comment period, a summary of the comments, and how the FRA is using the comments in the process to identify a Preferred Alternative for NEC FUTURE.

NEC DEIS Comments - RECORD #129 DETAIL

Status :

[REDACTED]

Record Date :

1/11/2016

First Name :

Peter

Last Name :

Aaron

Stakeholder Comments/Issues :

I believe that the ability to easily and comfortably board a train with a bicycle is a vital part of any improvement plan for rail in the US. A multimodal transportation system that involves all methods of pedestrian and cyclist use of rail is vital to the continued and development of an all encompassing transportation system this country badly needs. This not only makes it possible for extended travel with bicycles but makes a healthy lifestyle possible which is discouraged by not allowing free access to the rail system.

NEC DEIS Comments - RECORD #1891 DETAIL

Status :

████████████████████

Record Date :

2/15/2016

First Name :

Aarti Sanket

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2250 DETAIL

Status : ██████████
Record Date : 2/15/2016
First Name : Sandra
Last Name : Abagnaro
Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1172 DETAIL

Status :

[REDACTED]

Record Date :

2/13/2016

First Name :

Sue

Last Name :

Aberbach

Stakeholder Comments/Issues :

I am strongly opposed to the plan to construct a rail line through the center of Old Lyme, Connecticut. I am a docent and volunteer at the Florence Griswold Museum in Old Lyme where I see the historical and cultural importance of this institution. The Florence Griswold Museum preserves the 19th century art colony as well as celebrates and encourages contemporary Connecticut artists in its historic boarding house and modern art gallery. Thousands of visitors come to the museum for tours, art events, musical performances, and lectures. The Florence Griswold Museum is a unique and vital part of Connecticut's history and culture. The effect of a rail line bisecting Old Lyme would destroy the nature of the community-- both its historic identity and contemporary economic community. I am strongly opposed to this plan and the detrimental effect it would have on one of Connecticut's most irreplaceable and important institutions.

NEC DEIS Comments - RECORD #1908 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

marilyn

Last Name :

abrahamsson

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven, as well as the beauty and historical essence of Lyme Street which is the heart of Old Lyme

NEC DEIS Comments - RECORD #2083 DETAIL

Status :

~~Not a Comment~~

Record Date :

2/15/2016

First Name :

Giancarlo

Last Name :

Accettullo

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2661 DETAIL

Status : [REDACTED]

Record Date : 2/16/2016

First Name : Sharon

Last Name : Aceto

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2337 DETAIL

Status : [REDACTED]

Record Date : 2/15/2016

First Name : Christina

Last Name : Achorn

Stakeholder Comments/Issues :

I am an alum from the Lyme Academy College of Fine Arts. Please let the tradition of fine arts so precious in the area remain intact and find somewhere else to disrupt.

NEC DEIS Comments - RECORD #2488 DETAIL

Status :

Station Complete

Record Date :

2/16/2016

First Name :

Michael

Last Name :

Acosta

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2953 DETAIL

Status : ██████████
Record Date : 2/16/2016
First Name : Michael P.
Last Name : Adam-Kearns
Stakeholder Comments/Issues :

As a resident of Eastford, Ct., I would like to express my support for "Alternatives 2&3" as they are proposed for connecting Hartford to Boston via both Providence and Worcester. It is wonderful to think that I could go to Willimantic and/or Storrs to get the train to Boston and of course, also be able to connect with the rest of the NEC system. It is my understanding that there is thought of having a direct link to the University of Connecticut. This would be a great boost to the area. The University is a great resource that serves thousands in a whole myriad of ways. I highly support this idea!

In looking at the Alternative 2&3 proposals it appears that the "Hop River" and "Airline" multi-purpose trails would be maintained parallel to the proposed rail corridor . It also appears, from the maps, that the multi purpose trail would be extended to Providence. This would be fantastic. A suggestion I have, is to pave these trails so the very active and large cycling community of the region could use these trails more effectively, especially for commuting and regional connectivity. It would be a dream come true for many of us, especially if it connected all the way to Hartford as a safe means of bicycle travel. Another suggestion, would be to have a new station in Tolland, Ct. on the "via Worcester route". This is a rapidly growing community that needs to be served with effective and efficient mass transit.

It is my hope that these suggestions will be considered. There are way too many cars on the roads. It is dangerous and very costly, with far too many accidents occurring daily.

To imagine a quick and safe commute, being able to take in a cultural event, or just going out to dinner without the current nightmare of driving is a fantastic idea to think about. Let's hope it happens.

NEC DEIS Comments - RECORD #3023 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Cathleen

Last Name :

Adams

Stakeholder Comments/Issues :

Do not implement option 1 through old Lyme !!!!!

Leave a piece of our artistic history in peace!

NEC DEIS Comments - RECORD #1808 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Daniel

Last Name :

Adams

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1795 DETAIL

Status :

Carolina

Record Date :

2/15/2016

First Name :

Daniel

Last Name :

Adams

Stakeholder Comments/Issues :

Please do not destroy Old Lyme the viability of Old Lyme can not be hurt especially the Lyme Academy

NEC DEIS Comments - RECORD #1138 DETAIL

Status :

[REDACTED]

Record Date :

2/13/2016

First Name :

Grace

Last Name :

Adams

Stakeholder Comments/Issues :

Wouldn't improved rail service, both freight and passenger be a good thing? Greyhound bus might resent competition, but other than that?

MATT ADAMS: So I just wanted to go on record. My affiliation, I'm just a private citizen. I'm a resident in Baltimore. Public school teacher, if that matters, but just, independently, I just wanted to go on record being in favor of whatever alternative, 1 or 2 or 3, but trying to make sure that bicycle access to the railcars is included. I personally would prefer the third alternative, the one with the most bells and whistles, the one -- the high-speed option. However, just increasing the amount of access and putting bicycles on Amtrak or any other service train -- it's gotten better in the last year, but it can still get so much better.

And I think that as we grow, our roads are, you know, running out of space. We need to just provide for the future with all the

54

environmental issues abound to make sure that cars or -- or so that bikes and trains can work together so people have alternatives to driving everywhere they go. And that's all.

RUBY SIEGEL: Well, excellent. Thank you. Thank you for being patient through our logistics here. I promise it will be smoother.

NEC DEIS Comments - RECORD #5 DETAIL

Status :

[REDACTED]

Record Date :

11/10/2015

First Name :

Nick

Last Name :

Addamo

Stakeholder Comments/Issues : Alternative 2 presents much potential and promise. Hartford and UConn are huge economic engines for Connecticut, and can provide many potential riders under NEC FUTURE with such an "inland route."

NEC DEIS Comments - RECORD #1826 DETAIL

Status : ██████████
Record Date : 2/15/2016
First Name : Suzanne
Last Name : Adinolfi
Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #137 DETAIL

Status : [REDACTED]

Record Date : 1/11/2016

First Name : Johnny

Last Name : Adriani

Stakeholder Comments/Issues :

Though I now reside in Louisiana, I spent several years commuting the NEC and wish to continue to stay informed.

NEC DEIS Comments - RECORD #985 DETAIL

Status : [REDACTED]
Record Date : 2/11/2016
First Name : Nitin
Last Name : Agarwal
Stakeholder Comments/Issues :

Ms. Carol Braegelmann
Office of Environmental Policy and Compliance
1849 C Street, NW-MS 2462-MIB
Washington D.C. 20240

Dear Ms. Braegelmann:

As a citizen of Maryland and a lover of our state's few remaining wild places I am writing this letter in opposition to Alternate 3 in your rail plan.

This proposal would chop off 60 acres of the Patuxent Wildlife Refuge including pristine stream, wetland, riparian and forest habitats, critical to a number of at-risk bird species. It would destroy this valuable wildlife habitat in a region of Maryland where development has taken an immense toll on natural resources, and in so doing would damage the ecological integrity of the largest remaining forest block in central Maryland—also recognized by Audubon Maryland-DC as an Important Bird Area (IBA) in 2006 because it provides habitat for several declining bird species, including Eastern whip-poor-will, wood thrush, Kentucky warbler and prairie warbler.

The Patuxent Research Refuge was established in 1973 specifically for the purpose of upholding and promulgating the Migratory Bird Conservation Act. The Act was passed to more effectively meet the U.S. migratory bird treaty obligations through the acquisition of land and water for the perpetual preservation for birds.

Allowing the proposed rail line to destroy a publicly-owned natural resource at the Patuxent Research Refuge would set a dangerous precedent for the country's most beautiful and biologically diverse landscapes. Feasible and less destructive alternatives to incising a wildlife refuge exist. Please choose an alternate that does not disturb a national treasure.

Sincerely,

Nitin Agarwal
Montgomery county
Maryland

NEC DEIS Comments - RECORD #2582 DETAIL

Status : [REDACTED]

Record Date : 2/16/2016

First Name : Michael

Last Name : Agenbroad

Stakeholder Comments/Issues :

The proposed route would destroy not only historic areas of Old Lyme but also important wetland habitats. This would be a travesty.

NEC DEIS Comments - RECORD #2917 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Ms. Carol Braegelmann
Office of Environmental Policy and Compliance
1849 C Street, NW-MS 2462-MIB
Washington D.C. 20240

RE: Tier 1 Draft Environmental Impact Statement (EIS) and Section 4(f) Assessment for NEC FUTURE, A Rail Investment Plan for the Northeast Corridor, Washington, DC, MD, DE, PA, NJ, NY, CT, RI, and MA

Dear Ms. Braegelmann:

As a citizen of Maryland and a lover of our state's few remaining wild places I am writing this letter in opposition to Alternate 3 in your rail plan.

This proposal would chop off 60 acres of the Patuxent Wildlife Refuge including pristine stream, wetland, riparian and forest habitats, critical to a number of at-risk bird species. It would destroy this valuable wildlife habitat in a region of Maryland where development has taken an immense toll on natural resources, and in so doing would damage the ecological integrity of the largest remaining forest block in central Maryland—also recognized by Audubon Maryland-DC as an Important Bird Area (IBA) in 2006 because it provides habitat for several declining bird species, including Eastern whip-poor-will, wood thrush, Kentucky warbler and prairie warbler.

The Patuxent Research Refuge was established in 1973 specifically for the purpose of upholding and promulgating the Migratory Bird Conservation Act. The Act was passed to more effectively meet the U.S. migratory bird treaty obligations through the acquisition of land and water for the perpetual preservation for birds.

This is disgusting, and potentially destructive on an epic scale. Allowing the proposed rail line to destroy a publicly-owned natural resource at the Patuxent Research Refuge would set a dangerous precedent for the country's most beautiful and biologically diverse landscapes. Feasible and less destructive alternatives to incising a wildlife refuge exist. Please choose an alternate that does not disturb a national treasure.

Sincerely,

Donn Ahearn

Greenbelt, Maryland

NEC DEIS Comments - RECORD #2503 DETAIL

Status : ██████████
Record Date : 2/16/2016
First Name : Joseph
Last Name : Akin
Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2365 DETAIL

Status : [REDACTED]

Record Date : 2/15/2016

First Name : Khadija

Last Name : Al Arkoubi

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

The next speaker is David Peter Alan.

MR. ALAN: Thank you, Ruby.

I'm David Peter Alan, A-l-a-n. I live and practice law in South Orange, New Jersey. I am chair of the Lackawanna Coalition, which is a local advocacy group. I'm vice chair of the Senior Citizens of Disabled Residents Transportation Advisory Committee here at New Jersey Transit. I am on the board of Run Rail Users Network, which advocates for rail on the national level. And I am a contributing editor and columnist for Destination Freedom at National Corridors dot-org.

I mention these credentials to show that I am concerned with many aspects of rail and our transportation from the local and national points of view as well as the point of view of the people who need it the most. I'm not here as a journalist today, and I am not here representing any of these other organizations. I'm speaking for myself. I see many people I recognize who I've seen through the years on similar hearings on many of these other projects, going back to the original ARC from 20 years ago.

I must express my deep disappointment that there is one feature of the original ARC and Portal Bridge processes from the 1990s that we do not have now, and that was a Regional Citizens Liaison Committee. I was on the original RCLC. In those days, and it's showed that the riders, who, after all, will be paying for this system and using it, were considered special stakeholders. Today we are not. We are merely members of the general public. And I know this could have been done because I remember Ruby from twenty years ago when she occupied a similar position with respect to the ARC and Portal Bridge processes when I was on the original RCLC. I'm hoping there can be some arrangements to get the riding public and specifically a known and acknowledged and recognized representatives of the riding public in on the service development process in a way that we have not been present in this alternatives process.

Concerning the alternatives process itself, I was reviewing the materials online earlier today, saw the maps for the various alternatives. And I remember a map that shows a really good alternative for what we could have in New England, the northern part of the NEC. It was from an era more than fifty years ago, because that's when I started riding the shoreline, in my undergrad days at MIT. And that map I refer to was the general public timetable for the New York New Haven and Hartford Railroad from the early 1950s. There were places people could go, both on the existing shoreline and connected to it, that we cannot go now. The Springfield line, the air line through Hartford and Willimantic, no longer exists. But many of these can and should be brought back.

Concerning the different alternatives, it seems to me that it does not make much sense to go as far east on Long Island as Ronkonkoma and build a tunnel under Long Island Sound when the powers that be today are having trouble building tunnels between New Jersey and Penn Station. We did not get ARC because it had turned from a good project, I don't know why alternative G was never built, I guess I know some of it. If we had alternative G, we would have had this project eight years ago. Now we're still fighting over it. But we don't have tunnels to Penn Station.

Now, don't get me wrong. I am not endorsing every bit of Gateway. I am endorsing tunnels, because we need them, and they are cost effective.

And we may need a new Portal Bridge too. But we look at a planning frontier for this process of 2040, and that's only six years behind the deadline for which Joe Gordman and Drew Galloway and other people at Amtrak say that the existing tunnels need to be taken out of service. And the same people say that with Gateway as it is, the soonest we could have new tunnels is 2030. I don't trust a four year window like that. Things take too long.

So I think we have -- while this is a good exercise, it makes sense to talk about it, I share Governor Florio's concern about funding. In my column this week in Destination Freedom, I expressed doubt that Gateway will ever be funded to the tune of \$20 million -- \$20 billion. And I think we have to look first at getting the NEC into a state of good repair.

The part of the NEC in New Jersey that's called the Raceway, between New Brunswick and Trenton, is not up to par. And the Amtrak inspector general in a report last June 17th, expressed doubt that this project would be completed on schedule, which could risk a major grant. So before we start talking about expanding the NEC and building other alternatives, I think we have to get the entire house in order.

I look forward to a day when there's a change in politics, and our elected leaders start taking seriously our mobility needs, and that means rail and that means transit, and that means every right-of-way we can get. But I think we have to go back to basics, talk about funding, and see where we can go to the extent that we can get the taxpayers and the riders to foot the bill.

Thank you.

THE MODERATOR: Thanks, David.

Okay, the next speaker, David Peter Alan.

MR. ALAN: Thanks again, Ruby. Thank you for the extra opportunity. David Peter Alan, A-l-a-n, back. You have my affiliations, and I'm still speaking personally.

I think we all know that we need more investment in rail in the northeast region, as well as everywhere else in the country. I don't want to get too involved with the best way to do it, because frankly, I don't know what kind of money there will be available to fund this, and I don't know what kind of political will there will be to make rail enhancements in the Northeast Corridor. Certainly the first step makes a lot of sense. Let's get to the first one before we get to the second one. There are some issues that if I had had time before, I would have brought up. Since there's time now, I will.

I've heard a lot of interesting technical ideas about building the line, and I think these will hash out as we go. I think every -- almost everyone here has had something very interesting to say. I'm not quite sure about the campaign speech. But we have to keep a couple of things in mind that have not been brought up.

One is ownership. Not all of the NEC is under Amtrak ownership. Metro-North owns the portions between New Rochelle and New Haven. They have to be brought into the picture somehow. And if I know Metro-North, they have a pretty strong independent streak.

Also, the part of the NEC within Massachusetts is owned by the Commonwealth of Massachusetts. Things are changing there very quickly, especially with a new governor. So there has to be a means for making sure that whatever happens, Massachusetts is on board with it.

We also need to think about connectivity. That's why I complained that riders do not have a sufficient stake in this process or have not been taken sufficiently seriously in this process. Because we actually want to go somewhere. We don't necessarily only want to go from one Amtrak stop to another. We have a number of regional rail providers, MARC, SEPTA, New Jersey Transit, Metro-North, Shoreline East, BATIA (phonetic), Boston. We may want to go from somewhere on Amtrak to another Amtrak point and then change for a local train, or the other way around. And whatever is done with the NEC needs to have that kind of connectivity.

One idea that I've proposed in the past, and maybe it's time to bring it up again, is to have, as an alternative to Amtrak, a less expensive alternative in terms of fares that will take longer but would get people from one local point to another. For instance, a New Jersey Transit train connecting not only physically but temporally with a SEPTA train at Trenton, which could go through to Newark, Delaware, and connect there with a MARC train that could take passengers all the way to Washington, D.C. using these local services. Now, I know there are gaps. The gap between Newark, Delaware and Perryville, Maryland. And the gap between New London, Connecticut and Wickford Junction, Rhode Island. But those aren't very big. Those can be filled in. And whatever is done along the NEC should take into account not only Amtrak ridership as we have it, not only regional ridership as we have it, but riders who might want to take a trip using both because they may want to go to or from a place that Amtrak does not serve.

THE MODERATOR: Thanks a lot.

MR. ALAN: And this is why I've been talking about back to basics. We have to think about what riders need, we have to think about where the money will come from, we have to think about cost effectiveness. And we have to do one thing above all others, we have to do it first, and that is, bring the NEC up to a state of good repair. Amtrak isn't doing as well as they could with their improvements in the New Jersey Raceway between Trenton and New Brunswick. And there are more problems north of the Raceway along Metuchen Metro Park, Rahway, that cause more delays than problems in the Raceway. This is Amtrak owned, they should be doing about this. That's not part of a plan I hear today.

We also need to make sure that we have tunnels into Penn Station. As Ruby knows, we've been talking about them for at least twenty years.

THE MODERATOR: I'm standing here.

MR. ALAN: We still need them.

THE MODERATOR: I'm ready.

MR. ALAN: Times haven't changed.

I know you want me to wrap up and I will.

THE MODERATOR: That's okay.

MR. ALAN: We -- in the 1970s schedules on New Jersey Transit were one-third faster on every line. At that time it took 30 minutes on most local trains to go between Newark and New Brunswick. Today it takes 42. Let's fix that, and then we can go forward to a new NEC future.

Thank you.

THE MODERATOR: Thank you very much.

NEC DEIS Comments - RECORD #1719 DETAIL

Status : ██████████
Record Date : 2/15/2016
First Name : George
Last Name : Alderson
Stakeholder Comments/Issues :

To: Carol Braegelmann, Office of Environmental Policy and Compliance

Dear Ms. Braegelmann:

Please consider this message as our comment on the draft EIS for the Northeast Corridor (NEC Future) project. We heartily support the overall thrust of the NEC Future project, but we are absolutely opposed to taking any lands from Patuxent Research Refuge for railroad purposes, as contemplated in Alternative 3. The impacts of such an action should be fully analyzed in the EIS.

We live in Maryland, and I (George) have visited the Patuxent Refuge in my work. For seven years I also rode past its boundary eight or ten times a week on MARC trains when I was working in Washington, between 1989 and my retirement in 1996.

Now, whenever we ride MARC to Washington for work or pleasure, we see the refuge from the train window. It is always a pleasure to see wildlife habitat in its natural state. In this way it benefits railroad passengers, as well as wildlife and the people who visit the refuge to see wildlife. This benefit should be considered in the EIS.

The Alternative 3 proposal would take away 60 acres of the refuge, destroying wildlife habitats that include wetlands, pristine streams, riparian and forested areas. The area has been identified as an Important Bird Area. It is also the largest remaining block of continuous forest in central Maryland.

We question whether such refuge lands could be lawfully taken for non-refuge purposes under the laws governing the National Wildlife Refuge System. This legal question should be addressed in the EIS.

We are sure the NEC Future project can be done without taking lands from Patuxent Research Refuge. The

refuge should be off-limitsto any such project.

Sincerely,

George & Frances Alderson



CatonsvilleMD 21228

NEC DEIS Comments - RECORD #579 DETAIL

Status : [REDACTED]

Record Date : 2/7/2016

First Name : Jane

Last Name : Aldieri

Stakeholder Comments/Issues :

I am opposed to Alternative #1 based on its high financial cost and its destruction of a natural wonder. You don't get a second chance with repairing beauty lost. The Lieutenant Rver and Historic district of Old Lyme are treasures in the Sate of Connecticut, so unique and irreplaceable. Please do not destroy the beauty. We are the Stewards of this land and temporary inhabitants. Let's consider our children and their children being able to enjoy and learn from this beauty.

I am however in favor of High Speed Rail and all modes to improve congestion and dependency on single vehicles. Tier 3 seems to give us the best impact and ridership through major cities.

NEC DEIS Comments - RECORD #2131 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Alex

Last Name :

Stakeholder Comments/Issues :

The plan to build a high-speed railway through historic Old Lyme and other towns should be turned down and never revisited. It is a foolish idea and it is unnecessary, and when it is at the cost of the Lyme Art Academy and other local homes and institutions, it is shameful. Put the money toward something we need, like helping the environment - shoreline east is plenty fine.

NEC DEIS Comments - RECORD #186 DETAIL

Status : [REDACTED]
Record Date : 1/15/2016
First Name : Eric
Last Name : Alexander

Stakeholder Comments/Issues :

So there was a public hearing for this plan on Long Island that involved literally no one from Long Island. So a simple question who did you reach out to on Long Island?

Who is advising your team on this project?

Do you feel the public input you received is sufficient to get feedback from the 3 million people and over 100 municipalities in this region?

You can call us at [REDACTED] if you want to discuss. Thanks

NEC DEIS Comments - RECORD #593 DETAIL

Status :

Record Date :

2/8/2016

First Name :

Linda

Last Name :

Alexander

Stakeholder Comments/Issues :

To Whom it May Concern:

I am writing from the Old Lyme Phoebe Griffin Noyes in Old Lyme. There is considerable concern about the NEC Future project in our town and we would like a print copy of the Tier I Draft Environmental Impact Statement for our library. We realize that this document is available online however many of our patrons would prefer to use the print copy.

Please respond to this request as soon as possible.

Thank you,

Linda Gunn Alexander
Public Services Manager

Old Lyme - Phoebe Griffin Noyes Library
2 Library Lane
Old Lyme, CT

(860)-434-1684 - Ext 121

NEC DEIS Comments - RECORD #1365 DETAIL

Status : [REDACTED]
Record Date : 2/14/2016
First Name : Theresa
Last Name : Alexander
Stakeholder Comments/Issues :

PLEASE do not move forward with Alternative 1!!!!!!

NEC DEIS Comments - RECORD #2228 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Ralph

Last Name :

Alfano

Stakeholder Comments/Issues :

I oppose Alternative 1 of The Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #1793 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Abdulsalam

Last Name :

Alharbi

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #623 DETAIL

Status : [REDACTED]

Record Date : 2/9/2016

First Name : Alison

Last Name :

Stakeholder Comments/Issues :

As a resident of Old Lyme since I was four years old, I have grown up surrounded by the beauty, culture, history, and environment of this town. Alternative 1, the plan to update the rail system by essentially sacrificing an historic town, is beyond comprehension. Alternative 1 invades the rights of property owners and townspeople while simultaneously destroying a precious, and preserved, ecosystem. Not only will townspeople be displaced from their homes, but the damage to property values will be significant and the potential for destruction of the local economy is real.

At its essence, Old Lyme is a town built around history, art, and tradition. Downtown Lyme Street is full of historic homes, buildings, and art museums visited by countless visitors and artists throughout the year. Artists line up on the side of the road to paint the beautiful steepled church, and people flock in masses to attend art shows at one of our beautiful museums or the Lyme Art Academy. In addition, the damage done to the local ecosystems and marshlands by the proposed Alternative 1 plan should immediately take the plan off the table. Old Lyme contains marshlands and land trusts that are preserved, untouchable, and full of natural wild life that absolutely must be protected. For example, living in this town has afforded me the chance to see bald eagles in the wild on multiple occasions, as there are a few nests throughout town that locals know about. To disrupt an environment where endangered animals live is beyond reproach, especially in today's era where environmental conservation is key.

The idea of a small town preserved in time, culture and environment is what makes Old Lyme beautiful, and is what makes its townspeople fight for it. Alternative 1 would destroy central Old Lyme and everything it stands for, in addition to inflicting significant and unnecessary harm to the economy and preserved wildlife. Please, consider alternatives to this plan that will not cause such harm on so many levels.

NEC DEIS Comments - RECORD #1626 DETAIL

Status : [REDACTED]

Record Date : 2/15/2016

First Name : Milton

Last Name : Allen

Stakeholder Comments/Issues :

Dear Sir:

The NEC Option 1 plan would destroy the center of our town.

There is no real need for a new rail road to parallel the highway I95!

The present Amtrak tracks from Old Saybrook CT has a great detail for more traffic.

Stop wasting taxpayers money!

Milton N. Allen

[REDACTED]
Old Lyme, CT

NEC DEIS Comments - RECORD #2407 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Renée

Last Name :

Allen

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #14 DETAIL

Status :

Record Date :

11/13/2015

First Name :

Theo

Last Name :

Allen

Stakeholder Comments/Issues : To Rebecca Reyes-Alicea:

The Northeast Corridor is owned by the National Railroad Passenger Corporation south of Penn Station in New York. North of Penn Station, the main line is owned in part by Metro-North Commuter Railroad, the State of Connecticut Department of Transportation, the Massachusetts Bay Transportation Authority.

While Amtrak maintains and dispatches the Northeast Corridor nearly full, Amtrak shares responsibility with MTA Long Island Rail Road between Penn Station and Harold Interlocking. In addition, MTA Metro North Railroad maintains and dispatches the New Haven Line between Shell Interlocking in New Rochelle and north of New Haven State Street.

However, while 8 commuter railroads use the Northeast Corridor, there are several limiting factors on this corridor. They are divisible into three categories: organizational practices, electronics, and concrete.

First, the organizational practices of railroads throughout the country have high labor costs. This includes lack of proof of payment and the incredible cost of peak service. There is lack of a unified smartcard for travel on commuter railroads, and ticket vending machines do not sell interagency tickets. Some agencies do not offer online tickets, and others are cash only. The Federal Railroad Administration (FRA) should neglect these reasons.

Second, there are a lack of mobility and station delays. One issue is high level platforms. Over one hundred years ago, when building Grand Central Terminal, engineers clocked passengers boarding between low level and high level platforms. The reason Grand Central was built largely accessible in 1913 was due to the desire for profit, not due to the Americans for Disabilities Act.

In 1963, the historic Penn Station was torn down, and Madison Square Garden was built upon it. This had led to severe problems in pedestrian flow, and causes passengers to have to wait and rush for the stairs to board evening rush hour LIRR and NJT trains when tracks are announced with 10 minutes notice. In Penn Station, LIRR, NJT, and Amtrak should share space and maximize pedestrian flow space.

Other issues are equipment based. Out of the passenger railroads operating on the Northeast Corridor right of way, some facts can be discovered. [PATH is excluded, because it does not share tracks with the general rail system.]

There are electrification issues. The only railroads which operate on 25 kV 60 hZ, 12.5 kV 60 hZ, and 12.5 kV 25 hZ are Amtrak and NJT.

Standardization of equipment (such that all engines be equipped with (i) diesel engines, (ii) underrunning and overrunning third rail at 750 volts DC, and (iii) catenary at 12.5 kV / 25 hz, 12.5 kV / 60 hz, and 25 kV / 60 hz) is important. It is also expensive.

Installing CBTC is another way to improve captivity. However, this is extremely expensive and useless.

Having catenary with regenerative braking is environmentally friendly. This can be done by installing non-fixed catenary throughout the NEC south of the North River Tunnels.

There are also crashworthiness standards which are required by FRA

Regulations. However, eliminating these regulations after PTC is completed should be done, as with Caltrain.

The final part is concerte. This should be avoided as much as possible. Various legal and political grounds require this. This also includes contract provisions.

- Under Buy American Requirements, all materials must be made in America as required by DOT Regulations.
- Under Fair Pay and Safe Workplaces, contractors must go through their systems to discover labor violations, self report, and for "major violations", will be disqualified from the current contract.
- Under due process rights, competitors who lose procurements may be able to sue that the Contract was unlawfully awarded.
- Under Davis-Bacon and similar public regulations, all workers must be paid prevailing wages in the construction community.
- There are various enviromental regulations in place.
- A contractor has to meet minority / women / small business / veteran / disenfranchised participation requirements.

These requirements tend to cause contractors to underbid to lowball to be the lowest bidder, since the lowest bidder not disqualified and qualified must be awarded the contract. This risk also requires contractors to maintain tremendous insurance, which is all included and paid by the government. When the contract does not come in as cheaply as anticipated, due to overtime and other reasons, the government is responsible.

The Government has less ability to succeed and is worse than the private sector, because there is no pressure to have efficiency that is similar to the private sector in loss of business.

In addition, there is enviromental reviews and lawsuits that can come from any person who has standing. This can take multiple years in delay to a project.

Eminent domain is extremely expensive. Just compensation must be paid, for example. And even though this sort of eminent domain is undoubtedly constitution under Kelo, this unpopular decision has caused states to severely limit this power of eminent domain, and shown how abusive this process is.

There are people who say "Not In My Back Yard". This occured in Bronxville, when Metro-North expanded on there right of way, the Harlem Line from 2 tracks to 3.

In addition, New York is not inexpensive for rail tunnels. The costs of this plan are low for New York Standards, yet are extremely high compared to other places.

CONCLUSION

With these comments, the following should be done:

- (1) Alternatives 2 and 3 should be rejected.
- (2) A full time inspector on each project should be retained to control costs.
- (3) Organizational changes should be done before electronics and concrete.
- (4) Construction should be minimized to the greatest extent possible. This does not mean not restoring the right of way to a state of good repair.
- (5) New rail cars with less weight and which can be used throughout the NEC should be invested into.
- (6) Tunnels should be avoided whenever possible.
- (7) As little acquisition of property should be performed.
- (8) Significant bonuses should be included for underbudget and on time performance.

Finally, the Department should consider what class I freight railroads would pay, and prohibit compensation in excess of what Class I Freight Railroads would pay.

Attachments :

AllenTheo_Original.pdf (5 kb)

NEC DEIS Comments - RECORD #736 DETAIL

Status :

Record Date : 2/10/2016

First Name : Kaye

Last Name : Allison

Stakeholder Comments/Issues :

I commute daily, via the MARC train, between Baltimore and Washington, DC. I would like nothing more than a better, safer, quicker rail system, but NOT AT THE EXPENSE OF LOSING THE PATUXENT WILDLIFE REFUGE!! Please do not destroy this national treasure!

Christian Allyn.

MR. ALLYN: Hi. My name is Christian Allyn. Like Saman Azimi I am a student at UConn and a member of ConnPIRG students.

I would like to echo a lot of what I heard today, particularly improving our rail network for people in rural communities like the one that I live in in far northwestern Connecticut. So I share Ms. Chinatti's concerns about being an ignored area of the state.

And also connecting with UConn that Mr. Warren mentioned, that is a big -- for me that's very optimistic, for me as a young person in the state, to see that someone who drives about two and a half hours just to get home one way for the holidays can see maybe their child in the future not having to make such a long trip, a costly trip, and risk their safety driving that long distance.

I would also like to see -- like Mr. Warren mentioned with the eminent domain, there is also another highway that was going to be built in my hometown in the 1970s which tore down the second oldest home in my community dating to before the Revolution. I would like the NEC to consider what's going on in Old Lyme seriously and make sure that our cultural heritage, one of the things that Millennials come to Connecticut to see and to interact with as well as being so close to urban areas, is protected.

HEARING OFFICER SIEGEL: Thank you. Thank you, sir.

MR. ALLYN: Thank you.

NEC DEIS Comments - RECORD #2069 DETAIL

Status :

Record Date : 2/15/2016

First Name : Sarah

Last Name : Alsharif

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven, endanger the federally protected areas of the Connecticut River Estuary and ruin the aesthetic quality of Old Lyme's nationally recognized historic district.

NEC DEIS Comments - RECORD #1991 DETAIL

Status : [REDACTED]
Record Date : 2/15/2016
First Name : Abdullah
Last Name : AITamemi
Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1847 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Robert

Last Name :

Alvine

Stakeholder Comments/Issues :

Dear Federal Rail Administration:

I strongly oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of the Nationally known Lyme Academy College of Fine Arts and that of the University of New Haven. Other proposed alternatives make far more sense such as the one providing service along the I-91 corridor to Hartford, Providence and Boston which is a highly needed inland service.

NEC DEIS Comments - RECORD #1251 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Charlene

Last Name :

Amacher

Stakeholder Comments/Issues :

I oppose the construction of this rail line through the OLD LYME historic village.

Let's -- you want to speak for the first time?

MS. AMARATO: Very quickly.

THE MODERATOR: Yeah. You don't have to be quick. It's okay.

MS. AMARATO: It's okay. I just want --

THE MODERATOR: You have three minutes, a generous three minutes. Just make sure you introduce yourself.

MS. AMARATO: Yes, I will.

My name is Edie Amarato. I live in Hicksville. I've lived there my whole life.

I only found out about this last week. Unlike Floral Park, who has the Trustee come and represent their Town in such an eloquent way, we have no representation in Hicksville.

This third rail is supposed to end in Hicksville. I have three legislators, my town is divided up into three legislators. Not one of them is here.

I get political mailings all the time from them. I never got any sort of mailing to let me know about this meeting, to let me know what was going on. Not everybody reads Newsday. I happen to read Newsboy everyday. I don't really remember reading about this meeting here but this is so big, so huge. This is going to impact so much of our lives. We've already been negatively impacted over the past year with tractor trailers, with taking down 250 trees. We were not granted a public hearing in Hicksville. We were just told it was all done.

This can't happen without more people knowing about it. I'm sorry, but the whole County needs to know about this. If they can afford political mailers and then to say that -- that our comments have to be in by January 30th when most of us are only finding out about it this now, that's not right.

And 7:30 in the evening, they're having a public hearing, that's not right.

There's no rush. We waited this long, we can wait a little bit longer so that everybody knows what's going on.

Thank you.

THE MODERATOR: Okay.

Thank you.

Would you like to speak?

Okay. Scott will be patient.

NEC DEIS Comments - RECORD #1418 DETAIL

Status :

Record Date :

2/14/2016

First Name :

Steven

Last Name :

Ames

Stakeholder Comments/Issues :

Several years ago there was the Ocela Train which was supposed to be a high speed train. It failed miserably and now they want to destroy a beautiful colonial and historic town which will surely become another failure. Why not use the existing rail line and build a new bridge next to the existing one thereby not destroying a beautiful town?

NEC DEIS Comments - RECORD #2299 DETAIL

Status :

Record Date : 2/15/2016

First Name : Nicholas

Last Name : Amico

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

After careful review and discussion of FRA's Northeast Corridor Future proposal, "I strongly oppose Alternative 1 of the Northeast Corridor Futures proposal, as it will have a profound affect on The University of New Haven's (UNH) Lyme Academy College of Fine Arts."

The UNH community has been extremely proactive in the development of a sustainable college facility in Old Lyme, CT, which offers a high quality educational institution to the citizens located in that part of the state.

Alternative 1 of the FRA Northeast Corridor proposal will threaten the long-term vitality of its picturesque campus in Old Lyme. UNH has developed a strong partnership with Lyme Academy College of Fine Arts, which is a leading fine arts school. UNH's affiliation and relationship with Lyme Academy College of Fine Arts can be described as nothing short of extraordinary, including enrollment growth, and the creation of new and innovative programs at our main campus in West Haven.

Regards and continued success,

Nick Amico

NEC DEIS Comments - RECORD #2787 DETAIL

Status : ██████████

Record Date : 2/16/2016

First Name : Joseph H.

Last Name : Boardman

Stakeholder Comments/Issues :

On behalf of our Executive Office, please find the attached NEC FUTURE Draft EIS Correspondence, accompanied by the Steer Davies Gleave Report.

Originals will follow via FedEx mailing.

WENDY WENNER

AMTRAK, NEC Business Development

The OFFICE of THE EXECUTIVE VICE PRESIDENT

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Attachments : NEC_Future+Draft_EIS_response_16Feb2016_RRA.pdf (962 kb)
SDG review of the NEC FUTURE Draft Tier 1 EIS.PDF (5 mb)



Joseph H. Boardman
President and Chief Executive Officer

February 16, 2016

Ms. Rebecca Reyes-Alicea
Northeast Corridor Joint Program Advisor
U.S. Department of Transportation
Federal Railroad Administration
1 Bowling Green, Suite 429
New York, NY 10004

Re: Draft Environmental Impact Statement for the Northeast Corridor

Dear Ms. Reyes-Alicea:

The National Railroad Passenger Corporation ("Amtrak") is pleased to submit comments for the administrative record regarding the Federal Railroad Administration's ("FRA") Draft Environmental Impact Statement ("DEIS") for the Northeast Corridor ("NEC" or "the Corridor"). This effort is part of NEC FUTURE, a comprehensive planning effort to define, evaluate, and prioritize NEC passenger rail investments.

The NEC FUTURE Environmental Impact Statement is a National Environmental Policy Act (NEPA)¹ requirement to undertake a rigorous environmental review to assess potential effects of the NEC FUTURE program on the built and natural environments. An environmental process, the Final EIS and Record of Decision (ROD) will set parameters for the NEC's growth through 2040 and beyond. Amtrak concurs with the findings in the NEC FUTURE Purpose and Need Statement and supports the FRA's efforts.

Amtrak is the national intercity passenger rail operator serving 21,000 route miles in 46 states, the District of Columbia, and Canada. A steward and majority-owner of the NEC, Amtrak carries intercity travelers and provides access and operational support to eight commuter authorities and four freight operators on the NEC spine between Boston, MA, and Washington, DC, on infrastructure that, in many cases, is over a century old. In addition, Amtrak's experience as the only U.S. high-speed operator and NEC end-to-end user provides us with unique perspective and insights into future options for this integral part of the transportation network and the economy.

Amtrak and the region face enormous financial and operational challenges to ensure the NEC supports future travel demand, delivers safe, reliable, and convenient intercity, commuter, and freight service, while increasing the region's global competitiveness. We believe it is our responsibility to strongly advocate for an outcome that will achieve these aims.

The DEIS presents three Action Alternatives, each offering a different vision for passenger rail service in the region. Consistent with NEPA requirements, the DEIS also presents a No Action Alternative. At this stage, alignment options are conceptual and set a framework for Tier 2 project-level assessments.

