NEC DEIS Comments - RECORD #1736 DETAIL

Status : [redacted]
Record Date : 2/15/2016
First Name : Jane
Last Name : Montanaro
Stakeholder Comments/Issues :

February 15, 2016
Objection to NEC Future
Tier 1 Draft EIS - Alternative 1

I am writing to raise concerns regarding NEC Future Alternative 1. The Environmental and Ecological impacts of this proposal have not been adequately considered by the FRA. The importance of the Connecticut River estuary has been recognized globally, particularly as a "Wetland of International Importance" by the Ramsar Convention:

CONNECTICUT RIVER ESTUARY AND TIDAL RIVER WETLANDS COMPLEX

Connecticut River Estuary & Tidal Wetlands Complex. 14/10/94; Connecticut; 6,484 ha; 41°15'N 072°18'W. State Wildlife Management Areas, State Parks. The longest and largest river system in New England. Shifting sandbars have preserved the river's extraordinary assemblage of natural and undisturbed plant and animal communities. The site includes open water; fresh, salt and brackish tidal wetlands; floodplains, river islands, beaches, and dunes. The system serves as essential habitat for numerous regionally, nationally, and globally rare or otherwise significant species and forms an extensive biological corridor that links marine and estuarine waters of the Atlantic Ocean. Many migratory and Neotropical bird species nest or winter in the marshes, which regularly support over 10,000 individuals, consisting of 18 species of waterfowl. Two million people live in the river basin that supports active commercial and recreational fisheries, various tourist facilities and activities. Hunting and trapping represent considerable revenues to the state. Ramsar site no. 710. Most recent RIS information: 1995.

NEC Future Alternative 1 proposes significant disturbance and destruction of the estuary. The impacts that NEC Future will have on this delicate ecosystem, and the community that has worked tirelessly to protect it, must be more carefully considered.

NEC DEIS Comments - RECORD #3001 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : Jody
Last Name : Holton
Stakeholder Comments/Issues :

Please find the attached letter with comments on the NEC Future Tier 1 Draft EIS

Jody Holton, AICP
Executive Director
Montgomery County Planning Commission
610-278-3756 (o)
215-681-8843 (c)
JHolton1@montcopa.org<mailto:JHolton1@montcopa.org>

[Comp Plan Logo sm]<http://www.montcopa.org/2040compplan>[MCPC_30px]<http://www.planning.montcopa.org/> [Facebook_30px] <http://www.facebook.com/pages/Montgomery-County-Planning-Commission/181442168555334?v=wall> [cid:image009.gif@01D06564.E2EAD480] <http://www.flickr.com/photos/75012107@N05/> [Twitter Icon] <https://twitter.com/@montCoPlanning> [World Wide Web] <http://www.montcopa.org/index.aspx?nid=490> [Blog Icon 24x24] <http://www.montcopa.org/Blog.aspx?CID=1> [Data Portal Icon] <http://webapp.montcopa.org/planning/dataportal/Introduction.asp>

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Attachments : NEC Comment Letter EDITED 2-11-16jh.pdf (70 kb)

MONTGOMERY COUNTY
BOARD OF COMMISSIONERS
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MONTGOMERY COUNTY
PLANNING COMMISSION
MONTGOMERY COUNTY COURTHOUSE • PO BOX 311
NORRISTOWN, PA 19404-0311
610-278-3722
FAX: 610-278-3941 • TDD: 610-631-1211
WWW.MONTCOPA.ORG

JODY L. HOLTON, AICP
EXECUTIVE DIRECTOR

February 16, 2016

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

Dear Ms. Reyes-Alicea:

Montgomery County, PA, located just outside the City of Philadelphia appreciates the opportunity to provide comments on the Tier 1 Draft Environmental Impact Statement (Tier 1 Draft EIS) for NEC FUTURE. Montgomery County has over 800,000 residents and 500,000 people who work in the County. As the county with the second largest population and number of jobs in the nine-county Philadelphia region, second to Philadelphia, we value the economic opportunities and the high quality of life of having easy access to Amtrak's Northeast Corridor, SEPTA's regional rail, and the Amtrak's Keystone services. Many of the people who live, work, or attend school in Montgomery County benefit from access to the Northeast Corridor, whether it is through the Amtrak Keystone Service, connecting through SEPTA's regional rail service at 30th Street Station, or parking and riding at 30th Street Station, North Philadelphia Station, Cornwell Heights, or other stations in the region. With these stakeholders in mind, we offer the following comments on the Tier 1 Draft EIS.

- *Keystone Service - One Seat Ride to NYC* - AMTRAK's Keystone Service between Harrisburg and New York City runs through Montgomery County and includes a stop within our borders at Ardmore. It is important that any changes to the Northeast Corridor preserve the one-seat ride to New York City on the Keystone Service, and keep convenient connections to other NEC services. Montgomery County desires that an increase in the frequency of Keystone service on the Northeast Corridor be planned for under any future potential scenario.

- *Allow for a seamless connection to high-speed service from the Keystone* - If the preferred alternative creates high-speed rail that is separate from 30th Street Station, both the Keystone and the high-speed rail services should stop at a station outside of Center City Philadelphia (such as Cornwell Heights with a park-n-ride) where passengers can make a seamless connection between the two, rather than having to take a separate trip from 30th Street Station to a new station in Center City.

- *Consider ticket affordability* - We support increased frequency and capacity along the Northeast Corridor to allow more people to use the corridor instead of driving. While affordability of the service did not appear to be addressed directly in the purpose and need statement of the Tier 1 analysis, NEC FUTURE should consider ways to maintain and expand the most affordable service while maximizing the capacity of the corridor, such as

double decker vehicles. Providing affordable transportation options could help provide access to jobs for diverse income levels and populations along the corridor.

- *30th Street Station as an Intercity Rail Station* - Finally, Montgomery County understands that 30th Street Station will continue to remain a major hub under all three alternatives presented in the Tier 1 Draft EIS. We support this approach and stress how important it is that 30th Street Station remain a significant intercity rail asset, not only for the Northeast Corridor, but for the potential future additional intercity service to western parts of Pennsylvania such as Pottstown, Bethlehem, and Quakertown.

We look forward to participating in the planning process moving forward.