¹ 42 U.S.C. § 4321 *et seq.*



Amtrak has prepared this response to contribute to the public review and comment process and to help inform the many stakeholders served by the NEC. We also enclose an analysis of the DEIS commissioned by Amtrak and undertaken by Steer Davies Gleave, an internationally recognized transportation consulting firm, to elaborate on the key points made herein.

Amtrak's Preferred Alternative

Before discussing Amtrak's preferred alternative, we must be clear why certain alternatives are not acceptable. The No Action Alternative would have serious repercussions for passenger and freight rail service and infrastructure. Investment levels under this Alternative would not even achieve a state-of-good-repair, let alone provide opportunities for growth. The network's degraded conditions would cause passengers to experience declining service reliability and longer travel times due to necessary speed restrictions to safely operate over deteriorating infrastructure. Customer demand -- given the expected demographic growth in the Corridor -- could not be met under this scenario.

Conversely, the action alternatives all provide some level of improvement over the No Action Alternative and will contribute to sustaining the region's economic growth, creating positive environmental benefits by reducing greenhouse gas emissions, improving safety, and enhancing infrastructure resiliency.

However, Alternatives 1 and 2 fall far short of creating a world-class rail transportation system that will meaningfully impact the region's global competitiveness. These Alternatives do not provide sufficient infrastructure to support the service frequencies and travel times proposed, nor are the service plans designed to accommodate major disruptions to ongoing operations necessary for asset replacement on the existing Corridor. Alternatives 1 and 2 offer only minimal capacity for growth beyond the horizon year, leaving the region facing major costs to keep the NEC relevant past 2040.

Alternative 3 is closest to Amtrak's long-term vision for passenger rail in the Northeast.² Not only does it provide stakeholders flexibility to choose from the largest menu of infrastructure investment options, it preserves the opportunity to invest in multiple improvement programs within the region.

Alternative 3 also provides the following critical benefits:

- Necessary capacity and trip time improvements that can substantially increase rail's share of the NEC travel market to enhance mobility and grow and sustain the region's economy to 2040 and beyond;
- True high-speed rail service comparable to the proven systems found internationally with dedicated infrastructure that can be operated and maintained at a very high level of reliability and performance impossible to achieve in a "mixed-traffic" environment;
- Additional capacity to expand freight, regional and commuter rail services on the existing spine by segregating a portion of the high speed services on to the new alignment;

²The Amtrak Vision for the Northeast Corridor, 2012 Update Report



- Capacity to support robust service levels between major city pairs on a new alignment while the decades-long effort to rehabilitate the existing NEC is underway;
- Expanded commercially viable services that likely won't require large operating subsidies;
- Improved connectivity between Regional and Intercity services;
- Capacity expansion within the corridor with fewer disruptions to ongoing service during construction;
- Greater shifts in travel to a more environmentally-sustainable mode that also relieves congestion on the corridor's highways and airports;
- Tremendous transit-oriented and sustainable development opportunities associated with new stations and alignments; and
- Major community regeneration opportunities for existing NEC-served communities through expanded service and reduced trip times that will increase access to large labor and commercial markets.

Amtrak generally finds the specific infrastructure and routing elements included in Alternative 3 to be reasonable. However, Amtrak understands that while the Action Alternatives are presented as discrete options, the FRA's Preferred Alternative may be a blend of elements contained in the various Action Alternatives. With that in mind, Amtrak makes the following observations and recommendations regarding specific options for Alternative 3:

- The New Haven-Hartford-Providence-Boston route presents an alignment with more commercial activity within the proposed markets than the alternative New England routes evaluated.
- The Long Island route option within the New York to New Haven segment presents an opportunity to tap into a mature, dense market with relatively quick modal shift opportunities.
- The option for new alignments along the Interstate Highway 95 corridor between Rhode Island and New York State, inclusive – found in the other alternatives but not in Alternative 3 – should be included in the New England route options for service along the current NEC spine. While this option does not replace the need for a new high-speed alignment, introducing a higher speed rail alignment along the I-95 Corridor would offer significant mobility and resiliency benefits for services utilizing the current NEC spine, including current Northeast Regional services. These services include the growing number of off-corridor, state-supported route extensions that could greatly benefit from improved trip times on the NEC spine.

Alternative 3 includes most of the improvements contained in Alternatives 1 and 2, dictating major upgrades to the existing NEC spine occur in tandem with developing a new high-speed alignment. This practical requirement results in significant capital costs for this Alternative. This choice effectively subordinates the introduction of world-class high-speed rail in the NEC to the rehabilitation and improvement of the conventional NEC and obscures the consideration of the trade-offs that should be



analyzed between various investments in the two systems. For instance, a new alignment could mean certain improvements to the existing NEC spine may not be necessary or could be delayed. Similarly, developing a new alignment may only be appropriate within the horizon period for certain portions of the network. Variants of Alternative 3 should be developed and analyzed to achieve a state-of-good-repair for the existing NEC and focus capital expenditures on improvements that drive intercity rail performance and strong financial outcomes, as any rail operator and public and private investors seeking to carry out such a program of improvement would.

Amtrak's Concerns with the Analysis

While Amtrak generally supports Alternative 3, Amtrak believes the NEC FUTURE analysis fails to capture the true benefits of this transformative option and has not optimized the Alternative to create a commercially viable system. We believe crucial assumptions built into the analysis substantively understate the relative benefits of higher levels of investment. In fact, several factors in the analysis lead to worsening outcomes despite successive increases in capital investment, most notably progressively declining commercial performance. We believe these findings are contrary to international experience and risk sending NEC FUTURE off course.

It is Amtrak's strong recommendation that key assumptions are reconsidered before the FRA selects a preferred alternative.

Fare Assumptions: Overall, the fare policy assumptions contribute to a number of counter-intuitive ridership outcomes, which materially affect the assessment of alternatives. Non-express fares are reduced by 30% relative to existing Amtrak fares in the Action Alternatives, whereas fares are not adjusted at all in the No Action Alternative (Section 4.2.2.2; Section 9.4.1.3). Amtrak believes this assumption creates a distortion when comparing the Action Alternatives with the No Action Alternative, dilutes the proposed Intercity-Express ("IC-E") market product (whose rider profile typically involves air travel, the most environmentally harmful mode), and leads to a lower level of mode shift (Table 4-15).

As evidence, the daily frequency between Boston and New York is presented increasing from 10 to 72 on the IC-E service and 9 to 72 on Intercity-Corridor ("IC-C") service between the No Action Alternative and Alternative 3 (Table 28 of Appendix B.08). However, the ridership increase between Boston and New York is vastly different among the two service types: IC-E ridership is forecasted to increase by 33 percent, whereas IC-C ridership shows a 356 percent increase. While there are substantial travel time improvements in both product lines, this suggests a *significant underestimate of high-speed infrastructure and service utility*.

The fare strategy within the Action Alternatives is not intended for a fare-maximizing or ridership-maximizing analysis (page 4-15). We are concerned this approach damages the case for selecting an action alternative and has overlooked an opportunity to review existing fare structures across all service types. It would seem reasonable, for example, to attach a fare premium to transformative services resulting from major investment. In addition, under current law³, Amtrak is required to maximize revenues in order to minimize government subsidies, which is clearly at odds with NEC FUTURE's approach to fare policy.

³ 49 USC 24101 (d)



In short, the DEIS lets a seemingly arbitrary determination of potential fares drive the entire analysis. More prudent fare assumptions that comply with federal law and that reflect Amtrak and commuter rail policies should be incorporated into the analysis for the Final EIS (FEIS).

Alternative Service Specifications: A critical service component that affects the evaluation of alternatives is presuming a new service type ("Metropolitan") in all three Action Alternatives. Metropolitan service operates at high maximum speeds (160 mph) with rapid acceleration and deceleration rates; high frequency levels (typically 4 trains/hour, on a standard interval pattern) and stops at all stations served by today's slower Amtrak *Regional* services and at selected stations served today only by commuter service providers. Whether or not this type of service innovation is appropriate cannot be properly evaluated since it is featured in every investment case.

Expanded Metropolitan high frequency service, with fares set well below IC-E levels, diverts significant demand away from express high-speed rail service. Further, in our view the demand modeling does not account for passenger responses to different rail options and amenities that can be observed today, and it underestimates the likely appeal of express high-speed rail service to future travelers. The net effect is a decrease in the commercial performance of rail operations on the Corridor (Table 4-15). A scenario that encourages passengers to switch from higher-priced, premium service to a slower but significantly cheaper service, is likely detrimental to the financial feasibility of NEC investments. This scenario would, in Amtrak's estimation, introduce large public subsidy requirements to sustain the Metropolitan service and all-but-eliminate Amtrak's ability to finance the service on a sound commercial basis.

The ridership and revenue modeling assumptions need to be re-assessed without Metropolitan Service to demonstrate a more balanced evaluation of intercity rail alternatives.

Service Frequencies and Load Factors: Substantial increases in service frequency are assumed for the Action Alternatives. For example, up to 151 trains per day between New York and Washington are assumed under Alternative 3 for the IC-E and IC-C services combined (Table 5-19), a frequency equivalent to one train every 7 minutes with seating capacity as high as 980 seats (Table 14 of Appendix A to Appendix B.5). However, the demand modeling analysis assumes there is little to no impact on ridership for frequency levels above 50 trains per day per service (Sections 3.2.4.1 and 3.2.5.1 of Appendix B.8). This means transformative increases in train frequency do not translate to substantial ridership changes between alternatives and therefore the proposed infrastructure is overbuilt relative to its use.

This modeling approach assumes the average number of riders per train decreases significantly as additional trains are added. Average load factors reach very high and possibly unachievable levels in the No Action Alternative, while in Alternative 3, the load factor of the improved IC-E service drops to roughly a one-third of current Acela levels. With an annual ridership forecast of around 1.5 million one-way trips between New York and D.C. (Table 5-21), the implied number of passengers per train could be as low as 30 in Alternative 3 despite average fares remaining virtually unchanged and travel time and frequency vastly improved. The demand modeling assumptions should be re-examined to more closely align with observable consumer behavior.



Further, we question whether there is sufficient infrastructure to support the service frequencies and travel times proposed in the Action Alternatives, given additional capacity needed for regular, ongoing maintenance. A conceptual basic maintenance plan, based on reasonable assumptions of required track outages, should be included in the analysis to demonstrate sustainable levels of service frequency and trip time improvements for each Alternative.

Ridership Growth via Induced Demand and Air Modal Diversion: The NEC FUTURE demand modeling suggests that intercity ridership growth as a result of induced demand (journeys that would not otherwise be taken) and air modal diversion (journeys that would otherwise be taken by air) would be minimal. The levels are extremely low when compared to high-speed rail in other countries with comparable characteristics to the Northeast, and with modeling used in recent FRA-sponsored studies of California's High Speed Rail program.

The levels of induced demand -- 0.6 percent for Alternative 1 and 1.1 percent for Alternatives 2 and Alternative 3 (Section 6.3 of Appendix B.8) -- appear very low in comparison to international experience of between 6 percent and 27 percent on European high-speed rail systems such as LGV (Paris-Lyon), Eurostar (London-Paris), and Eurostar HS1 (London-Paris speed improvement). These ranges are commonly accepted in international rail planning projects. For example, in the United Kingdom the demand model which supports the business case for HS2 (high-speed rail service between London and several other British cities) suggests induced trips will form 24 percent of additional high-speed rail ridership.⁴

Closer to home, the induced demand for the proposed California High-Speed Rail system was predicted to be 2.1 percent to 2.2 percent.⁵ While still low compared to high-speed rail studies elsewhere, these rates were nonetheless roughly double than those predicted by NEC FUTURE.

The NEC FUTURE analysis proposes that only 3.9 percent to 5.7 percent of the increase in intercity rail trips in the Action Alternatives would be diverted from air (Table 9-8). While acknowledging many air trips in the base numbers may be connecting to or from other flights, we believe this is an especially low diversion rate from air to intercity rail, especially considering that the Action Alternatives provide significant travel time savings from the No Action Alternative. In Alternative 3, for instance, the New York to Boston station-to-station travel time on IC-E service is reduced to 2 hours, 1 minute and on IC-C to 2 hours, 26 minutes (Table 9-17). Both trip times should result in effective competition with air travel after accounting for airline terminal security and wait time. Indeed, the California high-speed rail analysis predicts a diversion rate from air to high-speed rail of up to 24 percent,⁶ much higher rate than NEC FUTURE.

What is clear from a careful analysis of the NEC FUTURE modal share data is that a large part of the overall trip diversions to intercity rail is *within* the rail category itself; that is, passengers who would have taken intercity express are diverted to intercity non-express services. The data shows that modal share of

⁴ Steer Davies Gleave. *Review of the NEC FUTURE Draft Tier 1 EIS*, February 2016 ("SDG Report"), p.26

⁵ SDG Report, Appendix A: Revenue and Ridership Forecast Comparisons with California High Speed Rail, Table A.5

⁶ *Ibid.*



intercity rail (both IC-E and IC-C) between No Action and Alternative 3 increases substantially from 3.3 percent to 6.7 percent while the modal share for air travel barely changes from 4.0 percent to 3.5 percent (Appendix B.08; appendix I, tables I-1 through I-8). This outcome seems to result from the decision to propose substantially reduced fares for intercity non-express in the Action Alternatives. While this fare policy may have advantages for some rail passengers, it does little to divert traffic away from the region's already congested and capacity-constrained airports. The fare assumptions used for demand forecasting should be re-worked in the FEIS to provide a more accurate picture of future modal shifts resulting from increasing investments in high-speed rail.

Travel Model Analysis: The underlying assumptions of intercity travel preferences within the NEC FUTURE study are contrary to what other studies have shown. For example, the travel model analysis shows rail to be the *least preferred* mode relative to auto, air and bus for both business and non-business travelers (Tables 14 and 16 of Appendix B.08) when observed service attributes like travel time, cost, and frequency are already accounted for. This finding is not consistent with other international and U.S. intercity passenger rail studies where, all things being equal, high-speed rail is always assumed to be more attractive than the air mode.⁷

In addition, the FRA has opted to constrain distinctions between different types of passenger rail modes -- that is, unobserved attributes (e.g., comfort, convenience, seat pitch, ability to work onboard, etc.) that are not already accounted for in other travel components such as travel time, cost, and frequency, were made to be equal across all rail options (Table 14 of Appendix B.8). This is contrary to typical intercity modeling practice where express rail services are considered more attractive than regional rail services, all else being equal,⁸ and is another factor contributing to undervaluing of IC-E services and the questionable modal shifts discussed earlier. A re-examination of travel preference assumptions needs to be incorporated in the FEIS.

Other Analytical Concerns: Amtrak has additional concerns regarding the following:

- The DEIS makes no distinction between levels of **increased service reliability** under the Action Alternatives. Despite the FRA's recognition that the increase in reliability is an important benefit to users and operators (Section 6.3.4.3), the choice not to differentiate these impacts between the alternatives, nor to undertake some kind of estimation, understates potential ridership growth and leaves the reader with only a partial view of what transformative rail infrastructure investments can provide.
- The **economic development impacts** within the Action Alternatives could be much greater than the DEIS suggests. Experience from overseas suggests that the combination of labor market effects (i.e., better matching workers' skills to jobs) and agglomeration effects (i.e., economic efficiencies among close urban markets) are typically in the order of 10 percent-30 percent of travel market effects.⁹ Given the characteristics of the Northeast -- its population density and

⁷ SDG Report, p. 27

⁸ *Ibid.*

⁹ *Ibid.*, p. 33, Table 3.1



clustering of major markets -- there are good reasons to believe that the impacts on the NEC could be towards the upper end of this range. However, the DEIS does not include these components in its quantitative evaluation of travel market effects (Section 6.3.4).

- The DEIS states that the opportunity for additional ridership as a result of **improved connectivity between Regional and Intercity services** may have been underestimated because ridership forecasts for these services were estimated separately (Section 9.4.1.2). Given the substantial frequency increases in the Action Alternatives, the connectivity benefits could be quite significant as intercity rail travel becomes much more convenient for suburban residents and businesses.
- **Disruptions** to existing services during construction have not been considered adequately. International experience suggests extended service disruptions have considerable impact and ridership can take up to five years to respond fully to service improvements. Further, the impact will vary depending whether the work occurs on or off existing track.
- The **comparison of costs and benefits** in the NEC FUTURE analysis appears to understate the long-term value of the investments by artificially cutting off analysis at the 2040 time horizon. Assets, many with useful lives of over 100 years, and spanning the 2040 horizon, are simply not recognized for their enduring benefit beyond 2040. Further, the Action Alternatives analysis does not generally assign capital costs associated with each Alternative to Intercity and Regional services or discuss which set of service requirements are driving which set of investments. This obscures possible trade-off analysis between various investments.
- Consideration of **freight development** and its impact on alternative infrastructure options is limited. Beyond recognizing capacity and reliability constraints inherent to shared-use infrastructure (pages 3-8 and 3-13), there is no real comparative analysis of how the different alternatives impact freight traffic.
- The opportunities to create wider **transportation hubs** (including transit, pedestrian, bicycle, bus) were given limited consideration in the station development discussion (Section 6.3.5.1).

Alternative/Complementary Investment Scenarios: Amtrak recognizes that given the NEC Future's 2040 time horizon, less intensive (and comprehensive) investment scenarios than Alternative 3 may be deemed supported as the preferred alternative, especially in light of anticipated funding, environmental and constructability factors. Under such scenarios, short of a transformative approach, Amtrak would prefer Alternative 2 as the next-best outcome to advance toward a Record of Decision. We specifically recommend including in the preferred alternative a new alignment in the I-95 corridor between Kingston, Rhode Island and New Rochelle, New York, and other high-performance infrastructure improvements elsewhere along the NEC spine (as examples, Alternative 2's New Haven-Hartford, Philadelphia International Airport and northeastern Maryland express alignments, as well as curve modifications at select NEC-spine locations) aimed at substantial intercity rail trip-time improvements that could significantly narrow the gap between the maximum incremental benefits delivered by the Alternative 3 and those of other alternatives.

Ms. Rebecca Reyes-Alicea
February 16, 2016
Page 9



Conclusion

Amtrak favors a transformational NEC investment strategy -- one that enables the phased creation of a sustainable, world-class transportation system able to support and act as a catalyst for the region's continued economic growth.

Prior to selecting its preferred alternative, Amtrak requests that the FRA evaluate Amtrak's concerns, particularly the ridership and revenue modeling assumptions underlying the NEC FUTURE analysis. We believe re-working of specifications and assumptions is required before conclusions can be accurately drawn. This need not -- and should not -- be a lengthy process, but should help clarify and better align the outcomes, documented to the high standards that the process has followed to date.

Amtrak appreciates the opportunity to review its analytical findings with the FRA and the public.

Sincerely,


Joseph H. Boardman
President and Chief Executive Officer

Enclosure: *Review of the NEC FUTURE Draft Tier 1 EIS, Steer Davies Gleave report for Amtrak, February 2016.*

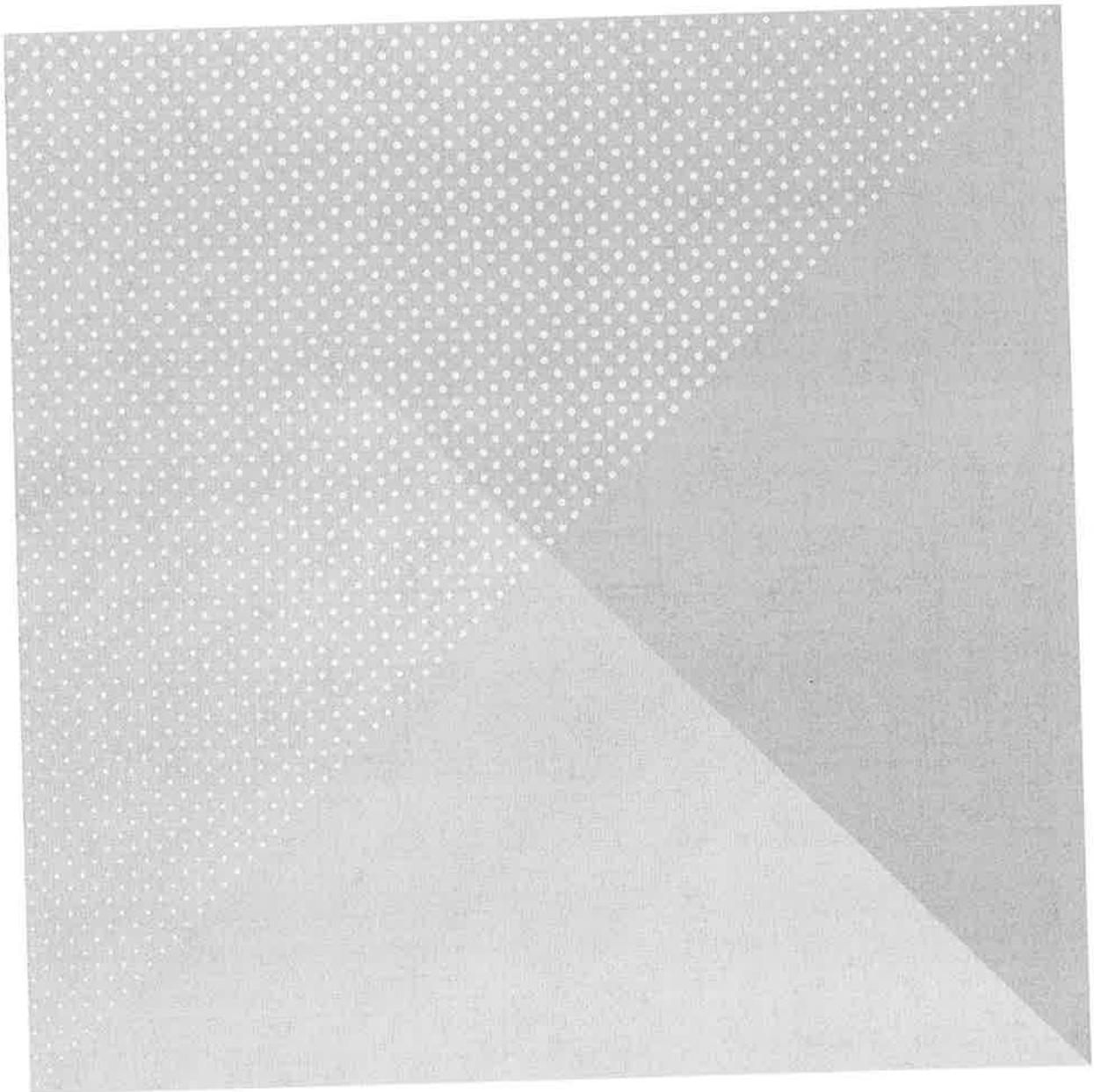


Review of the NEC
FUTURE Draft Tier 1 EIS

Report
February 2016

Amtrak

Our ref: 22602411





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Contents

Executive Summary	i
Introduction	i
Overview	i
1 Introduction and Overview	1
Introduction	1
Overview	1
2 Approach	3
Introduction	3
Markets Served	5
Service Types	5
Service Planning Assumptions	7
Alternatives – Key Features	10
Commercial and Operating Effects – Some Key Observations	17
3 Analytical Methodology	21
Introduction	21
Evaluation Methodology: Demand and Ridership Forecasts	21
Evaluation Methodology: Economic Effects	29
4 Other considerations	35
5 Way Forward	42

Figures

Figure 2.1: Annual Regional Rail Train Trips by Alternative	9
Figure 2.2: Average Load Factor comparison	18
Figure 2.3: Average fare comparison.....	18
Figure 2.4: Average Speed Comparison.....	19
Figure 2.5: Comparison of net financial contribution of Intercity services	20
Figure 3.1: Indexed Change in Ridership and Frequency Between Key Station Pairs	22
Figure 3.2: Rail Modal Share in Select Markets	24
Figure 3.3: Direct and indirect employment estimates.....	31

Figure 4.1: Key Figures on Global High-Speed Rail Development	40
Figure 4.2: Characteristics of Global High-Speed Rail Service	40

Tables

Table 2.1: Frequency (Sum of IC-E and IC-C trains per day per direction)	7
Table 2.2: Intercity Express travel time	7
Table 2.3: Overview of Alternatives	10
Table 2.4: Key metrics – No Action Alternative	13
Table 2.5: Key Metrics –Alternative 1	14
Table 2.6: Key Metrics –Alternative 2	14
Table 2.7: Key Metrics –Alternative 3	16
Table 2.8: Net revenue contribution and Capital Cost Estimates	17
Table 3.1: Sample of Agglomeration and Labor Market Impacts as a proportion of User Benefits	33

Appendices

A Revenue and Ridership Forecast Comparisons with California High Speed Rail

Executive Summary

Introduction

Steer Davies Gleave was asked by Amtrak to undertake an independent review of the Draft Tier 1 EIS published by NEC FUTURE in November 2015, with particular focus on the analysis relating to revenue and ridership projections and the long term economic effects. This report documents our key findings and includes our suggestions for further improvements that the FRA may wish to consider before finalizing the Tier 1 EIS for the Northeast Corridor. The comments and suggestions contained in this report represent the views of Steer Davies Gleave.

Overview

Overall the Draft EIS provides thorough, transparent and extensive documentation, forming part of a comprehensive planning effort to define a long-term vision for the corridor that includes passenger high-speed rail.

But the question of which of the three identified investment alternatives performs best against the chosen EIS criteria (*maintain/grow/transform*) has not been adequately investigated. In addition, there are significant questions around the analysis carried out to date that should be addressed before the FRA seeks to reach decisions on its preferred alternative.

There are several factors in the supporting analysis that lead to *worsening* outcomes (of which the most visible is progressively declining commercial performance) with successive *increases* in capital investment in the alternatives. Average load factors reach very high and possibly unachievable levels in the No Action case, while in Alternative 3 (“transform”) the load factor of the improved IC-E service drops to around a third of current levels on Acela, despite the average fare remaining virtually unchanged and travel time and frequency vastly improving.

Four examples of questionable assumptions made as input to the analysis are:

- A reduction in fares from the current level is assumed for all but the Inter City Express (IC-E) service in the Action alternatives. This is the exact opposite of what might be expected in practice, where a better offer in a competitive travel marketplace – at least for intercity travel – might be expected to attract some increasing levels of fares premium.
- A proposal for a new high frequency “Metropolitan” service tier in all action alternatives, with fares set at a level well below those for the IC-E service (and below even the No Action alternative Intercity Corridor (IC-C) service), diverts a significant amount of demand away from the less frequent limited stop (high-speed) IC-E service. The demand modeling methodology employed does not account for market responses to rail product differentiation that can be observed today, and it underestimates the likely appeal of IC-E service to corridor travelers. Meanwhile the Metropolitan service concept, in combination with unchanged IC-C services, would make for inefficient utilization of track capacity: the Metropolitan service overlay is an expensive use of extra capacity.
- The demand modeling suggests inexplicably low levels of both induced demand estimates (in comparison with actual experience as well as modeling of high-speed rail in other comparable situations) and modal diversion to improved rail (in comparison with, for example, recent FRA-sponsored studies of California’s HSR program).
- Substantial increases in service frequency are assumed for the action alternatives (with, for example, up to 151 trains per day between New York and Washington under

alternative 3 for the IC-E and IC-C services combined). But the demand modeling analysis assumes there is little to no impact on ridership for frequency levels above 50 trains per day per service.

These and other shortcomings in the analytical methodology give rise to counter-intuitive and potentially faulty conclusions. **It is recommended that each of the alternatives should be re-specified with service levels and fares that meet demand on a broadly consistent basis in terms of load factors, and without a presumption of a new (Metropolitan) tier of service.**

There are also some notable areas of omission. A number of important indirect benefits that would be realized under the Action alternatives have not been quantified within the study, including increased connectivity, added network resilience, improved service reliability and aspects of economic growth.

There are five further key areas of analysis that the EIS would have been expected to cover but which are substantively missing:

- Deliverability – including important questions of *disruption* to existing rail services while upgrade works are carried out (potentially largely avoidable by construction of new alignments) and of *funding*, including what would be the most propitious approach to seeking non-Government/tax-payer sources of capital investment funds.
- Commuter service development – which is entirely neglected, yet the scope for each state and commuter rail service provider to expand its operations using released capacity in alternatives where high-speed inter city services are diverted off-corridor, is a crucial area of benefit.
- Freight development – beyond the protection of existing access rights.
- Hub station development – and the opportunities to create a wider non-highway based transportation mode.
- Beneficial effects on competing modes (highways and airports).

Consideration of these areas will provide a more comprehensive picture of the costs and benefits of each alternative and it is therefore **recommended that these should be considered and included in the evaluation and selection of the Preferred Alternative.**

Overall Conclusions

The Draft EIS overstates the costs of expansion of services in the corridor: the options tested have unsupportable low load factors – and it is not clear that it would be worth investing in the “Metropolitan” service concept.

The demand analysis underestimates the likely market response to the improvements examined. Higher frequency options are precluded from generating a positive market response because of assumptions made in the demand forecasting.

Benefits from induced travel (journeys that would not otherwise be made), from relieving the stress on competing travel modes, and from transformed on-time service reliability, are each seriously underestimated. The benefits attributed to agglomeration effects are much lower than comparable international estimates, and the benefits attributable to urban redevelopment have only been formulated at an indicative level.

Little attention has been paid to access to rail stations, to commuter rail as well as intercity rail. We suggest that expanded access transportation (by the full array of available transportation modes) should feature in a programmatic level EIS since they are an inescapable part of expanding the role of rail in the NEC.

We respectfully suggest that the FRA should re-examine the specifications and assumptions that are identified above (and in greater detail later in this document) before drawing conclusions on the preferred alternative. This need not and should not be a lengthy process, but clearly stakeholders will wish to see the results of such work, documented to the high standards that the process has followed to date.

1 Introduction and Overview

Introduction

Steer Davies Gleave was asked by Amtrak to undertake an independent review of the Draft Tier 1 EIS as published by NEC FUTURE in November 2015, with particular focus on the analysis relating to revenue and ridership projections and the long term economic effects. This report documents our key findings and includes our suggestions for further improvements that the FRA may wish to consider before finalizing the Tier 1 EIS for the Northeast Corridor. The comments and suggestions contained in this report represent the views of Steer Davies Gleave. The report includes references for the sources of evidence used in its preparation.

Steer Davies Gleave (SDG) is a leading independent transport consultancy. The firm was founded in 1978 and has throughout its history served the rail and other transportation sectors providing financial, economic, technical and commercial expertise for central and regional governments, regulators, operators and investors. With offices in the USA, Canada, Europe, Latin America and Asia, SDG is able to bring international insights and collective experience to provide clients with informed and objective advice.

Overview

This document sets out our comments and findings from our review of the NEC FUTURE, the Draft Tier 1 EIS, the content of which has been prepared and issued by the Federal Railroad Administration (FRA) in November 2015 following two and a half years of research and analysis. The Draft EIS is part of a comprehensive planning effort to define a long-term vision for the Northeast Corridor that includes passenger high-speed rail.

As the Draft EIS states, the NEC should be regarded as a national asset, serving a “mega-region” that accounts for 30% of US jobs, linking four cities that are in the top 25 of cities worldwide. By 2040, an additional seven million residents are expected in the Northeast region, yet no transportation mode has the capacity to accommodate the increase in travel demand this will bring. These are the challenges addressed within the Tier 1 programmatic EIS.

The Draft EIS is intended to set a framework for future Tier 2 project-level assessments. Its importance lies in establishing the overall policy direction and the need for investment. Options are described conceptually, rather than as specific alignment designs, and this is appropriate at this stage.

By considering a planning horizon through 2040, the FRA is able to distinguish the choices available: to do nothing; to maintain the role of rail in the NEC; to grow the role of rail in the corridor; or to transform the role of rail. This represents a logical and helpful approach. A time horizon of 25 years+ is appropriate given the scale of growth and investment. It exposes the

need to move above and beyond questions of annual budgets and to seek the efficiency and flexibility that can flow from investments conceived as part of a longer term vision.

The Draft EIS provides thorough, transparent, and extensive documentation. It is to be subject to a period of public review and comment, during which the FRA will hold public hearings and meetings throughout the Northeast region and identify a Preferred Alternative.

Where necessary, we raise questions about the Draft EIS analysis, which in some respects has surprising and – we would suggest – unlikely and counter-intuitive implications. We provide further evidence from other studies and experience observed elsewhere.

In section 2, we summarize how the FRA developed alternatives for consideration in the Draft EIS and we highlight the importance of assumptions made about service specifications. These have a crucial effect on the apparent merits of the infrastructure alternatives and we explore what each defined alternative implies in terms of load factors and commercial outcomes.

In section 3, we review the FRA's analytical approach to demand forecasting and evaluation, including, for example, assessments of the attractiveness of different travel modes. Our review suggests that the demand for improved rail service could be **much higher if full account is taken of, for instance, the transformational effects of a world class integrated high speed passenger rail system operating at high frequency and high levels of reliability, and that the agglomeration benefits of the investment alternatives could also be much greater than the Draft EIS suggests.**

In section 4 we consider other areas that have either been omitted from the draft Tier 1 EIS or would warrant further examination because they are sufficiently significant to affect judgments about how the preferred alternative should be developed.

In the final section, we contribute some thoughts on the way forward towards a preferred alternative, defined at a program level. The "maintain" and "grow" alternatives considered in the EIS have merits. But the Draft EIS does not make fully clear the need to expand network capacity. The safest and most efficient way to achieve this is to provide separate infrastructure for high-speed, commuter rail, and freight services. This is what transformational investment would achieve. We respectfully suggest that this is a possible and credible outcome and that the way forward should be driven by a vision that does not preclude transformational investment in the NEC.

2 Approach

Introduction

In this section we summarize how the FRA developed alternatives for consideration in the Draft EIS and highlight the importance of assumptions made about service specifications.

The *NEC Future, the Draft Tier 1 EIS* forms part of a comprehensive planning effort, the NEC FUTURE Program, to define a long-term vision for the corridor:

- With the **Purpose** of upgrading aging infrastructure and improving the reliability, capacity, connectivity, performance, and resilience of future passenger rail service on the NEC for both Intercity and Regional trips, while promoting environmental sustainability and continued economic growth
- Addressing the **Need** which includes aging infrastructure, additional capacity to accommodate growing population and employment, gaps in connectivity, compromised performance, resiliency, environmental sustainability, and economic growth.

A planning horizon of 2040 has been adopted for this vision, which is appropriate given the scale of growth and investment contemplated, but account also needs to be taken of the period after 2040.

Four alternatives have been evaluated. These comprise a No Action alternative and three Action alternatives to address the Purpose and Need of the NEC FUTURE Program, where each Action alternative defines a different role for rail on the NEC:

- Alternative 1 - maintain the current role of rail
- Alternative 2 - grow the role that rail plays in regional transportation
- Alternative 3 - transform rail as the mode of choice for transportation in the region.

In contrast, the No Action alternative seeks to deliver only sufficient investment to preserve today's service levels (defined as the number of trains per hour by operator and type of service) in the future. Essentially, the No Action alternative is specified as a "do minimum" alternative, rather than a "do nothing" alternative, the consequence of which would result in a decline and potential cessation of passenger rail services on the corridor.

The FRA determined that at the first stage of environmental analysis a Tier 1 EIS was appropriate due to the complexity of the NEC and the multi-jurisdictional nature of the passenger rail operations. The process was initiated with a formal Scoping period in which comments from the public and other stakeholders were solicited to inform the development of the alternatives and scope of the environmental analysis. The Scoping period was concluded in Autumn 2012.

We recognize that the level of analysis required for Tier 1 is necessarily at a relatively high level rather than at the greater level of detail necessary for a Tier 2 EIS. However, as explained in the following sections, some aspects of the methodology and assumptions employed in the analysis give cause for concern as they appear to have led to some unexpected and counter-intuitive results.

We understand that the FRA will identify a Preferred Investment Alternative to be carried forward for analysis in the Final Tier 1 EIS. The identification will be based on the analysis presented in this Draft Tier 1 EIS and following consideration of public and stakeholder input received during the public comment period. The Preferred Alternative may include elements from each of the Action alternatives and may involve re-packaging elements of the Action alternatives.

The alternatives considered in the Draft Tier 1 EIS were developed from a list of 100 “initial alternatives” which were later screened to 15 “preliminary alternatives”¹ based around four program levels, which ranged from achieving state of good repair with modest service improvements to a level in which a world class high speed rail system would be achieved through the addition of a new spine. Screening of the 15 “preliminary alternatives” was achieved by application of evaluation criteria with metrics determined for five criteria themes: Growth and Capacity Expansion; Aging Infrastructure; Service Effectiveness and Performance; Connectivity; and Environmental Consequences². The FRA considered three route options for a second spine between New York City and Hartford, CT, and three new off-corridor routes for a second spine between Hartford, CT, and Boston. These were consolidated to four options for the second spine between New York, Hartford and Boston, although the FRA acknowledges that the dismissed routes could become part of a longer-term investment program to improve access to markets beyond the NEC or along connecting corridors³.

The FRA re-packaged the Preliminary Alternatives into three distinct Action alternatives to meet the Purpose and Need⁴. The approach involved three elements:

- Define geographic markets to be served and assumptions about the level of passenger rail service that will be provided to these markets
- Determine the infrastructure improvements that support this level-of-service
- Identify a Representative Route (or footprint) that connects these markets.

The FRA developed the Action alternatives to understand and quantify key rail market and service dynamics, such as the trade-offs between frequency of service, travel time, fares, and the convenience of one-seat service between markets⁵. While the FRA has sought to define three contrasting Action alternatives, with each representing a distinct long-term vision for improving passenger rail services, they are also intended to share some common attributes, notably:

- Maintain and improve service on the existing NEC

¹ Draft Tier 1 EIS, Table 4-2 of Chapter 4

² Draft Tier 1 EIS, Table 4-3 of Chapter 4

³ Draft Tier 1 EIS, Section 4.1.2.1 of Chapter 4: Preliminary Alternatives Dismissed

⁴ Draft Tier 1 EIS, Section 4.1.3 of Chapter 4: No Action and Action Alternatives

⁵ Draft Tier 1 EIS, Section 4.2 of Chapter 4: Characteristics of Action Alternatives

- Bring the NEC to a state of good repair by replacing or renewing aging infrastructure on the existing NEC and eliminating the backlog of infrastructure requiring replacement so that all future capital upgrades are planned and implemented according to a regular replacement cycle
- Address the most pressing capacity and service chokepoints that constrain capacity on the existing NEC
- Protect freight rail access and the opportunity for future expansion
- Incorporate national and international best practices to address capacity constraints, broaden the mix of station pairs served, improve performance, and generate operating cost efficiencies.

Steer Davies Gleave supports the principle of a market-driven approach and the key attributes that are attributed to each of the alternatives.