Sincerely,

Jody Holton, Executive Director

NEC DEIS Comments - RECORD #304 DETAIL

Status : [redacted]
Record Date : 1/27/2016
First Name : Joseph
Last Name : Moody
Stakeholder Comments/Issues :

Hello,

What is very concerning is the lackluster public input solicitation that the Federal Railroad Administration (FRA) has had with Long Islanders. To have only one poorly advertised public hearing in Nassau County, for all of Long Island, is disturbing.

Besides I attended the meeting at the Nassau County Legislators Building. The information was lacking, where exactly will the tracks go, how will our communities be impacted. Ant questions that were asked, the people were told to meet the woman leading the discussion in the back of the room after the meeting. How is that transparent?
The FRA has not giving any good reasons to do "Alternative 3". The cost is too much and the construction would devastate many Long Island Communities.

NEC DEIS Comments - RECORD #1469 DETAIL

Status : [redacted]

Record Date : 2/14/2016

First Name : Lesley

Last Name : Moore

Stakeholder Comments/Issues :

Alterntive 1 would not only ruin our Town of Old Lyme but also would destroy the historical structures that make our community so unique. Lyme Art Association, the Florence Griswold Museum, Lyme Academy....it is unthinkable.

NEC DEIS Comments - RECORD #1356 DETAIL

Status : [redacted]
Record Date : 2/14/2016
First Name : Marcia
Last Name : Moore
Stakeholder Comments/Issues :

I like alternative 2 or 3, because they broaden the option of rail transportation. But why not include Bradley International in the play? Why just Providence?

NEC DEIS Comments - RECORD #1106 DETAIL

Status : [redacted]

Record Date : 2/12/2016

First Name : Stephen

Last Name : Moore

Stakeholder Comments/Issues :

I am in agreement that rail service in new England needs some upgrades, but I am utterly opposed to the stealthy and well-cloaked way in which this has been conducted. I have absolutely no faith in our elected representatives who appear to have been hoodwinked by you as well.

Alternative 1 is a no-brain rejection in my view. To converge rail construction with an overloaded highway that will itself be under construction until 2017, monopolize traffic and roadways through the main commercial artery of Old Lyme. Since neither Old Lyme or Niantic will be getting a high-speed rail stop, there's plenty of room further north to pass over the CT river with a shorter span and less-occupied real estate.

NO, NO, NO to alternative 1. I can't believe you pissed away so much taxpayer's money on such a poorly planned 'study'>

NEC DEIS Comments - RECORD #284 DETAIL

Status : [redacted]

Record Date : 1/25/2016

First Name : Stephen

Last Name : Moore

Stakeholder Comments/Issues :

The Alternative 1 proposal for the Old Lyme area is INSANE. Move it north about 10 miles, where there's plenty of space and a need for another bridge to replace the ferry (make it a bridge for both vehicles and trains) Alternative 1 would not only destroy the town of Old Lyme, but also disrupt I95, since all the building machinery would use 95.

NEC DEIS Comments - RECORD #2926 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : Suzanne
Last Name : Mora
Stakeholder Comments/Issues :

Total disregard for environmental impact on long island sound just to save a little travel time.

NEC DEIS Comments - RECORD #565 DETAIL

Status : [redacted]
Record Date : 2/5/2016
First Name : Gabriel
Last Name : Morey
Stakeholder Comments/Issues :

Hello FRA--

I am a senior public policy major at William and Mary who is most likely moving to the DC area this spring. The Northeast Corridor is a major reason why I want to live in DC and stay on the Northeast. The convenience and relaxation of an Amtrak trip beats driving any day, even with the higher cost. Driving takes too long and too much energy, and is an environmentally unsustainable way to travel. Additionally, for a young person on a tight budget, flying takes too much money and time, especially when flying necessitates getting transportation to and from the airport.

I want to see a robust NEC, and therefore support the 4th alternative. Although it costs the most, the increased service and competitiveness achieved by the 4th alternative is unbeatable. Currently, the NEC is a patchwork of 20th and 19th century infrastructure. Only a transformation will give us a 21st century rail network.

NEC DEIS Comments - RECORD #2431 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Danielle

Last Name : Morgan

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 #1158 DETAIL

Status : [redacted]

Record Date : 2/13/2016

First Name : Margaret

Last Name : Morgan

Stakeholder Comments/Issues :

this project risks destroying not just a town, but a historical destination. Traffic on 95 is already treacherous, please do not add to the problem.

NEC DEIS Comments - RECORD #3030 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Evelyn

Last Name : Morgen

Stakeholder Comments/Issues :

The impact of the high speed railway cutting through Old Lyme CT would be devastating to this historic town and famous art colony, and to the mouth of the Connecticur River which is a federally protected Heritage River and home to nesting Ospreys. Please find another route!!

NEC DEIS Comments - RECORD #2062 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Jim

Last Name : Moriarty

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 #983 DETAIL

Status : [redacted]

Record Date : 2/11/2016

First Name : Nicholas

Last Name : Moriarty

Stakeholder Comments/Issues :

please do not put aaa rail through PatuXEnt wildlife refuge, we have too few conservation areas left in the northeast.

NEC DEIS Comments - RECORD #2668 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Barbara

Last Name : Morris

Stakeholder Comments/Issues :

I oppose Alternative 1 of the Northeast Corridor Futures proposal because it will destroy the campus of Lyme Acadmy College of Fine Arts of the University of New Haven. my daughter recently graduated from UNH. I am confident that good alternatives are available which would not be so destructive and detrimental to this historic area.

NEC DEIS Comments - RECORD #2626 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Linda

Last Name : Morris

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 #2007 DETAIL

Status : [redacted]
Record Date : 2/15/2016
First Name : Michael
Last Name : Morris
Stakeholder Comments/Issues :

Dear Federal Rail Administration,

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

NEC DEIS Comments - RECORD #772 DETAIL

Status : [redacted]

Record Date : 2/10/2016

First Name : Roy

Last Name : Morris

Stakeholder Comments/Issues :

Fix the choke points, and make the infrastructure more reliable. Fancier fixes are interesting, but not realizable.

NEC DEIS Comments - RECORD #1069 DETAIL

Status : [redacted]
Record Date : 2/12/2016
First Name : Jo
Last Name : Morrison
Stakeholder Comments/Issues :

Dear Ms. Braegelmann:

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

The 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 already 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. This area was 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 US 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,

Jo Morrison

NEC DEIS Comments - RECORD #2162 DETAIL

Status : [redacted]
Record Date : 2/15/2016
First Name : John
Last Name : Morrison
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 #2546 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : Christopher
Last Name : Morrissey
Stakeholder Comments/Issues :

This is ridiculous. It sounds destroy the beautiful of a quaint, historic new england town. An artist haven! I'm outraged and disgusted at this proposition.

NEC DEIS Comments - RECORD #651 DETAIL

Status : [redacted]

Record Date : 2/9/2016

First Name : Jessica

Last Name : Morrissey

Stakeholder Comments/Issues :

I am totally against alternative 1. Do NOT destroy Old Lyme. Project our towns and our shores.

NEC DEIS Comments - RECORD #1703 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Rachel

Last Name : Mosier

Stakeholder Comments/Issues :

I am against Alternative 1. Further destroying the shoreline and the coves is criminal. Too many inlets have already died due to lack of waterflow when the existing line was built. Besides, any alternative that does not involve getting the rail closer to our biggest city - Hartford - and our biggest university - UCONN - is a waste of time and money.

MS. SIEGEL: Then we go to Tristan Mountanos.

MR. MOUNTANOS: My name is Tristan Mountanos. I'm a member of the public that's interested in the project.

I'm mostly in favor of Alternative 1, especially since it -- one of the things you address is the Hudson Tubes. And the reason why I believe the Hudson Tubes need to be addressed as soon as possible is because of the fact that, during Superstorm Sandy, one of the tunnels was damaged, and there is a report that was released recently that says it needs to be repaired. If one of the tunnels gives out, then Amtrak transit service will be reduced by 75 percent. And you really can't put more people on the PATH trains, because those are already at capacity. And I'm sure if anybody has gone over the GW Bridge or the Lincoln and Holland Tunnels, you already know that those are also at capacity, so you can't really put more people in there either.

If the tunnels wash out while there are people inside them, then that would obviously be a big problem and would cause many unnecessary deaths.

So I believe that we should push forward for Alternative 1, focusing on upgrading things like the Hudson Tubes that really do increase capacity and increase the speed and service of the Northeast Corridor.

MS. SIEGEL: Thank you.

NEC DEIS Comments - RECORD #2248 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Paulette

Last Name : Moye

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 #505 DETAIL

Status : [redacted]

Record Date : 2/2/2016

First Name : Margaret

Last Name : Moylan

Stakeholder Comments/Issues :

Keep Amtrak! It is the best way to travel for the environment.

2 Broadway
New York, NY 10004
212 878-7000 Tel

Metropolitan Transportation Authority
State of New York

Rebecca Reyes-Alicea
USODT – Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

February 16, 2016

Dear Ms. Reyes-Alicea,

The MTA is pleased to offer the following comments on the Federal Railroad Administration (FRA) Northeast Corridor Future Draft Tier 1 EIS (DEIS) document within this letter and attachment.

We appreciate the efforts of FRA and its team to assess the needs of the Northeast Corridor (NEC) region and welcomed the opportunity to participate in the review and discussions of the methodology and draft findings. The FRA's transparent and thorough efforts provide a significant contribution to understanding of the region and its rail transportation system, and underscores the importance of restoring the NEC to a state of good repair and maintaining and expanding the role of rail to enhance the region's economy and environment. While the DEIS establishes alternative visions for the NEC, we agree with statements made by FRA that the regional railroads' capital planning and investments are not bound by these alternatives.

Our comments presented in the attachment focus on specific items of the DEIS or to request clarification of points made in the document. More broadly, we offer the following observations to provide input to the FRA's decision-making and selection of a Preferred Alternative.

- We agree that the NEC must be brought to a State of Good repair and maintained in that condition as a baseline. As pointed out, many sections of today's NEC are more than 100 years old and show evidence of functional or structural obsolescence. MTA is an owner of a portion of the NEC in Westchester County, NY, and has made considerable investments over the last 30 years to bring it to a State of Good Repair (SGR). We have also worked with our partners in Connecticut to bring the NEC from the state line to New Haven to a State of Good Repair. Construction projects needed to attain SGR can temporarily diminish railroad operating capacity, but the long-term benefits are well worth short-term inconvenience.
- We also concur that maintaining SGR will require long-term dedicated funding to prevent future deferred maintenance and returning to inadequate service levels. A broad partnership of the railroads, states, and FRA will be required in the NEC Commission forum to provide sufficient resources to maintain the benefits of improving the NEC.
- We are reviewing projects in the DEIS through the lens of New York and MTA priorities that have been established by our capital program process. These include:
    - Metro-North Railroad "Penn Station Access" that will add commuter service to Penn Station and four new stop in the eastern section of the Bronx along its New Haven Line of the NEC, which is a goal of New York State. This project will also

advance broader NEC goals by improving and expanding the Hell Gate Line in the Bronx.

- Additional trans-Hudson river rail capacity is important to NEC services and to expand New York City's access to labor markets in New Jersey as well as enhancing service provided by New Jersey Transit under contract to Metro-North for Rockland and Orange County, New York customers, and beyond.
- LIRR Expansion Project, the addition of a third track along LIRR's Main Line in Nassau County, provides new service opportunities, supports regional economic activity, reduces traffic congestion and improves air quality
- Reuse of the Farley Post Office in Manhattan for regional rail including LIRR and Metro-North, and Amtrak use as well as redevelopment of the current Penn Station into modern and welcoming passenger facilities.

Therefore, MTA agrees that the FRA concept of a "Universal First Phase" of investments is a good building block to provide important improvements to NEC service quality and quantity and support inclusion of the Penn Station Access and trans-Hudson projects in the Universal First Phase. We encourage FRA support of the LIRR and Penn/Farley projects as highly supportive of increased use of NEC services.

- We request FRA continue to clarify the relationship of the DEIS, the future Preferred Alternative, and Service Development plan, with more explanation about the steps that would prioritize these NEC projects and programs for federal funding support and streamlined FTA, FRA and other federal NEPA and permitting reviews. Likewise, we would appreciate FRA clarifying how "Tier 2" NEPA analysis might occur when a state or local sponsor decides to pursue a project that might be an element of the Universal First Phase or other Proposed Alternative, particularly if the project is pursued with another USDOT lead agency such as FTA.
- Lastly, we request FRA clarify the statement on page 10-12 regarding coordination among NEC stakeholders, "As noted, the FRA considers these issues of great importance and would consider conditioning future federal funding on the commitment to achieving necessary governance and institutional changes upon completion of projects." Please clarify what governance and institutional changes FRA seeks to bring about, or how funds will be withheld by USDOT until such changes are made.