Markets Served

The FRA has identified four primary markets – Washington, D.C., Philadelphia, New York City, and Boston – and has conducted analyses of current travel demand and projections for ridership and population growth⁶. Other study area rail markets include smaller intermediate cities or urban and suburban areas, some of which are located directly on the NEC, (e.g. Baltimore, MD, Wilmington, DE, and New Haven, CT) while others are located away from the NEC (e.g. Hartford, CT, Ronkonkoma, NY, and Worcester, MA). The FRA distinguishes between interregional and regional markets⁷. Interregional markets involve trips that start and end in different metropolitan areas (e.g. Philadelphia and Boston), trips from intermediate cities to a primary metropolitan area, or trips between two intermediate cities⁸. Regional markets are those involving trips that are contained within a single metropolitan area⁹.

Service Types

For the purposes of the analysis, the FRA has defined two primary service types, Intercity and Regional¹⁰. In principle, Intercity services are aligned with serving the Interregional markets while Regional services are aligned with serving the Regional markets, as defined above. The FRA defines Regional rail as passenger rail services within the travel shed of a metropolitan area providing local and commuter-focused services characterized by a high-percentage of regular travelers¹¹. While this approach may reflect current market conditions, the travel opportunities afforded by some of the Action alternatives are likely to lead to significant changes in travel patterns, such as the growth of longer-distance commuting extending beyond single metropolitan areas. As defined, such travel would fall within the interregional

⁶ Draft Tier 1 EIS, Section 4.2.1 of Chapter 4: Markets Served, Section 2.1 of Appendix B.5: Ridership Markets

⁷ Draft Tier 1 EIS, Section 4.2.1.1 of Chapter 4: Interregional and Regional Markets, Section 2.1 of Appendix B.5: Ridership Markets

⁸ Draft Tier 1 EIS, Section 4.2.1.1 of Chapter 4: Interregional and Regional Markets, Section 2.1.1 of Appendix B.5: Interregional Market

⁹ Draft Tier 1 EIS, Section 4.2.1.1 of Chapter 4: Interregional and Regional Markets, Section 2.1.2 of Appendix B.5: Regional Market

¹⁰ Draft Tier 1 EIS, Section 4.2.2 of Chapter 4: Service and Station Types, Section 2.2 of Appendix B.5: Service Types

¹¹ Draft Tier 1 EIS, Section 4.2.2 of Chapter 4: Service and Station Types, Section 2.2.1 of Appendix B.5: Intercity

market definition. In section 3 we further discuss the potentially significant impacts of increased interregional connectivity on passenger demand and the broader economy.

Intercity passenger rail services have been further sub-divided into sub-categories:

- Intercity-Express (IC-E) – defined as a premium intercity rail service operating at speeds of 160–220 mph on the NEC, making limited stops and only serving the largest markets¹². The fares on these services are assumed to be higher than on non-Express services¹³
- Intercity-Corridor (IC-C) – defined as a conventional intercity rail service that operates at speeds of 110–160 mph on the NEC and on connecting corridors to markets beyond the electrified territory of the NEC¹⁴. This service provides connectivity and direct one-seat rides to large and midsize markets on the NEC, including the Keystone Corridor, between Harrisburg and Philadelphia, PA; the Southeast High-Speed Rail corridor south of Washington, D.C., serving Virginia; the Knowledge Corridor serving central Massachusetts and Vermont; and the Inland Route between Springfield and Boston, MA.

The *Intercity-Corridor* service, in turn, includes three types of service¹⁵:

- A new service concept described as “Metropolitan”, to offer an improved service to new and intermediate markets and key transfer locations, with stops at more stations than the current Northeast Regional service
- “Intercity-Corridor-Other” - a successor service to the current Northeast Regional service to provide connectivity and a direct service between non-electrified connecting corridors and the large and mid-size markets on the NEC
- “Long Distance” - long-distance service such as the existing Amtrak services to Florida, New Orleans, and Chicago. FRA has assumed that the level of long-distance train service on the NEC will remain constant through the 2040 horizon period.

A feature of the “*Metropolitan*” service is that it would be operated with high-performance train sets at up to 160 mph, achieving travel times competitive with current Intercity-Corridor service while making additional stops. By contrast, the “*Intercity-Corridor-Other*” services are assumed to have operating characteristics similar to today’s Amtrak Northeast Regional trains, which will be dual-mode in the future, with top speeds of 125 mph on the NEC and up to 110 mph off of the NEC.

Given the visionary nature of this planning effort, it seems inappropriate for the purposes of the analysis to specify “Intercity-Corridor-Other” services with inferior operating characteristics to “Metropolitan” services when operating on the NEC. The capacity of the corridor is likely to be compromised by a mix of operational capabilities and the differential in achievable travel times between the “Metropolitan” and “Other” services creates a potentially artificial distortion in the distribution in demand between these services.

¹² Draft Tier 1 EIS, Section 4.2.2 of Chapter 4: Service and Station Types, Section 2.2.1 of Appendix B.5: Intercity

¹³ Under all Alternatives the average fares for IC-E services have been assumed to remain unchanged from those of the existing Acela service (shown as around \$160), whereas the average fare for IC-C services is assumed to drop by 30% from a current level of around \$70 (see Figure 2.3:)

¹⁴ Draft Tier 1 EIS, Section 4.2.2 of Chapter 4: Service and Station Types, Section 2.2.1 of Appendix B.5: Intercity

¹⁵ Draft Tier 1 EIS, Section 4.2.2 of Chapter 4: Service and Station Types, Section 2.2.1 of Appendix B.5: Intercity

Service Planning Assumptions

Indicative service plans have been developed for each alternative, and these underpin the analysis that supports the evaluation of the alternatives. Details of these service plans, such as timetables showing stopping patterns, are omitted from the Draft Tier 1 EIS documentation, but station-to-station travel times and frequencies presented within the EIS help to illustrate the service plan assumptions for each alternative (see Tables below).

Table 2.1: Frequency (Sum of IC-E and IC-C trains per day per direction)

Station Pair	No Action	Alternative 1	Alternative 2	Alternative 3*
Washington-Philadelphia	38	70	110	154
Philadelphia-New York	48	86	118	184
New York-Boston	19	47	92	147
Washington-Boston	17	40	57	105

*Average of Alternative 3 options

Source: Analysis derived from Table 5-19 (Chapter 5) of Draft Tier 1 EIS

Table 2.2: Intercity Express travel time

Station Pair	No Action	Alternative 1	Alternative 2	Alternative 3
Washington-Philadelphia	1:37	1:37	1:29	1:04
Philadelphia-New York	1:07	1:04	0:55	0:43
New York-Boston	3:31	2:54	2:33	2:01
Washington-Boston	6:33	5:45	5:07	3:57

Source: Table 5-18 (Chapter 5) of Draft Tier 1 EIS

The Draft EIS sets out an approach to service planning for the Action alternatives in which schedules are headway-driven such that virtually all NEC services would operate at regular “clockface” 15-, 30-, or 60-minute intervals, with local stations generally being served by 2 to 4 trains per hour (tph) during peak periods (and major stations more)¹⁶. The Draft EIS mentions the benefits that such regular standard pattern services could provide for passengers, including allowing easier connections with other rail and local transit services. “Pulse-hub” operations at key hub stations such as Philadelphia 30th Street are also suggested but no attempt has been made to assess the implications of these service developments¹⁷. We acknowledge the connectivity benefits that such integrated scheduling could bring, but note that there can be significant infrastructure implications to facilitate such operations, and these have not been explicitly identified.

Despite the proposed timetabling philosophy, neither the costs nor the benefits of such operations have been assessed in the accompanying analysis. The omission from the assessment of the potential ridership, revenue and benefits that would be expected to result from such improved connectivity associated with each Action alternative is a significant concern, as discussed in Section 3.

¹⁶ Draft Tier 1 EIS, Section 4.2.2.1 of Chapter 4: Service Concepts and Operating Efficiencies

¹⁷ Draft Tier 1 EIS, Section 5.7 of Chapter 5: Pulse-Hub Operations

The FRA determined that applying a 30% discount to current fares on non-express services would attract additional riders and still cover operating expenses¹⁸. This assumption was applied for non-express services in each of the Action alternatives in estimating ridership, revenues, and O&M costs¹⁹. However, no such adjustment was applied to the No-Action alternative²⁰, nor were similar adjustments made to the higher fares used for the Intercity Express services. As a consequence, the fare policy assumptions appear to be driving a number of counter-intuitive outcomes, as discussed further in Section 3²¹.

The Draft EIS (Chapter 4, 4.2.2.1) states that integrated ticketing and fares across the NEC would potentially improve passenger convenience, and reduce station dwell times and overall travel times²². However, the additional demand induced by the convenience value of integrated ticketing and fares does not appear to have been factored into the forecast demand and revenue analysis.

Regional Rail

The significant levels of investment, particularly in the second and third Action alternatives, create major increases in capacity. The Draft Tier 1 EIS suggests that this will provide for increases in the level of Regional services by up to 140% as shown in Figure 2.1: below. However, the demand, revenue, wider benefits and costs associated with these services have not been estimated and have therefore been excluded from the quantitative elements of the evaluation of alternatives. Given that these represent major benefits for the populations living and working in the metropolitan areas, we consider this an important omission from the evaluation.

¹⁸ Draft Tier 1 EIS, Section 4.2.2.2 of Chapter 4: Service Planning Assumptions – Fare Policy, Section 4.3 of Appendix B.5: Operations And Maintenance Costs

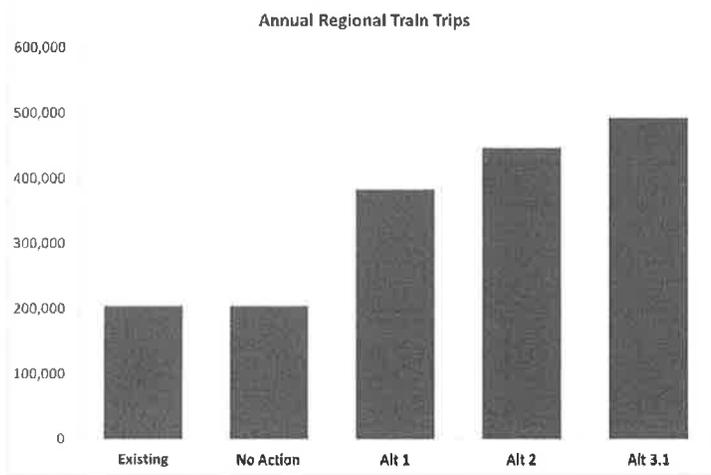
¹⁹ Draft Tier 1 EIS, Section 4.2.2.2 of Chapter 4: Service Planning Assumptions – Fare Policy, Section 9.4.1.2 of Chapter 9: Capacity Utilization - Trip Diversion

²⁰ Draft Tier 1 EIS, Section 5.3.2 of Chapter 5: Rail Pricing

²¹ Draft Tier 1 EIS, Section 6.1 of Appendix B.8: Impacts To Rail Linked Trips, Section 9.4.1.2 of Chapter 9: Capacity Utilization - Trip Diversion

²² Draft Tier 1 EIS, Section 4.2.2.1 of Chapter 4: Service Concepts and Operating Efficiencies

Figure 2.1: Annual Regional Rail Train Trips by Alternative



Source: Appendix B, O & M Costs, Section 5, Tables 6 & 9 of Draft Tier 1 EIS

Shared Access and Consideration of Freight

It is stated that each Action alternative preserves freight access and operations on the NEC and does not preclude future expansion opportunities²³. While four specific freight traffic growth opportunities have been identified (Chapter 4, section 4.2.2.2), it is unclear to what extent additional infrastructure (beyond that included in the incremental capital costs estimated for each of the Action alternatives) would be required to facilitate those growth opportunities. The economic value of realizing such growth in rail freight traffic does not appear to have been reflected in the Economic Effects analysis.

²³ Draft Tier 1 EIS, Section 4.2.2.2 of Chapter 4: Service Planning Assumptions - Shared Access and Consideration of Freight, Section 4.1.5 of Appendix B.5: Freight Rail, Section 4.7 of Appendix B.5: Freight Rail

Alternatives – Key Features

For reference, we summarize below the key features of the alternatives considered in the Draft Tier 1 EIS.

Table 2.3: Overview of Alternatives

Alternative	Role	Capital cost \$ billion (2014)	Choke point relief	Additional tracks	New segments
No Action	Base	20		NJ Raceway	None
Action 1	Maintain	64-66	New Carrollton	Bayview-Newark	70 miles new construction, including: <ul style="list-style-type: none"> • New Baltimore tunnel (2 miles) • Hudson River third and fourth tunnels and expanded Penn Station New York (3 miles) • Old Saybrook-Kenyon new segment (50 miles)
			Newark DE Holly Interlocking Philadelphia flyover Trenton Metropark station Hunter flyover New Rochelle South Nowalk East Bridgeport Canton J - Readville	Hell Gate-NY E Greenwich-Warwick Canton J - Route 128	
Action 2	Grow	131-136	New Carrollton	Washington – New Carrollton	214 miles new construction, including: <ul style="list-style-type: none"> • Baltimore Tunnel (2 miles) • Aberdeen, MD, to Newark, DE (23 miles) • Wilmington, DE, Bypass (8 miles) • Baldwin, PA, to Philadelphia 30th Street Station via Philadelphia International Airport (10 miles) • Philadelphia 30th Street Station to Bridesburg, PA, through North Philadelphia, PA (8 miles) • North Brunswick, NJ, to Colonia, NJ (16 miles) • Elizabeth, NJ, to Secaucus, NJ (12 miles) • Secaucus, NJ, to Hell Gate Viaduct, Queens, NY via new Hudson and East River Tunnels and expanded Penn Station New York (8 miles) • New Rochelle, NY, to Westport, CT (29 miles) • Sharon, MA to Canton Junction, MA (3 miles)
			Newark DE Philadelphia 30 th St Trenton Metropark station Hunter flyover New Rochelle New Haven Canton J - Readville	New Carrollton-Halethorpe Bayview-Perryville Hellgate-NY Providence-Hyde Park	

Alternative	Role	Capital cost \$ billion (2014)	Choke point relief	Additional tracks	New segments
No Action	Base	20		NJ Raceway	None
Action 3.1	Transform	283-294	New Carrollton Odenton Newark, DE Philadelphia flyover Trenton Metropark Station Hunter Flyover New Rochelle Canton J - Readville	Odenton-Halethorpe Hellgate-NY Providence-Hyde Park	Second spine 459 miles new construction, including: <ul style="list-style-type: none"> Washington-New York (235 miles) New York-Danbury-Hartford (113 miles) Hartford - Providence - Boston (111 miles)
Action 3.2	Transform	267-277	New Carrollton Odenton Newark, DE Philadelphia flyover Trenton Metropark Station Hunter Flyover New Rochelle Canton J - Readville	Odenton-Halethorpe Hellgate-NY Providence-Hyde Park	Second spine 478 miles new construction, including: <ul style="list-style-type: none"> Washington-New York (235 miles) New York-Long Island-Hartford (132 miles) Hartford - Providence - Boston (111 miles)
Action 3.3	Transform	280-291	New Carrollton Odenton Newark, DE Philadelphia flyover Trenton Metropark Station Hunter Flyover New Rochelle Canton J - Readville	Odenton-Halethorpe Hellgate-NY Providence-Hyde Park	Second spine 467 miles new construction, including: <ul style="list-style-type: none"> Washington-New York (235 miles) New York-Long Island-Hartford (132 miles) Hartford - Worcester - Boston (100 miles)

Alternative	Role	Capital cost \$ billion (2014)	Choke point relief	Additional tracks	New segments
No Action	Base	20	New Carrollton Odenton Newark, DE Philadelphia flyover Trenton	NJ Raceway Odenton-Halethorpe Hellgate-NY Providence-Hyde Park	None Second spine 448 miles new construction, including: <ul style="list-style-type: none"> • Washington-New York (235 miles) • New York-Danbury-Hartford (113 miles) • Hartford - Worcester – Boston (100 miles)
Action 3.4	Transform	296-308	Metropark Station Hunter Flyover New Rochelle Canton J - Readville		

Source: Section 4.6 of Chapter 4: Infrastructure Elements, Section 8.4 of Appendix B.5: Infrastructure Elements

No Action Alternative²⁴

Consistent with NEPA requirements, the FRA identified a No Action alternative to provide a baseline for comparison. The No Action alternative identifies improvements that would occur regardless of NEC FUTURE. The No Action alternative includes committed or funded projects for the NEC through 2040. The No Action alternative continues today’s service levels in the peak hours of operation – defined as the number of trains per hour by operator and types of service – but falls short of addressing existing capacity constraints, gaps in connectivity, or expansion to markets that are underserved by rail.

The No Action alternative includes the completion of transportation projects already planned and programmed, or in-progress by 2040.

The capital cost estimate for the No Action alternative is approximately \$20 billion (in 2014 prices) and includes the estimated costs for planned rail projects grouped into three categories:

- Funded projects or projects with approved funding plans – \$8 billion
- Funded or unfunded mandates – \$1 billion
- Unfunded projects necessary to keep the railroad running– \$11 billion.

We note that the capital cost provisions of the No Action alternative include the New Jersey Raceway project and also procurement of a new fleet of high speed train sets, which will increase train seating capacity from 304 to 450 and allow for limited expansion of the Intercity-Express service. These investments should enable some modest travel time improvements, given the enhanced performance capability of the new high speed train sets and potential higher operating speeds between Philadelphia and Newark. However, the

²⁴ Draft Tier 1 EIS, Section 4.3 of Chapter 4: No Action Alternative, Chapter 7 of Appendix B.5: No Action Alternative

analysis indicates that the No Action alternative is assumed to result in no improvement on existing travel times.

Capital replacement or upgrading of infrastructure assets is assumed to be undertaken as necessary to maintain railroad operations at current levels, based on the condition of the assets. This includes some – but only a modest proportion – of the significant backlog of work associated with bringing the NEC to a state of good repair. The No Action alternative does not bring the NEC to a state of good repair. As a result, punctuality and reliability will be impaired, and this will lead to suppressed demand and additional costs such as those required to provide for contingency (e.g. rolling stock), disruption mitigation, asset repairs and spare resources. Such costs have not been identified or included in the analysis of the No Action alternative.

Table 2.4: Key metrics – No Action Alternative

Metric	Future Year - 2040
Intercity Ridership (million trips)	19.0
Intercity Revenue (\$ million)	1,820.4
Intercity Revenue Train-miles (million)	8.97
Regional Revenue Train-miles (million)	10.11
Intercity apportioned O&M cost (\$ million)	906.6
Intercity Net Contribution (\$ million)	992.9
Total O&M cost (\$ million)	1,571.9

Source: Analysis derived from Draft Tier 1 EIS, Appendix B, O & M Costs, Section 5, Tables 6 & 9 - 16

Action Alternative 1²⁵

Alternative 1 *maintains* the role of rail as it is today in the region, with the level of rail service keeping pace with the population growth in the Study Area. Alternative 1 includes new rail services and commensurate investment in the NEC to expand capacity, add tracks, and relieve key chokepoints. Alternative 1 would bring the existing NEC to a state of good repair.

Alternative 1 would support increases in Intercity and Regional rail services, eliminating key chokepoints along the corridor, and increasing capacity at selected locations by adding additional track within the existing NEC and new segments parallel to and outside the existing NEC right-of-way.

It is noteworthy that even to “maintain” the role of rail as it is today, this Alternative includes the construction of 70 miles of new alignment segments, including a 50 mile new segment between Old Saybrook and Kenyon to provide a new inland route avoiding the constrained and potentially flood prone Shore Line route in Connecticut. Infrastructure work also includes relief to 12 choke points and some additional tracks to provide separate between different traffic flows.

²⁵ Draft Tier 1 EIS, Section 4.6.1 of Chapter 4: Alternative 1, Chapter 8 of Appendix B.5: Alternative 1

Metrics

Table 2.5: Key Metrics –Alternative 1

Metric	Future Year - 2040	% variance from No Action
Intercity Ridership (million trips)	32.6	+72%
Intercity Revenue (\$ million)	2,037.9	+12%
Intercity Train-miles (million)	14.4	+60%
Regional Train-miles (million)	16.5	+63%
Intercity apportioned O&M cost (\$ million)	1,326.9	+46%
Intercity Net Contribution (\$ million)	846.4	-15%
Total O&M cost (\$ million)	2,078.2	+32%

Source: Analysis derived from Draft Tier 1 EIS, Appendix B, O & M Costs, Section 5, Tables 6 & 9 - 16

It is notable that while the expansion of services provided under Alternative 1 results in a 72% increase in Intercity ridership, Intercity revenue for this alternative grows by only 12% and this leads to a 15% reduction in the net financial contribution of Intercity services compared to the No Action alternative. This surprising and unappealing result arises from the approach to modeling demand and revenue, where fare levels for IC-C services have been discounted (as discussed in Section 3).

Action Alternative 2²⁶

Alternative 2 *grows* the role of rail, expanding rail service at a rate greater than the proportional growth in regional population and employment. Alternative 2 maximizes capacity of the existing NEC and removes speed restrictions where practical and safe and would bring the existing NEC to a state of good repair. Alternative 2 also provides a new segment between New Haven and Hartford, CT, and Providence, RI, improving performance between New York City and Boston while connecting to new markets in the Connecticut River Valley.

Metrics

Table 2.6: Key Metrics –Alternative 2

Metric	Future Year - 2040	% variance from No Action
Intercity Ridership (million trips)	37.1	+95%
Intercity Revenue (\$ million)	2,486.7	+37%
Intercity Train-miles (million)	34.1	+281%
Regional Train-miles (million)	15.5	+53%

²⁶ Draft Tier 1 EIS, Section 4.6.2 of Chapter 4: Alternative 2, Chapter 9 of Appendix B.5: Alternative 2

Metric	Future Year - 2040	% variance from No Action
Intercity apportioned O&M cost (\$ million)	1,839.7	+103%
Intercity Net Contribution (\$ million)	647.4	-35%
Total O&M cost (\$ million)	2,576.5	+64%

Source: Analysis derived from Draft Tier 1 EIS, Appendix B, O & M Costs, Section 5, Tables 6 & 9 - 16

Alternative 2 creates a major uplift in capacity and the service plans adopted for the analysis provide increases of 281% and 53% in Intercity and Regional Train-miles respectively. The corresponding increase in Intercity ridership is only 95%, revealing a decline in load factor. As with Alternative 1, the Intercity revenue increases by a much smaller margin (37%) and as a result, the net financial contribution of Intercity services declines by 35% compared to the No Action alternative. Again these surprising results reflect issues identified in the service planning assumptions and demand and revenue forecasting methodology.

Action Alternative 3²⁷

Alternative 3 *transforms* the role of rail, supporting trips over longer distances and to places not currently well connected by passenger rail. It positions rail as the dominant mode for interregional travel to urban centers along the NEC.

Alternative 3 includes a continuous second spine operating between Washington, D.C., and Boston. The second spine would be separate from the existing NEC, but connected to and integrated with services offered on the existing NEC at designated Major Hub and Hub stations. The second spine would support speeds up to 220 mph between major NEC markets and provide additional capacity for Intercity and Regional rail services throughout the Study Area.

Alternative 3 would also include service and infrastructure improvements on the existing NEC to increase capacity, eliminate chokepoints, and bring the existing NEC to a state of good repair.

Between Washington, D.C., and New York City, Alternative 3 includes a single route for the second spine, located parallel to the existing NEC. This section of the second spine would connect to the existing NEC at several Major Hub stations, including Washington, D.C.; Baltimore-Washington International (BWI) Airport; Wilmington, DE; and Newark Penn Station, NJ.

Between New York City and Boston, Alternative 3 includes four route options, all of which connect through Hartford, CT:

- New York City – Hartford via Danbury, CT
- New York City – Hartford via Ronkonkoma, Long Island
- Hartford – Boston via Worcester
- Hartford – Boston via Providence

²⁷ Draft Tier 1 EIS, Section 4.6.3 of Chapter 4: Alternative 3, Chapter 10 of Appendix B.5: Alternative 3

These give the FRA flexibility to consider different intermediate markets north of New York City. The options have been combined as follows:

- Alternative 3.1: Washington, D.C.- New York City - Danbury – Hartford - Providence - Boston
- Alternative 3.2: Washington, D.C. - New York City - Ronkonkoma - New Haven - Hartford - Providence- Boston
- Alternative 3.3: Washington, D.C - New York City - Ronkonkoma - New Haven - Hartford - Worcester -Boston
- Alternative 3.4: Washington, D.C. - New York City -Danbury - Hartford - Worcester - Boston

A key feature of the second spine is the provision of new stations within the downtown areas of the cities of Baltimore and Philadelphia. These stations would be served exclusively by high speed Intercity services and would offer the potential for to create urban redevelopment benefits, although the potential value of such benefits does not appear to have been included in the benefits attributed to Alternative 3. These new stations would be remote from the existing stations on the NEC corridor (Baltimore Penn and Philadelphia 30th Street), so connectivity with regional and other IC-C services operating from these stations would be lost without further interventions to provide connecting facilities.

Metrics

Table 2.7: Key Metrics –Alternative 3

Metric	Alternative 3.1 via Central Connecticut/Providence		Alternative 3.2 via Long Island/Providence		Alternative 3.3 via Long Island/Worcester		Alternative 3.4 via Central Connecticut/Worcester	
	Future Year - 2040	% variance from No Action	Future Year - 2040	% variance from No Action	Future Year - 2040	% variance from No Action	Future Year - 2040	% variance from No Action
Intercity Ridership (million trips)	38.3	+101%	38.7	+104%	39.8	+109%	38.6	+103%
Intercity Revenue (\$ million)	2,641.0	+45%	2,714.8	+49%	2,759.1	+52%	2,650.4	+46%
Intercity Train-miles (million)	49.4	+451%	47.1	+425%	45.4	+406%	43.6	+387%
Regional Train-miles (million)	21.5	+113%	22.0	+117%	22.7	+124%	22.2	+119%
Intercity apportioned O&M cost (\$ million)	2,318.4	+156%	2,230.8	+146%	2,230.2	+146%	2,184.5	+141%
Intercity Net Contribution (\$ million)	464.3	-53%	489.3	-51%	531.7	-46%	467.8	-53%
Total O&M cost (\$ million)	3,153.2	+101%	3,069.4	+95%	3,079.7	+96%	3,011.0	+92%

Source: Analysis derived from Draft Tier 1 EIS, Appendix B, O & M Costs, Section 5, Tables 6 & 9 - 16

Each of the Alternative 3 options result in similar levels of ridership, while there is some variation in train-miles reflecting the different choices of alignment. However, with the creation of a second spine, the service plans adopted for the analysis result in a step change increase in train-miles (a four-fold increase over the No Action alternative). Given the corresponding step change improvement in Intercity travel times, it is surprising that ridership barely rises above that achieved by Alternative 2. This counter-intuitive result appears to be attributable to the way the service plans were set up and the demand and revenue modeling methodology.

Commercial and Operating Effects – Some Key Observations

The level of infrastructure intervention ranges from relatively modest levels in the No Action alternative and Alternative 1 to major engineering programs involving remodeling and expansion of existing infrastructure and construction of new segments to create a parallel second corridor spine. The estimated capital costs of Alternative 2 are approximately double those of Alternative 1, while the Alternative 3 options have four times the capital costs of Alternative 1. The analysis set out in the Draft Tier 1 EIS report also provides an estimate of the net revenue contribution from Intercity services. This reveals that with successive increases of capital investment the financial performance of the Intercity services worsens (see Table 2.8: below).

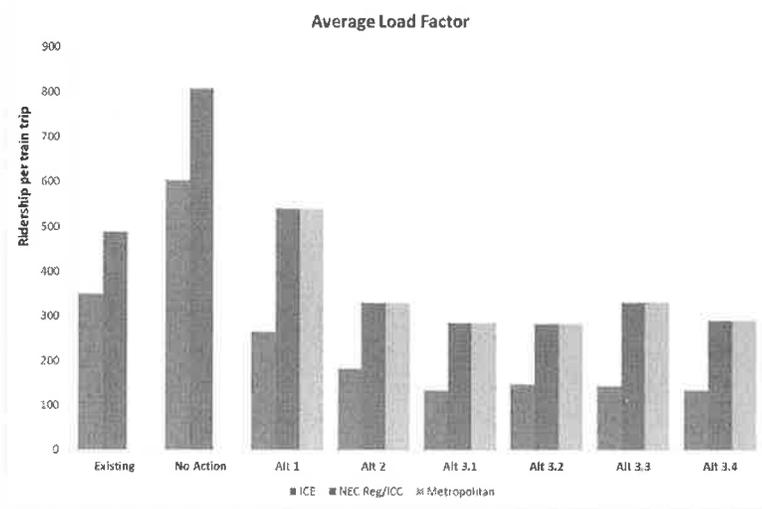
Table 2.8: Net revenue contribution and Capital Cost Estimates

	No Action	Alternative 1	Alternative 2	Alternative 3 (average)
Total Intercity O&M Net Revenue (\$M 2014)	970	840	680	570
Total Capital Cost (\$B 2014)	19.9	63.6–66.2	131.0–136.1	266.8–308.0

Source: Analysis derived from Draft Tier 1 EIS, Appendix B, O & M Costs, Section 5, Tables 6 & 9 – 16 and Capital Costs Technical Memorandum, Section 3, Tables 2 - 8

The service planning assumptions described above have a crucial effect on the apparent merits of the infrastructure alternatives. Examination of the projected metrics reveals some unexpected results that raise questions about some of the service planning assumptions and demand forecasting methodologies. Figure 2.2: shows the average load factor forecast for each alternative by service type. This reveals that under the No Action alternative, where service levels would remain unchanged from today, average load factors would increase by up to 60%. This would be possibly unachievable given the capacity available. However, with the significant increases in service levels and higher capacity rolling stock provided under Alternatives 2 and 3, average load factors diminish to materially below current levels. Furthermore, despite the step-change transformation in travel times under the Alternative 3 options and average fare being relatively unchanged from existing levels, the average load factor of IC-E services drops to around a third of that of the existing Acela service. This seems implausible.

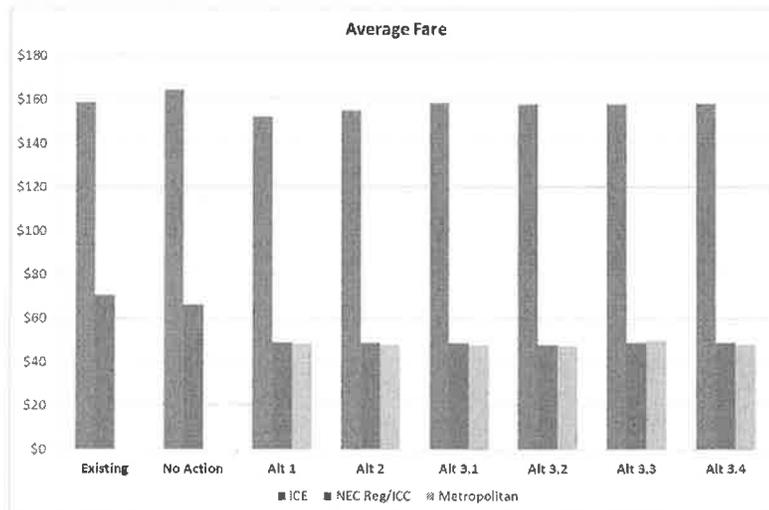
Figure 2.2: Average Load Factor comparison



Source: Graph constructed by Steer Davies Gleave from data in Appendix B, Operations and Maintenance (O&M) Costs Technical Memorandum, Section 5, Tables 6 & 9

Assumptions made about fares have a significant impact on the projections for ridership and revenues. Figure 2.3: shows that the assumed average fare for IC-E services remains broadly constant at the existing level of around \$160. However, in the Action alternatives the average fare for the IC-C services is reduced by around a third. Increasing the fare differential between IC-E and IC-C services will have a very material impact on the ridership and revenue projects for each of the Alternatives. The treatment of fares in the demand and revenue modeling is discussed further in Section 3.

Figure 2.3: Average fare comparison



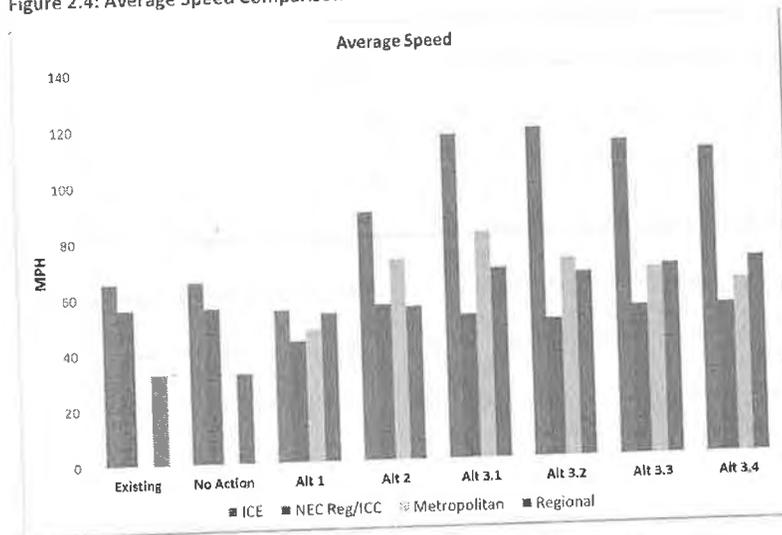
Source: Graph constructed by Steer Davies Gleave from data in Appendix B, Operations and Maintenance (O&M) Costs Technical Memorandum, Section 5, Table 9, Section 6, Tables 11 – 16

The provision of a second spine in Alternative 3 enabling train operations at speeds up to 220mph creates a step change in travel time reduction. This is illustrated in Figure 2.4; where it can be seen that the average speed of IC-E services reaches well over 100 mph, twice as fast as under Alternative 1 and up to 30% faster than in Alternative 2. Furthermore the frequency of IC-E services under Alternative 3 is over 3 times that under Alternative 1 and more than 50% greater than in Alternative 2. Despite these transformational improvements, the revenue generated by the IC-E services is predicted to be only 12-24% more than in Alternative 2.

Such improvements should have a transformational impact on demand for rail service within the corridor. For Alternative 3 to provide only marginal benefits over Alternative 2 is counter-intuitive and suggests that the service planning assumptions and modeling approach should be re-examined.

The reduction in average speed shown in Figure 2.4 for the IC-E service under Alternative 1 (down by 16% to 55mph) is inconsistent with the headline journey time improvements shown in Table 2 above. Also the average speed of Regional services more than doubles under Alternative 3 and is greater than the existing IC-E service. This seems to suggest that there may be some irregularities in the source data.

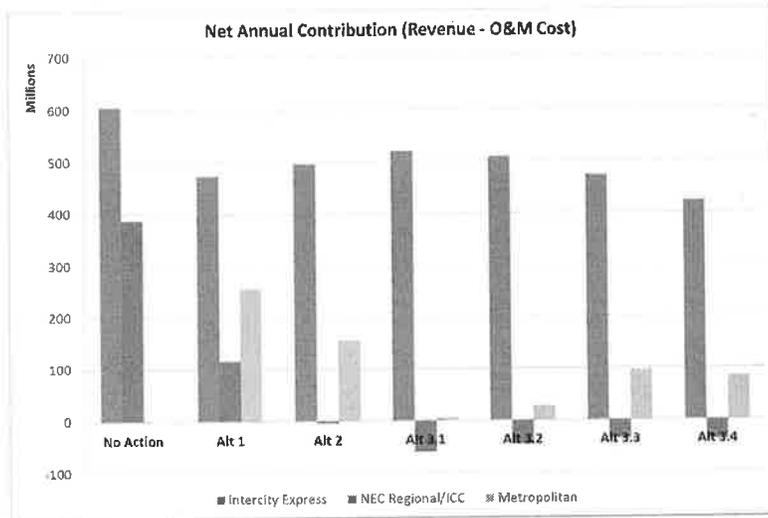
Figure 2.4: Average Speed Comparison



Source: Graph constructed by Steer Davies Gleave from data in Appendix B, Operations and Maintenance (O&M) Costs Technical Memorandum, Section 5, Tables 6 & 9

The analysis set out in the Draft Tier 1 EIS included an estimate of the revenues and attributed operating and maintenance costs for each category of Intercity service. This reveals, as illustrated in Figure 2.5; that the net contribution of intercity services on the corridor would decline materially under the Action alternatives. This is a significant concern, as funding will be a considerable challenge in realizing any of the capital programs envisaged in the Action alternatives. Figure 2.5: shows that the IC-E services provide for the vast majority of the net financial contribution.

Figure 2.5: Comparison of net financial contribution of Intercity services



Source: Graph constructed by Steer Davies Gleave from data in Appendix B, Operations and Maintenance (O&M) Costs Technical Memorandum, Section 6, Tables 10 - 16

3 Analytical Methodology

Introduction

In this section we comment on the analytical methodologies employed by NEC FUTURE, firstly on those relating to the demand and ridership forecasts and then on the analysis relating to the assessed economic effects for each of the alternatives.

Evaluation Methodology: Demand and Ridership Forecasts

Our comments focus firstly on the definition of the alternatives themselves and their service characteristics, and then on the demand forecasting methodology itself.

Service Alternative Definitions

Service Plans

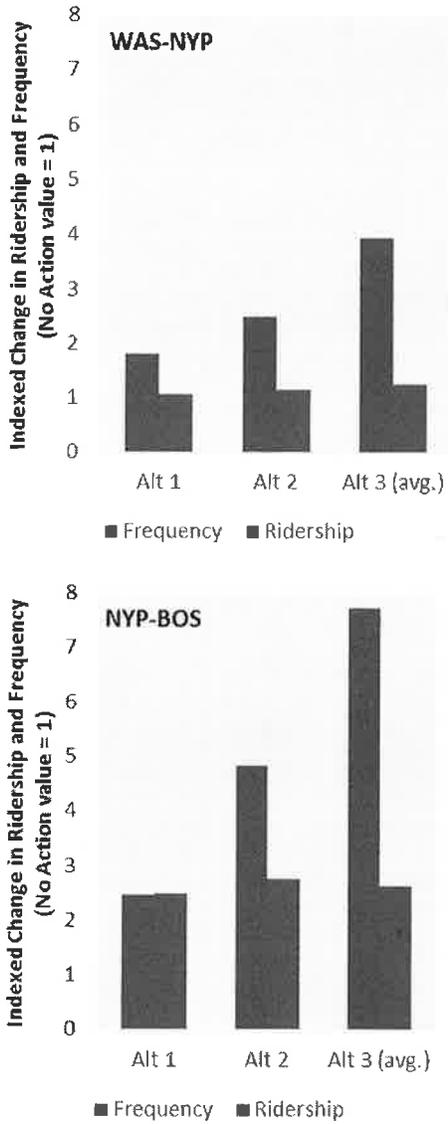
The approach used to develop service plans appears to have been to increase service frequency and the number of station pairs served without full regard to the capacity required to meet forecast demand. For example, Alternative 3 provides up to 150 trains per day between New York and D.C. (Table 5-19 of Chapter 5), a frequency equivalent to one train every 7 minutes with seating capacity as high as 980 seats/train (Table 14 of Appendix A to Appendix B.5).