The attachment provides specific comments to details within the DEIS and we submit them for your consideration. We would be happy to meet with you to clarify any of our comments, and look forward to working with the FRA to continue to improve the NEC to meet the environmental and economic development goals of our region.

Sincerely,

William M. Wheeler
Director, Special Project Development and Planning.

CC: D. Betty, J. Hyland, K. Walther – LIRR
M. Shiffer, B. Sterman – MNRR

Attachment – MTA comments to specific pages of NEC Future DEIS.

Executive Summary

1. Page 30 – Description of the Universal First Phase, who will undertake the Universal projects, and do they become requirements of the NEC users? Suggest a statement like that of the hearings, eg: the implementation of the projects are not the obligation of the commuter railroads.

Chapter 3

2. Page 3-9, paragraph starting "Regional travel trends..." seems contradictory in that it suggests much of the growth in commuter rail arrival volumes have occurred in the off-peak. How does this trend "put pressures on ageing and capacity-constrained infrastructure?"

3. Page 3-10, paragraph starting "current conditions..." second sentence seems to offer opinions that while may seem correct are not backed up by analysis offered here. MTA's strategy to address constraints in the East River Tunnels and Penn platforms is the LIRR East Side Access project.

4. Page 3-11, bottom paragraph would be strengthened by a gap or opportunity analysis for commuter rail or Intercity to airport trends.

5. Page 3-12, third paragraph last sentence, not clear what trip is described or how it's accomplished, or the gaps in such service. LIRR travelers to NJ can switch to NJ Transit trains within Penn Station.

6. Page 3-14, first paragraph. The sentence "A primary cause of delays..." is not supported in the hyperlink referenced in the footnote; in addition, the cited website is not available. The FRA Section 207 performance report for Quarter ending 6/2015 does not support this assertion. Commuter Train Delays are rarely the primary causes of service delay; many are scheduled Amtrak work or mechanical trouble. Per the Amtrak monthly report for June 2015 time period, "other passenger rail" (not commuter) caused 6% of delay-minutes and freights were 3% to NEC trains.

Chapter 4

7. In regard to the PSA service levels and plans, the information provided to the NEC Future was the best information available at that time reflecting the on-going conceptual planning effort. It will be updated with the involvement of PSA stakeholders as that planning effort continues.

8. Page 4-13, second paragraph section 4.2.2.1, consider adding to Operational Improvements an evaluation of trains for proper consist length so as to maximize seats

offered by each train before adding additional trains that consume more track occupancy time.

9. Page 4-13, second bullet section 4.2.2.1 would be strengthened by offering analysis of benefits and challenges of "through-running" regional rail service at NY Penn. While it would no doubt be more convenient for travelers across the suburbs to not change trains in the terminal, there's no analysis of how large these markets are, or the origin-destination pairs for such trips to evaluate this statement.
10. Section 4.2.2.2 (Page 4-15) The DEIS states that "Each Action Alternative preserves freight access and operations on the NEC and does not preclude future expansion opportunities." In this regard, how does the NEC Future DEIS account for CSX and P&W future storage/staging along the Hell Gate Line on the tracks that they currently use?
11. Section 4.2.2.4 (Page 4-21) - The discussion of physical improvements associated with stations outlines footprints for different "levels" of stations (Major Hub, Hub and Local). Due to limited space within the environs of most Metro-North stations, expanding the stations footprint to provide for additional platforms for new services may require significant land takings.
12. Table 4-4, why two rows for Regional rail push-pull, single level or bi-level? Also please explain what "Tier" refers to.
13. Table 4-5 (page 4-24) NEC Future Stations - It is unclear if the stations listed in the table are Major Hubs, Hubs or Local. A column should be added to provide clarity.
14. The Parkchester Station (Station ID # 79) should be called Parkchester/Van Nest.
15. Table 4-7 (Page 4-32) The table recommends that the New Haven Yard be expanded to maintain Hartford Line equipment. Is it assumed that this expansion will occur by not impacting land that could be used to expand the NHL New Haven Yard, should that need to occur?
16. Table 4-8, East River trains per hour counts don't seem to correlate to the investment Alternatives, eg: how does Alternative 1 tph rise to 68 when no additional trans-East River capacity is provided, etc. The footnote to the table indicates the table does not include LIRR East Side Access volumes via the 63rd Street Tunnel.
17. Table 4-9, East River regional rail screenline is a very large number that may be theoretically possible but please note this is not an MTA goal, nor has any analysis been performed to understand the ability of the rest of the LIRR network to support such service levels to PSNY.
18. Table 4-8 (Page 4-39) – FRA should clarify that the train volumes represented in this table are demand, not capacity. Also the total East River service level for the No Action Alternative appears to be in error.

19. Section 4.5.2 (Page 4-41) - How will Intercity Travel times between NYC and Boston decrease by 30 minutes? Which infrastructure improvements will help achieve that and what time savings are associated with each?

20. Page 4-42, last paragraph. It's not clear how this would be accomplished how regional rail services could make use of spare HSR line capacity. Speeds of regional rail and HSR intercity are very different by FRA discussion in prior paragraphs, so HSR would have to slow down behind the regionals. Likewise, headways of one minute are uncommon even in rapid transit environments. More documentation is needed for these DEIS points.

21. Page 4-45, new track for Alternative 1. Not clear why two new tracks for the Hell Gate Line in Queens are needed, or how they would be accommodated. Please clarify here, bullet list on top of page 4-46 and Alternative 2 page 4-49, Alternative 3 section 4.6.3.2, etc.

22. Section 4.6.1.1 (Page 4-45) Metro-North does is not convinced that a Shell Flyover is needed to address a chokepoint at Shell Interlocking. Recent improvements were made to Shell Interlocking to address the issue.

23. Section 4.6.1.2 (Page 4-45-4-46) – New track projects, include "Hell Gate Line, Queens NY and Bronx NY, expanded to 4 tracks". It should be noted that PSA will only require the expansion of tracks only on a portion of the Hell Gate Line in the Bronx. Further, the freight service and related freight operator rights between the Bronx River Bridge and Gate Interlocking may limit the ability to expand the number of passenger service tracks in that area.

24. Page 4-49, Alternative 2 New Segments, 8th bullet. We do not object to two new East River Tunnels to Queens, but their placement within Penn and Long Island City would make a large difference in how they can be used by the PSNY railroads. Likewise, the new tubes would likely need to access larger train storage yards in Queens. This need and potential location in a densely developed urban area should be discussed.

25. Figure 4-8, No Action Alternative. Please show and label LIRR East Side Access project.

26. Section 4.7.1.6 (Page 4-58) The description of the Hell Gate Line includes a discussion of the line being at grade near I-278 in the Hunts Point section of the Bronx. It is actually a combination of cuts and grades to account for the area's varying topography.

27. Page 4-63, please note the two new Hell Gate tracks in Queens.

28. Section 4.7.2.3 (Page 4-63) – Alternative 1 does not address two new tracks on the HGL for PSA.

29. Figures 4-12 and 4-16 – consider adding Penn South to this graphic.

30. Section 4.7.3.5 (Page 4-69) – Alternative 2 also does not address two new tracks on the HGL for PSA.

31. Figure 4-19, consider clarifying figure to indicate that all three new lines east of PSNY are not proposed as one option.

Chapter 5

32. Table 5-15. Additional information may help the understanding of this table, including the relative contribution of high-speed, "metropolitan" and regional service to the changes; effect of changing fares, service levels, or trip times, etc.

Chapter 9

33. Page 9-8, paragraph beginning "Alternative 1..." The discussion of service growth in Alternative 2 resulting from through-running operations under the East River needs further description and discussion. While the concept layout of the Alternative may provide for the proposed train movements, far more details are needed on where such trains would be stored, turned-back, or serviced, as well as analysis of the travel markets to assess feasibility and use of such services.

34. Table 9-2. Entry for East River screenline are confusing: first, the sum of total trains does is not the sum of the train counts directly above, and second, the practical capacity estimates are not well defined, that is, how dues capacity grow from 38 trains/hour in the No Action option to 48/hour in Alternative 1? Likewise, how does Regional Rail volumes grow from 36/hour to 68/hour in Alternative 1 with the infrastructure proposed?

35. Table 9-3. Please explain why entry for East River ridership is forecasted to decrease between Existing NEC scenario to No Action alternative.

Chapter 10

36. General – As any phasing plan will affect service on Metro-North owned territory, therefore Metro-North will want to be involved in its development.

37. Table 10-1 (Page 10-5) Universal First Phase Projects – Aging Infrastructure and Major Chokepoints –

38. As previously noted, MNR is not convinced that a Shell Flyover is a necessary Phase 1 project.

39. Hell Gate Line 4-tracking – As previously noted, freight rights and agreements may prevent additional passenger tracks being constructed between the Bronx River Bridge and Gate interlocking.

40. Section 10.3.1 (page 10-11) first bullet implies that the success of the Alternatives relies on through-running of regional rail services at Penn Station NY. If this is the foundation of the DEIS analysis, then this point should be carefully documented, and sub-alternatives created that do not rely on such service models as the NEC Future process can not compel what would effectively be mergers of local railroads.

41. Section 10.3.2 (Page 10-12) - For the Universal First Phase projects to be implemented, planning and sequencing must address the availability of sufficient railroad labor forces.

42. Page 10-12, paragraph beginning, "Resolving these issues..." FRA should clarify the meaning of this statement regarding FRA's potential withholding of federal funding unless some new form of NEC governance is attained.

Comments to Appendix Materials

43. Appendix B.5 - The service intervals and the times that have been provided by the study assume very aggressive train timings and seem to have been created with little regard to the current schedules or service patterns that are in place. Our major concern is contained on page 21 where the concept of through-running is stated to enhance throughput. This concept has been studied and has shown to actually reduce capacity in the PSNY environment. While one would think intuitively that trains could just continue in their arrival direction (New Jersey to Long Island is the stated example), it is reality that a number of things need to happen at the platform that in every case relates to increased station dwell. Increasing any dwell on a platform in PSNY has a negative effect on performance. We are concerned that an opinion like this could influence public opinion when it is not based in a realistic perspective.

44. Simplified Operations (Appendix B.5 Page 22): All timetables and schedules are coordinated for all 3 carriers at Penn Station. The concept of "Simplifying Operations" while adding service does not have historical precedent, rather the opposite has been observed.

45. Various Models (Appendix B.5 pages 25 – 28): While I understand that certain assumptions have to be made I'm not sure that the conclusions drawn are accurate. For example, Appendix B.5 Table 12 on page 46 indicates that a NYC – Nassau – Ronkonkoma – New Haven route would result in 6.6M riders per year while the existing NYC – New Rochelle – Stamford would accommodate 4.4M riders per year. Furthermore when those numbers are broken down it is a comparison of 18,082 riders/day compared to 12,055 riders/day - are the projections of 6,000 riders/day worth the investment?

46. Table 10 (Appendix B.5 page 45): is the 10 minute travel time estimate from Ronkonkoma to Stamford realistic?

47. While estimates were provided for the Capital costs for each of the alternatives there are no comparative estimates for the cost to Operate and maintain this level of service and infrastructure.

48. We fully agree that the infrastructure has to be brought to a State of Good Repair which is mentioned in the "No Action" Alternative.

49. While obvious, the study goes out of the way to make the case for Gateway.

50. We fully support two additional East River Tunnels (Alternative 3).

51. It is assumed that a Diesel Locomotive only pulls four coaches. That isn't accurate. (page 19 of the Technical Memorandum)

52. Also, one of the premises assumed is that all equipment is "interoperable" – We suggest just getting to that point would require a major investment. Likewise, a consistent AC power specification for all future NEC work would be a major step to promoting interoperable equipment.