With a total annual ridership forecast of around 1.5 million one-way trips (Table 5-21 of Chapter 5) between New York and D.C., the implied average number of passengers per train could be as low as 30 in Alternative 3 (noting that this excludes other riders traveling between intermediate stations).

As discussed below, the models used predict little to no ridership impact for frequency levels above 50 trains per day per service (Sections 3.2.4.1 and 3.2.5.1 of Appendix B.8). This means that some of the high-frequency alternatives incur significant capital and operating costs, but do not attract any additional riders to the rail system and merely redistribute riders between larger numbers of trains. In such cases, reducing service frequency may reduce costs without impacting ridership.

In effect, transformational increases in train frequency do not translate to substantial ridership changes between alternatives. The graphs below show that large increases in train frequency between Action alternatives result in small changes in ridership in the WAS-NYP and NYP-BOS markets. This also means that the average number of riders per train decreases significantly as more trains are added, as shown in Figure 3.1:.

Figure 3.1: Indexed Change in Ridership and Frequency Between Key Station Pairs



Source: Table 5-19 and 5-21 of Chapter 5 (Note: Ridership and frequency include trips on both Intercity Express and Intercity Corridor.)

There are some inconsistencies in the description of the services within the EIS documents and it is unclear which tables accurately show the level of service used in the ridership forecasting model. Below are some examples:

- Frequency: Table 5-19 of Chapter 5 and Table 28 of Appendix B.8 shows 27 Intercity Express (IC-E) and 30 Intercity Corridor (IC) trains per day between D.C. and Boston in Alternative 2, however Table 9-14 shows a total of 92 trains in Alternative 2 for the same station pair.

- Travel time: The D.C.-Boston IC-C travel time in Alternative 2 is variously described as 6 hours 7 minutes (Table 9-16 of Chapter 9), 6 hours 22 minutes (Table 5-18 of Chapter 5), and 7 hours 3 minutes (Table 28 of Appendix B.8).
- Travel time: In the description of the service characteristics in Table 22 of Appendix B.8, the air travel time for Boston-New York is listed as 2:37, whereas the Boston-Washington time is 2:26. It seems counterintuitive that traveling over a shorter distance in the former instance should actually take more time on the clock.
- Service types: The Stated Preference (SP) survey assumed the Metropolitan service would be distinct from IC-C service, but this distinction was later eliminated and they were combined into one mode for the mode choice model estimation (Section 2.2.3.4 of Appendix B.8). However, Figures 10 and 11 of Appendix B.8 still show IC-C and Metropolitan as separate modes.

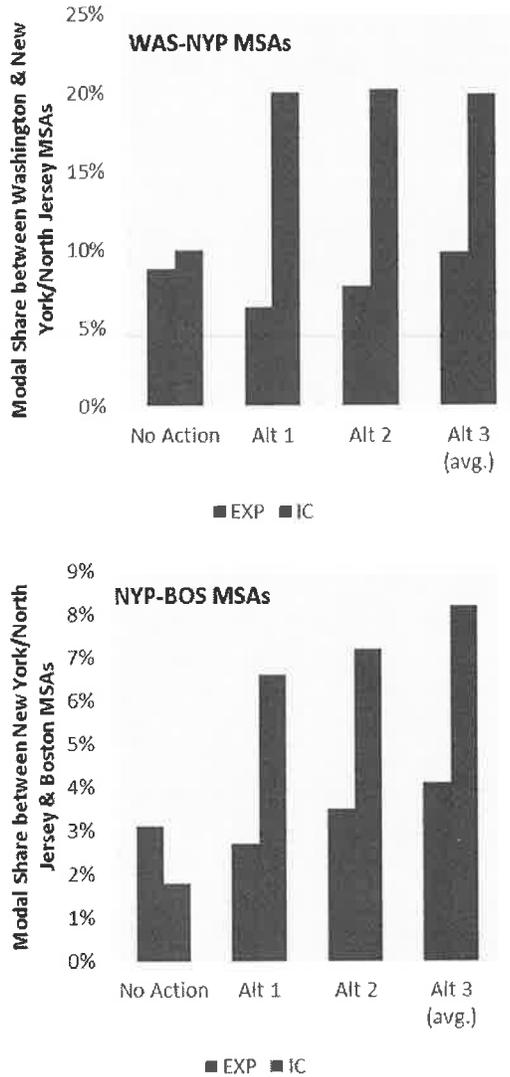
Fare Assumptions

The daily frequency between the Boston and New York increases at similar rates for the IC-E and IC-C service (product) types between the No Action alternative and Alternative 3 (in Table 28 of Appendix B.8. the increases are from 10 to 72 on IC-E and from 9 to 72 on IC-C).

However, the ridership increase between the Boston MSA and the New York/North Jersey MSA is vastly different among the two service types: IC-E ridership increases by 33%, whereas IC-C ridership increases by 356%. This is presumably because non-express fares are assumed to be reduced by 30% in the Action alternatives. The effect of this assumption is to mask the beneficial impact of frequency and trip time improvements on IC-E.

Comparing the Action against the No Action alternatives, the share of travelers choosing IC-C (shown as IC in Figure 3.2: below) increases much more than the share of travelers choosing IC-E (shown as EXP in Figure 3.2: below) within the overall travel market. Figure 3.2: shows the rail modal share between two of the largest MSA market pairs:

Figure 3.2: Rail Modal Share in Select Markets



Source: Appendix I of Appendix B.8

Comparing No Action to Alternative 3, the increase in market share is much larger in IC-C than in IC-E, suggesting that many of the incremental rail riders are choosing IC-C instead of IC-E.

The reduced fare policy assumed within the Action alternatives is described as “not intended as a fare-maximizing or ridership-maximizing analysis” (Section 4.2.2.2 of Chapter 4). It remains unclear what its purpose is and how it can be reconciled with the statutory basis on under which Amtrak operates.

In the No Action alternative, rail capacity does not change from current levels even as ridership demand rises in 2040, but there is no analytical treatment of the excess demand that would arise. Using higher fares to price-off excess demand (i.e. imposing a quantity ceiling) in the No Action alternative would be a prudent analytical (and possibly necessary real world)

device, but its application would generate a deadweight²⁸ loss compared to the free market equilibrium. It is not clear from the documentation if this effect has been captured in the economic assessment.

While the increasing chances of service disruption in this scenario may affect the market appeal of intercity rail services, a corollary would be the option to apply a premium in the Action alternatives as a state of good repair is achieved and disruptions are reduced. This is a missed opportunity for capturing consumer surplus, reflecting part of the value that the Action Alternatives bring.

Overall, the fare policy assumptions appear to contribute to a number of counter-intuitive outcomes from the ridership analysis, which in turn inform and affect the project assessment:

- The Action alternatives each have worse operating profit margins compared to the No Action alternative (Table 4-15 of Chapter 4).
- 75% of the possible ridership change on Intercity services (IC-E and IC-C combined) against No Action is achieved by Alternative 1 even though it has the least incremental service among all the Action alternatives (Table 5-13 of Chapter 5). The average annual intercity O&M cost in Alternative 3 is 77% higher than that of Alternative 1, however it only gains 16% more intercity ridership.
- The total value of intercity rail travel time savings achieved by rail passengers is highest in Alternative 1 even though this alternative actually has the slowest IC-E and IC-C trains out of all the Action alternatives (Table 6-6 of Chapter 6).
- The monetary value of emissions savings is highest in Alternative 1 (Table 9-25 of Chapter 9).

Adopting more rational fare scenarios may provide for more a balanced comparison of the service possibilities.

Auto and Bus Service Characteristics

On average, roadway congestion within the study area was assumed to increase by 7-8% between 2013 and 2040 (Section 3.3.1.1 of Appendix B.8). This represents a compound annual growth rate of less than 0.3%. If congestion in the corridor increases at a higher rate, rail may become a relatively more attractive option to auto and bus users.

For longer auto and bus trips, it is unclear if en-route stops for rest breaks or refueling were factored into the travel time used in model estimation. These stops could significantly increase the total auto or bus travel times and improve the relative attractiveness of the other modes.

It appears there were no changes in auto travel cost assumed for 2040 (Section 3.2.1.1 of Appendix B.8). While there is considerable uncertainty over future gas prices, road pricing, or other costs associated with driving, changes in auto operating costs affect the attractiveness of rail.

²⁸ In the No Action alternative where demand for rail travel far exceeds available seat capacity, it would be possible to assess a premium to price off excess demand to reconcile it with available capacity. It would mean that some travelers become unable to travel on rail. This would mean that the economic benefits that flow from these passengers' rail travel is lost too. This loss is the "deadweight loss" and the NEC FUTURE document is not clear as to whether this has been taken into consideration as part of the economic assessment work.

Ridership Forecasts

Connectivity Benefits

Section 9.4.1.2 of Chapter 9 states that the “opportunity for additional ridership when improved connectivity between Regional and IC/IC-E services are considered” may have been underestimated because ridership on regional and IC/IC-E services was forecast separately. Given the substantial frequency increases in the Action alternatives, the connectivity benefits may be significant. This potential impact should be considered within the study.

Induced Demand

The levels of induced demand (0.6% for Alternative 1 and 1.1% for Alternatives 2 and Alternative 3, Section 6.3 of Appendix B.8) appear very low in comparison to international experience. Induced demand levels of between 6% and 27% have been observed on European high-speed rail systems such as LGV (Paris-Lyon), Eurostar (London-Paris), and Eurostar HS1 (London-Paris speed improvement), and such ranges are commonly accepted in similar international rail planning projects. For example, in the UK the demand model which supports the business case for HS2 (high speed rail service between London and several other British cities) suggests induced trips will form 24% of total trips.²⁹

Air Modal Diversion

In the Action alternatives, between 1.3 and 2.3 million air trips are diverted to IC-E and IC-C services in 2040 out of a base of 22.9 million air trips in the No Action alternative (Table 9-8 of Chapter 9; Table I-2 of Appendix B.8). While acknowledging that many of these air trips may be connecting to or from other flights, this still seems to be a very low diversion rate from air, especially considering that all the Action alternatives provide significant travel time savings from the No Action alternative. For example, in Alternative 3, the D.C.-Boston travel time on IC-E is reduced to approximately 4 hours and therefore is likely to be able to compete effectively with air after accounting for terminal security and wait times encountered in air travel. Indeed, in 2014 – with similarly competitive travel times compared to air – Amtrak had nearly 80% and 60% of the air-rail market share in the New York-D.C. and New York-Boston markets, respectively. The rail capture rate could be expected to significantly increase with the transformational service improvements proposed in the Action alternatives. The nesting structure of the mode choice models may be distorting the impact of faster travel times on air/rail market share and on rail ridership.

Mode Choice Models

Saturation of frequency effects

Alternative 3 has daily train frequencies above 70 for the major station pairs on both the IC-E and IC-C services. However, the impact on ridership of train frequency is saturated at around 50 trains per day per service in the demand forecasting model (Sections 3.2.4.1 and 3.2.5.1 of Appendix B.8). This in part explains why the significant increase in capital and operating costs of Alternative 3 compared to Alternatives 1 and 2 are not matched by corresponding revenue and ridership increases. With this model, it would be possible to achieve an equivalent

²⁹ Table 2 of “Economic Case for HS2: Updated appraisal of transport user benefits and wider economic benefits” (2012). UK Department of Transport.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3650/hs2-economic-case-appraisal-update.pdf

ridership benefit with a lower service frequency and in turn lower capital and operating expenses. Indeed, the increasing levels of service in each of the Action alternatives actually result in progressively lower operating profit (Table 4-15 of Chapter 4). While it may be reasonable for incremental service frequency increases to have limited ridership impacts at very high levels of service, better consistency between the service plan and ridership model would avoid situations where additional frequencies are not attracting more riders (merely redistributing them between trains) while incurring significant costs.

Business Traveler Model

All of the rail mode alternative-specific constants (ASCs) are constrained to be equal to one another; and overall rail is also the least preferred mode relative to auto, air, and bus (Table 14 of Appendix B.8). This means the mode choice decision between the different rail alternatives is based on only their observed attributes, such as time, cost, and frequency, contrary to typical intercity modeling practice where express rail services are usually considered more attractive compared to regional rail services (reflecting wider service attributes), all else being equal.

The relative attractiveness of the intercity modes implied by the ASCs are quite counter-intuitive and do not follow established literature and findings from other intercity passenger rail studies in the NEC, elsewhere in the US and internationally. After converting the ASCs reported for the business traveler model into equivalent travel time differences, the model implies that, all else being equal:

- The intercity bus mode is almost as attractive as the auto mode (the intercity bus is only inferior by 20 minutes) when typically it is considered less attractive.
- The intercity bus mode is more attractive than the air and the intercity rail modes by a value of 51 and 87 minutes respectively, contrary to common practice where rail is considered as more attractive than bus assuming comparable time and cost.

The implied value of time is around \$92/hour for IC-E users and around \$41/hour for the IC-C users (Section 3.2.4.2 of Appendix B.8). This is at the very high end of “plausible ranges for hourly values of travel time savings” presented in a 2014 USDOT guidance document.³⁰

Non-Business Traveler Model

The mode choice model for Non-Business travelers was estimated using only Revealed Preference data based on actual travel experience on existing Amtrak Northeast Corridor (NEC) services (Table 16 of Appendix B.8). The ridership impacts that could be expected to result from the transformational improvements in service level and travel speed in the Action alternatives may therefore be understated. If it is not feasible to collect or estimate a model from Stated Preference data, one might borrow from experience on other corridors where transformational changes have been implemented or studied to adjust or validate the existing model.

The modal constant for IC-E compared to auto is quite unfavorable (Table 16 of Appendix B.8). Ceteris paribus, IC-E is estimated to be inferior to the auto mode by 280 minutes. This may help explain why incremental IC-E ridership is quite low in the Action alternatives.

³⁰ Table 5 of <https://www.transportation.gov/sites/dot.gov/files/docs/USDOT%20VOT%20Guidance%202014.pdf>

The ASC for the Metropolitan service was asserted to be equivalent to that of Regional Commuter trains (Section 3.2.5.1 of Appendix B.8). Considering its proposed service characteristics, the Metropolitan ASC should have been asserted using the ASC for IC-C services and not commuter rail services; the latter has a less favorable ASC, which may have contributed to lower ridership estimates in the Action alternatives.

The values of time implied by the time and cost coefficients are significantly lower than typically used values for intercity personal travel (\$6/hour for trips costing \$50, \$9/hour for a trip costing \$100 and \$18/hour for a trip costing \$200; Section 3.2.5.2 of Appendix B.8).³¹

The piecewise linear cost coefficients for Non-Business travelers create the issue of boundary conditions or “cliffs”; for example, if a trip cost \$50, the fiftieth dollar would have a much more significant impact to the mode choice decision than each of the previous 49 dollars (Table 16 of Appendix B.8). Thus there may be situations where adjusting fares by small amounts can lead to more significant changes in estimated ridership.

Commuter Model

The value of time (\$28/hour; Section 3.2.6.2 of Appendix B.8) implied by the time and cost coefficients in the commuter model is quite high.

*Mode Choice Model Nesting Structure*³²

The rail nest is on the same level as auto, air, and bus (Figures 10 and 11 of Appendix B.8), meaning the model assumes the same pattern of substitution between rail and all these other modes. As a result, improvements in rail would draw proportionately from all the other modes, although one might expect a higher diversion from other common-carrier modes such as air or bus.

Air is in a separate nest relative to IC-E. This is unusual given that available evidence suggests that these are highly substitutable modes; for example rail travel is increasingly more popular than air travel for the D.C.-New York and New York-Boston markets since 2006.³³

Base Year Model Calibration

The range of calibration factors used to adjust the base year seems quite large, ranging from -14.58 to +10.00 (Section 3.3.3 of Appendix B.8). This may suggest limitations on the ability of the mode choice models to accurately reflect existing mode shares.

Stated Preference (SP) Survey Design

Broadly speaking, the SP survey design seems suboptimal in several aspects. As the survey data forms the basis of model estimation, these limitations may be affecting the mode choice

³¹ Same as 30.

³² The NEC FUTURE mode choice models are statistical models, called logit models, that predict the fraction of travelers who use each mode (e.g. auto, air, rail etc.) based on mode and traveler characteristics. Logit models group the available modes in a hierarchy that reflects the implicit similarity or difference between travelers' preferences for the modes, and so the substitutability between them. The mode groups at each level of the hierarchy are called “nests”. The placement chosen for particular modes in the different levels and nests of the hierarchical mode choice model structure affects the mode shares predicted by the model. The nesting structure used for the ridership forecasts developed by the FRA in the NEC may be contributing to the low (and counter-intuitive) air diversion to the IC-E mode.

³³ Amtrak FY14 Q2 Air-Rail Market Report

coefficients and contributing in turn to the relatively low ridership increments between the Action alternatives. It may be advisable to validate and adjust the mode choice model coefficients based on operational experience or comparable studies to ensure reasonable results. Some of these limitations are described below:

- The time and cost attributes were only varied by $\pm 15\%$ or $\pm 30\%$ (Section 2.3.2 of Appendix B.8). However, the actual service characteristics of IC-E service often change by higher magnitudes between the No Action and Action alternatives. Typical SP survey designs employ more than two levels to capture between-variable effects.
- Attribute levels on the respondent's current mode were all adjusted to be less attractive, and attribute levels for the two alternate modes were all adjusted to be more attractive (Page 28 of Appendix A to Appendix B.8). This defeats the purpose of achieving a near-orthogonal design and is contrary to standard practice.
- Respondents saw changes in only two out of three variables (time, cost, and schedule) within the survey (Section 2.3.2 of Appendix A to Appendix B.8). Including variations of all three may provide for more robust results.

Comparison with revenue and ridership forecasts for California High Speed Rail

We have also examined how the revenue and ridership forecasts for high speed rail in the NEC FUTURE study compare with those developed for the proposed California High-Speed Rail (CAHSR) system. Details of this analysis, in which we attempt to make a high-level comparison between publicly available data on the two studies for proposed High-Speed and Intercity Passenger Rail (HSIPR) systems, are set out in Appendix A. This high-level comparison also shows, in general, lower mode shares for the true high-speed rail service in the NEC compared to similar service in California for the major origin-destination pairs.

Evaluation Methodology: Economic Effects

The Draft Tier 1 EIS includes an assessment of the potential economic effects that may be expected for each of the NEC FUTURE alternatives. From our examination of the methods and results as reported, there were some aspects of the analysis which we found surprising and would as a result give rise to unlikely and counter-intuitive outputs. We discuss these below.

Construction and Rail Sector Employment Effects

In line with best practice the approach to estimating jobs and earnings impacts uses multipliers provided by the US Bureau of Economic Analysis (BEA) for the construction and professional services industries. As noted in the BEA RIMS II guidance, "The model's assumptions...should not be overlooked"³⁴. These assumptions are important in determining whether the model is suitable for a particular impact study." It is not clear to us, however, whether changes to the standard approach described in the BEA RIMS II guidance have been made to reflect the specific nature of the NEC alternatives.

More specifically, we note that a number of assumptions inherent within the BEA RIMS II guidance may not be applicable when considering the delivery of a very large infrastructure project. For example:

³⁴ See *RIMS II: An essential tool for regional developers and planners* (https://bea.gov/regional/pdf/rims/RIMSII_User_Guide.pdf)

- “I-O models assume that industries do not change the relative mix of inputs used to produce output.” Over the 25-year construction time-horizon we would expect that improvements to working practices would deliver efficiency gains which alter the relative attractiveness of inputs. Furthermore, in the case of Alternative 3, the deployment of innovative railway technology along a new alignment may involve a different mix of inputs altogether.
- “I-O models are often referred to as “fixed price” models because they assume no price adjustment in response to supply constraints.” Since funding and finance sources are currently unknown, the scale of economic activity supported or new to the affected area may be large, and there is a risk that input prices (particularly for materials) may face upward inflation pressure.
- “RIMS II multipliers for the construction industry are based on national averages across a wide variety of construction projects.” Multipliers for the construction industry are, therefore, more suited for estimating the impacts of commercial and residential construction projects. One possible concern when using multipliers for the construction industry is that some construction projects use specialized workforces from outside the region. For example, ironworkers may be brought in to build a bridge. Since RIMS II assumes that local workers can work on all types of construction projects, the construction multipliers may produce inflated impact estimates for projects that use specialized, nonlocal labor. Best practice, as advocated within the RIMS II guidance, suggests that adjustments to replace average values with information that is specific to an individual construction project should be made using the bill-of-goods method. The bill-of-goods method can provide more accurate estimates when specialized workforces from outside the region are used in a construction project. This method can also be used to appropriately account for other inputs that may be produced locally but purchased from outside the region.

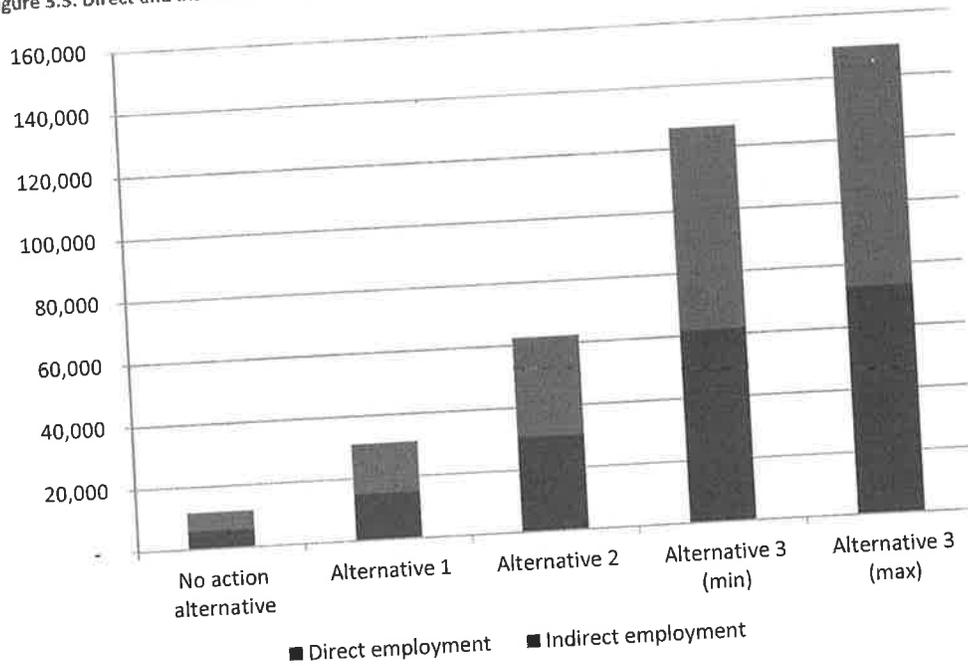
In order to have confidence in the resulting estimates of jobs and earnings, it is our view that the issues identified above should be considered explicitly within the Final Tier 1 EIS. While any adjustments may not affect the ranking of alternatives, it is important to understand the absolute economic effects if they are to be meaningfully compared to other project benefits and estimates of construction and maintenance costs.

Linked to the issues identified above we note that the jobs estimates reported within the Draft EIS appear high. As can be seen in Figure 8, Alternative 3 is projected to support the equivalent of 70,000 direct and 75,000 indirect full-time equivalent jobs over the entire 25-year development and construction period (2016-2040). By contrast, Amtrak’s 2012 NEC Business and Financial Plan estimated that construction of a NextGen HSR system would generate approximately 40,000 annual jobs over a 25-year construction period.³⁵

In practice the labor requirements for the project are unlikely to be uniform and will peak during the construction phase.

³⁵ <https://www.amtrak.com/ccurl/453/325/Amtrak-Vision-for-the-Northeast-Corridor.pdf> (see section 5.4)

Figure 3.3: Direct and indirect employment estimates



Source: NEC FUTURE Draft Tier 1 EIS Table 6.1. We have assumed that FTE jobs are supported for the entire development and construction period (2016-2040).

In order to establish that the NEC FUTURE projections are within a reasonable range we suggest that construction jobs estimates should be benchmarked against other domestic infrastructure investment and/or overseas rail investment employment.

Travel Market Effects

It is evident that a considerable volume of analytical work has been undertaken in order to generate monetized estimates of travel market effects. We have no reason to doubt that the relevant guidance has been followed and that, in principle, the process followed is reasonable.

In practice, the assessment of travel market effects is dominated by the impact of changes in the value of travel time savings and travel costs which are, themselves, driven by assumptions regarding service frequency, travel times and rail fares. As a consequence the evaluation of travel market effects is inextricably linked to the demand models and input assumptions used.

As noted above, the rationale behind many of these assumptions – in particular the service fare assumptions – is not clear. In the Action alternatives, non-express fares were reduced by 30% relative to existing Amtrak fares, whereas in the No Action alternative fares were not adjusted. The Draft EIS explains that this policy assumption is “neither fare-maximizing or ridership-maximizing analysis” and “is intended only to demonstrate that the Service Plans operate profitably over multiple fare structures.”³⁶

³⁶ Draft EIS, Section 4.2.2.2 of Chapter 4

We consider that this seemingly arbitrary assumption damages the case for Action alternatives and represents a significant weakness in the analysis. In practice, implementation of the Action alternatives would create an opportunity to review the fares structure across all service-types and to develop fares which were optimized so as to meet shared objectives for increasing rail ridership in the NEC while at the same time recognizing passenger requirements and the commercial obligations of Amtrak and other operators.

Following the implementation of the Action alternatives, we would expect that the considerably improved service levels that will be delivered would increase, rather than diminish, passengers' willingness to pay for rail travel. Indeed, as currently formulated the fare policy assumptions imply that in some circumstances passengers should pay more for fewer, less frequent and less reliable services within the No Action alternative. We consider important that this anomaly should be resolved before drawing any conclusions regarding potential changes in the need for public financial subsidy for rail services in the corridor i.e. the relative affordability of alternatives.

Although there are several references to increased service reliability and resilience under the Action alternatives compared to the No Action alternative, these impacts do not appear to have been quantified or included within the analysis. In addition, the impacts of disruption to existing services during the construction phase do not appear to have been considered within the comparison of options. International evidence suggests that periods of extended disruption can have a considerable hysteresis and that ridership can take up to five-years to respond fully to service improvements³⁷.

Economic Development Response

We would support the FRA's view that investment of the scale envisaged under the Action alternatives would have the potential to influence the quantity and distribution of economic activity within the North East Corridor. These impacts arise from transportation interventions that deliver:

- Agglomeration economies e.g. knowledge-spillover effects
- Labor market improvements e.g. better matching of skills to jobs
- Additional competition e.g. intensifying the competitive environment.

The transformational Alternative 3 has the potential to support considerable improvement in the functioning of local and regional economies in the NEC. However, we believe that the economic development response (in particular the agglomeration benefits) to all investment alternatives could be very much greater than the Draft EIS suggests.

Consensus over the existence and importance of these impacts has been building over time, both in academic circles and among practitioners, and methods to quantify Economic Development Responses are established within the UK, Australia and New Zealand. As can be seen in Table 3.1., experience from these and other countries suggests that the combination of labor market effects and agglomeration effects are typically of the order of 10%-30% of travel market effects.

³⁷ *Passenger Demand Forecasting Handbook* version 5.1 (Association of Train Operating Companies, 2013) and *Revisiting the Elasticity Based Framework* (Arup and Oxera, 2010)

Table 3.1: Sample of Agglomeration and Labor Market Impacts as a proportion of User Benefits

Project type	Location	Project	Economic Development Response as a proportion of user benefits		
			Agglomeration	Labor market	Total
Rail	Major city	Crossrail	24%	28%	52%
HSR	Inter-urban	HS2 Phase 1 (London – Birmingham)	44%	0%	44%
Road	Conurbation	Leeds – Bradford Improved Highway Connections	30%	5%	35%
Road	Conurbation	Leeds Urban Area Highway Improvements	31%	3%	34%
Mixed	Major city	Melbourne East West Road and Rail Package	22%	6%	28%
Rail	Major city	AirTrack	26%	1%	27%
Road	Inter-urban	Leeds to Sheffield Highway Improvements	24%	-2%	22%
HSR	Inter-urban	High Speed Rail (Lisbon – Porto)	18%	0%	18%
Road	Urban	Waterview Connection	18%	0%	18%
Bus	Conurbation	Leeds to Bradford Public Transit Improvements	18%	2%	20%
Road	Inter-urban	A46 Interurban Road	13%	1%	14%

Source: Steer Davies Gleave research

These benefits tend to be toward the upper end of this range when:

- The existing corridors are congested and currently operate at capacity
- The existing corridors link significant large conurbations
- The interventions are likely to have significant positive impacts on travel times along the corridors
- The interventions are likely to have a significant positive impact on reducing congestion on local roads and improving urban connectivity
- The scale of agglomeration-sensitive industries both within and bordering the affected area is large.

We note that by excluding regional services from the analysis, many of the agglomeration and labor market benefits that may arise from improving urban connectivity may be missed. Agglomeration impacts within metropolitan areas decay rapidly with distance and rely upon a full representation of the range of travel opportunities (including rail) that are available to travelers. We anticipate that by removing long-distance traffic from the existing NEC infrastructure and reducing conflicts between local and intercity services, Alternative 3 offers the greatest scope to realize agglomeration impacts through optimizing the use of released capacity for local services.

While there is limited local evidence regarding the relationship between economic density and productivity within the US, the exclusion of quantified assessments may affect both the

conclusions regarding the public benefits of individual alternatives, as well as the ranking of mutually exclusive project options. We suggest that the FRA be asked to consider whether such measures could be developed to inform the final EIS.

Even if it is not possible to produce monetized estimates of agglomeration and labor market effects, we consider that the measures as currently reported within the Draft EIS do not provide an adequate proxy for such methods and, in some cases, may lead to sub-optimal outcomes. For example, station area connectivity (as reported in Figure 6.4 of Chapter 6) and connectivity (as reported in Table 6.16 of Chapter 6) measures may favor new out-of-town rail interchanges over improvements to city center stations where agglomeration economies are expected to be most significant.

Similarly, the arbitrary 30-minute travel-shed for considering labor market effects is likely to devalue the potential for rail to compete with the automobile along certain corridors. For example, Alternative 3 brings the Greater Philadelphia area within 38 minutes of New York City. This represents a travel time reduction of approximately 30% over the No Action alternative and, even taking into account access and egress from the rail network, is considerably faster than the equivalent journey by automobile. Through offering opportunities to travel that simply cannot be delivered by any other mode, the potential for transformative investment in the NEC to affect economic geography should not be understated.

Comparing Costs and Benefits

We believe that the adopted horizon year has the potential to distort the comparison between project costs and benefits, and between alternatives. There are two principal reasons for this:

- Capital costs are expressed as a total for the entire 25-year construction phase (2016-2040), while operating costs and all benefits are single-year estimates; and
- The benefits of alternatives that bring significant long-term improvements e.g. through providing additional capacity, cannot be captured.

The first issue concerns the fact that capital costs and all other monetized effects are not expressed in the same unit of account. As a consequence it is difficult to conceptualize any trade-offs between incremental capital costs and other measure. For example, an additional \$10 billion capital expenditure may generate an additional \$0.3 billion in travel time saving benefits and \$0.2 billion in revenues each year. While these figures appear small in comparison with the additional costs required to secure them, the additional revenue and benefit streams are received in perpetuity. Outside a formal social accounting framework it is not, therefore, possible to make meaningful comparisons of project costs and benefits.

The second issue is that any deterioration in service quality e.g. through overcrowding or unreliability beyond the 2040 horizon is ignored. For example, the chronic shortage of capacity that would be experienced in the No Action alternative beyond 2040 is not recognized and therefore the incremental benefits of Action alternatives relative to this position are likely to be understated. Conversely, through delivering transformational change, Alternative 3 removes the persistent requirement to patch-and-mend an aging asset, and delivers headroom into which future demand for rail travel can grow.

4 Other considerations

Introduction

In this section, we highlight areas of the analysis conducted in support of the draft Tier 1 EIS where there are gaps – missing components that are sufficiently significant in our view to affect judgments about how the preferred alternative should be developed. Some of these can be addressed, we suggest, by an expansion of the analysis, others through sensitivity tests.

There are also some significant areas of the analytical “jigsaw” that have been omitted but where we suggest that FRA should consider at least adding commentary to the Tier 1 statement. This includes the critical area of deliverability. It would be tempting to consider this to be a downstream activity, but in practice it is a significant discriminator between the types of investment choices that the FRA has identified and therefore needs to be considered at this programmatic level.

Also in this section, we consider global trends in seeking to achieve competitive economic advantage through enhanced connectivity. Many countries are using high speed rail – and expanded commuter and metro rail systems – to secure greater economic competitiveness.

Gaps that could be addressed through extending the existing analysis

Rail, and especially dedicated high-speed rail, provides a wider set of attributes, beyond travel time and frequency, that are becoming increasingly important to customers worldwide. It is important to recognize these factors since they are likely to have a very significant effect on demand and mode choice. Recent research among long distance rail passengers in the UK, for example, found that 10% of travelers chose the rail mode because they felt able to make better use of the time spent while traveling.³⁸ Features such as free Wi-Fi usable while traveling – both at stations and on-board – can be crucial, especially if the alternative is to drive. Other quality factors that affect the train experience, such as modernized or newer stations, on-board catering, improved comfort levels from modern equipment and better track conditions are also relevant.

While the FRA may not have the research evidence to address these quality factors, it should be possible to apply a sensitivity test to the elements of each alternative that has the intrinsic scope for these features, especially on longer distance journeys where they are most likely to have greatest impact.

The second addressable gap is in assessing the value that can be placed on increased travel reliability, both for passengers in terms of decisions on how to travel and for the wider economy from less wasted time, and from the greater efficiency that stems from not needing

³⁸ UK Department for Transport, “Public Attitudes towards train services”, p. 33, December 2015

to build in margins for lateness. While excluded from the demand modeling carried out to date for the EIS, it is relatively straightforward to introduce this. Essentially, at this programmatic level, the less intensively the infrastructure is utilized, and the more it has been modernized or built new, the greater the level of service reliability that can be achieved. Since this is itself a major aim of NEC FUTURE, as noted in the Draft EIS, it would seem essential that some attempt is made to quantify the value that would be created by each action Alternative. In the case of Alternative 3, with the creation of a second spine, used exclusively by high speed passenger trains and with the benefit of greater security of a fully segregated right of way, very high levels of reliability should be achievable.

However, the new and improved infrastructure proposed under each of the Action alternatives will result in considerable disruption during construction. This represents a third area of omission in the analysis. The FRA acknowledges that the planning and staging of work to minimize adverse impacts to ongoing operations will be challenging and notes that there will be adverse impacts on train operations, with temporary reductions in service levels, longer travel times and reduced on-time performance and reliability. While these impacts are rightly highlighted, their effects on demand and ridership and the financial performance of the train operators will be material and will differ in magnitude between the Alternatives. We suggest that the evaluation of the Alternatives for the Tier 1 EIS should at a minimum reflect the relative disruptive impacts of construction on train operations.

The Draft EIS cites integrated ticketing and fares across the NEC to improve passenger convenience, and reduce station dwell times and overall travel times as a key project benefit, and it is the fourth omission that we believe should be addressed.³⁹ There are of course costs associated with creating a simpler user-friendly system, but worldwide this is the trend, with mobile phone booking or paperless authorities to travel. Often, the investments needed are found to represent very good value for money and can ultimately achieve operating cost savings. So the additional demand induced by the convenience value of integrated ticketing and fares also needs to be factored into the forecast demand and revenue analysis: it is a key part of transformational change and is likely to have a significant bearing on modal choice. Convenience is a critical variable in how people choose to travel.

The fifth issue is that a number of the (higher end) investments would bring associated cost efficiencies and the lower operating costs associated with cab signaling (a pre-requisite for the new line in Alternative 3) and this should be reflected in the EIS.

The sixth missing point that should be addressed is that there is no consideration of post-2040 impacts. Such impacts fall differentially across the alternatives, because they have differing capacity reserves. We acknowledge that this requires simplified assumptions on a trend basis, but the EIS as presented ascribes no value to the capacity reserves created by the higher spend alternatives, nor costs to the constrained – and in future years inevitably congested – outcomes of the lower cost options.

The final point is the desirability of adding sensitivity assessments around some key areas and these include the following areas:

- The effects of a much higher level of induced demand (in line with international experience, as described in section 3)
- Impacts of fuel price and hence auto operating cost changes

³⁹ Draft EIS, Section 4.2.2.1 of Chapter 4

- Sensitivity to auto congestion and operating cost levels
- Sensitivity to demographic growth both pre- and post- 2040
- Premium fares applied to new high quality high-speed services

Missing Aspects of Analysis

There are five missing “jigsaw pieces” – areas that are not addressed in the EIS. We discuss them here, and indicate how they would affect the FRA’s consideration of the action alternatives had they been included in the Draft EIS work to date. We understand their exclusion to date cannot be made good readily without further FRA-commissioned analysis. But we suggest how they can be taken into account in coming to a view on a Preferred Alternative.

The five topics are:

- Deliverability
- Commuter service development
- Freight development
- Hub station development
- Effects on competing modes (highways and airports)

Deliverability

While the sequencing of construction for each of the Action alternatives is briefly discussed in Chapter 8 of the Draft Tier 1 EIS, the deliverability questions associated with the implementation of the infrastructure changes have not been considered.

Whether infrastructure changes are an adaptation on existing rights of way in the NEC or form part of a new spine route has a critical effect on deliverability. In both cases, there will be environmental impacts to consider – and these will need to be assessed in future Tier 2 EISs. But decisions on the best way forward need to reflect the fact that major investment in the existing corridor in anything like the timescales implied by a 2040 planning horizon year entails levels of investment and of *disruptions to services* that are likely to be on an unprecedented scale. In terms of retention of service continuity, a better approach is one that centers on creating new alignments.

At the programmatic level, it would be unreasonable to seek estimates of work schedules from which disruption levels, even in outline, could be quantified. But this fact alone is reason to ensure that the transformational level approach as reflected in Alternative 3 is not rejected: it may be that, on further study, some of the incremental developments envisaged in Alternatives 1 and 2 turn out to have unacceptably protracted delivery timescales.

There are several other points on deliverability. The first is simple: the impact of greater levels of service disruption from a failure to achieve a state of good repair (the No Action alternative) has not been estimated. This serves to underline the conclusion that the No Action alternative is unsupportable.

Creating additional capacity with more tracks, at/through stations and on plain line, results in increased resilience/redundancy. For times of major future renewals, for example, a parallel route/pair of tracks can be made available for use. This benefit is not easy to quantify, but it is nonetheless real and simple indicators could be used to show how the alternatives perform in regard to added network resilience.

A specific way in which this leads to an important strategic choice is whether to build new spine capacity first and then using the completed section of new line to direct services while the original route is brought to a state of good repair. The alternative incremental approach would be to make the improvements to the existing line first, expecting that this will help build market share and wider economic value, and then create the additional capability of a new line. We suggest that these choices should be considered on a case by case basis (and that would be a Tier 2 matter in due course) but these options are only available if there is commitment to a long-term development program that creates new track capacity off-line.

More generally, the Draft EIS gives little or no consideration to phasing, suggesting that is for later. However, there will be little clarity around the NEC FUTURE vision if the preferred approach makes no reference to this area, and specifically around where the priorities lie within the overall program. The question of sequencing is one to which the FRA may wish to devote some attention: which elements are needed before others can be properly utilized? Which can be considered independent of each other? Looking at these areas would be helpful in forming a view on the Preferred Alternative.

Funding for each alternative is inevitably a key part of any deliverability assessment. Analysis conducted by Steer Davies and Gleave and KMPG for Amtrak in support of its Vision for the Northeast Corridor updated in 2012⁴⁰ identified a trajectory through which, by creating new ring-fenced infrastructure assets initially funded by government sources, it would be possible to raise revenue from private sources and use those sources to downsize the scale of federal/state funding needed for future stages of the investment program. This would be a matter for policymakers to decide, but the essential requirement is that new asset creation minimizes risks for private sector investors. This can be achieved provided asset condition (otherwise a major risk and deterrent with the historic assets) can be readily assessed and understood; and if there is a clear revenue stream from making the asset available to other train service providers. The projected strong commercial performance of the Intercity Express service element points to how this can be realized without the circularity of needing increased subsidy to cover access fees payable to the private sector.

In short, if the FRA wishes to create the possibility of future private sector funding of parts of the NEC, then it would need to ensure that its vision provides for new infrastructure that supports the profitable operation of rail services – and in practice that means high-speed rail.

Commuter Service Development

Consideration of how the capacity that can be increasingly created through Alternatives 1, 2 and 3 could be used to expand – indeed transform – commuter rail operations is, surprisingly, absent from the analysis. A primary benefit of a new spine route for express services is the capacity released on the existing corridor for which the prime candidate use would logically be expanded commuter services.

We would suggest that the FRA might use the next period to work with state and local government and with operators to develop outline commuter service concepts – analogous to those it has already developed for intercity services – and then see how the Alternatives are best suited to facilitating their introduction.

⁴⁰ <https://www.amtrak.com/ccurl/453/325/Amtrak-Vision-for-the-Northeast-Corridor.pdf> (reference page 22, NEC Business & Financial Plan)

Freight

Existing freight services on the NEC are treated as a fixed requirement in the Tier 1 analysis. In practice freight demand and service requirements are evolving continually and rapidly. The consultations may reveal freight company ambitions that would help take further trucks off the highway network, for example. In any event, we suggest that the FRA should seek to understand what use could be made of the existing NEC if Alternative 3 is adopted and significant additional capacity, and score its performance in the EIS accordingly.

Hub Station Development

The Draft EIS suggests that a connecting timetable approach, possibly with “pulse hubs” at major stations would bring significant benefits. However, neither the costs of achieving this outcome nor its benefits have been identified. It is not possible therefore to reach any conclusions on this matter in the EIS, and therefore we suggest that references to this concept should only be included if they can be supported by an indicative assessment.

A related question is the matter of access capacity to NEC stations. Expanding service capacity along the corridor is one matter. But the availability of access facilities (walk, cycle, bus, transit and auto) each need to be considered too. There will be costs and benefits from any capability/capacity improvements that extend beyond those related to travel along the NEC that need to be assessed. At this stage, we would suggest that the final EIS needs to reference this issue and how it should be regarded.

Effects on Competing Modes

As noted in Section 3, the EIS analysis is, in our view, very cautious in its estimates of the effects of Corridor enhancement on other travel modes. The evaluation, moreover, excludes any consideration of the benefits for highway users of what we believe would be likely to be a much greater impact. This also applies to air travel where the scope to reduce congestion at airports is significant.

Global Trends

The NEC is unique in the US. Therefore comparators have to be drawn from elsewhere. The world has embraced high-speed rail as a means to secure economic competitive advantage. The pace of development is remarkable as illustrated in Figure 4.1: and Figure 4.2.

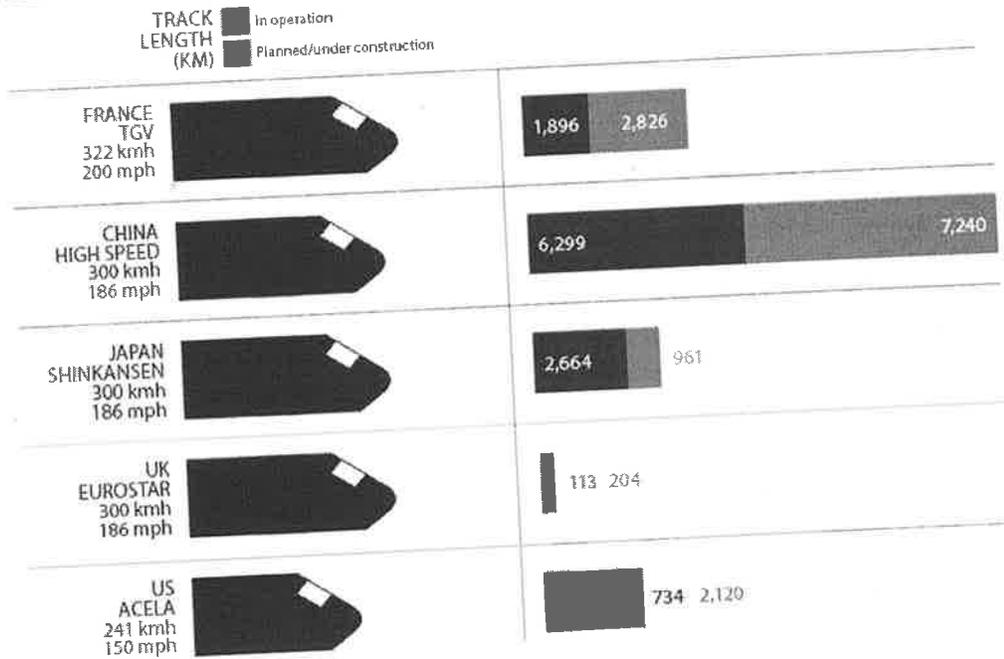
Figure 4.1: Key Figures on Global High-Speed Rail Development



Source: UIC

Figure 4.2: Characteristics of Global High-Speed Rail Service

High-speed trains around the world



Source: UIC/Amtrak

In the diagram shown in Figure 4.2, the planned mileage in the US relates to plans in California and in the NEC – plans which are subject to the Tier 1 EIS. It is an optimistic representation since the operating speeds shown in all countries except the US is the line standard, whereas in the US case it is the top speed capability of the train, achievable only over short sections of track.

But the driver of these developments – which have also taken place in South Korea, Germany, Spain, Italy, and are planned for India, Malaysia, Thailand, Sweden, Russia, and Morocco – is economic development. In many cases (France and India are good examples) the problem is that the existing network was/is congested. Investment in better connectivity between major cities is seen as a way to achieve the following:

- Expanded business markets
- The agglomeration benefits from creating better access to high value business centers
- Expanded commuter markets – especially from using released capacity to expand commuter operations
- Quicker journeys to work and for business meetings
- Greater journey reliability and system safety
- Increased business efficiency and labor market productivity
- Scope for more freight on rail
- An opportunity to rectify deficiencies in historic first generation railroads
- Pressure relief for overcrowded highways and airports
- Least damaging environmental impacts of the options available to increase capacity.

5 Way Forward

The Draft EIS provides thorough, transparent and extensive documentation, forming part of a comprehensive planning effort to define a long-term vision for the corridor that includes passenger high-speed rail. Furthermore the FRA has taken a logical approach to distinguish the choices available: to *do nothing*; to *maintain* the role of rail in the NEC; to *grow* the role of rail in the corridor; or to *transform* the role of rail.

It is evident that to do nothing would have serious consequences: declining service punctuality and extended travel times as speed restrictions need to be put progressively in place to safely operate over ageing infrastructure. Customer demand – especially in the context of the expected demographic growth in the corridor – could not be met. The ensuing loss of rail market share – reversing recent trends – would put even greater pressure on the highway network and airports. Connectivity between the Northeast’s major cities and other communities would decline. The economic gains of widening labor markets and of expanded corridor resident job choices could not be met either. A stand-still is impracticable. At the very least, the investment needed to maintain rail’s market share and role in the NEC is required.

However, the question of which of the three investment alternatives (maintain - grow - transform) has not, in our view, been sufficiently addressed in the evidence that the FRA has provided. As discussed in the preceding sections of this report, there are significant questions around the analysis carried out to date and we respectfully suggest that these should be addressed before the FRA reaches decisions on its preferred alternative.

Our evidence suggests that there is a strong case for the transformational approach to investment – albeit one that progresses through stages (“stair-steps”), as encapsulated by Amtrak’s Vision for the Northeast Corridor.⁴¹ Such an outcome is possible and therefore, we suggest, the way forward should not preclude transformational investment in the NEC.

The “maintain” and “grow” alternatives considered in the EIS also have merits. But the Draft EIS does not make clear there is a need to expand network capacity and that the most efficient and safest way to achieve this is to provide separate infrastructure for high-speed intercity, commuter rail and freight services. This is what transformational investment would achieve.

The scale of capital investment required naturally grows as the policy ambition progresses from maintain → grow → transform. For reasons that we have discussed earlier in this response, the assessed impacts of these three “do-something” alternatives do *not* show a correspondingly positive progression as would be expected.

These reasons relate to the following, which we summarize in turn:

⁴¹ <https://www.amtrak.com/ccurl/453/325/Amtrak-Vision-for-the-Northeast-Corridor.pdf>

1. The specification of each alternative, in terms of service levels and fares
2. Assumptions made in the demand forecasting work
3. The evaluation methodology
4. Omissions from this stage of the work.

In each case, we highlight the additional analysis that we suggest should be undertaken to address the identified issues (shown in **bold type**).

Alternative Service Specifications

Here we cover the important inter-relationship between infrastructure investment and operating service assumptions.

The Draft EIS rightly sets out to assess different ways of meeting market needs. The logical sequence is therefore market needs → service specifications → infrastructure requirements. In practice, this entails some iteration between operational and infrastructural specifications to ensure consistent treatment of alternatives. The risk is that some alternatives are over-specified (resulting in low load factors) or under-specified (with unrealistically high load factors) – and, indeed, as we have shown, both of these unfortunate outcomes have arisen in the Draft EIS.

A generic issue that affects all aspects of the evaluation of alternatives is that all three action alternatives presume that a new type of service will be introduced onto the NEC. This is denoted “Metropolitan” service, and it has the characteristic of being able to operate at high maximum speeds (160 mph), with high acceleration and deceleration rates; it operates at high frequency levels (typically 4 trains/hour, on a standard interval pattern) and stops at all of the stations served by today’s slower Amtrak services *and* at selected stations (unspecified in the Draft EIS documentation) served today only by commuter service providers. Whether or not this type of service innovation is appropriate cannot be judged since it features in every investment case.

What is certain is that this expanded “Metropolitan” high frequency service, with fares set at a level well below the Intercity Express (IC-E) services, diverts a significant amount of demand away from the less frequent limited stop IC-E service. Further, in our view the demand modeling does not account for market responses to rail product differentiation that can be observed today, and it underestimates the likely appeal of IC-E service to corridor travelers. The net effect is a worsening in the commercial performance of rail operations on the corridor. In turn, with existing passengers encouraged to switch from the higher-priced, premium service to a slower but significantly cheaper service, this is likely to be detrimental to the financial feasibility of investment in the NEC.

We recommend that the action alternatives should be reassessed assuming – as the infrastructure permits – expansion of intercity express/high-speed services, of NEC corridor services, including feeder lines and commuter services with no presumption of a new “Metropolitan” tier of service.

Fares

The Draft EIS presumes a reduction in fares in the investment alternatives compared with both today’s levels and the projected levels under the No Action alternative – the one exception being the Intercity Express fares in the three Action alternatives, which remain at existing levels. It would be more usual to assess alternatives consistently with no change in fares levels

in real terms and **it is suggested that the full set of alternatives is tested with a no-change approach to fares**. Sensitivity tests can then be carried out as appropriate.

As matters stand, the assumptions made on fares are one of several factors leading to a worsening commercial performance as the alternatives support improving levels of service. This is the exact opposite of what might be expected in practice, where a better offer in a competitive travel marketplace – at least for intercity travel – might be expected to attract some levels of fares premium and **this it would be useful to test as a sensitivity**.

Service Frequency

The Draft EIS assumes substantial increases in service frequency from No Action to the Action alternatives, including up to 151 trains per day between New York and Washington approximately equally split between IC-E and non-express Intercity (IC-C) services.

The demand models used assume there is little to no impact on ridership for frequency levels above 50 trains per day per service (IC-E or IC-C). This means some of the high-frequency alternatives incur significant capital and operating costs without commensurate benefits, merely redistributing riders between different numbers of trains.

The levels of daily train frequency tested separately for the IC-E and the IC-C services as part of the NEC FUTURE work are above the levels typically examined in the US. But when higher service frequencies have been assessed in other countries, there would be no arbitrary cut off in frequency impact: the advantages of trains at 10 minute intervals rather than 15, for instance, would be reflected in the demand modeling and appraisal. Experience suggests that high service frequencies that facilitate a walk-on approach, rather than requiring travelers to plan and book ahead, are fully compatible with load/seat management (it has been feasible with the French TGV network from the outset, for example) and are part of the transformation of service offer that could be pursued in the NEC.

Operating Speeds

While Alternative 1 entails \$64-66 billion of capital expenditure in comparison with the No Action case, the Tier 1 analysis suggests this would result in a significant *slow-down* of both the Intercity Express and Intercity Corridor services⁴². **We suggest that Alternative 1 should be re-examined with a more realistic travel time response to investment (and any consequential adjustments made to the specifications of Alternatives 2 and 3).**

Implications for Load Factors and Commercial Performance

When applied together with the demand modeling, the service specification issues lead to conclusions that are implausible (but which can be corrected):

- The overall annual financial contribution from operating NEC services declines from the No Action Case to Alternative 1 (“maintain”); declines further in the case of Alternative 2 (“grow”); and yet further in the case of Alternative 3 (transform”). On this basis – which ignores the treatment of investment costs – if judgement were to be made on commercial criteria alone (which, to be clear, we recognize the FRA does not propose), the preferred outcome would be the No Action case. However, we consider that these conclusions are

⁴² As noted in section 2 above, the reduction in average speed observed in Figure 4 may be a function of irregularities in the source data. They appear to contradict the headline journey times shown in Table 2 above. If the average speeds shown in Figure 4 are in fact erroneous, the comment here may not be applicable.

- faulty and will be very different if the assumptions made in the analysis are changed as suggested.
- An indication of how the service levels specification might be best adapted is that the analysis to date shows that the IC-E service accounts for by far the largest financial contribution in all Alternatives (while the IC-C services decrease from an annual net contribution of \$387 million under the No Action option to a net loss in Alternatives 2 and 3). By way of contrast, the 2012 Amtrak NEC Business & Financial Plan⁴³ had a balanced outcome, with IC-C services retaining today's levels of demand while IC-E demand expanded by nine times by 2040.
 - The average load factor becomes very high and possibly unachievable in the No Action option, but with Alternatives 2 and 3, with higher capacity rolling stock provided, load factors drop well below current levels. In the case of the IC-E service, the load factor drops to around a third of the current loading on Acela, while the average fare remains around the same and travel time and frequency are greatly increased – a very unlikely combination of outcomes.

We recommend that each of the alternatives should be re-specified and iterated as necessary with service levels and fares that meet demand with acceptable and consistent results in terms of load factors, and without a presumption of a new (Metropolitan) tier of service.

Demand Ridership Modeling Methodology and Demand Forecasts and Evaluation Methodology

The FRA study team undertook welcome extensive data collection efforts that provide an improved understanding of travel conditions and passenger perspectives along the NEC. But a number of issues arise with the methodology applied in both demand modeling and evaluation of alternatives. In summary, these are:

- 75% of the possible ridership change on Intercity services (IC-E and IC-C combined) against No Action is achieved by Alternative 1 even though it has the least incremental service level increase among all the Action alternatives
- Air modal diversion is very low in all of the Action alternatives. Where service speeds are significantly improved between Boston and Washington, this is contrary to current experience in which Amtrak enjoys the majority of the air-rail market share between New York and Washington and between New York and Boston.
- The estimated levels of induced demand – between 0.6% and 1.1% for the Action alternatives – appear very low in comparison to international experience. Induced demand levels of between 6% and 27% have been observed on European high-speed rail systems, and such ranges are commonly accepted in similar international rail planning projects. For example, the demand model that supports the business case for HS2 (high speed rail service between London and several other British cities) suggests 24% of trips will be from induced travel, and the 2012 Amtrak NEC Business & Financial Plan assumed 11% of trips from induced demand.

⁴³ <https://www.amtrak.com/ccurl/453/325/Amtrak-Vision-for-the-Northeast-Corridor.pdf> (see section 5.0)

Evaluation Methodology

Employment Effects

The EIS follows standard practice for estimating construction and rail sector employment effects, using RIMS II guidance published by the Bureau of Economic Analysis. This methodology is supported by a number of assumptions, some of which may not be applicable when considering the delivery of infrastructure at the scale of NEC FUTURE Action alternatives. In particular, we highlight the following RIMS II assumptions and inputs which may not be applicable to the assessment of NEC FUTURE Action alternatives:

- “I-O models assume that industries do not change the relative mix of inputs used to produce output”
- “I-O models are often referred to as ‘fixed price’ models because they assume no price adjustment in response to supply constraints”
- “RIMS II multipliers for the construction industry are based on national averages across a wide variety of construction projects”.

In order to have confidence in the resulting estimates of jobs and earnings, it is our view that the issues identified above should be considered explicitly within the Final Tier 1 EIS.

We also note that the estimates of construction jobs supported by Tier 1 EIS Action alternatives appear high. Under Alternative 3 the equivalent of 70,000 direct and 75,000 indirect full-time equivalent jobs are supported for the 25-year development and construction period (2016-2040).

We recommend that construction employment estimates should be benchmarked against other domestic infrastructure investment and/or overseas rail investment employment to establish that the NEC FUTURE estimates are within a reasonable range.

Travel Market Effects

The assessment of travel market effects is influenced heavily by assumptions regarding service frequency, travel times and rail fares. The rationale behind many of these assumptions is not clear and we are concerned that arbitrary assumptions about fare policy may damage the case for the Action alternatives. In practice, implementation of the Action alternatives may well present an ideal opportunity to review existing fare structures across all service types, but policy shifts on fares should be kept separate from this assessment of infrastructure need.

In the absence of optimized fare assumptions, we do not consider that estimates of the travel market effects are reliable. Furthermore, until this issue is resolved, we do not consider that it is possible to draw any conclusions regarding potential changes in the need for public financial assistance for rail services in the corridor i.e. the relative affordability of alternatives.

We suggest that the assessment of travel market effects should be repeated with equivalent fares in the No-Action and Action alternatives in order to remove and isolate the impact of assumptions regarding fares.

Economic Development Response

The economic development response (in particular the agglomeration benefits) to all Action alternatives could be very much greater than the Draft EIS suggests. Experience from overseas suggests that the combination of labor market effects and agglomeration effects are typically of the order of 10%-30% of travel market effects, and there are good reasons to believe that

interventions on the Northeast Corridor could be towards, if not exceed, the upper end of this range.

While there is limited local evidence regarding the relationship between economic density and productivity within the US, the exclusion of quantified assessments may affect both the conclusions regarding the public benefits of individual alternatives, as well as the ranking of mutually exclusive project options. In the absence of such evidence, there is a danger that the measures currently reported within the Draft EIS do not provide an adequate proxy for such methods.

Business connectivity and agglomeration benefits may be underestimated in the current demand modeling methodology, where regional and intercity services are forecast separately. This will especially impact the Action alternatives, where there are significant improvements in service speed and frequency. **We would suggest that the FRA should consider whether such measures could be developed to inform the final EIS.**

Comparing Costs and Benefits

The adopted horizon year of 2040 has the potential to distort the comparison between project costs and benefits and between alternatives, because:

- Capital costs are expressed as a total for the entire 25-year construction phase (2016-2040), while estimates of operating costs and all benefits are for a single year
- The benefits of alternatives that bring significant longer-term improvements, e.g. through providing additional capacity, cannot be captured.

We note that “the purpose of the NEC FUTURE program is to upgrade aging infrastructure and to improve the reliability, capacity, connectivity, performance, and resiliency of future passenger rail services on the NEC for both Intercity and Regional trips, while promoting environmental sustainability and continued economic growth.” By truncating the assessment horizon to 2040, there is a risk that the incremental benefits of Action alternatives relative to the No-Action alternative are likely to be understated. In turn, the full contribution of Action alternatives to meeting long-term objectives for the Northeast Corridor is not captured.

Given the long-term objectives for the Northeast Corridor and the expected asset lifetime of Action alternatives, we would suggest that the FRA should update the analysis with the assessment horizon of the costs and benefits extended beyond the expected service commencement year.

Addressing Omissions: Further Analysis and Evidence

As acknowledged in the EIS, there are various indirect benefits under the Action alternatives including increased connectivity, redundancy/reliability and economic growth, that have not been quantified within the study. As set out in the preceding section, it should be possible to vary assumptions and carry out sensitivity tests to make good these weaknesses before determining a preferred alternative.

Five key missing “jigsaw pieces” – areas of analysis not covered by the EIS – have been identified and described in the preceding section.

The five topics are:

- Deliverability
- Commuter service development

- Freight development
- Hub station development
- Effects on competing modes (highways and airports).

Consideration of these areas will provide a more comprehensive picture of the costs and benefits of each alternative and we suggest therefore that they should be quantified and included in the evaluation and selection of the Preferred Alternative.

Conclusions on Infrastructure Alternatives

The Draft EIS recognizes that the NEC is an unmatched transportation asset, connecting the major metropolitan areas of the Northeast megaregion. Its significance has been highlighted by the EIS process, in which extensive baseline data collection has revealed a good understanding of current travel conditions. There are today no plans in existence to address the challenge of demographic and market growth – and this is true across the transportation system as a whole, not just rail.

As the draft EIS makes clear, this is not simply a choice between the identified alternatives of no action, “maintain”, “grow” and “transform” but to define an overall vision. It would be most helpful if this is expressed in terms of a long-term strategy with defined and measurable goals and a set of signposts on how the FRA wishes to see the vision realized.

We have identified evidence that would support a view that the vision, having ruled out “No Action” (for the reasons given earlier), should provide for transformational growth of NEC rail. This would entail commitment both to an overall vision – as anticipated in the Tier 1 EIS – and to a long-term multi-stage investment program that allows rail service providers to plan investment in equipment.

We believe there is a strong argument in favor of a transformational approach rather than an incremental approach based on the following:

1. In the absence of plans to expand the capacity of either the highway or aviation sector, and in the face of substantial market demand growth, rail in the NEC needs to make a more significant contribution and its capacity and capability therefore need to be *substantially* expanded
2. New infrastructure designed to operate services free from conflict with trains with very different operational characteristics will create assets of commercial value that are capable of attracting *non-Government funding*
3. Only by removing the higher-speed (160 miles/hour or above) express services from existing running lines can capacity be created for a significant *expansion of commuter rail services*
4. The scale of economic benefit to the wider economy has been underestimated in the Tier 1 Draft EIS: a combination of super-dependable high-speed rail and expanded commuter rail will support the *rapid growth of the economies* of the metropolitan areas and businesses along the length of the corridor.

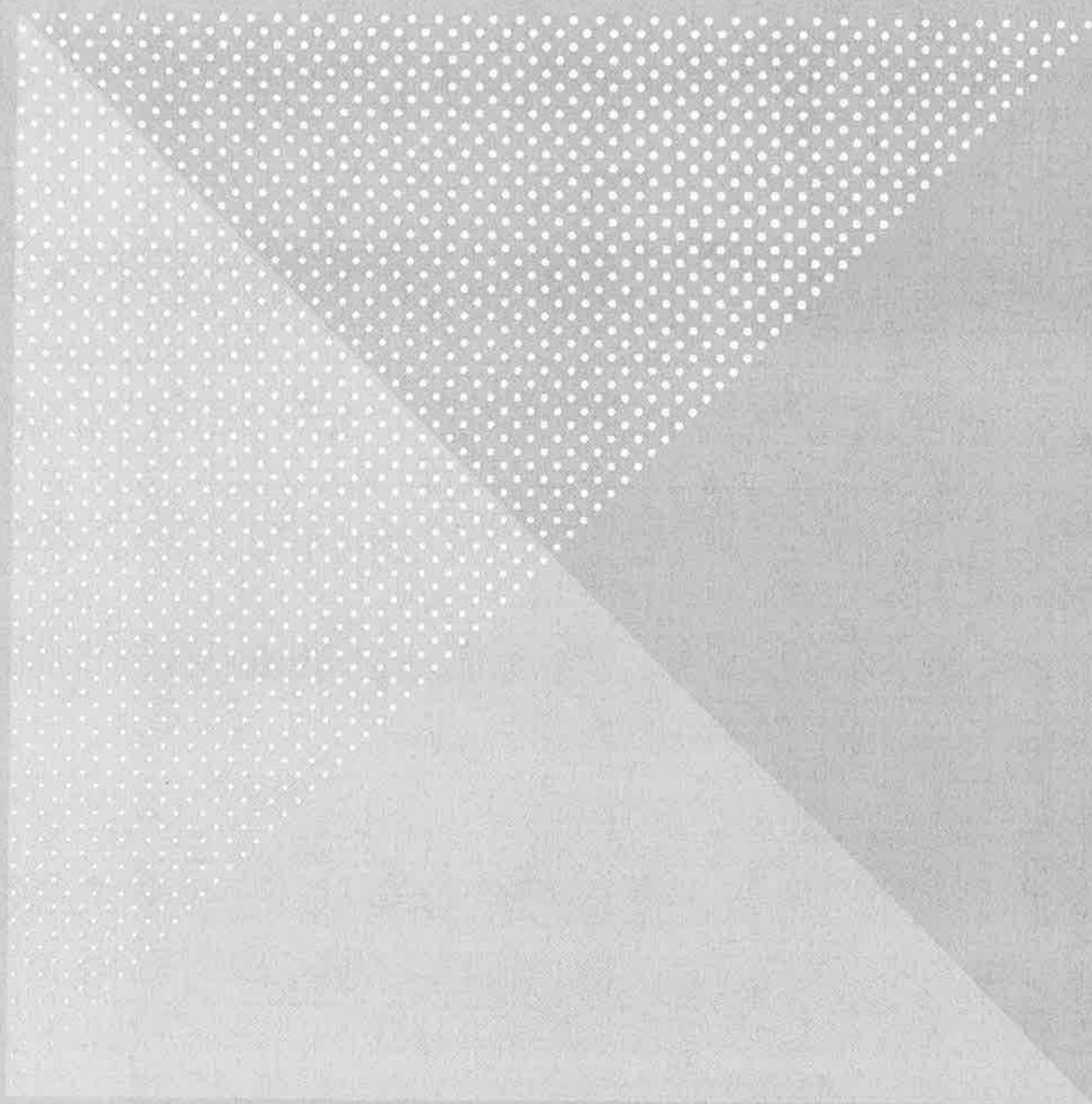
Overall Conclusions

The Draft EIS overstates the costs of expansion of services in the corridor: the options tested have unworkable low load factors – and it is not clear that it would be worth investing in the “Metropolitan” service concept that is common to all the action alternatives.

The demand analysis underestimates the likely market response to the improvements examined. Higher frequency options are precluded from generating a positive market response because of the demand forecasting assumptions made. Benefits from induced travel (journeys that would not otherwise be made), from relieving the stress on competing travel modes, and from transformed on-time service reliability, are each seriously underestimated. The benefits attributed to agglomeration effects are much lower than comparable international estimates, and the benefits attributable to urban redevelopment have only been formulated at an indicative level.

On the other hand, little attention has been paid to the need to expand access service, to commuter rail as well as intercity rail. This will bring significant costs – as well as benefits – that are being ignored. We suggest they should feature in a programmatic level EIS since they are an inescapable part of expanding the role of rail in the NEC.

Based on the review that we have conducted into the analysis that underpins the draft NEC FUTURE EIS, we respectfully suggest that the FRA re-examine the specifications and assumptions identified above before drawing conclusions on the preferred alternative.



A Revenue and Ridership Forecast Comparisons with California High Speed Rail

Revenue and Ridership Forecast Comparisons with California High Speed Rail

Introduction

As part of our review of the Draft Tier 1 EIS for the Northeast Corridor, we also sought to examine how the revenue and ridership forecasts for high speed rail in the NEC FUTURE study compare with those developed for the proposed California High-Speed Rail (CAHSR) system. In this Appendix we draw a high-level comparison between publicly-available information from the studies of these two proposed High-Speed and Intercity Passenger Rail (HSIPR) systems. The CAHSR system has been carefully studied over a long period of time, with extensive review and refinement of its ridership forecasts. Because of this, the CAHSR forecasts provide an interesting point of reference for proposed NEC improvements.

Approach

We focused on comparing the forecasts for Intercity Express (IC-E) in the NEC FUTURE study with the CAHSR forecasts because of the similarity and commonality of the two rail services' characteristics. Our aim was to compare mode share estimates for CAHSR with those reported in the NEC FUTURE study, not to compare absolute ridership numbers. We reviewed publicly available ridership and revenue forecasting reports published by the California High-Speed Rail Authority⁴⁴. The most recent ridership and revenue forecasts were developed using the 2014 Version 2.0 enhanced ridership model, which reflects major changes in the data and models used from prior versions. Version 2.0 represents the Authority's most recent and current analysis and judgment regarding the proposed high-speed rail, incorporating recommendations and comments from the Authority's Ridership Technical Advisory Panel (RTAP), the Authority's Peer Review Group (RPG) and the General Accountability Office's report.

Findings

The updated 2014 CAHSR reports include market-level HSR mode shares for major CAHSR markets developed for 2040. Table A.1 Table A.1: presents the HSR shares for selected major CAHSR markets from the mid-level forecasts (the central case).

⁴⁴ http://www.hsr.ca.gov/About/ridership_and_revenue.html

Table A.1: CAHSR 2040 Mode Shares for Major Inter-Regional Markets for Mid-Level (Central Case) Forecasts

Inter-Regional Markets		Approximate Distance (miles)	Year 2040 Ph1B
SANDAG MPO Area (San Diego area)	MTC MPO Area (San Francisco area)	500	13.9%
MTC MPO Area (San Francisco area)	SCAG MPO Area (Los Angeles area)	383	21.6%
SCAG MPO Area (Los Angeles area)	San Joaquin Valley	226	7.7%
MTC MPO Area (San Francisco area)	San Joaquin Valley	188	8.4%
MTC MPO Area (San Francisco area)	SACOG MPO Area (Sacramento area)	90	2.2%

Note: Phase 1B of the CAHSR proposal does not extend to San Diego; passengers wishing to travel between San Francisco and San Diego would be expected to transfer from the CAHSR to Amtrak's Pacific Surfliner at L.A. Union station. Even with the inconvenience of a transfer, the 2040 HSR mode share in this market reaches 13.9%.

Source: Table 7.4 2014 Business Plan Ridership and Revenue Technical Memorandum (February 6, 2014)

Since the updated 2014 CAHSR reports do not include detailed ridership and revenue forecasts for all modes, we also reviewed reports published by the Authority on earlier versions of the model that were used to support the California High Speed Rail Program Final 2012 Business Plan. Detailed ridership and revenue forecasts developed using the original V 1.0 and V1.1 models were documented in the final technical memorandum⁴⁵. The outputs of the earlier models were reported as low-level and high-level forecasts developed for 2030.

Table A.2 shows the 2030 Phase 1B HSR shares for selected major CAHSR inter-regional markets for the low- and high-level forecasts (central case forecasts not reported) as reported in the 2012 Business Plan. The HSR mode shares forecast by the various versions of the CAHSR model are in the same range.

Table A.2: Forecast of 2030 HSR Inter-Regional Mode Shares (CAHSR)

Inter-Regional Markets		Approximate Distance (miles)	Year 2030 Ph1B (Low)	Year 2030 Ph1B (High)
SANDAG MPO Area (San Diego area)	MTC MPO Area (San Francisco area)	500	10.5%	10.8%
MTC MPO Area (San Francisco area)	SCAG MPO Area (Los Angeles area)	383	30.9%	36.0%
SCAG MPO Area (Los Angeles area)	San Joaquin Valley	226	7.7%	7.3%
MTC MPO Area (San Francisco area)	San Joaquin Valley	188	7.9%	7.4%
MTC MPO Area (San Francisco area)	SACOG MPO Area (Sacramento area)	90	0.0%	0.0%

Source: Table 5.6 and Table 5.7 California High-Speed Rail 2012 Business Plan Final Technical Memorandum

⁴⁵ http://www.hsr.ca.gov/docs/about/business_plans/BPlan_2012Ch5_RidershipRevForecasting.pdf

To facilitate the comparison between the CAHSR study and the NEC FUTURE study, we evaluated the high-speed rail mode shares for the two systems. Table A.3 shows the Intercity Express (IC-E) mode shares from the NEC FUTURE report. Compared to the CAHSR mode shares in Table A.1 and Table A.2, the IC-E mode shares in Table A.3 are relatively low⁴⁶. The mode share for the Washington – New York market (the most prominent market in the NEC) in Alternative 3 is only 9.8%, compared to the San Francisco area – Los Angeles area (the most prominent market in California) HSR mode share of 21.6% in the V 2.0 model and between 31% and 36% in the V1 model. Even with the one-seat ride between Washington and Boston in the NEC, the Intercity Express mode share is only 1.4% compared to the greater than 10% HSR mode share for a similar distance market between the San Diego and San Francisco areas. Note that for the proposed Phase 1b of CAHSR system, the trip between the San Diego and San Francisco areas would involve a two seat ride with a significant transfer in Los Angeles. In general, for all the markets shown in Tables 1, 2 and 3, the HSR mode shares are much lower in the NEC FUTURE forecasts than the CAHSR forecasts.

Table A.3: IC-E Mode Shares for Selected Major NEC MSA Market Pairs

Market		Approximate Distance (miles)	No Action	Alternative 1	Alternative 2	Alternative 3 Average
WAS	BOS	438	0.3%	0.6%	0.9%	1.4%
WAS	NYP	225	8.8%	6.4%	7.7%	9.8%
NYP	BOS	215	3.1%	2.7%	3.5%	4.1%
PHL	NYP	97	1.3%	1.3%	1.5%	1.8%

Source: NECF Tier 1 Draft EIS Appendix B.8 Tables I-2 to I-8

We also compared the percentage of HSR trips diverted from other modes as forecast by the CAHSR and the NEC FUTURE studies.

Table A.4 shows the percentage of intercity rail trips diverted from the air, auto and intercity bus modes from the NEC FUTURE study. These HSR trip diversion percentages appear low given that the transformational intercity rail service proposed here (at least for Alternative 3) competes quite well with the other intercity modes, and especially the air mode. For example, in Alternative 3, the D.C.-Boston travel time on the IC-E service is reduced to approximately 4 hours, which should result in very effective competition with the air mode after accounting for the terminal security and wait time encountered in air travel. Indeed, in 2014 – with similarly competitive travel times compared to air – Amtrak had nearly 80% and 60% of the combined air-rail market share in the New York-D.C. and New York-Boston markets, respectively. Thus, the share of IC-E trips diverting from air would have been expected to be much higher for this market given the transformational service improvements proposed in rail service in Alternative 3. However, as seen in Table A.4, only 5.7% of HSR trips were diverted from air to the IC-E service for this alternative.

⁴⁶ Note that the share of travelers choosing the Intercity Corridor (IC-C) service increased much more than the share of travelers choosing the IC-E service as a direct consequence of the level of service changes (e.g. reduction of IC-C fares and excessive increase of IC-C frequency). As explained in more detail in *SDG's response to the NEC Future Draft Tier 1 EIS*, this increase in the IC-C mode shares took place at the expense of IC-E service.

Table A.4: Percentage of NEC Intercity Rail Trips Diverted from Other Modes and Induced Demand

Mode	Alt 1	Alt 2	Alt 3
Auto	28.3%	34.2%	35.3%
Air	3.9%	4.9%	5.7%
Intercity Bus	4.2%	4.6%	5.0%
% Trips diverted from Auto, Air, Intercity Bus	36%	44%	46%
Induced Demand	0.6%	1.1%	1.0%

Source: SDG analysis of NEC FUTURE Report Tier 1 Draft EIS Table 9-8

The shares of inter-regional HSR trips diverted from each mode were also included in the CAHSR Final Technical Memo and are presented in Table A.5. It is expected that the HSR shares diverting from other modes will be higher in California than in the NEC given the absence of existing and directly competing intercity passenger rail services in California; nonetheless, the predicted percentage of IC-E trips diverted from air for Alternative 3 still appears low in the NEC FUTURE report compared to what was reported in California.

Table A.5: Source of Inter-regional Trips by Mode (CAHSR)

Range	2030 Phase 1 Blended			
	Auto	CVR	Air	Induced
Low	74.2%	1.4%	22.3%	2.1%
High	68.3%	5.2%	24.3%	2.2%

Source: Table 5.8 California High-Speed Rail 2012 Business Plan Final Technical Memorandum

Additionally, the alternative-specific constants⁴⁷ (ASCs) for the HSR mode in the CAHSR study imply that, other things equal, HSR is always considered to be more attractive than the air mode. This contrasts with the NEC FUTURE study, where the IC-E alternative-specific constants for both business and nonbusiness travel market segments make HSR less attractive than the air mode when other things are equal. These relative values of HSR alternative-specific constants result in higher predictions of diversions from the air mode to HSR for the CAHSR study compared to the NEC FUTURE study.

Tables A.4 and A.5 also show the percentage of induced rail trips from the NEC FUTURE study and CAHSR study, respectively. Induced trips represent new riders that would not have made trips if the HSR system did not exist. The induced HSR demand percentages reported in California for the 2012 Business Plan (equivalent figures were not shown in the 2014 Business Plan) were more than double those predicted by the NEC FUTURE study. We also observe that the induced demand percentages reported in both the studies appear relatively low compared to what we have seen in HSR studies elsewhere.