NEC DEIS Comments - RECORD #1548 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : John & Eileen

Last Name : Mueler

Stakeholder Comments/Issues :

To Whom It May Concern-We are writing to express our concerns regarding the Tier 1 Draft EIS. The proposed plan will have a dramatic negative impact on the CT estuary encompassed w/in the proposed railway infrastructure along the CT shoreline. The impact has not only local but worldwide significance for migratory birds. As stewards of our environment, we need to be responsible and thoughtful when considering changes to the our regional environmental ecosystem w/ extended impact to connected environmental habitats. Finally, the cultural impact on the Old Lyme and other shoreline communities would be devastating. Many of us as long term residents of the community have worked tirelessly to maintain the exceptional cultural, scholastic and living environment offered to us as residents of vibrant shoreline CT communities. Please accept these concerns establishing a balanced proposal protecting the livelihood of the CT shoreline. With kind regards.

NEC DEIS Comments - RECORD #2777 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Eileen

Last Name : Mueller

Stakeholder Comments/Issues :

I am appalled that the FRA committee would seriously consider endorsing Option1 which would have the rail tracks run directly through the heart of the Old Lyme community. Your proposal would bring environmental risks to the area as well as negative financial impact to the town and Lyme Art academy. I would welcome the opportunity to share my concerns with a representative of the FRA.

NEC DEIS Comments - RECORD #2357 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Kathryn

Last Name : Muir

Stakeholder Comments/Issues :

when are people going to stop destroying beautiful old towns?

NO TRAINS THROUGH OLD LYME

NEC DEIS Comments - RECORD #415 DETAIL

Status : [redacted]

Record Date : 1/30/2016

First Name : Douglas

Last Name : Mulcahy

Stakeholder Comments/Issues :

As a family member who has lived in the lyme, old lyme area since the early 30"s, and love and appreciate the history and beauty of the town, I am shocked and totally dismayed by what I have just read. To casually destroy the beauty and history of the town is unacceptable.

NEC DEIS Comments - RECORD #625 DETAIL

Status : [redacted]
Record Date : 2/9/2016
First Name : Christine
Last Name : Mullaney
Stakeholder Comments/Issues :

Rebecca Reyes-Alicea:

Alternative 3 of the FRA plan for the Amtrak NE corridor is outrageous and never should have been proposed. It would destroy Garden City and other communities to our west and east. To propose such a destructive plan demonstrates how out of touch the FRA is with residents of Long Island. Please drop alternative 3 immediately. We can assure you, if you proceed with such a reckless proposal, the demonstrations against it will be huge and widespread.

Mr. & Mrs. Thomas Mullaney

[redacted]

Garden City, NY 11530

NEC DEIS Comments - RECORD #207 DETAIL

Status : [redacted]

Record Date : 1/20/2016

First Name : Pattrick

Last Name : Mullen

Stakeholder Comments/Issues :

Please bring back bicycle "roll on service" to the northeast corridor.

NEC DEIS Comments - RECORD #204 DETAIL

Status : [redacted]

Record Date : 1/20/2016

First Name : Peter

Last Name : Mullen

Stakeholder Comments/Issues :

stop talking about this and be about it. fix existing rail lines and upgrade before the world leaves us in the dust. yall been talking about this stuff forever. tell the feds to stop stealing rail money for the roads and airlines. we still run trains like the 1800s. pathetic system here.

NEC DEIS Comments - RECORD #1081 DETAIL

Status : [redacted]
Record Date : 2/12/2016
First Name : Steve
Last Name : Mullen
Stakeholder Comments/Issues :

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

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 1936 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,

Stephen Mullen

+++Steve

NEC DEIS Comments - RECORD #1669 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Richard

Last Name : Mulligan

Stakeholder Comments/Issues :

Do not approve Alternative 1. That proposal would significantly alert that Old Lyme historic district, which is a gem. It would despot the Lyme Art Academy and the entire art district. I oppose Alternitive 1.

NEC DEIS Comments - RECORD #242 DETAIL

Status : [redacted]

Record Date : 1/23/2016

First Name : Ted

Last Name : Mundy

Stakeholder Comments/Issues :

Your proposed route through Old Lyme is very destructive to the fabric of the community, its conservation resources and the natural setting of the place. Please reconsider and INVOLVE our local leaders.

NEC DEIS Comments - RECORD #936 DETAIL

Status : [redacted]
Record Date : 2/11/2016
First Name : Edward
Last Name : Munster
Stakeholder Comments/Issues :

Sirs:

With all due respect to the need to improve commuter rail service in the United States, this Alternative 1 would be a disaster. Destroying the heart of this town, the art college and the many historic buildings are too high a price to pay. I am not a resident of Old Lyme but while I an advocate for historic preservation this proposal impacts so much more that is critical to this shoreline town that it cannot be allowed to proceed.

Edward Munster
[redacted]

MS. MUNTZ: I came in for the second crew, but I'm hearing stuff that I'd like to speak about.

THE MODERATOR: Okay. So just -- I don't know if you were here when I said, just make sure you introduce yourself and speak nice and slow and clearly so we can hear you.

MS. MUNTZ: Okay.

Well, I'm Eileen Muntz, M-u-n-t-z.

I live in Westbury, New York. I've been there since 1969.

I -- I've formed a love for Long Island and I appreciate how small it is. And I appreciate the traffic and I have family who won't come to Long Island because they say, we're not coming here, the traffic's always so terrible.

But I don't really see how a tunnel underneath the Long Island Sound would help Long Island. Long Island is really relatively small and I was looking at some of the population densities. The population density of Nassau County is 4,705. The population density of Suffolk County is 1,637 per square mile. For Fairfield County, Connecticut, it's 1,467, New Haven County 1,427, Hartford, 1,217, and New London County 412. It's just a relationship of land to the people who live there. And I mean, would you put a high speed rail train right through Yellowstone National Park? In a way, Long Island has reached the point of saturation.

Nassau County has lost the land -- the public sleigh riding area in the middle of Nassau County. So our kids, our families, have no place to sleigh ride. And if a few -- a few feet of track space would make sleigh riding help for the people and the kids who live on Long Island.

So I really don't see that this tunnel out to Connecticut will benefit most of the people on Long Island. It will be a degradation, I think, to the service. I can see more service into the City. I do see the viability of a third track going into the City where you can have higher speed service. And I think that would alleviate some of the pressure in the Island and some of the pressure on the expressway, the parkways. But the tunnel, the Amtrak going through the middle of Long Island, it's just really too small when you really look at it.

Thank you.

THE MODERATOR: Thank you.

THE MODERATOR: Is there -- are there any other folks who'd like to make a comment?

Okay. Come on up.

MS. MUNTZ: Thank you.