⁴⁷ Table 6.24 of the CAHSR 2014 Version 2 Model Documentation, http://www.hsr.ca.gov/docs/about/ridership/ridership_CM_and_forecast_FR1_CAHSRA_Model_Doc.pdf

CONTROL INFORMATION

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Philadelphia, PA 19104

Version issue number

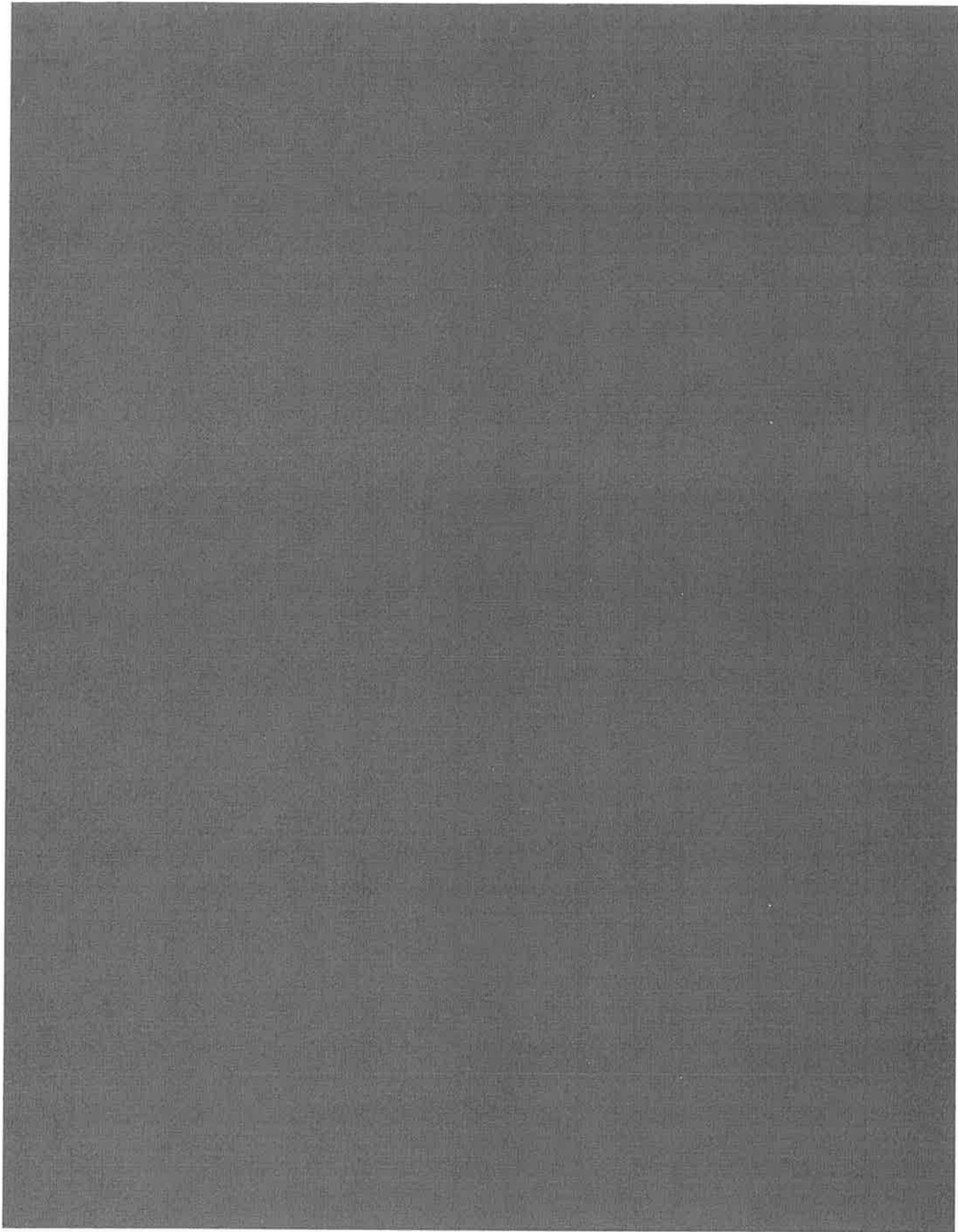
Final

Date

February 11th, 2016



U:\Boston\Projects\226\0\24\11\Output\Reports\SDG review of the NEC FUTURE Draft Tier 1 EIS_2016 02 11 Final.docx



NEC DEIS Comments - RECORD #1410 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Leah

Last Name :

Amyot

Stakeholder Comments/Issues :

I oppose Alternative 1 for the Northeast Corridor, which would result in the destruction of the many cultural and historic resources in Old Lyme, CT, environmental harms to the CT Shoreline east of Old Saybrook, CT and would leave the train infrastructure vulnerable to hurricane damage. I support Alternatives 2 or 3, with improved access to Hartford, CT and UCONN.

NEC DEIS Comments - RECORD #2710 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Sally

Last Name :

Anastos

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #1750 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Jeffrey

Last Name :

Andersen

Stakeholder Comments/Issues :

As Director of the Florence Griswold Museum in Old Lyme, Connecticut, I am gravely concerned about the cultural and historic damage to our town by Alternative 1 that runs right through our historic district and in close proximity to our National Historic Landmark Florence Griswold House and Museum. I strongly urge that you remove the new track route that goes through the center of the town as part of Alternative 1 and give priorities to other less damaging alternatives. Thank you. Jeff Andersen

NEC DEIS Comments - RECORD #1219 DETAIL

Status : ██████████
Record Date : 2/13/2016
First Name : Dean
Last Name : Anderson

Stakeholder Comments/Issues :

Forget rebuilding Amtrak for passenger service. Traditional railroads were obsolete for carrying people nearly sixty years ago.

Instead, build a modern monorail system. Run it right, smack down the middle of I-95. Use our shopping malls for monorail stations.

Instead of running down in an ugly gully (which most of the existing rail line is) it'd be up overhead. The monorail cars will be swift, clean, and quiet. I rode on one at the New York World's Fair nearly fifty years ago. Yet the government keeps dumping endless dollars into patching up an obsolete choo-choo system

The existing track could be used to move freight and freight only. It's good for carrying heavy weight which passenger trains are not. Think about it. It's time for a 21st Century solution to our transportation problems.

NEC DEIS Comments - RECORD #201 DETAIL

Status : ██████████
Record Date : 1/19/2016
First Name : Geoffrey
Last Name : Anderson

Stakeholder Comments/Issues :

I've often heard the term "relief airport" thrown around about Stewart International Airport. It implies that the three major New York City area airports, and the many regional airports in the area, are at or over capacity. Attempts to increase capacity have occurred, but the reality is most of the airports have expanded to their economical or geographic limits, and can't significantly increase capacity in the long term without massive costs.

This presents a challenge. Without increasing the amount of airport capacity available, flight ticket prices will greatly increase, possibly past what the average middle class family can afford. Without a mass transit alternative, families or business travelers will be forced to drive, which is still quite expensive and time consuming, or choose not to travel.

But, there is a way to increase capacity at airports. Through investment in high speed rail, specifically along the NEC, many more travelers can choose to take rail to their destination instead of planes. Further build out of the nation's high speed rail network would provide even greater competition to airports, thus keeping capacity and prices in check.

Amtrak's Acela service is a great example of a success story. Faster service, more service and more reliability would greatly increase the amount of people who utilize rail as a travel option. Adding options for a suburban station with parking (like Metropark station in NJ) would also greatly increase usage.

Fantastic investments have been made in airport and highway transportation. It's time that we make the same level of investments in our rail networks.

NEC DEIS Comments - RECORD #1068 DETAIL

Status :

Record Date :

2/12/2016

First Name :

Stephen

Last Name :

Anderson

Stakeholder Comments/Issues :

I respectfully suggest that rather than the needless destruction of the heart of Old Lyme that the new by pass use the existing, recently upgraded, right of way from New Haven to Hartford and from there follow I-84 to Boston. The existing shoreline service could remain without the destruction proposed by Alternate 1

NEC DEIS Comments - RECORD #1157 DETAIL

Status :

[REDACTED]

Record Date :

2/13/2016

First Name :

Sydney

Last Name :

Anderson

Stakeholder Comments/Issues :

NO!!!! I fully support UPGRADING EXISTING RAIL LINES, but NOT adding any new ones. The new lines would cut through some of our most historical and culturally rich towns, with their historic buildings and landmarks, devastating their way of life and negatively impacting real estate values. Improve the lines we already have!!!!

NEC DEIS Comments - RECORD #1261 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Janine

Last Name :

Anderson- Bays

Stakeholder Comments/Issues :

Though I like the corridor to include connections along the new haven- new London shoreline, going through historic and tourist destinations is a terrible idea.

NEC DEIS Comments - RECORD #3072 DETAIL

Status :

[REDACTED]

Record Date :

2/17/2016

First Name :

Flip

Last Name :

Andrade

Stakeholder Comments/Issues :

I oppose to Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

Flip

NEC DEIS Comments - RECORD #913 DETAIL

Status :

[REDACTED]

Record Date :

2/11/2016

First Name :

Geo.

Last Name :

Andres

Stakeholder Comments/Issues :

Riding north on amtrak after the Baltimore stop looks like a war zone. Both sides north & south. All passengers on the train are outraged. Baltimore should demolish the whole area before building a new station.

NEC DEIS Comments - RECORD #2979 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Erica

Last Name :

Angerame

Stakeholder Comments/Issues :

While I am very excited in the NEC rail plan, I wish that you could find a way to avoid destroying the Lyme School of Art.

NEC DEIS Comments - RECORD #258 DETAIL

Status :

Record Date : 1/24/2016

First Name : Norman

Last Name : Angus

Stakeholder Comments/Issues :

As a long term resident of Old Lyme I can not support your plan. The original layout of the Amtrak line should be replaced. However moving it North through the Town of Old Lyme will distroy the town.

It would be better to move the line to cross the Connecticut Rive over the bridge at Middletown.

Why has this been so hidden from the citizens involved. It is a travesty that we were no informed and a hearing was not planned out in the Community that would be most effected!

Why were we not informed?

NEC DEIS Comments - RECORD #493 DETAIL

Status : [REDACTED]

Record Date : 2/2/2016

First Name : Steven R.

Last Name : Schuh

Stakeholder Comments/Issues :

Hello Rebecca,

Please see attached from County Executive Steve Schuh.

Let me know if you have any questions.

Regards,

Sarah Beardsley

Schedule Coordinator

County Executive Steven R. Schuh

(p) 410-222-2003

(c) 443-679-8396

----- Forwarded message -----

From: <ricoh@aacounty.org>

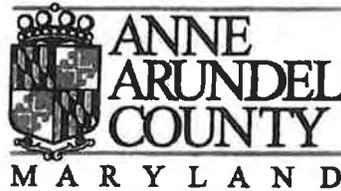
Date: 2016-02-02 3:58 GMT-05:00

Subject: Message from KMBT_C360

To: exbear00@aacounty.org

Attachments : SKMBT_C36016020209580.pdf (639 kb)

STEVEN R. SCHUH
County Executive



P.O. Box 2700 | Annapolis, Maryland 21404
(410) 222-1821 | countyexecutive@aacounty.org | www.aacounty.org

January 21, 2016

Rebecca Reyes-Alicea
NEC FUTURE Program Manager
US DOT
Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

Re: NEC FUTURE Tier 1 Draft Environmental Impact Statement

Dear Mrs. Reyes-Alicea:

Thank you for the opportunity to comment on the Federal Railroad Administration's comprehensive plan for the Northeast Corridor rail line from Washington, D.C. to Boston, Massachusetts known as NEC FUTURE. County staff has reviewed the information presented and held discussions with key stakeholders in the county. We offer the following comments.

Rather than advocating for a specific alternative, we offer the following comments on all of the alternatives and would suggest a modified approach. The "Purpose and Need" statement of the study primarily speaks to addressing failing infrastructure or poor service and only secondarily refers to increasing new service as a way of promoting economic growth and environmental sustainability. As such we do not recommend the dramatic increase in new high speed rail service to new markets. The high speed rail corridor should be limited to the dense major urban downtowns currently on the mainline. High speed rail service is primarily for intercity transportation, with the regional rail providing local service. Alternative 3, the "Transform" alternative, costs significantly more with minimal return for the investment over Alternative 2, the "Grow" alternative, as shown in minimal increase in intercity ridership. We support the extra rail line and new hubs in downtown Baltimore and Philadelphia as these areas should be the focus of improved high speed rail service. Similarly addressing the chokepoints should be the focus and not expanding service to new areas.

In addition, it is not clear why Philadelphia International Airport is proposed to have a stop and not Baltimore-Washington International (BWI) Airport, when both the material in the report and the presentations identify BWI as a major transportation hub along the corridor identical to Philadelphia's airport. In keeping with the concept that high speed rail service should be focused on the major urban downtowns and that stops

"Anne Arundel County: The best place to live, work and start a business in Maryland."

between those areas should be limited, we recommend that the Philadelphia airport stop not be included. Both the airports and other smaller urban areas should continue to be served by regional, non-high speed rail. Given that the study shows the vast majority of trips will be taken on regional rail, we recommend increased funding for the regional rail services that will make the high speed corridor a success.

Thank you again for the opportunity to comment, and we appreciate FRA's effort to keep us involved and informed in the progress of your proposed plan.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Schuh", written over a horizontal line.

Steven R. Schuh
County Executive

cc: Maryland House and Senate Delegation
Pete Rahn, MDOT
Mark Hartzell, Chief Administrative Officer
Larry Tom, Planning and Zoning Officer
Chris Phipps, Public Works Director

NEC DEIS Comments - RECORD #2193 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

James

Last Name :

Annino

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1 DETAIL

Status :

Record Date :

11/10/2015

First Name :

Last Name :

Stakeholder Comments/Issues :

Preferred alternative: Alternative 2 at least; Alternative 3 if possible.

Notes: Currently, train travel across the country is painfully slow, unreliable and inconvenient. I do not consider rail as an alternative mode of transportation in its current state. The two biggest issues that need to be addressed are connectivity and speed. Another major concern is that this draft does not include any plans to connect South Station in Boston to the North Station.

The system falls behind many Asian and European countries in all other aspects as well: tidiness, cleanliness, ticketing and seat allotment. Given the inconvenience associated with air travel, the general public who cannot afford Acela for leisure trips is left with just one option: driving; which just equates to a surplus of 300 million Internal Combustion Engines on the roads.

The northeast corridor already has the advantage of a scenic route. If the system is upgraded, maintained, and operated well, it would become a revenue generating machine rather than a chronically sick liability.

However, I am not optimistic of any progress being made given the current state of infrastructure in this country. The lawmakers choose to turn a blind eye to important issues while waging senseless battles on "select" topics to attract voters. All real progress seemed to have halted in the United States in the last few decades. I would be wonderfully surprised if any of the proposed alternatives other than "No Action" alternative become a reality.

NEC DEIS Comments - RECORD #22 DETAIL

Status :

[REDACTED]

Record Date :

11/23/2015

First Name :

Last Name :

Stakeholder Comments/Issues :

very nice post, i certainly love this web site, keep on it kcedeedebbegbce

Attachments :

DEIS_public_a00022 Original.pdf (1 kb)

NEC DEIS Comments - RECORD #41 DETAIL

Status :

[REDACTED]

Record Date :

12/3/2015

First Name :

Last Name :

Stakeholder Comments/Issues :

Alternative 3! Rail is crucial to a sustainable future

NEC DEIS Comments - RECORD #80 DETAIL

Status :

[REDACTED]

Record Date :

12/21/2015

First Name :

Last Name :

Stakeholder Comments/Issues :

Page 4-42 of the report incorrectly states that the travel time from DC to Boston of Alternative 3 would be 5 hr 10 min rather than the correct value (I believe 3 hr 20 min).

NEC DEIS Comments - RECORD #86 DETAIL

Status :

[REDACTED]

Record Date :

12/23/2015

First Name :

Last Name :

Stakeholder Comments/Issues :

Sustain is the only plan that has a real practical chance of being complete within its stated time frame and budget.

12-15-15 NEC-NY

Okay. That's the last speaker I have signed up.
Is there anyone who would like to speak at this time who hasn't signed up.

Sure, come on up.

AUDIENCE MEMBER: No, just a question.

My question is, is the New York City subway tracks compatible with the Amtrak tracks? And if so, could we then lend the No. 7 Amtrak tracks to New Jersey?

(Laughter.)

A VOICE: No, no. The answer's no.

THE MODERATOR: So the audience is answering for us.

(Laughter.)

THE MODERATOR: And I think if you wanted to come up and make a statement, we'll do that but otherwise that's a conversation that maybe we'll have after we close the public hearing session. That sounds like more of a discussion. Did someone else want to make a statement, give testimony?

...

Did you want to make a statement?

AUDIENCE MEMBER: Just a quick --

THE MODERATOR: So why don't we -- let me do this.

AUDIENCE MEMBER: Very quickly. Very, very quickly.

My point is that if you make this gateway tunnel for Amtrak, is there any room for New York City subway tracks under that tunnel?

THE MODERATOR: That's the question on the table.

Okay.

Do you -- do you want to identify yourself?

AUDIENCE MEMBER: No.

THE MODERATOR: Okay.

Does anyone else want to don't hear from anyone, what public hearing portion but we stay, look at the boards. The

Also, just remind everyone as we already mentioned, to stay very anxious to hear from everyone. There's comment forms. There repeat this presentation again

ARON-0006-TINYNY

12-15-15 NEC-NY

mic for additional testimony.

You're just stretching?

AUDIENCE MEMBER: No, no, no. I just wanted -- at one time I think that may have been a physical possibility. It used to be third rail under running shoes to the Hudson Tunnels -- or over running shoe as a -- but that was -- it's not an option any more. The gate is the same but other than that, it's not an option.

THE MODERATOR: This is definitely a room filled with many knowledgeable people so I bet the conversations at the boards are quite good.

12-15-15 NEC-NY

mic for additional testimony.

You're just stretching?

AUDIENCE MEMBER: No, no, no. I just wanted -- at one time I think that may have been a physical possibility. It used to be third rail under running shoes to the Hudson Tunnels -- or over running shoe as a -- but that was -- it's not an option any more. The gate is the same but other than that, it's not an option.

THE MODERATOR: This is definitely a room filled with many knowledgeable people so I bet the conversations at the boards are quite good.

Axon-0007-TN/NY.

NEC DEIS Comments - RECORD #139 DETAIL

Status :

[REDACTED]

Record Date :

1/12/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Establish multi use passes or touches for traveling between CT and NJ.

NEC DEIS Comments - RECORD #190 DETAIL

Status :

Record Date :

1/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Please stay out of Old Saybrook Old Lyme areas,

-go the direct route.

-Pick up the city's who actually need or want the service.

-we already have a train/bus service

-diversify, hit some of the route don't copy an existing system

-the area was not adequately informed notice to petition

Notice to petition

- please do not add complications to the already hectic beach traffic and congestion avoid the shoreline

- wetlands will be disrupted

- historic areas disturbed

-Wildlife will be displaced

It is shady and immoral to try to pass something like this quietly.

This needs to be proposed publicly. The New London area is very familiar with eminent domain after the US

Supreme Court got involved.

Go another route please.

We don't want the tracks, the traffic, the station, none of it.

Hartford Springfield is a better option for everyone, Thank you.

09

NEC DEIS Comments - RECORD #1133 DETAIL

Status :

[REDACTED]

Record Date :

2/13/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I support alternative 3. The Northeast US contains a huge percentage of our nation's population, industry and commerce. Yet this region has the oldest infrastructure in the country, with little federal investment. If America wants to remain a world power it needs to act and move like a modern power does. Regional high speed rail is big part of that.

Asor - 40
04

NEC DEIS Comments - RECORD #1146 DETAIL

Status :

[REDACTED]

Record Date :

2/13/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I believe that creating a new rail segment, which will go through the towns of New London and Mystic, is ideal. The Interstate Highway 95 is heavily used and always congested. Constructing a rail segment would alleviate these conditions and provide another way for people living in Southeastern CT to travel and commute to New York City and Boston.

Arxon - 041

NEC DEIS Comments - RECORD #1164 DETAIL

Status :

[REDACTED]

Record Date :

2/13/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I support this project. Stop holding up progress and let them get to work. We need the upgrades to the infrastructure system and this would create jobs.

Axon 1164
053

NEC DEIS Comments - RECORD #2113 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven. These plans are unacceptable as they would destroy the campus community, endanger the federally protected areas of the Connecticut River Estuary and ruin the aesthetic quality of Old Lyme's nationally recognized historic district.

Anonymous
088 -

NEC DEIS Comments - RECORD #282 DETAIL

Status :

[REDACTED]

Record Date :

1/25/2016

First Name :

Anonymous_0011

Last Name :

Stakeholder Comments/Issues :

Good idea.

11
12

NEC DEIS Comments - RECORD #338 DETAIL

Status :

[REDACTED]

Record Date :

1/27/2016

First Name :

Anonymous_012

Last Name :

Stakeholder Comments/Issues :

The most ambitious plan Transform is needed to reduce car travel along 95. Trains need to be cheaper and faster and reliable. A train that stops at Philadelphia airport, Newark and BWI would be a boon to travelers.

Please use this card to provide comments on the Tier 1 Draft Environmental Impact Statement. Please submit your comments by the formal comment period closing date of January 30, 2016.



① ^{map error} Representative Route
Alternative one - Sheet 2

② Schuylkill River to Backs count
change red to blue and green.

Name: _____

Address: _____

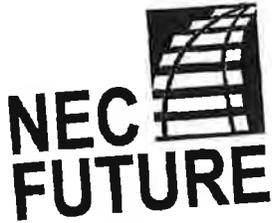
Email: _____



NEC FUTURE
U.S. DOT, Federal Railroad
Administration
One Bowling Green, Suite 429
New York, NY 10004



Place
Stamp
Here



Comment Card

If you have a comment on the NEC FUTURE Tier 1 Draft Environmental Impact Statement, please fill out this comment card and hand it to an NEC FUTURE team member, or mail it by January 30, 2016, to the Federal Railroad Administration, using the address on the reverse side of this card. You can also submit comments through the project website at www.necfuture.com or via email to comment@necfuture.com.

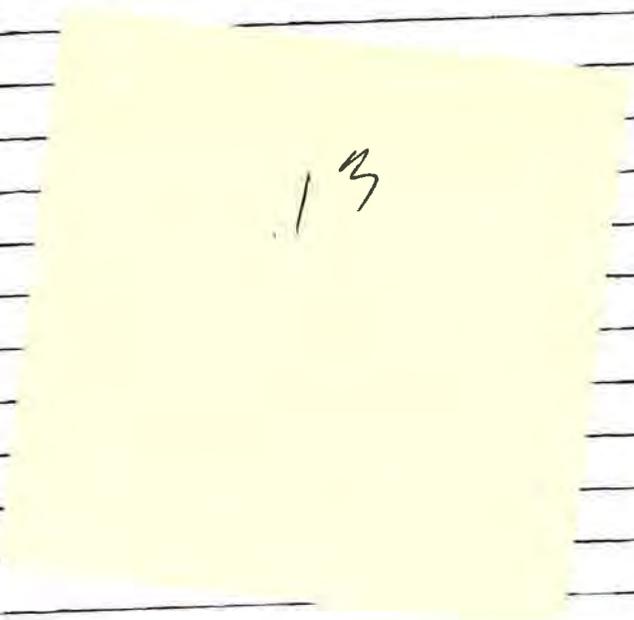
Thank you for your interest and input!

Please use this card to provide comments on the Tier 1 Draft Environmental Impact Statement. Please submit your comments by the formal comment period closing date of January 30, 2016.



Supportive of ~~the~~ New Airport Augment

Not Supportive of the New Downtown Penna Station.
Keep all services through 30th St Station to
create the momentum for revitalization and
overall enhancement of that area of the city.



Name: _____
Address: _____
Email: _____



NEC FUTURE
U.S. DOT, Federal Railroad
Administration
One Bowling Green, Suite 429
New York, NY 10004



Place
Stamp
Here



Comment Card

If you have a comment on the NEC FUTURE Tier 1 Draft Environmental Impact Statement, please fill out this comment card and hand it to an NEC FUTURE team member, or mail it by January 30, 2016, to the Federal Railroad Administration, using the address on the reverse side of this card. You can also submit comments through the project website at www.necfuture.com or via email to comment@necfuture.com.

Thank you for your interest and input!

NEC DEIS Comments - RECORD #359 DETAIL

Status :

[REDACTED]

Record Date :

1/28/2016

First Name :

Anonymous_015

Last Name :

Stakeholder Comments/Issues :

It seems like the NEC is getting slower and slower. With trains being the most affordable, convenient, and environmental friendly way to travel, investment in it is key.

NEC DEIS Comments - RECORD #410 DETAIL

Status :

[REDACTED]

Record Date :

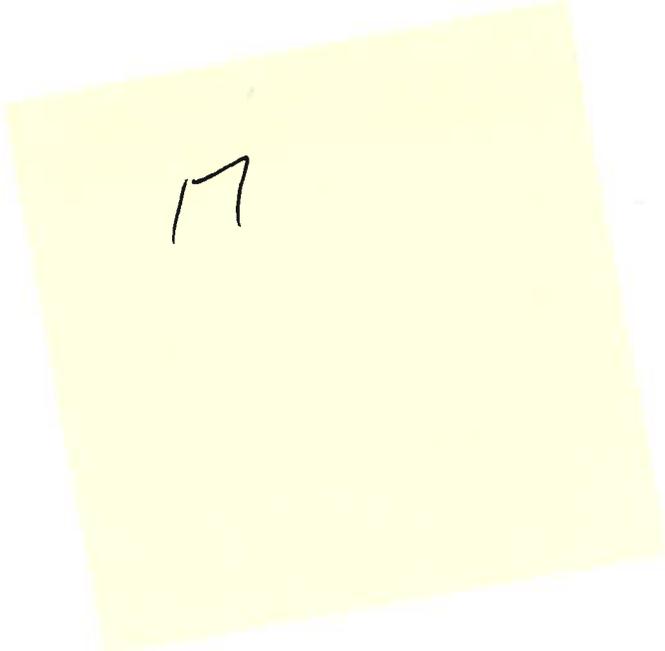
1/30/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Please reconsider changing the location of the rail through the historic district in Old Lyme, CT. The preservation of property values in this area town is personally very important to me. The proposed changes would create huge problems in our little town because the proposed routes would block pedestrian access to Lyme street, cause issues with travel to and from Old Lyme schools, would cut off the old lyme schools from local conveniences on main street, and would cause unnecessary noise near our schools and beloved historic landmarks.



NEC DEIS Comments - RECORD #422 DETAIL

Status :

Record Date :

[REDACTED]
1/30/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

This will ruin the historical downtown Old Lyme and cross right near where my children go to school. There must be an alternative to keep it close to where it exists now.

18-19

NEC DEIS Comments - RECORD #433 DETAIL

Status :

[REDACTED]

Record Date :

1/31/2016

First Name :

Anonymous_019

Last Name :

Stakeholder Comments/Issues :

I strongly oppose the Northeast Corridor rerouting high-speed rail lines over a new bridge crossing the Connecticut River, across the saltwater marshes at the Lieutenant River and through the historical district of Old Lyme. It would devastate not only the local wildlife, but also the historic Art Colony.

NEC DEIS Comments - RECORD #453 DETAIL

Status :

[REDACTED]

Record Date :

2/1/2016

First Name :

Anonymous_020

Last Name :

Stakeholder Comments/Issues :

I would love for the Maryland train to be continued up into Delaware.

NEC DEIS Comments - RECORD #494 DETAIL

Status : [REDACTED]
Record Date : 2/2/2016
First Name : Anonymous_021
Last Name :
Stakeholder Comments/Issues :

To Whom it May Concern,

As a resident of the Town of Old Lyme, I am writing to express my opposition to Alternative 1 of the NEC plan to improve rail service between Washington D.C. and Boston.

As a resident of Lyme Street (which runs through the heart of Old Lyme's historic village center), my family and I will be directly effected by the proposed NEC plan. The path of the proposed railway would not only cut through the heart of this community and effect major educational and cultural institutions such as the Lyme Academy of Fine Arts and the Florence Griswold Museum, but could quite literally cut through the heart of our historic home (c. 1880) which along with many other homes on Lyme Street have been lovingly and painstakingly restored to their original grandeur. The proposed railway will not only decimate the character and charm of Old Lyme (and our historic village center), but also depress property values in the general vicinity for decades to come. Of course, all of this pales in comparison to the impact on the environment and, most importantly, the health and well-being of my children and my children's children who will be forced to live and attend school (the majority of educational institutions in Old Lyme sit on Lyme Street) so close to a high-speed rail line.

I therefore implore you to abandon Alternative 1 of the NEC plan and seek alternative, more reasonable solutions for improving rail service in the region that will not have such devastating consequences.

NEC DEIS Comments - RECORD #517 DETAIL

Status :

2/3/2016

Record Date :

Anonymous_022

First Name :

Last Name :

Stakeholder Comments/Issues :

This is a vital and valuable extension of rail transit, one that would provide important commuter access to much of Connecticut and the Northeast. It would also help to eliminate traffic congestion and carbon emissions in the New England area.

NEC DEIS Comments - RECORD #521 DETAIL

Status :

██████████
2/3/2016

Record Date :

First Name :

Anonymous_023

Last Name :

Stakeholder Comments/Issues :

As a UConn grad student, a rail line would be a great and welcome development to connect the thousands of us on campus to major points of interest in the northeast. With a rail line to improve two-way access between Storrs and other communities, there is great potential to grow and enhance many university-community partnerships.

NEC DEIS Comments - RECORD #547 DETAIL

Status : [REDACTED]
Record Date : 2/4/2016
First Name : Anonymous_024
Last Name :
Stakeholder Comments/Issues :

A train connection in Storrs would be incredibly helpful for faculty and students to travel to and from the university for personal and professional events.

NEC DEIS Comments - RECORD #612 DETAIL

Status :

[REDACTED]

Record Date :

2/8/2016

First Name :

Anonymous_025

Last Name :

Stakeholder Comments/Issues :

This rail way will destroy the Eco system that we all love in Old Lyme. It is also set to go through some of the only marsh land that is left on the Old Lyme shore

NEC DEIS Comments - RECORD #631 DETAIL

Status :

[REDACTED]

Record Date :

2/9/2016

First Name :

Anonymous_026

Last Name :

Stakeholder Comments/Issues :

As one of, if not the, most densely populated region in the country, the Northeast Corridor deserves to receive massive investment in non-automobile infrastructure. People who live in such a dense region should not have to rely on a private automobile for intercity transit. Expanding rail infrastructure is a key part of making the area livable for people of all incomes and ensuring climate and environmental sustainability. Please adopt Alternative 3 and focus on expanding rail access to as many cities in the corridor as possible.

NEC DEIS Comments - RECORD #724 DETAIL

Status :

[REDACTED]

Record Date :

2/10/2016

First Name :

Anonymous_027

Last Name :

Stakeholder Comments/Issues :

Need a true express line.

DC

Philly

NYC

Boston

NEC DEIS Comments - RECORD #769 DETAIL

Status :

Record Date :

[REDACTED]
2/10/2016

First Name :

Anonymous_028

Last Name :

Stakeholder Comments/Issues :

We once were the best in railroads and now we are like a fourth World Country. France has an efficient and fast rail system all over their country moving people and freight. We have gas guzzling trucks. I France can have a TGV why cant we?

NEC DEIS Comments - RECORD #785 DETAIL

Status :

[REDACTED]

Record Date :

2/10/2016

First Name :

Anonymous_029

Last Name :

Stakeholder Comments/Issues :

How about a truly fast /express train between NYC and Boston /DC?

NEC DEIS Comments - RECORD #826 DETAIL

Status :

[REDACTED]
2/11/2016

Record Date :

First Name :

Anonymous_030

Last Name :

Stakeholder Comments/Issues :

Do not do this. Dont ruin our beautiful hometown.

NEC DEIS Comments - RECORD #856 DETAIL

Status : ██████████
Record Date : 2/11/2016
First Name :
Last Name : Anonymous_031
Stakeholder Comments/Issues :

I strongly disagree with the addition of these train tracks through the center of Old Lyme, CT. You will be destroying a small town for no real reason. Reducing the time it takes to get to DC from Boston by only 30 minutes is not reason enough to do so.

NEC DEIS Comments - RECORD #872 DETAIL

Status :

2/11/2016

Record Date :

First Name :

Anonymous_032

Last Name :

Stakeholder Comments/Issues :

It's completely criminal the fact that Amtrak even thinks it has the right to build tracks in downtown Philadelphia and to the Airport, bypassing the SEPTA system. You're in Philadelphia, you take their system. Amtrak needs to BACK OFF. You take no care of your infrastructure you share with SEPTA, your equipment is often repaired by SEPTA, it's shoddy, foreign made, and subpar....you have no right to right to even propose a downtown and airport station.

Therefore, the "NO BUILD" alternative is best. At the very worst, Alternative 1.

NEC DEIS Comments - RECORD #901 DETAIL

Status :

[REDACTED]

Record Date :

2/11/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Please do not do this. I live on the shoreline, work on the shoreline, commute on the shoreline, recreate on the shoreline. The disruption this would cause would ensure the better part of a generation would not have adequate access to easily take advantage our beautiful area. Not to mention the destruction of historic properties in affected towns. All this to shave 30 minutes round trip? Boondoggle!

33

NEC DEIS Comments - RECORD #931 DETAIL

Status :

[REDACTED]

Record Date :

2/11/2016

First Name :

Anonymous_034

Last Name :

Stakeholder Comments/Issues :

I am opposed to the high speed rail through Old Lyme.

NEC DEIS Comments - RECORD #933 DETAIL

Status :

Record Date :

2/11/2016

First Name :

Anonymous_035

Last Name :

Stakeholder Comments/Issues :

As a graduate student at Uconn Storrs ho can not afford a car payment, being a part of the rail corridor would be wildly helpful to me. It would improve commerce in both Providence and Hartford as those are destinations enjoyed by many students who can not visit as often as they might like. I fully support the decision to include Storrs in the railway.

NEC DEIS Comments - RECORD #953 DETAIL

Status : [REDACTED]

Record Date : 2/11/2016

First Name : Anonymous_036

Last Name :

Stakeholder Comments/Issues :

I am against having our town of Old Lyme destroyed by this train. This is not the answer.

NEC DEIS Comments - RECORD #961 DETAIL

Status :

2/11/2016

Record Date :

Anonymous_037

First Name :

Last Name :

Stakeholder Comments/Issues :

Placing an expansion to the train through the historic district of Old Lyme CT would destroy the rich history of the area, not only houses, but the community as well. Putting a train track through the lyme academy campus would also be simply heartbreaking to the students and alumni. It would also completely destroy an important part of the community. The college brings so many people into the town, which is good for everyone: tax payers, businesses, etc. There must be another route the train can take. I take the train often. I know how important it is. But going through a historic area and demolishing a college isn't helping anyone. Please find another route. I'm sure another route as possible.

NEC DEIS Comments - RECORD #964 DETAIL

Status :

2/11/2016

Record Date :

First Name :

Last Name :

Stakeholder Comments/Issues :

I am against Alternative 1 of the three high-speed railtrack routes proposed by the Federal Railroad Authority (FRA). Being a resident of Old Lyme, CT, Alternative 1 would be detrimental to our community. Alternative 1 would replace our only town center, run straight through our historical main street, and ruin our town's economy, as well as our identity. I don't believe that saving a few minutes on a train is worth destroy our community and the history our town has established. Please reconsider Alternative 1 and look at the communities this plans destroys. Thank you for your time and consideration.

38

NEC DEIS Comments - RECORD #1004 DETAIL

Status :

2/11/2016

Record Date :

Anonymous_039

First Name :

Last Name :

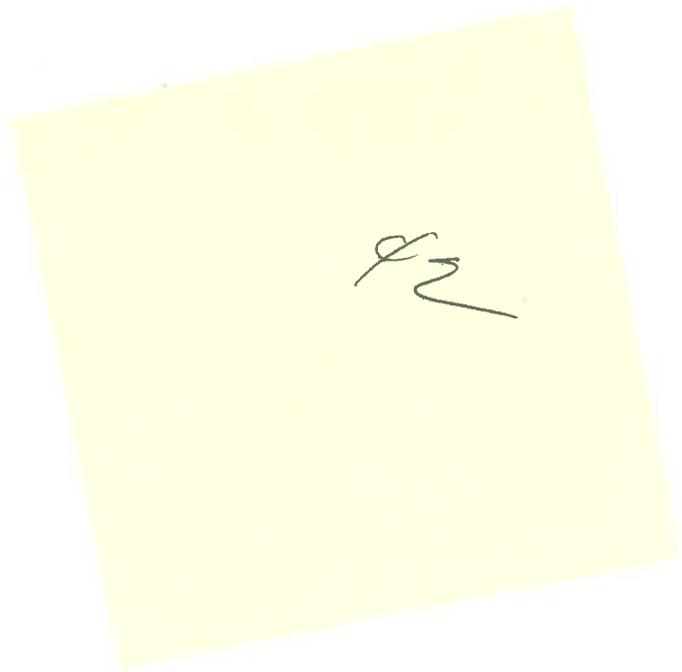
Stakeholder Comments/Issues :

You are fucking stupid if you go on building this new railroad. You have a perfectly fine, working one already which doesn't infer severely with the lives of Old Lyme citizens. If you're on board with this idiotic idea, I'm assuming your an old, white, male republican piece of shit, because that group seems to have the WORST ideas ever. I can't wait until that group dies out. I digress though. Don't be a bunch of dipshits and fuck up people's lives, you foul pricks.

NEC DEIS Comments - RECORD #1244 DETAIL

Status : ██████████
Record Date : 2/14/2016
First Name :
Last Name :
Stakeholder Comments/Issues :

What a terrible idea alternative 1 is! Don't destroy a beautiful and historic town like Old Lyme -- you can't ever get it back!



FZ

NEC DEIS Comments - RECORD #1247 DETAIL

Status :

[REDACTED]

Record Date :

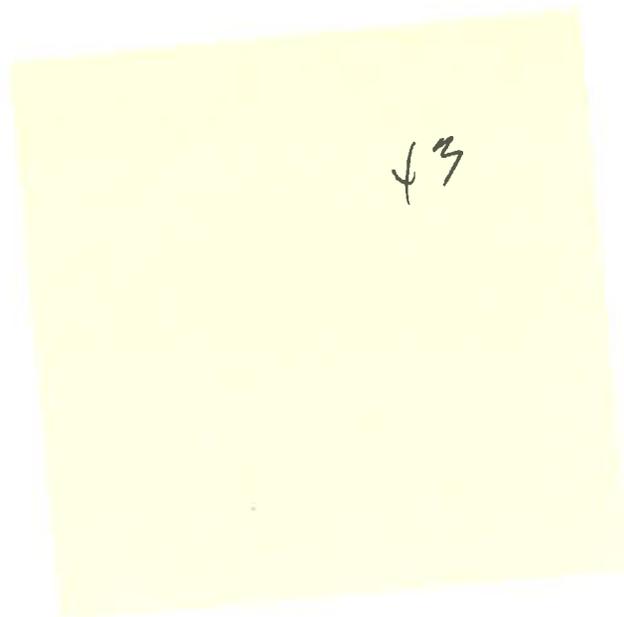
2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

This is NOT what is best for our community. Please reconsider.



NEC DEIS Comments - RECORD #1041 DETAIL

Status :

[REDACTED]

Record Date :

2/12/2016

First Name :

Anonymous_044

Last Name :

Stakeholder Comments/Issues :

Proposing to build a line through downtown Old Lyme, CT would destroy the town. It is one of the oldest communities in the US, founded in 1665. Its history and beauty is unparalleled. By building a rail line through the center of main street (yes, that is the proposal) is completely insensitive, cruel, and shortsighted. GO AROUND!!!

NEC DEIS Comments - RECORD #1346 DETAIL

Status :

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Strongly OPPOSE Alternative 1!!

We need to preserve the character of Old Lyme, including The Historic District, The Lyme Art Academy, etc.

NEC DEIS Comments - RECORD #1275 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Ruin Old Lyme....and two of its treasures . Why? The beauty of Lyme is that it is quite and the Flor gris is more than a tresure it is priceless. There is no museum like it around this area. For a slightly faster trian, they need to get a brain.

NEC DEIS Comments - RECORD #1278 DETAIL

Status :

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I feel that the transform option best suits our long term goals but why are we hastening into this. I feel the Govt is being the usual underhanded and self serving monster it always is. I would like to see the ecological and community impact studies done by independent surveyors. I will probably move out of this area if the social and economic impact is to destructive. Also I would like to know that the work being done is not performed by heavy donors to politicians but actually helps the average worker and local job market. But having watched our government i.e. politicians be so self serving torso long I have lost all faith that this will be done for the public good!!!

NEC DEIS Comments - RECORD #1280 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Of the 3 options presented, tier one would be the most impactful on the residents of Old Lyme and its Historical District. I strongly advocate using either tier2 or tier3.

NEC DEIS Comments - RECORD #1282 DETAIL

Status :

Record Date :


2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Alternative 3, the transformation of the system gets my vote. It's what the system truly needs. I would fight against passage of Alternative 1 - I don't even want to imagine the damage that would be done to historic Old Lyme were this alternative to be implemented.

NEC DEIS Comments - RECORD #1293 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Do not do it! I oppose

NEC DEIS Comments - RECORD #1294 DETAIL

Status :

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Those of us living in Lyme and Old Lyme (or anyone who recognizes the importance of historic buildings and towns) are horrified to learn of a possible plan to run train tracks through our beautiful, quaint town center. Unfathomable. Please don't destroy and disrupt this town.

NEC DEIS Comments - RECORD #1295 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose it

NEC DEIS Comments - RECORD #1099 DETAIL

Status :

[REDACTED]

Record Date :

2/12/2016

First Name :

Go

Last Name :

Fuckyourself

Stakeholder Comments/Issues :

You will not, at any cost, move your rail line anywhere near my property. Go fuck yourselves as you are another useless government agency that is wasting tax payer dollars with your pathetic jobs. Get a fucken life and actually work for our tax dollars you useless pieces of shit.

NEC DEIS Comments - RECORD #1651 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

The center of Old Lyme is the heart of our small community. Please do not destroy the economic and historic lifeblood of Old Lyme.

NEC DEIS Comments - RECORD #1512 DETAIL

Status :

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

1. The basic premise of Northeast population growth that underlies the potential need for large scale, costly alternatives is suspect from the start. The northeast is the most child-free region in the U.S. This fact, combined with consistent population departure rates, means northeast population growth is projected to be among the slowest in the nation.
2. Technological leaps that cannot even be imagined today will render any newly designed system completely obsolete and grossly inefficient. Focusing on investments in existing track capacity and increasing frequency of service would be a more prudent course that will minimize switching costs when a technological leap occurs.
3. The cost estimates for the more dramatic alternatives will be enormously unrealistic. Rail project overruns average 45%. Such cost overruns have become unavoidable as overly optimistic budgets are submitted to increase the odds of approval. (See: Megaprojects and Risk by Bent Flyvbjerg)

NEC DEIS Comments - RECORD #1534 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

no action alternative. The idea of building new rail lines through the most highly populated area of the county is absurd. Would displace many home owners (eminent domaine or fair market value) and destroy long existing towns along the corridor. Work with what you already have.

NEC DEIS Comments - RECORD #1536 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

no action alternative - way too expensive

NEC DEIS Comments - RECORD #1652 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I adamantly OPPOSE Alternative 1 that will destroy historic Old Lyme and several historic landmarks.

NEC DEIS Comments - RECORD #1803 DETAIL

Status :

Record Date :

[REDACTED]
2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1816 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1822 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1825 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1828 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #1832 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1730 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I am totally opposed to the new rail line going through the coastal historic areas of Old Saybrook and especially old Lyme. that Alternative #1 would ruin historical and environmentally protected areas. The second alternative plan of going through Hartford is far more obviously straight line and in more industrial, business area.

NEC DEIS Comments - RECORD #1848 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven

NEC DEIS Comments - RECORD #1852 DETAIL

Status :

Not Complete

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1855 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #1867 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1477 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

How could anyone in his/her right mind think of ruining an historic New England village.

NEC DEIS Comments - RECORD #1907 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1939 DETAIL

Status :

Record Date :

██████████
2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #3058 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I am a resident of Old Lyme, CT. The new proposed rail line would decimate the town and negatively effect the town. I chose to move to this town due to its quiet nature. Having a house away from the existing rail line was a must for me. The new rail line would be in close proximity to my residence, and would cause annoyance. On a second note, this will greatly effect the value of my house. I hope Amtrak or the state is planning on buying my house from me should this poor idea actually goes through. Of note I due utilize Amtrak from old Saybrook to Boston at least once or. It twice a year.

NEC DEIS Comments - RECORD #1785 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1774 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2047 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Do not destroy the Lyme Academy College of Fine Arts!! It is a very important establishment and part of the community.

NEC DEIS Comments - RECORD #1762 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2049 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #1758 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1774 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2047 DETAIL

Status :

Record Date :

[REDACTED]
2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

- Do not destroy the Lyme Academy College of Fine Arts!! It is a very important establishment and part of the community.

NEC DEIS Comments - RECORD #1762 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2049 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #3015 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose this plan. Your ideas suck and will rouine ct state forests and the natural peaceful environment we all enjoy in CT's quiet corner.

NEC DEIS Comments - RECORD #1758 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1757 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #3004 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Old Lyme is a gorgeous New England town. This project will destroy the quaint small town character of this shoreline community. Please do not deface the history of this town for a railway system that has no benefit to the residents.

NEC DEIS Comments - RECORD #2207 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2210 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2214 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2216 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2091 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2231 DETAIL

Status :

Record Date : 2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2235 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

This would destroy our community! Please do not destroy our home.

NEC DEIS Comments - RECORD #2239 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2246 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2122 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2129 DETAIL**Status :****Record Date :**

2/15/2016

First Name :**Last Name :****Stakeholder Comments/Issues :**

The proposed railway that would pass through historic Old Lyme and its unique wetlands Is an insult to the townspeoples intelligence and to the integrity of the town itself. Yes, this is the cheapest solution, but that does not mean best solution! It's proposal in itself shows the utter disconnect between corporation and community, and makes it blatantly obvious that there was VERY little if not no research done on the part of The NEC in regards to the environmental and community impact of beautiful, unique, and historic Old Lyme.

NEC DEIS Comments - RECORD #2150 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2151 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2306 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Anonymous_100

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2326 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Anonymous_101

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2274 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2278 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Following through with plans intending to build a rail road system that has a location on the south end of Old Lyme will not accomplish the goals of fixing CT economy. Implementing this plan will only disrupt the well perserved wildlife in old lyme that has captured attention on a national scale. We need to implement a rail system that will connect our capital city, Hartford, to New Haven, Providence, Boston and New York. We need to connect UCONN, our largest public university and medical center that is currently isolated in Storrs, CT to these cities as well. Alternative two is clearly the better option. As i do support the investment into infrastructure as a soild plan to fix the economy in the state, bisecting a historic district and compromising a wildlife community that has been so so strategically protected is simply a waste of precious resources especially seeing as the reward for doing so will not be profitable.

NEC DEIS Comments - RECORD #2336 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Anonymous_104

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration, I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2291 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy Collage of Fine Arts of the University of New Haven. It will also endanger the federal protected areas of the Conn. River Estuary and ruin the aesthetic quality of Old Lyme's nationally recognized historic district. This in turn will ruin Old Lyme's tourist industry and the town's economic well being.

NEC DEIS Comments - RECORD #2297 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2353 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Anonymous_107

Last Name :

Stakeholder Comments/Issues :

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2354 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Anonymous_108

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2157 DETAIL

Status :

Record Date :

██████████
2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2157 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2356 DETAIL

Status :

[REDACTED]
2/15/2016

Record Date :

Anonymous_110

First Name :

Last Name :

Stakeholder Comments/Issues :

Don't build a railroad through the campus.

NEC DEIS Comments - RECORD #2502 DETAIL

Status :

[REDACTED]
2/16/2016

Record Date :

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose this plan as it would ruin the beautiful village of Old Lyme, as well as many other peoples' lives by having their property taken by eminent domain.

NEC DEIS Comments - RECORD #2511 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2383 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Anonymous_113

Last Name :

Stakeholder Comments/Issues :

I am concerned with the impact of Alternative 1 on Old Lyme, CT. The area that the new rail would cross (historic Old Lyme and the Lyme Academy of Fine Arts) would certainly be affected. I would not personally be in favor of this.

NEC DEIS Comments - RECORD #2385 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Anonymous_114

Last Name :

Stakeholder Comments/Issues :

I vigorously object to the proposed alternative 1 routing. This proposal both will devastate an environmental jewel, a historic and unique town in American artistic culture and yet deliver mediocre improvement to high speed rail transportation.

Sent from my iPad

NEC DEIS Comments - RECORD #2523 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

The town of old Lyme is so culturally significant to not only Connecticut, but our country, that to destroy it for the purpose of faster transit, or anything for that matter, is a disgrace. Our rich heritage in the arts, maritime culture, and connecticut's history makes it ludicrous to think this is even a viable option. I was born in old Lyme, have lived and called this town home my entire life. To see it destroyed for high speed rail would be an insult to my family, and my life. The loss of old Lyme would a loss of immeasurable proportions, and I will do all I can to see that it does not happen.

NEC DEIS Comments - RECORD #2608 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Anonymous_116

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2632 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Anonymous_117

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2633 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Anonymous_118

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2555 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I strongly oppose Alternative 1 of the Northeast Corridor Futures proposal as it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2559 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2565 DETAIL

Status :

2/16/2016

Record Date :

First Name :

Last Name :

Stakeholder Comments/Issues :

I am opposed to Alternative 1. Adding a new rail bridge between Old Saybrook and Lyme would cut a swath through a lovely historic town and ruin the town's rural feel. Please do not do this to our beautiful, historic, and bucolic riverfront environs.

NEC DEIS Comments - RECORD #2570 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2634 DETAIL

Status :

2/16/2016

Record Date :

Anonymous_123

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2635 DETAIL

Status :

[REDACTED]
2/16/2016

Record Date :

First Name :

Anonymous_124

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2636 DETAIL

Status :

2/16/2016

Record Date :

Anonymous_125

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2579 DETAIL

Status :

[REDACTED]
2/16/2016

Record Date :

First Name :

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2583 DETAIL

Status :

Record Date :

██████████
2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2643 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Anonymous_128

Last Name :

Stakeholder Comments/Issues :

As a resident of Lyme, CT, I am writing to voice my opposition to Alternative #1. Implementing this plan would devastate prime ecosystems and the town of Old Lyme. Besides being irreplaceable in the abstract, the people of this community have shown long term commitment to preservation of nature and the environment over generations and we will not be willing to allow this development to proceed without stiff and protracted legal opposition. Preservation of natural habitat along the NE corridor is of essential importance to our view and we urgently advise the Administration to invest in Alternative #2

NEC DEIS Comments - RECORD #2649 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2650 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Please do NOT send new rail tracks through Old Lyme, CT.
Please do NOT tunnel under Long Island Sound for new rail tracks.
This "study" appears to be incomplete and not fiscally responsible let alone the impact to the state and neighborhoods of CT.

NEC DEIS Comments - RECORD #2596 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Anonymous_131

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2663 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Anonymous_132

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2671 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Anonymous_133

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2701 DETAIL

Status :

Record Date :

2/16/2016

First Name :

A voting citizen!! Who is concerned about what is happening in m. Back yard and the entire U. S. A.

Last Name :

Stakeholder Comments/Issues :

The impact to people and environment is key to this and any development. Trying to push one bad plan through is criminal! The best plan would have the least impact on the people and environment and is not the proposed plan. You don't even know how this plan would make any difference to the use of the railway! Incompetence in government is all it is!!

NEC DEIS Comments - RECORD #2685 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Anonymous_135

Last Name :

Stakeholder Comments/Issues :

Slow down and take time to talk some.

NEC DEIS Comments - RECORD #2721 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2687 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Anonymous_136

Last Name :

Stakeholder Comments/Issues :

I am not okay with my money, and other tax payers money being spent on a project that will demolish historic buildings and damage a beautiful, historic town to cut out a half hour of a commute. I'm sorry but the benefits do not out weigh the risks. If this plan passes, it's just another reason why governor Maloy needs to get out of the office. Stop making enemies in your state.

NEC DEIS Comments - RECORD #2692 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Anonymous_137

Stakeholder Comments/Issues :

You guys are leaving nothing behind for your grandchildren nor mine. The railroad can be improved without tunnels in the Sound, and the train goes fast enough already.
Thank you.

NEC DEIS Comments - RECORD #2800 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Anonymous_139

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

Best regards,

NEC DEIS Comments - RECORD #2821 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Anonymous_140

Stakeholder Comments/Issues :

Any redesign of rail corridors that impacts a community should have full disclosure of the plan and opportunity for the FRA and the community to work together to reach a solution that will benefit all. A situation like the one in Old Lyme CT, where the new railway would decimate the existing center of the town is certainly not a boon for the community the rail line would pass through. The Northeast part of the country is fairly heavily populated, and a plan that plows through existing communities without regard for who or what is being displaced is irresponsible. Historic areas and open space have value.

NEC DEIS Comments - RECORD #2827 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Anonymous_141

Last Name :

Stakeholder Comments/Issues :

As a homeowner in Old Lyme, I live directly in the path of your proposed Alternative 1 rail track. I am in shock that any branch of government would consider such a destructive measure. Your plan for our Old Lyme community would decimate out town economically, historically, ecologically and educationally.

Our town/village contains the Old Lyme Art Academy, Lyme Art Association, The Historical Society and the Florence Griswold Museum in addition to the endless wetlands and marshes preserved by our Nature Conservancy Association. This does not include the destruction possibly elimination of our residential area which include historically reserved century old homes.

I question the lack of transparency your organization has exercised regarding this rail system and its extreme negative impact on or community. I find it unconscionable for the Old Lyme government officials to learn about your "study " thru the "grapevine" just a handful of days ago.

Instead of spending all those tax dollars on your study I would like to suggest you use that money to improve the already existing rail system that services the Acela and Metro North trains.

I am greatly opposed to the Alternative 1 of the EIS rail service.

Sincerely,

Mary Louise Stock

NEC DEIS Comments - RECORD #2476 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2929 DETAIL

Status :

██████████
2/16/2016

Record Date :

First Name :

Last Name :

Stakeholder Comments/Issues :

Bad idea for our community and the sound. Especially if it will only save a half hour travel time. Not worth all the trouble.

NEC DEIS Comments - RECORD #2943 DETAIL

Status :

Record Date :


2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

As a Milford resident, I am 100% opposed to the rail plans as currently outlined. The concept of a tunnel under Long Island sound is ridiculous! The public has been kept in the dark regarding the proposed changes and the money is desperately needed in other areas, health and education to name two. If only today were April 1st, we could all enjoy a good laugh and move on. I hope this "plan" is truly the joke it appears to be.

NEC DEIS Comments - RECORD #2964 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2991 DETAIL

Status :

[REDACTED]
2/16/2016

Record Date :

First Name :

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2891 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Anonymous_146

Last Name :

Stakeholder Comments/Issues :

I am opposed to plan #1, that has rail line going through the hart of old lyme. You just electrified the existing line as well as updated it! Why would you consider of going through the middle of our town?????????

NEC DEIS Comments - RECORD #2754 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Anonymous_147

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven and also the historic main street which is a treasure in the state of CT.

NEC DEIS Comments - RECORD #2758 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Anonymous_148

Last Name :

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2792 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Last Name :

Stakeholder Comments/Issues :

NO high speed train tunnel into Milford Harbor, Connecticut from Long Island. Be very careful about proposing plans that show a lack of attention and respect for the charming beautiful towns dotting the shoreline in CT. Milford Harbor is extremely beautiful and is surrounded by historic houses which should be preserved. The Harbor also supports the local economy as a tourist destination (boat owners frequent the local eateries, residents from surrounding towns come to Milford for beaches boating). Milford is defined as a small city but really is more of a walkable upscale town with a village green. If you destroy the beauty of Milford you will likely have more exodus of working class people moving out of that shoreline town. Quality of life is important to the middle working class that choose certain shoreline communities to call home. A better alternative may be to come directly into New Haven harbor which is already primarily commercial. You would also likely face much lesser public outcry. It may be a little more costly but if the middle class residents leave the area (seeking a better lifestyle) you will have less working class clients to pay the monthly train fees in the New Haven area. The best plan may be to connect Hartford to NYC via 84 corridor with a very high speed rail with travel time of ONE HOUR or less. That will attract people to move up towards Hartford again (attract the population to move AWAY FROM THE CROWDED SHORELINE). This State is losing residents because of the exodus of corporations out of Hartford due to the high cost of doing business. But if folks can live near Hartford and commute to jobs in NYC you may have a renewed interest in the middleclass moving to more affordable and beautiful areas surrounding Hartford. Hartford is currently surrounded by several beautiful towns with an educated population nearby (UCONN). Hartford has stunning architecture and is ripe for revitalization. Hartford may then focus on attracting mid and small size businesses again along with vamping up cultural attractions. Whatever you do plan, please keep a HUGE focus on maintaining the BEAUTY of the neighborhoods you affect. The railway should be physically attractive as well as functional. After all, this is about reducing congestion (both of residential properties, people and automobiles from the shoreline 95 corridor) while improving the economics and quality of life for us all, correct? If the Northeast loses its beauty due to ugly development, there will be nothing really left to keep folks wanting to live here. KEEP IT ELEGANT and UNOBTRUSIVE ! Thank you for your consideration.

NEC DEIS Comments - RECORD #2087 DETAIL

Status :

[REDACTED]
2/15/2016

Record Date :

First Name :

Timothy

Last Name :

Anthony

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #2420 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Theresa

Last Name :

Antonellis

Stakeholder Comments/Issues :

Theresa Antonellis stands in opposition to Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2874 DETAIL

Status : ██████████
Record Date : 2/16/2016
First Name : Richard
Last Name : Arena
Stakeholder Comments/Issues :

Richard J. Arena and Kurt Marden, Co-Presidents
Association for Public Transportation
Massachusetts Association of Railroad Passengers

P.O. Box 51029
Boston MA 02205-1029
www.aptmarp.org
apt@aptmarp.org
781-797-7245

16 February 2016

Ms. Rebecca Reyes-Alicea
NEC FUTURE
U.S. DOT Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

APT -
Alicea

Re: Tier 1 Draft Environmental Impact Statement (DEIS) for the Northeast Corridor Rail Investment Plan
Via: e-mail, on-line, and post

Dear Ms. Reyes-Alicea:

The Association for Public Transportation, and its affiliate organization the Massachusetts Association of Railroad Passengers (APT) strongly supports the construction of high speed passenger rail service (220 mph) to more efficiently connect Boston, New York, Philadelphia, Washington and additional destinations beyond the existing corridor. We consider this a vital regional and national necessity, for a host of environmental and economic reasons. As you are aware, although the region served by the Northeast Corridor is one of the United States' major economic engines, our transportation infrastructure lags far behind the global standard, undermining our long-term competitiveness. Poor transportation weighs particularly heavily on a region whose primary resource is our skilled workforce. This substantial disadvantage needs to be urgently and decisively corrected.

While we commend the FRA for the leadership and expertise it has brought to advancing this necessary and challenging project, we are concerned that the current DEIR overlooks key elements critical to its successful implementation and the maximization its long-term value. We are also concerned that the DEIR does not establish any global context for the improvements it proposes, without which many decision makers may not fully appreciate the urgency and necessity of the required investments.

Global Context

APT believes we need world-class rail in the United States, and strongly support NEC Alternates 3.1 – 3.4 as a first step toward achieving this. It is important to clarify, however, that even these Alternates are modest by world standards, that they bring us only to a position many of our competitors reached and surpassed decades ago, and that none of the proposed Alternates will provide transportation parity, let alone bring us a leadership position.

We are concerned that characterizing the 3 Alternates as: "maintains", "grows" and "transforms" masks this unfortunate reality, and may tacitly steer many decision makers toward compromise solutions that will leave us falling ever farther behind. Alternate 2 represents "growth" only when compared to our decades of underinvestment. Compared to the global standard it represents continued backsliding. The 3 Alternates might therefore be more aptly described as "obsolete", "falling behind" and "making progress". The DEIR and future studies need to do a much better job of putting our system, challenges, and goals in a global context, not simply in the context of our past neglect. Additional text and graphics should be added comparing performance, travel time and investment levels among modern industrialized countries. There will be great opposition to the investments proposed in NEC Future, and we therefore need to make our case forcefully.

Performance Goals

Even the 100-minute service between Boston and New York, proposed under Alternate 3 (DEIR p. 4-42) falls short of the less than 90-minute service Texas High Speed rail will offer between Houston and Dallas/Ft. Worth – cities that are farther apart, and they plan to do it decades earlier. We are not going to accomplish our goals by offering too little, too late.

We trust that the proposed "5 hour 10 minute" travel time from Washington to Boston, cited under Alternate 3 on p.4-42 is a typo, since it reflects no improvement over Alternate 2, far exceeds the separate Boston-NY and NY-DC travel times, and would be totally uncompetitive.

Alternates

As noted previously, APT strongly supports Alternate 3. Regarding subalternates 3.1 through 3.4, we believe the priority should be reducing travel time between major hubs. It appears Table 9-17 (Avg. Station to Station Travel Times Savings") may in fact show travel times, not time savings, because the supposed "savings" match the average travel times cited in the preceding table. We would be grateful if you could clarify this. It appears that the travel times for the Alternate 3 Express options vary by only 10 minutes, which may not be determinative. For the Worcester options, more information is needed about regional economic effects, grade separations in the congested Worcester to Boston corridor, and other details to resolve this question. It is our position however that a very high value should be placed on achieving the shortest possible travel time between major hubs.

Intermodal Connectivity

The DEIR refers to South Station in Boston as a Major Hub, accessible by transit, commuter rail, bus and other modes, but it neglects key factors that undermine its capacity to function effectively in this role, and overstates its capacity to support a revitalized NEC. Most critically, it ignores the fact that significant parts of Boston's transit and regional rail systems have no direct access to South Station. Table 5-8 shows 36.1 million passenger trips on MBTA commuter rail in 2013, without noting that a significant portion of those trips terminate

at North Station, with no direct access to South Station and connections to just two of Boston's 5 transit lines. The unfortunate reality is that Massachusetts does not in fact have a "commuter rail system". Rather, it has two systems, one serving regions north of Boston, and another serving regions to the south, and current proposals to expand South Station as a stub-end terminal with surface tracks do nothing to address this problem.

The DEIR's near silence regarding South Station in Boston is puzzling. The discussion of Major Stations on page 10-15 reviews the preparatory work planned at Washington Union Station and Penn Station and its role in supporting NEC planning, with no mention of South Station in Boston, arguably one of the project's major destinations and hubs.

Given the scale of the investments that will be needed to modernize the NEC, haphazard integration of intercity rail, regional rail and transit, and lack of analysis of the improvements needed to achieve it, is simply unacceptable and fiscally unsound. World-class rail infrastructure has to be conceived as a coherent, unified system, with stations and intermodal connections perfectly coordinated to maximize benefits over many decades. Seamless intermodal connectivity should be a basic precondition for any transportation investment on the scale NEC Future proposes.

The DEIR makes reference to "South Station Expansion", but it is important to recognize that MassDOT's current plans to add 7 extra surface tracks will not correct this critical defect, nor provide adequate long-term capacity and operating efficiency. What is urgently needed is a direct north-south rail link (NSRL) that will allow regional and intercity rail services to run below the city and connect with all 5 transit lines. Integrating the lines in this way will connect 57 additional northside commuter rail stations directly to the NEC and extend the NEC itself north to Maine and eventually Montreal. Current efforts to extend rail service from Manchester and Concord NH to North Station (Capitol Corridors Project) would be far more valuable if they connected directly with the NEC in this way.

It is not acceptable for Massachusetts' failure to unify its infrastructure (as Philadelphia, New York, and Providence did long ago) to effectively veto NEC access from northern New England. Any argument for federal support of needed infrastructure investments will be much the stronger if it enjoys broad regional support, with northern New England included as a key stakeholder.

There is an unfortunate perception that the NSRL was evaluated in the early 2000's and found to be economically infeasible. This is not the case. In fact, 8 years of study confirmed its feasibility and necessity, when all of the benefits, revenue streams, and cost savings were considered holistically. In addition to its transportation benefits, the North South Rail Link solves a host of operational and land-use challenges, and avoids the need for \$2B in terminal expansions that produce far less capacity improvement. For these reasons, APT believes unification of the Massachusetts rail systems by a North South Rail Link is both essential and feasible, and must be an integral part of NEC Future. A Working Group led by two former Massachusetts governors, legislative leaders and other key stakeholders is pressing to move this needed project forward, and its necessity for the NEC Future should not be ignored. For more information, see: <http://www.northsouthraillink.org>.

APT is concerned that despite extensive prior comment by our organization and other stakeholders, there is no reference to the North South Rail Link or Massachusetts regional rail integration in the DEIR. This unfortunate

omission undermines both the NEC Future project and efforts to modernize New England's regional rail system, both of which are necessary and synergistic.

Freight Coordination

APT supports the FRA's stated goal of removing conflicts between Freight and Passenger Rail, while improving capacity for both. We also commend the FRA for its stated interest in identifying mutually beneficial opportunities. Given the likely very high cost of acquiring and developing the new alignments identified in Alternate 3, we wonder whether joint development of parallel but separate Freight and Passenger lines along these alignments might defray some of the cost of the Passenger share, while streamlining freight operations between the hubs. This should be evaluated.

Project Schedule

We do not find in the DEIR sufficient discussion of the potential timeframe for the proposed Build Alternates. There is urgency to this project. If we wait 25 more years to do the work, it will be obsolete when it's finished. We believe an aggressive timeframe will spur interest in the project as surely as a dilatory approach will depress it. Just as the DEIR has defined 3 potential scopes of work, it should also define schedule options, ranging from aggressive to more conservative, and identifying all key action items needed to accelerate the work and the economic benefits of doing so. As noted above, this analysis should be put in a global context, comparing our progress to that of our competitors. Readers should be told how quickly Alternate 3 could be built if it receives full and prompt support at all necessary levels, and how long it could drag on if this is not forthcoming. The cost of delay should be clearly articulated.

APT appreciates the opportunity to comment on this vital project and looks forward to working with the FRA and other stakeholders to build the case for its prompt and comprehensive realization.

Please feel free to contact APT if we can be of further assistance.

Best regards,

Richard Arena and Kurt Marden,
Co-Presidents
for the Officers and Board of The Association for Public Transportation

NEC DEIS Comments - RECORD #2912 DETAIL

Status : ██████████

Record Date : 2/16/2016

First Name :

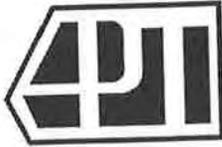
Last Name : brad@██████████

Stakeholder Comments/Issues :

Please see attached comments submitted by the Association for Public Transportation
(also submitted via the online comment tool a few moments ago)

Attachments : APT NEC Future Comments-2.16.16rev2.pdf (123 kb)

APT -
Ariana Marden



Association for Public Transportation

Massachusetts Association of Railroad Passengers

Richard J. Arena and
Kurt Marden, Co-Presidents
apt@aptparp.org
781-797-7245
P.O. Box 51029
Boston MA 02205-1029
www.aptparp.org

16 February 2016

Ms. Rebecca Reyes-Alicea
NEC FUTURE
U.S. DOT Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

Re: Tier 1 Draft Environmental Impact Statement (DEIS) for the Northeast Corridor Rail Investment Plan

Via e-mail, on-line, and post

Dear Ms. Reyes-Alicea:

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Please feel free to contact APT if we can be of further assistance.

Best regards,

Richard Arena and Kurt Marden,
Co-Presidents
for the Officers and Board of The Association for Public Transportation

cc: Honorable Charlie Baker, Governor of the Commonwealth
Secretary Stephanie Pollack, CEO, Massachusetts Department of Transportation

NEC DEIS Comments - RECORD #847 DETAIL

Status :

Record Date :

2/11/2016

First Name :

Judith

Last Name :

Archer

Stakeholder Comments/Issues :

I just absolutely cannot believe that this plan to run a high speed Amtrak line through the historic village of Old Lyme, Ct was ever considered. It's like running one through Williamsburg, Va or Concord, Ma. Historic sites of our nation's history. Old Lyme is a noted Art's Colony and this train track would eliminate an art college and remove and demolish nationally credited historic home. WHY? was this ever thought of???

NEC DEIS Comments - RECORD #469 DETAIL**Status :****Record Date :** 2/1/2016**First Name :** Judith**Last Name :** Archer**Stakeholder Comments/Issues :**

Needless to say this plan would have a huge impact of an historic N.E. village. This village prides itself on "staying" the same for centuries. A lot of hard working and dedicated people over the years have kept it that way. This Tier 1 plan would take all that away from its residents. There of course is the environmental impact as the trains would go through an estuary that has nesting sites of the Osprey, once an endangered bird. What are you looking to improve??? I understand the bridge being old and needing replacement, but aren't there structures in place to take on a new set of tracks and a new bridge?? You know we would travel, love to, by train to Boston to spend the day at museums but the cost does not allow us to entertain that way to get there. We can use Shoreline East and Metro No. to access N.Y.C. but not so Boston. So please save our town and look at other plans. Judith Archer

NEC DEIS Comments - RECORD #378 DETAIL

Status :

Record Date :

1/29/2016

First Name :

Judith

Last Name :

Archer

Stakeholder Comments/Issues :

We just cannot believe the idea of running a high speed rail line through our small and historic town of Old Lyme would even be considered at all...there are antique historic homes right in the path of this proposal. What are you thinking! We oppose this idea 100%.

NEC DEIS Comments - RECORD #3059 DETAIL

Status : [REDACTED]
Record Date : 2/17/2016
First Name : Richard
Last Name : J Arena

Stakeholder Comments/Issues :

Thank you for the opportunity to weigh in on this important project.

Best regards,

Richard Arena

Richard J. Arena
Managing Partner, ARC Systems International, LLC
NY/NJ: Red Bank, NJ 07701; MA: Boston, MA 02205; FL: Sarasota, FL 34233
Tel: 732.576.8840 rarena@arcsyst.com

Attachments : 20160216 Arena_Richard_NEC_Future_EIS_Submission.pdf (297 kb)



ARC Systems International, LLC

138 Bodman Place, Suite 17
Red Bank, NJ 07701

www.arcsyst.com

Richard J. Arena
President

rarena@arcsyst.com
Tel : 732.576.8840 Fax : 732.576.8838

16 February 2016

Ms. Rebecca Reyes-Alicea
US Department of Transportation
Federal Railroad Administration
Office of Railroad Policy & Development
1200 New Jersey Avenue SE, Mail Stop 20
Washington, DC 20590

Ref: Response to NEC Future Environmental Impact Statement (EIS)

Via e-mail, on-line, and facsimile

Dear Ms. Reyes-Alicea:

I am following up my oral testimony from the NEC Future outreach meeting held at City University of New York in New York City on 15 December 2015. Thank you for the opportunity to continue my remarks.

I strongly support the construction of high speed passenger rail service (220 mph) connecting Boston to New York City and Washington, DC. Furthermore, the EIS should be scoped to evaluate the improvements (including passenger rail stations in the Commonwealth of Massachusetts) that would be needed in connection with the extension of a high speed rail corridor from New York City to Boston with provisions for expansion of high speed rail to northern New England. Many of the Commonwealth's facilities need improvements to be able to provide true high speed rail service in that segment of the Northeast Corridor, while also providing for commuter rail and freight expansion with efficiency of operation in its shared corridors.

The flexibility being designed into the stations in Washington, DC and New York, NY is notable. Planners for both cities understand the potential for major passenger increases in both locations. In New York City, approvals have been granted to increase both the speed and frequency of trains from NYC to Albany and further points north and west. The Gateway / Moynihan / Penn Station's expansion comprehends this increased loading, as well as the capacity needs of next generation high speed rail service between Boston and DC. The planners for Union Station in Washington DC are working closely with counterparts in both Virginia and North Carolina to extend the NEC southward to Richmond, Virginia and further on to Raleigh and Charlotte North Carolina.

With respect to the NEC Future scenarios in New England, I strongly support Alternative 3.1 which routes from Hartford to Providence to Boston. This will permit true high speed rail speeds not currently available on the coast route while including another New England capital. Additionally, this central ROW combined with ongoing rail work throughout New England will bring all major cities within two to three hours of Boston and New York City. This is a significant improvement in regional connectivity.

Massachusetts, New England, as well as the entire NEC would likewise benefit by extending the NEC northward from Boston. The population density north of Boston to northeastern Massachusetts and Portland, Maine and Manchester,

Response to NEC Future EIS
February 16, 2016

New Hampshire, and eventually Montreal, Canada would be well served by access to the high speed NEC. But South Station is actually a surface terminal, constrained on the east by Boston Harbor, on the north by the Charles River, and on the surface by extensive real estate development. What Boston urgently needs is an underground station at South Station and tunnels northward under the Charles River to reach key population and business centers north. This necessitates a project similar to the proposed North/South Rail Link (NSRL). The NSRL would create a new underground station adjacent to South Station with four to six underground tracks and easy access to the increased numbers of trains and passengers.

Building the NSRL would alleviate track capacity and train storage issues in Boston. It will also provide through-running service between the separated north Amtrak and MBTA (Massachusetts Bay Transportation Authority) services which terminate at North Station, as well as the south and west Amtrak and MBTA services which terminate at South Station. Providing through-service will reduce congestion on both regional highways and airports, and divert passengers and commuters to an environmentally superior and efficient mode. The cost for this project would be in the vicinity of \$4 billion. Considering that both North and South Stations are capacity constrained at this time, the NSRL is a cost-effective solution to the congestion as well as great opportunity to maximize transit oriented development in Boston's Seaport and Financial District areas. Additionally, Transferrable Development Rights (TDR's) for the construction above the now underground stations will provide an infusion of cash to jumpstart construction.

The ROW between Boston and Providence is also capacity constrained. While some segments have three tracks, there are long distances of the ROW where there are only two tracks. The result is that high speed Amtrak Acela express train set are blocked by slower, local MBTA commuter trains. Even today, there is a need for a three track ROW. The EIS should investigate increasing the Providence – Boston ROW to as many as four tracks.

Lastly, I have serious reservations about the time frame for 220 mph service to Boston. At this time, such service to Boston is planned to be in operation by 2040. The New York to Washington segment will receive such service ten years earlier by 2030. It would be far preferable that development and construction of both the southern segment (NYC to DC) and the northern segment (NYC to BOS) of the high speed rail corridor be done simultaneously.

Thank you once again for the opportunity to weigh in on this very important project and I look forward to the day in the not-to-distant future when the shovels hit the ground.

Best regards,



Richard J Arena

12-15-15 NEC-NY

Richard Arena.

There he is.

MR. ARENA: Thank you, Ruby.

Thank you, Alicia.

Thank you for giving us the opportunity to talk.

My name is Richard Arena, A-r-e-n-a.

My company is RX Systems International. I'm also on the advisory board of U.S. High Speed Rail.

I'm here to talk to several things from various perspectives.

Number one, I'm a frequent -- I've actually lived in the Northeast most of my life and I've lived along the Northeast Corridor for most of that time.

I take the Northeast Corridor frequently; in fact, I took the Acela twice yesterday on a day trip.

I've also been a high tech executive running international divisions around the world, so I've had the opportunity to see -- to see how high speed rail can be a real asset to an economy and to a country when it's used right, which we are not doing here at this time.

And lastly, in my role as the Advisory Board of U.S. High Speed Rail, I get the opportunity to talk to people who are developing, building and running high speed rail networks around the world. And some of the observations they give, I think, we really need to listen to because I'm not sure that NEC Future is listening to all of them and I'll go into that in a minute.

They keep talking about high speed rail. What you want is a system that is time and cost competitive with air travel, within a sweet spot, 260 miles, or if you're China, they go up to 900 because the trains go faster.

I think a severe -- a poor decision was made when the decision was taken to drop the top speed of the NEC from 220 down to 160. All right? Because time is money. And what that means is the opportunity to say, go from Boston to Washington, you've increased that time to almost 50 percent. All right. That's problematic.

Having said that, when I look at the alternatives, definitely in favor of, at minimal, Alternative 2, although I think to get where we want to be to be cost and time effective, it has to be Alternative 3.

12-15-15 NEC-NY

And with all due respect to Mr. Prophet, who indicated the line from Hartford to Worcester, to Boston, let's not waste our time.

And I will say that as a person who used to live in the Newton-Wellesly-Brookline area, all right, you will never see a train going higher than 79 miles an hour there. Never.

If you're -- if you're familiar with the -- I just was at the High Speed Rail Conference. I spoke at that conference last week in California. And they were -- in Los Angeles, and they were talking about the issues of having gone through Palo Alto and Alhambra in California where, you know, these rich, high-tech entrepreneurs are throwing tens of millions of dollars up to prevent that train from going where it wants to go. You will have the same exact trouble in Brookline, Newton and Wellesley. All right?