Eileen Muntz, Westbury, New York.

Again, I've been a resident of Nassau County for almost 57 years now. I love the county. I love the idea of high speed train. I think there is room for a high speed train corridor but, as I said, with the population density figures that I gave before, I really don't think Long Island is the place.

And the idea of digging tunnels under parts of the Island that -- Long Island is very dependent on its aquifer. That aquifer is the only place that we get our drinking water from. It's under a lot of pressure. There are plumes of pollution that they monitor that move towards the aquifers. And the idea of tunneling into the Island, which is a limited geographical area just to me does not make any sense. And, therefore, you would be required, I think, almost to build this as an elevated train and that would, I think, destroy the quality of life for people who are compressed into this very small geographic region.

Long Island and the Hamptons and the East End are worldwide tourist destinations. And I guess people are of the opinion that, perhaps, if we improve the transportation, more people could go there. But I think that the people who are already going here will tell you, there's no more room for anyone to go there.

So don't destroy the golden goose. And, also, this thing about employment that people from Connecticut can come and work at the hub on Long Island, there aren't enough jobs on Long Island for Long Islanders at this point. Young people are leaving the Island because they can't get good paying jobs because they can't take their kids outside and go on a sleigh ride.

So I think -- I would love a high speed train but I just don't think the Island is the place for it.

Thank you.

THE MODERATOR: Thank you.

Do you want to make a final comment?

MS. MUNTZ: One quick thing.

THE MODERATOR: Okay.

MS. MUNTZ: Eileen Muntz.

I just forgot to mention and I thank Scott for reminding me.

The -- it's not just an issue of using the right-of-way that's here to go through the Island to get to a tunnel to go over to Connecticut. There was the question of the electrical capacity, where are these electrical power plants going to be built? Where are they going to put those towers up? There's one in Hicksville that takes up a fairly good chunk of land on tiny Long Island. So where will this extra electrical capacity be built?

Thank you.

THE MODERATOR: Great.

Thank you.

Thank you very much.

THE MODERATOR: That's okay. He can state that for the record.

MR. MUNTZ: Yeah, I'm Ray Muntz. I live in Westbury.

I just was curious how we find out more information about the line's that's going through Long Island because very little is shown. And I know there are maps that are showing stuff but I don't know the details, elevated, tunnel, whatever, high speed, low speed. How do we find that out?

THE MODERATOR: I think that's best if once we close out the comment --

MR. MUNTZ: Okay.

THE MODERATOR: -- we'll be happy to chat with you in the back of the room.

MR. MUNTZ: Okay.

Thank you.

A VOICE: It's on the web page.

THE MODERATOR: That's okay. He can state that for the record.

MR. MUNTZ: Yeah, I'm Ray Muntz. I live in Westbury.

I just was curious how we find out more information about the line's that's going through Long Island because very little is shown. And I know there are maps that are showing stuff but I don't know the details, elevated, tunnel, whatever, high speed, low speed. How do we find that out?

THE MODERATOR: I think that's best if once we close out the comment --

MR. MUNTZ: Okay.

THE MODERATOR: -- we'll be happy to chat with you in the back of the room.

MR. MUNTZ: Okay.

Thank you.

A VOICE: It's on the web page.

NEC DEIS Comments - RECORD #1911 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Dinesh

Last Name : Munukoti

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 #1693 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Anthony

Last Name : Muratore

Stakeholder Comments/Issues :

Why don't you repair your existing problems before you create new ones

NEC DEIS Comments - RECORD #152 DETAIL

Status : [redacted]
Record Date : 1/12/2016
First Name : Richard
Last Name : Murdocco
Stakeholder Comments/Issues :

Hello -

My name is Richard Murdocco, and I am a land use columnist. I am planning on attending the public hearing scheduled tonight at 6:00 PM in Mineola, but wanted to pass along my comments digitally as well.

Please find my comments attached as a PDF file.

If you need anything further, I'd be happy to provide it.

Thank you - and I look forward to presenting my comments this evening.

RJM

631-560-1450

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Attachments : Murdocco Public Comment NEC Future Jan 16.pdf (90 kb)

RM The Foggiest Idea

January 12, 2016

To Officials within the Federal Railroad Administration:

My name is Richard Murdocco, and I am commenting regarding the NEC Future proposal.

I am a land use columnist, who received my BA in both Political Science and Urban Studies from Fordham University, and my MA in Public Policy from SUNY Stony Brook. My published written work on the subjects of land use and real estate development appears frequently in *Newsday*, the *New York Daily News*, *Crain's New York Business, New York Magazine, Pacific Standard Magazine, Long Island Business News,* and in a weekly column for the *Long Island Press.* My work has also been featured live on-air on *CBS 2 New York.*

A collection of my published work and policy analysis can be found at my website, www.TheFoggiestIdea.org.

The NEC Future project is ambitious in scope, with impacts that would fundamentally resonate across countless communities on Long Island. As a region, Nassau and Suffolk Counties have more pressing transportation needs that affect residents and their livelihoods every day. Examples include construction of a third LIRR track between Floral Park and Hicksville, as well as the much-delayed Second Avenue Subway and East Side Access, all of which would open Long Island's access to the Northeast Corridor.

What is particularly concerning is the lackluster public input solicitation that the FRA has had with Long Islanders. It is disconcerting that the project has been shaped with stakeholders and policymakers since 2012, but only now, in 2016, is the public being brought into the planning process. Further, to have one public hearing in Nassau County, but not in Suffolk County, where a large majority of NEC Future work is proposed to take place, is troubling.

I formally request the opportunity for the 1.5 million residents of Suffolk County to share their input on this project in a formal public forum, with an extension of the public comment period being given as well.

Good transportation policy is grounded in an assessment of current and future community needs, as well as open and plentiful public input. In this case, it seems that a large majority of Long Island's residents, with the exception of a select few well-connected insiders, have been left out of the process.

I am optimistic that local elected officials, stakeholders and the FRA will remedy this, and I look forward to constructively working with them on improving quality of service on the Northeast Corridor in the New York Metro Area.

Richard Murdocco

Founder and Publisher,
The Foggiest Idea
Rich@TheFoggiestIdea.org
631-560-1450

EMAIL TO MARC BUSSO

RM The Foggiest Idea

January 12, 2016

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My name is Richard Murdocco, and I am commenting regarding the NEC Future proposal.