So don't even waste your time. You will not get high speed rail in. And as a person who's taken that rail and who wants to get to New York, it takes forever.

Our existing Acela -- I did a day trip to Boston yesterday. I live in New York right now but I equally go to Washington and Boston so I'm well familiar with both sides of the NEC. All right? The trip that was originally advertised to take three hours, now takes almost four. So it is almost impossible to do a day trip and get some business done.

Like in D.C. at least I can get there early in the morning. Be at the Senate at nine o'clock. Do my business, have dinner with somebody and get a train back to New York in one day. You cannot do that in Boston. In the morning it takes too long and number two, the frequency isn't sufficient. All right.

The other issue I'd like to bring up is I think the numbers in Boston are being short changed. When I look at the -- at the chart, it shows like there's a -- there's a route for the airport to Providence. There's capability from the airport in Philly. In Boston, there's a direct connection to the rail from South Station via the silver line. So there should be more there.

The other thing in Boston, which I should add is the Acela station plan in Boston is wholly inadequate. Several

12-15-15 NEC-NY

factors. I was there yesterday, I'm on a, you know, a special working group with Governor Dukakis and Governor -- former Governor Weld, to do the north-south rail link, which will combine north and south stations and move the tracks under ground, which makes excellent transit-oriented development, as well as the ability for transfer of development rights.

So I think that the NEC Future process has made a major mistake not including north-south rail link as one of the alternatives that should be there.

So I would definitely like to see that revisited because it makes a big difference for several reasons. Right now we can extend the Northeast Corridor southward down to Richmond, Charlotte and Atlanta relatively easy. It's not easy to do that up north because we're missing a short one-mile tunnel. If we do that, the numbers in Boston literally explode because there's a whole user base up there which cannot use -- cannot use it because it's inconvenient to get to the train. And once that happens, the utilization of the Northeast Corridor goes up dramatically from Boston down to New York, which means a return investment for the whole project and it goes up dramatically.

So, once again, thank you very much for your time and I appreciate it.

THE MODERATOR: Thank you.

NEC DEIS Comments - RECORD #260 DETAIL

Status :

Record Date :

1/24/2016

First Name :

Donald

Last Name :

Aridas

Stakeholder Comments/Issues :

My wife and I are avid cyclists who enjoy commuting by bike and traveling to other states to bike for vacation. Unfortunately, high airline baggage fees and boxing requirements have discouraged us from traveling beyond a comfortable drive from our home to bike for vacation. Similarly, boxing our bicycles on Amtrak has also discouraged us from riding the rails as well. We hope that roll on bike service will soon be instituted on all of Amtrak routes.

NEC DEIS Comments - RECORD #523 DETAIL

Status :

Record Date :

2/3/2016

First Name :

Abdurrahman

Last Name :

Arikan

Stakeholder Comments/Issues :

I think uconn is the best point for being a transport hub between new york and boston.

NEC DEIS Comments - RECORD #1981 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Susan

Last Name :

Armstrong

Stakeholder Comments/Issues :

The plans will cut through many lovely Connecticut towns for the purpose of a few travelers to save a few minutes on their train ride. I object to these plans. The cost is so high and the tracks will cut through our main street in Old Lyme.

NEC DEIS Comments - RECORD #357 DETAIL

Status :

[REDACTED]

Record Date :

1/28/2016

First Name :

Erik

Last Name :

Arneson

Stakeholder Comments/Issues :

Train service in the Northeast Corridor is incredibly important. Please do whatever possible to expand and improve service (including more high-speed service) in the NEC, including across Pennsylvania to Harrisburg and Pittsburgh. I regularly ride the train between Harrisburg and Philadelphia, Philadelphia and NYC, and Philadelphia and Washington DC.

NEC DEIS Comments - RECORD #2840 DETAIL

Status : [REDACTED]

Record Date : 2/16/2016

First Name : Amy

Last Name : Arnold

Stakeholder Comments/Issues :

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the historic community and village of Old Lyme that I live in!

NEC DEIS Comments - RECORD #2508 DETAIL

Status :

[REDACTED]

Record Date :

2/16/2016

First Name :

Christopher

Last Name :

Arnold

Stakeholder Comments/Issues :

"I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the Historic village of Old Lyme and the campus of Lyme Academy College of Fine Arts of the University of New Haven."

NEC DEIS Comments - RECORD #1458 DETAIL

Status :

Action Completed

Record Date :

2/14/2016

First Name :

Alan

Last Name :

Aronow

Stakeholder Comments/Issues :

Alternative #1 is a short sighted and costly non-solution to a serious long-term infrastructure issue. It doesn't really address the overall NE Corridor congestion problem through CT, is invasive, and destructive to historically significant areas in CT. One hopes that America ingenuity is still capable of developing sensible and scalable transportation options and that the FRA provides the public appropriate time to review and comment these options.

NEC DEIS Comments - RECORD #1248 DETAIL

Status :

[REDACTED]

Record Date :

2/14/2016

First Name :

Myra

Last Name :

Aronow

Stakeholder Comments/Issues :

What an awful idea

12-15-15 NEC-NY

Okay. Nina Arrow. Now that's an easy name.

MS. ARROW: Actually, it isn't.

(Laughter.)

THE MODERATOR: Did I say it incorrectly?

MS. ARROW: You did but that's fine.

I'm Nina Arrow.

THE MODERATOR: Oh.

MS. ARROW: It's the same spelling --

THE MODERATOR: Oh, I wasn't even close.

(Laughter.)

MS. ARROW: I'm director of planning and sustainability for the City of New Rochelle and I'm here on behalf of the City of New Rochelle, the City Council and the City Manager.

And I want to speak in support of Alternative 2 to growth.

The City of New Rochelle is committed to transit-oriented development and Amtrak is an important partner for us.

Amtrak's regional Boston to New York service stops in New Rochelle and we are in strong support of running existing infrastructure into good repair and growing services in our region.

New Rochelle has just completed a rezoning for its downtown, encouraging increased density, which will result in population growth.

This is in line with NEC Future's predictions of growth in the Northeast, which makes it clear that NEC's No Action Alternative is not a viable option.

New Rochelle's building the future around multi-modal transportation in Southern Westchester and in the broader region, and bringing the Northeast Corridor existing infrastructure into good repair, is the minimum that must be done to keep pace with growth and provide good service.

This is also critical to improve Westchester's rail connectivity with the west side of Manhattan, in conjunction with the proposed improvements to the Metro North Railway now in New York State's capital budget.

Alternative 2 Growth, is our preferred option as it goes beyond just keeping pace with expected growth. It adds capacity to accommodate demand at the Hudson River and encourages substantial transport mode of change - an

12-15-15 NEC-NY

estimated 93 million annual trips. I notice I missed out the million, that's a little critical, in my written statement.

To a passenger rail, a much more sustainable option than private vehicles in an area with already congested highways and bridges.

Thank you for the opportunity to speak in support of Alternative 2 Growth and we look forward to following the progress of this extremely important initiative.

Thank you.

THE MODERATOR: Thank you.

NEC DEIS Comments - RECORD #124 DETAIL

Status : ██████████
Record Date : 1/8/2016
First Name : Silvia
Last Name : Ascarelli

Stakeholder Comments/Issues :

I commute to New York City from New Jersey, and I have experienced enough delays from signal problems, downed wires, disabled trains and more to know how important it is for the region's economy that we upgrade signals and wires, add two tunnels and deal with the portal bridge. If we are ever routinely down to one tunnel during rush hour, New Jersey is screwed.

But you know that.

I'd love to see faster trains that can better compete with planes and cars, just like Eurostar and Thalys, among others. But given the hassles of airplane travel, do you need to be a lot faster, or is price a better point of competition?

There's one other area I'd like to bring up. I ride my bike a lot and would like to easily be able to go up and down the East Coast by train with my bike. I wanted to take the train to Fredericksburg, Va., this fall for a week-long bike ride along the East Coast Greenway. No baggage service there so even boxing my bike wouldn't help. No baggage service from Princeton Junction, or even Trenton. I'd like to go to Raleigh, NC this fall, also with my bike. Again, how do I get my bike on the train? What's needed is roll on, roll off service, as you have started with the train from Washington to Chicago. It should be so easy to do -- even if you limit it to selected trains. Copy the Europeans! Given the number of people who live along the East Coast and the growing popularity of cycling, demand could surprise you.

Thank you for taking public comment.

NEC DEIS Comments - RECORD #2176 DETAIL

Status :

[REDACTED]

Record Date :

2/15/2016

First Name :

Sheryl

Last Name :

Ash

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven and run through sensitive estuary areas.

NEC DEIS Comments - RECORD #2090 DETAIL

Status :

Record Date :

2/15/2016

First Name :

Ashley

Last Name :

Stakeholder Comments/Issues :

Dear Federal Rail Administration,

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2535 DETAIL

Status :

Record Date :

2/16/2016

First Name :

Anne

Last Name :

Astley

Stakeholder Comments/Issues :

My name is Anne Astley, Realtor and Old Lyme Resident. I have come here today to express my concern with and opposition to the Alternative 1 of the draft EIS for the NEC plan to improve rail service. First and foremost, this plan would destroy the heart of our community. This plan would impact our only commercial area, which houses our grocery store, pharmacy and many small businesses. Our village center, which is directly off of the commercial area, houses the Lyme Academy of Fine Arts, as well as the famous Florence Griswold Museum and the Lyme Art Association. All are sites of historic significance and the individual organizations have worked diligently to continue with their legacy and maintain the physical structures. It is beyond comprehension that these buildings would be considered of little importance as this project moves forward.

But the plan also impacts many properties along the way, as it is an entirely new track, cutting through several neighborhoods, not to mention wetlands, open space and areas of archaeological significance. Our community maintains our character through strict zoning regulations, considerate planning, and support of our historic treasures, including the museums, colleges, library and various art organizations.

I am utterly opposed to Alternative 1 of this plan and urge you to look at other, more reasonable solutions for reducing time travel between major cities. Thank you for your time

NEC DEIS Comments - RECORD #1147 DETAIL

Status :

Record Date :

2/13/2016

First Name :

Michelle

Last Name :

Astuti

Stakeholder Comments/Issues :

You didn't say where it would be going or where there might be a new station added. All of the towns here are hundreds of years old. I don't think that makes a difference in where the rail lines should go. It is a bit of a snub that the Feds did not ask for input, but honestly, any rail improvement is a great improvement and I would like to see the rail lines moved a little further inland.

We use the New London station when traveling and it is a pretty little station-I would hate to see it closed down, but making rail travel safer is important.

I cannot say that I oppose the proposal because you haven't offered me any specifics to what I should be opposing.

NEC DEIS Comments - RECORD #488 DETAIL

Status : [REDACTED]

Record Date : 2/2/2016

First Name : Dale

Last Name : Athanas

Stakeholder Comments/Issues :

We are strongly opposed to NEC Future Alternative number one as it would destroy one of the oldest and most beautiful towns on the shoreline. It would also have a very strong negative effect on all Old Lyme property values. There is already an existing railroad right of way and we see no reason why that can not be used and enlarged or refurbished as necessary.

--

Dale Athanas, [REDACTED] Old Lyme, CT

dale@[REDACTED]

[REDACTED] (Cell)

Have an outstanding day!

NEC DEIS Comments - RECORD #482 DETAIL

Status : [REDACTED]

Record Date : 2/1/2016

First Name : Cheryl

Last Name : Atkinson

Stakeholder Comments/Issues :

we need rail service. more frequent and high speed.

NEC DEIS Comments - RECORD #2995 DETAIL

Status : [REDACTED]

Record Date : 2/16/2016

First Name : Genese

Last Name : Leach

Stakeholder Comments/Issues :

Please kindly accept Audubon Connecticut's revised comments on the Northeast Corridor infrastructure proposals.

The comments submitted earlier (dated February 15,2016) was not the final version and we kindly request that you eliminate it and accept the attached document.

Thank you for your consideration and if you have any questions or concerns, please do not hesitate to contact me.

Best, Genese

Genese S. Leach
Policy Manager, Audubon Connecticut
Phone: 301-704-5235

Your Legacy is Audubon's Future!
Bequests have been essential sources of funding since the beginning of our Society - Audubon was founded with a Legacy Gift!
Planned gifts of all sizes can have a profound impact on our Society. They can also provide tax incentives like reducing estate income taxes.
To learn more how planned giving can support Audubon Connecticut, and our Centers, please click here <http://ct.audubon.org/planned-giving>

*Audubon CT
Leach*

Attachments : Audubon CT Comments on the NEC Future Plan_FINAL.pdf (173 kb)



February 16, 2016

Re: Comments on the Tier 1 Draft Environmental Impact Statement for the Northeast Corridor Future Plan

The Northeast Corridor Future Plan recommends several infrastructure proposals to update our mass transit system in the Northeast. Despite the potential reduction in carbon emissions, the Action Alternatives 2 and 3 present some significant negative impacts on wildlife, important habitats such as Audubon Important Bird Areas, wetlands, grasslands, and forest interior habitats. Audubon Connecticut therefore strongly recommends that Alternatives 2 and 3 be eliminated, and that would allow us to focus on Alternative 1, which itself presents significant environmental and social impacts in communities across Connecticut that are of great concern to us. All of the Alternatives present negative impacts on important habitats for birds and wildlife. We hope action is taken to require a careful environmental review to avoid any environmental damage.

Our specific concerns at this time with the draft EIS and proposed alternatives include:

- Major impacts to several Important Bird Areas including the Connecticut Audubon Society's Bafflin Sanctuary in Pomfret, the Audubon Center at Bent of the River in Southbury, the Quinnipiac River Tidal Marsh in New Haven, and Mansfield Hollow State Park in Mansfield. Even if some of these areas are proposed to be tunnels there will likely be significant disruption of surface habitats and public access during construction and operational phases of the project.
- There are questions as to what grade would the tracks be going through the Bent of the River Audubon Center in Southbury, CT. The topography is such that while the intent is to have this be underground it may have to come to the surface through the Pomperaug Valley. This would be unacceptable and violate deed restrictions related to the donation of the Audubon Center at Bent of the River to Audubon.
- The surface portion through Paugussett State Forest, Lake Lillinonah and George C. Waldo State Park would cause unacceptable negative impacts to an ecologically important area that is a critical wintering areas for Bald Eagles, as well as other raptor and numerous species of diving birds and waterfowl.
- Alternative 1 would have significant impacts on the tidal marshes of the lower Connecticut River, including a significant migratory roost for Tree Swallows that supports a high percentage of the eastern North American population of Tree Swallows in fall migration and includes some of the most important nesting habitat in the world for Saltmarsh Sparrows, a species of global conservation concern.
- The impacts to acreage of forest interior habitat that would be converted to edge, transitional or other non-interior classes is likely to be much larger than the footprint acreage directly affected. This impact is undefined in the draft EIS.
- Alternatives 2 and 3 present an unacceptable fragmentation impact on important habitat for Cerulean Warblers at Natchaug State Forest.
- Impacts to private, NGO and municipal open space, as well as impacts to state forests and wildlife management areas were not taken into account in the draft EIS.
- No detailed shapefiles of the routes and what is tunnel were provided to the public. This would have allowed us to better assess the full scale of impacts to important habitat for birds and other wildlife.

- Impacts to state-listed species and globally endangered, vulnerable, and near threatened species on the IUCN list were not taken into account in the draft EIS. This is particularly important for any potential negative impacts to Saltmarsh Sparrow, a species for which the Northeastern U.S. is a disproportionately important nesting area and a species that is already at high risk of extinction.
- We also strongly suggest that consideration be given to reducing existing tidal restrictions created by the existing rail lines as coastal routes are upgraded.

The devil is generally in the details with these massive projects and the details on specific impacts to habitats of importance to birds and other wildlife and on open space other than state or federal lands are very difficult to assess from the maps and text that are provided. This is a huge plan with major implications for Connecticut's habitats, open space, development patterns and our transportation network in the state. This project will impact tens of thousands of acres of habitat in Connecticut, in many cases converting critical and pristine habitat into rail infrastructure, with additional major fragmentation efforts on habitat in the state. The DEIS needs to do a better job of outlining resources such as NGO and municipal open space, open space owned by land trusts and other non-governmental organizations and private lands that may be protected under easement. In 1997, the Connecticut General Assembly set a goal of preserving 21% of the land area (673,210 acres) of Connecticut for open space for public recreation and natural resource conservation and preservation. As of September 2014, the State, working with land trusts and other partners, has protected a total of 496,191 acres, or close to 15% of Connecticut's land area (The Connecticut Comprehensive Open Space Plan, The "Green Plan", 2014-2019). Connecticut is 73% of the way toward achieving this open space preservation goal. While the DEIS does take into account the impacts of proposed rails on federal, state, and county parks and forests, it does not consider the 239,791 acres of protected municipal, not for profit, and water company lands in CT. See the chart at the end of this document for a list of open space lands that will be impacted by proposed routes. Both Alternatives 2 and 3, will likely result in a setback to Connecticut's land conservation goal as previously protected open space is converted and adjacent areas disrupted.

It is disturbing and unfortunate that the DEIS does not take into account state listed species or make use of the State's Natural Diversity Database. Nor does the plan consider the potential impacts on species identified as globally at risk by the International Union for the Conservation of Nature (IUCN). For example, expanses of woodlands in the Northeast corner of Connecticut, an area known to be important to Cerulean Warbler (a Species of Special Concern in Connecticut and identified as globally vulnerable by the IUCN) would be impacted by the constructions of a rail line from Hartford to Storrs to Providence.

Also, beyond the number of acres that will be converted in Connecticut in Alternatives 1-3, the impact on adjacent forested lands may be underestimated. There are large areas of interior forest, identified by the Center for Land Use Education and Research at UCONN, around Natchaug State Forest and Nathan Hale State Park. The proposed rail line from Hartford to Storrs to Providence in Alternatives 2 and 3 would cut through some of these areas. Not only would sections of the forest be lost, but the adjacent woodlands would be more susceptible to edge affects, such as increased predation and cowbird parasitism. Also, high speed rail line along the I-84 corridor in western Connecticut with stops in Danbury and Waterbury (Alternative 3) is likely to increase urban sprawl and development in Connecticut Northwest corner, part of the USDA Forest Service PA-NY-NJ-CT Highlands.

Additionally, since there is a mix of at-grade and tunnel proposals included in the options, it would be good to have more details on things like the depth and methodology for drilling and the size and frequency of tunnel ventilation shafts to better assess impacts to sensitive surface resources.

Audubon Connecticut strongly opposes transit of the proposed rail corridor through the Audubon Center at Bent of the River Property. Construction effects, possible ventilation infrastructure, security provisions and unforeseen impacts from construction and observation would potentially have serious negative impacts to the habitat, aesthetics and public access to this Audubon Center, which is a recognized Important Bird Area and one of the most popular destinations for birding and nature observation in the state. The Bent of the River was bequeathed to Audubon in 1993 by the estate of Althea Ward Clark and has strict conservation easements on the property. Any disturbance to the habitats of the Bent of the River from the proposed rail corridor would be in violation of those easement restrictions.

While the impacts of Alternative 1 on the state's bird populations are limited, we do want to bring to your attention the presence of a significant Tree Swallow roost on the Lower Connecticut River. Each fall hundreds of thousands of Tree Swallow use this roost each night from early September through mid-October. The roost is located on Goose Island, just north of where the I-95 crosses the Connecticut River and approximately a mile north of the proposed new bridge over the Connecticut River in Alternative 1. It would be a great tragedy to disrupt a natural event noted by Roger Tory Peterson of the Peterson Field Guides as the most incredible avian display he ever beheld. Additionally, the tidal wetlands of the lower Connecticut River have been identified as Wetlands of International Significance under the RAMSAR Convention and provide critical and irreplaceable nesting habitat for Saltmarsh Sparrows, a species classified as globally "Vulnerable" to extinction on the IUCN Red List.

The possible tunnel under Long Island Sound has its own issues, depending on tunnel construction methodology and much more detail must be provided to assess these impacts, particularly as the route appears to cross some unique and very important and productive hard substrate bottomlands of the Sound.

Thank you for the opportunity to comment on this important matter and please see the attached table below of open space/protected lands that are impacted by the proposed rail corridors.

Stewart J. Hudson
Executive Director

(Contact): Genese Leach, Policy Manager, Phone: 301-704-5235, Email: gleach@audubon.org

Audubon Connecticut, the state organization of the National Audubon Society, works to protect birds, other wildlife and their habitats using education, science and conservation, and legislative advocacy for the benefit of people and the earth's biological diversity. Through our network of nature education centers, protected wildlife sanctuaries and local, volunteer chapters, we seek to connect people with nature and inspire the next generation of conservationists.

Open space/protected lands potential impacted by proposed rail corridors

Federal	Municipality	DEIS Alternative that disrupts open space	Rail line structure
Connecticut River (Silvio O. Conte NFWR)	Hartford	Alt. 2 and Alt. 3 (LIS and Central CT routes)	Tunnel
State Preserved Open Space	Municipality	DEIS Alternative that disrupts open space	Rail line structure
*Quinnipiac River Tidal Marsh	New Haven	Alt. 2 and 3 (LIS route)	Trench/embankment
Silver Lake	Meriden/Berlin	Alt. 2 and 3 (LIS route)	Trench/aerial structure
Kensington Atlantic Salmon Fish Hatchery	Berlin	Alt. 3 (LIS route)	Tunnel
Hop River State Park Tail	Bolton	Alt. 2 and Alt. 3 (Providence)	Tunnel under at two locations
Bolton Notch State Park Scenic Reserve	Bolton	Alt. 2 and Alt. 3 (Providence)	Tunnel emerges around here
Nathan Hale State Forest	Coventry	Alt. 2 and Alt. 3 (Providence)	Embankment/trench/tunnel
*Mansfield Hollow State Park	Coventry	Alt. 2 and Alt. 3 (Providence)	Tunnel
Natchaug State Forest	Chaplin/Eastford	Alt. 2 and Alt. 3 (Providence)	Tunnel/trench/embankment
Killingly Pond State Park Scenic Area	Killingly	In affected area for Alt. 2 and Alt. 3 (Providence)	Tunnel emerges in this area
Rocky Neck State Park	East Lyme	On the edge of affected area Alt. 1	Tunnel/aerial structure
Paugusset State Forest	Newtown	Alt 3 (Central CT)	Tunnel/aerial structure
George C. Waldo State Park Scenic Preserve	Southbury	Alt 3 (Central CT)	Aerial structure/tunnel
Aldo Leopold Wildlife Area	Southbury	Alt 3 (Central CT)	Tunnel
State Bridal Trail	Naugatuck	Alt. 3 (Central CT)	Tunnel
Farmington Canal Trail	Southington	Alt. 3 (Central CT)	Tunnel
Belding Wildlife Management Area/Tankerhoosen Wildlife Management Area	Vernon	Alt. 3 (Worcester)	Aerial structure
Kollar Wildlife Area	Tolland	Alt. 3 (Worcester)	Aerial structure
Nipmuck State	Willmington,	Alt. 3	Aerial

Forest	Ashford, Union	(Worcester)	structure/embankment
Municipal, not-for profit, or water company preserved open space	Municipality	DEIS Alternative that disrupts open space	Rail line structure
Wooster Square and 3 playgrounds	New Haven	Alt. 3 (LIS route)	Tunnel?
Wallingford Land Trust Property (Shookies Pond)	Wallingford	Alt. 2 and Alt 3 (LIS route)	Aerial structure
Wallingford Conservation Commission Bobolink field	Wallingford	Alt. 2 and Alt 3 (LIS route)	Aerial/embankment
Tyler Mills Conservation Area	Wallingford	Just beyond affected areas for Alt. 2 and Alt 3 (LIS route)	Embankment
Wallingford Land Trust Property (Farnum Field)	Wallingford	Alt. 2 and Alt 3 (LIS route)	Embankment
Timberlands Park Golf Course	Berlin	Alt. 3 (LIS route)	Tunnel
Ragged Mountain	Southington	Alt. 3 (LIS route)	Tunnel
Martha Hart Park	New Britain	Alt. 3 (LIS and Central CT routes)	Tunnel
Fairview Cemetery	New Britain	Alt. 3 (LIS and Central CT routes)	Tunnel
Walnut Hill Park	New Britain	Alt. 3 (LIS and Central CT routes)	Tunnel
Bushnell Park	Hartford	Alt. 2 and Alt. 3 (LIS and Central CT routes)	Tunnel
Riverside Park	Hartford	Alt. 2 and Alt. 3 (LIS and Central CT routes)	Tunnel
Riverview Park	East Hartford	In affected area for Alt. 2 and Alt. 3 (LIS and Central CT routes)	Trench/embankment/aerial structure?
Wickam Park	Manchester	Alt. 2 and Alt. 3 (Providence)	Tunnel entrance in this area
Mansfield Town Open Space	Mansfield	Alt. 2 and Alt. 3 (Providence)	Tunnel
The Nature Conservancy Property	Pomfret	Alt. 2 and Alt. 3 (Providence)	Embankment/aerial structure
*Bafflin Audubon Sanctuary	Pomfret	Alt. 2 and Alt. 3 (Providence)	Embankment/aerial structure
East Lyme Town Open Space	East Lyme	Alt. 1	Tunnel/aerial structure?

(Smith-Harris Track)			
Oswegatchie Hills	East Lyme	Alt. 1	Tunnel/embankment
*Audubon Greenwich	Greenwich	Within a mile of Alt. 3 (Central CT)	???
*Audubon Center at the Bent of the River	Southbury	Alt. 3 (Central CT)	Tunnel
Town of Southbury Open Space	Southbury	Alt. 3 (Central CT)	Tunnel
Towns of Middlebury and Naugatuck Water Company Lands	Middlebury and Naugatuck	Alt. 3 (Central CT)	Tunnel
Panthorn Park	Southington	Alt. 3 (Central CT)	Tunnel
Crandall's Park	Tolland	Alt. 3 (Worcester)	Aerial structure
Yale Myers Forest	Union	Alt. 3 (Worcester)	Embankment

*Identified Important Bird Area - The Important Bird Areas Program is the largest and most comprehensive global network of important sites for bird and biodiversity conservation in the world. Initiated by BirdLife International, the National Audubon Society administers the IBA Program in the U.S. To qualify as an IBA, a site must meet at least one of a set of standardized criteria. These criteria address the population sizes, distributions, and habitat uses of certain species. All sites that meet the criteria qualify as an IBA, regardless of size, current level of protection, or landownership. More specific criteria are set at the statewide level. The generalized categories for the criteria are as follows:

- Species of global, continental, or state conservation concern
- Species with restricted ranges.
- Species that are concentrated in one general habitat type or biome.
- Species, or groups of similar species, that form congregations.

NEC DEIS Comments - RECORD #696 DETAIL

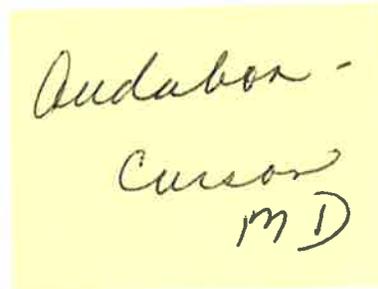
Status : [REDACTED]
Record Date : 2/10/2016
First Name : David
Last Name : Curson, Ph.D.
Stakeholder Comments/Issues :

Dear Ms Braegelmann,

Please accept these comments (see attached letter) on behalf of Audubon Maryland-DC on the NEC draft EIS. Audubon is concerned about the potential impact on the Patuxent Research Refuge. I am copying the staff of Senators Barbara Mikulski and Ben Cardin and Representatives John Sarbanes, Donna Edwards and Steny Hoyer.

Thank you,

David Curson, Ph.D
Director of Bird Conservation,
Audubon Maryland-DC
2901 E. Baltimore St.
Baltimore, MD 21224
Tel: 410-558-2473



Audubon -
Curson
MD

Attachments : Audubon comments NEC EIS 2-10-16.pdf (998 kb)



State Office
Patterson Park Audubon Center
Important Bird Areas Program
2901 East Baltimore Street
Baltimore, MD 21224
Tel: 410-558-2473
<http://md.audubon.org>

Ms. Carol Braegelmann
Office of Environmental Policy and Compliance
1849 C Street, NW-MS 2462-MIB
Washington D.C. 20240

February 10, 2016

RE: Tier 1 Draft Environmental Impact Statement (EIS) and Section 4(f) Assessment for NEC FUTURE, A Rail Investment Plan for the Northeast Corridor, Washington, DC, MD, DE, PA, NJ, NY, CT, RI, and MA

Dear Ms. Braegelmann:

Audubon Maryland-DC has reviewed the Tier 1 Draft Environmental Impact Statement (EIS) and Section 4(f) Assessment for NEC FUTURE, A Rail Investment Plan for the Northeast Corridor, and asks that on behalf of our 12,000 members you consider the following comments. The mission of Audubon Maryland-DC is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity.

Alternative 3 slices through the Patuxent Research Refuge located in Laurel, MD, directly impacting 60 acres of refuge property including stream, wetland, floodplain, riparian and forest habitats, which are critical to a number of at-risk bird species. Audubon considers this impact on the Patuxent Research Refuge (hereafter "the Refuge") to be unacceptable for the following reasons:

1. The loss of natural habitat and its wildlife on the Refuge for the benefit of an unrelated use, transportation, is contrary to the purpose and mission of the Refuge, as described by the National Wildlife Refuge System Improvement Act of 1997. This Act describes the mission of the National Wildlife Refuge System as follows: "to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife and plant resources and their habitats within the United States for the benefit of present and future generations of Americans."

The Refuge is a valuable and much-loved public asset, which provides an opportunity for people to enjoy recreation in a natural setting in a densely developed region of the country where such opportunities are limited. It is a refuge for the American people as much as for wildlife.

2. Alternative 3 would destroy valuable wildlife habitat and forest cover in a region of Maryland where development has taken an immense toll on natural resources, and in so doing would damage the ecological integrity of the largest remaining forest block in central Maryland, which is recognized as an Important Bird Area of statewide significance. Audubon identified the

Patuxent Research Refuge as an Important Bird Area in 2006, because of its importance to several declining bird species, including Eastern whip-poor-will, wood thrush, Kentucky warbler and prairie warbler. Scarlet tanagers and summer tanagers are also favorites for birdwatchers who frequent the refuge. Important Bird Areas (IBAs) are sites supporting significant populations of vulnerable bird species. The network of IBA sites is global, covering over 200 countries under the auspices of Birdlife International, a worldwide partnership of bird conservation organizations. In Maryland, 43 IBAs have been identified (see attachment).

3. The 2,000-ft-wide affected rail corridor in Alternative 3 does not adequately take into account indirect effects to habitat quality and function including habitat fragmentation and isolation, loss of forest interior, and degradation through increased noise and vibration. Increased rail traffic and speeds will also increase wildlife strikes and mortality. All of these factors play heavily into the quality of bird habitat and the viability of bird populations.
4. Allowing the proposed "take" of a publicly-owned natural resource at the Refuge would set a dangerous precedent, which could allow similar developments over future decades to erode the Refuge to the point of its ultimate loss by attrition.

The Patuxent Research Refuge was established in 1973 specifically for the purpose of upholding and promulgating the Migratory Bird Conservation Act. The Act was passed to more effectively meet the U.S. migratory bird treaty obligations through the acquisition of land and water for perpetual reservation for birds. Most of the portion impacted was established as refuge land by Public Law 101-519 (the Military Construction Appropriations Act, 1991).

Acquisition and/or conversion of refuge land for transportation use are currently prohibited by law and any attempt to convert it would set a disturbing precedent for the country's most beautiful and biologically diverse landscapes. Thankfully, as shown in your plan, feasible and less destructive alternatives to incising a wildlife refuge exist.

Audubon Maryland-DC is opposed to Alternative 3 and we ask that you reject it. If you have any questions about these comments please contact me by telephone at 443-386-6345 or by e-mail at the address below.

Sincerely,



David Curson, Ph.D.
Director of Bird Conservation
dcurson@audubon.org

Cc: US Senator Benjamin Cardin
Cc: US Senator Barbara Mikulski
Cc: Rep. John Sarbanes
Cc: Rep. Donna Edwards
Cc: Rep. Steny Hoyer

NEC DEIS Comments - RECORD #2460 DETAIL

Status : [REDACTED]

Record Date : 2/16/2016

First Name : Genese

Last Name : Leach

Stakeholder Comments/Issues :

On behalf of Audubon Connecticut, please kindly accept our position and comments on the NEC infrastructure proposals.

Thank you and please don't hesitate if you have questions or concerns.

Best, Genese

Genese S. Leach
Policy Manager, Audubon Connecticut
Phone: 301-704-5235

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Attachments : Audubon CT Comments on the NEC Future Plan.pdf (174 kb)

*2 files
Audubon -
Leach*



February 15, 2016

Re: Comments on the Tier 1 Draft Environmental Impact Statement for the Northeast Corridor Future Plan

The Northeast Corridor Future Plan recommends several infrastructure proposals to update our mass transit system in the Northeast. Despite the potential reduction in carbon emissions, the uncertainties associated with Action Alternatives 2 and 3 present some significant negative impacts on wildlife, important habitats such as Audubon Important Bird Areas, wetlands, grasslands, and forest interior habitats. Audubon Connecticut therefore strongly recommends that Alternative 1, with proper design, and combined with an emphasis on completing the New Haven to Springfield commuter line, be selected as the preferred alternative. The negative impacts on important habitats for birds and other wildlife presented by Alternatives 2 and 3 are just too high of a price to pay for an as of yet undefined transportation dividend. And identifying Alternative 1 as a preferred scenario does not exclude the need for careful environmental review and the inevitable need for planning and design work that would avoid any environmental damage that presents a significant threat either on a temporary or permanent basis.

Our specific concerns at this time with the draft EIS and proposed alternatives include:

- Major impacts to several Important Bird Areas including the Connecticut Audubon Society's Bafflin Sanctuary in Pomfret, the Audubon Center at Bent of the River in Southbury, the Quinnipiac River Tidal Marsh in New Haven, and Mansfield Hollow State Park in Mansfield. Even if some of these areas are proposed to be tunnels there will likely be significant disruption of surface habitats and public access during construction and operational phases of the project.
- There are questions as to what grade would the tracks be going through the Bent of the River Audubon Center in Southbury, CT. The topography is such that while the intent is to have this be underground it may have to come to the surface through the Pomperaug Valley. This would be unacceptable and violate deed restrictions related to the donation of the Audubon Center at Bent of the River to Audubon.
- The surface portion through Paugussett State Forest, Lake Lillinonah and George C. Waldo State Park would cause unacceptable negative impacts to an ecologically important area that is a critical wintering areas for Bald Eagles, as well as other raptor and numerous species of diving birds and waterfowl.
- Alternative 1 would have significant impacts on the tidal marshes of the lower Connecticut River, including a significant migratory roost for Tree Swallows that supports a high percentage of the eastern North American population of Tree Swallows in fall migration and includes some of the most important nesting habitat in the world for Saltmarsh Sparrows, a species of global conservation concern.
- The impacts to acreage of forest interior habitat that would be converted to edge, transitional or other non-interior classes is likely to be much larger than the footprint acreage directly affected. This impact is undefined in the draft EIS.
- Alternatives 2 and 3 present an unacceptable fragmentation impact on important habitat for Cerulean Warblers at Natchaug State Forest.
- Impacts to private, NGO and municipal open space, as well as impacts to state forests and wildlife management areas were not taken into account in the draft EIS.

- No detailed shapefiles of the routes and what is tunnel were provided to the public. This would have allowed us to better assess the full scale of impacts to important habitat for birds and other wildlife.
- Impacts to state-listed species and globally endangered, vulnerable, and near threatened species on the IUCN list were not taken into account in the draft EIS. This is particularly important for any potential negative impacts to Saltmarsh Sparrow, a species for which the Northeastern U.S. is a disproportionately important nesting area and a species that is already at high risk of extinction.
- We also strongly suggest that consideration be given to reducing existing tidal restrictions created by the existing rail lines as coastal routes are upgraded.

The devil is generally in the details with these massive projects and the details on specific impacts to habitats of importance to birds and other wildlife and on open space other than state or federal lands are very difficult to assess from the maps and text that are provided. This is a huge plan with major implications for Connecticut's habitats, open space, development patterns and our transportation network in the state. This project will impact tens of thousands of acres of habitat in Connecticut, in many cases converting critical and pristine habitat into rail infrastructure, with additional major fragmentation efforts on habitat in the state. The DEIS needs to do a better job of outlining resources such as NGO and municipal open space, open space owned by land trusts and other non-governmental organizations and private lands that may be protected under easement. In 1997, the Connecticut General Assembly set a goal of preserving 21% of the land area (673,210 acres) of Connecticut for open space for public recreation and natural resource conservation and preservation. As of September 2014, the State, working with land trusts and other partners, has protected a total of 496,191 acres, or close to 15% of Connecticut's land area (The Connecticut Comprehensive Open Space Plan, The "Green Plan", 2014-2019). Connecticut is 73% of the way toward achieving this open space preservation goal. While the DEIS does take into account the impacts of proposed rails on federal, state, and county parks and forests, it does not consider the 239,791 acres of protected municipal, not for profit, and water company lands in CT. See the chart at the end of this document for a list of open space lands that will be impacted by proposed routes. Both Alternatives 2 and 3, will likely result in a setback to Connecticut's land conservation goal as previously protected open space is converted and adjacent areas disrupted.

It is disturbing and unfortunate that the DEIS does not take into account state listed species or make use of the State's Natural Diversity Database. Nor does the plan consider the potential impacts on species identified as globally at risk by the International Union for the Conservation of Nature (IUCN). For example, expanses of woodlands in the Northeast corner of Connecticut, an area known to be important to Cerulean Warbler (a Species of Special Concern in Connecticut and identified as globally vulnerable by the IUCN) would be impacted by the constructions of a rail line from Hartford to Storrs to Providence.

Also, beyond the number of acres that will be converted in Connecticut in Alternatives 1-3, the impact on adjacent forested lands may be underestimated. There are large areas of interior forest, identified by the Center for Land Use Education and Research at UCONN, around Natchaug State Forest and Nathan Hale State Park. The proposed rail line from Hartford to Storrs to Providence in Alternatives 2 and 3 would cut through some of these areas. Not only would sections of the forest be lost, but the adjacent woodlands would be more susceptible to edge affects, such as increased predation and cowbird parasitism. Also, high speed rail line along the I-84 corridor in western Connecticut with stops in Danbury and Waterbury (Alternative 3) is likely to increase urban sprawl and development in Connecticut Northwest corner, part of the USDA Forest Service PA-NY-NJ-CT Highlands.

Additionally, since there is a mix of at-grade and tunnel proposals included in the options, it would be good to have more details on things like the depth and methodology for drilling and the size and