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I am optimistic that local elected officials, stakeholders and the FRA will remedy this, and I look forward to constructively working with them on improving quality of service on the Northeast Corridor in the New York Metro Area.

Richard Murdocco

Founder and Publisher,
The Foggiest Idea
Rich@TheFoggiestIdea.org
631-560-1450

Now we have Rick Murdocco.

I probably mangled that one -- so you'll --

MR. MURDOCCO: That's okay. My handwriting's sloppy. It's Rich.

THE MODERATOR: It's Rich. Yes, you're right. It says Rich. Okay.

MR. MURDOCCO: My name is Richard Murdocco. I'm commenting regarding the NEC Future proposal.

I'm a land use columnist who received my BA in both Political Science and American Studies from Fordham University, my MA in Public Policy from SUNY Stony Brook. My published written work on the subjects of land use and real estate development and it appears frequently in *Newsday*, the *New York Daily News*, *Crain's New York Business*, *New York Magazine*, *Pacific Standard Magazine*, *Long Island Business News* and a weekly column for the *Long Island Press*. My work has also been featured Live on air on CBS 2, New York.

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What is particularly concerning is the lackluster public input solicitation that the FRA has had with Long Islanders. And it's disconcerting that the project has been shaped with stakeholders and policymakers since 2012 but only now in 2016 is the public being brought into the planning process.

Further, to have one public hearing in Nassau County but not in Suffolk County, where a large majority of NEC Future work is proposed to take place, is troubling.

I formally request that opportunity for the 1.5 million residents of Suffolk County to share their input on this project in a formal public forum with an extension of the public comment period being given as well.

I am optimistic that local elected officials, stakeholders and the FRA will remedy this. I look forward to constructively working with them on improving the quality of service on the

Northeast Corridor in the New York metro area.

Thank you.

THE MODERATOR: Thank you very much. Thank you.

NEC DEIS Comments - RECORD #384 DETAIL

Status : [redacted]

Record Date : 1/29/2016

First Name : Dan

Last Name : Murphy

Stakeholder Comments/Issues :

Alternative 3 would dissect and devastate Garden City, New York and other suburban communities on Long Island and is not an acceptable option.

NEC DEIS Comments - RECORD #1116 DETAIL

Status : [redacted]

Record Date : 2/12/2016

First Name : Kathleen

Last Name : Murphy

Stakeholder Comments/Issues :

I absolutely approve of saving our wonderful coastline.

NEC DEIS Comments - RECORD #2055 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Karen

Last Name : Murphy

Stakeholder Comments/Issues :

This plan is completely irresponsible and illogical . Why would you choose one of the most pristine areas in our state in an historic village and destroy it with this clearly not well thought out plan.. Which by the way we can ill afford !!! Just what we need .

NEC DEIS Comments - RECORD #425 DETAIL

Status : [redacted]

Record Date : 1/30/2016

First Name : Karen

Last Name : Murphy

Stakeholder Comments/Issues :

We do not need another Capitol expense the State of Connecticut is hundreds of millions of dollars in the red . And then to undo decades of land trust preservation in one if our most beautiful and pristine areas in the state is unconscionable!!!! NO NO NO . Who comes up with this stuff?? We have a perfectly fine line to Boston now. If you want to get to Boston quicker MOVE CLOSER !!!!

NEC DEIS Comments - RECORD #2465 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Kevin

Last Name : Murphy

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 Lyme Academy College of Fine Arts of the University of New Haven.

NEC DEIS Comments - RECORD #2029 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : M.

Last Name : Murphy

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 #2154 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Mary

Last Name : Murphy

Stakeholder Comments/Issues :

I am against the NEC placing a rail line through the Lyme Academy of Fine Arts. The state of Connecticut has a history of ruining Connecticut's shoreline, beautiful historic areas, beautiful farm land vistas and historic old buildings with highways and oil tanks . Please do not allow this to happen to another beautiful historic area in CT.

NEC DEIS Comments - RECORD #325 DETAIL

Status : [redacted]
Record Date : 1/27/2016
First Name : Marie
Last Name : Murphy
Stakeholder Comments/Issues :

I am adamantly opposed to the proposal that would put an Amtrack train track through Garden City ....this would have a negative impact on the quality of life in our village ... Other options should be considered!!!!!!!

Sent from my iPhone

NEC DEIS Comments - RECORD #2451 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Michael

Last Name : Murphy

Stakeholder Comments/Issues :

Please consider making alternative plans to install the railway.

Thank you

NEC DEIS Comments - RECORD #45 DETAIL

Status : [redacted]

Record Date : 12/5/2015

First Name : walter

Last Name : murphy

Stakeholder Comments/Issues :

It is time that our rail infrastructure be upgraded to 21st Century needs. We need a commitment to rail projects similar to the Interstate Highway act. High Speed rail should be from Richmond, Va to Boston, Ma. and Albany. Further projects should make High Speed Rail from Florida to Maine a reality with connections to Canada.

NEC DEIS Comments - RECORD #46 DETAIL

Status : [redacted]

Record Date : 12/5/2015

First Name : walter

Last Name : murphy

Stakeholder Comments/Issues :

Alternate Plan 3 is the only one that makes sense. With growing population and diverse metropolitan centers the increase in track right of ways both in the south end but especially the North end of the NEC will make Rail travel easier and more accessable to the population of the areas served

NEC DEIS Comments - RECORD #2639 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Bob

Last Name : Murray

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 #1026 DETAIL

Status : [redacted]
Record Date : 2/12/2016
First Name : Linda R.
Last Name : Myers
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.

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,

NEC DEIS Comments - RECORD #2653 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Jill

Last Name : Nadler

Stakeholder Comments/Issues :

I oppose Alternative 1 for the high speed rail through Old Lyme CT. Why would you want to ruin a beautiful bucolic town like Old Lyme?

NAIOP
COMMERCIAL REAL ESTATE
DEVELOPMENT ASSOCIATION
CONNECTICUT AND SUBURBAN NEW YORK

One Regency Dr.
P.O. Box 30
Bloomfield, CT 06002

January 28, 2016

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

RE: NEC Future Tier 1 Draft EIS Alternatives 1-3

Dear Ms. Reyes-Alicea:

The Board of Directors of NAIOP's Connecticut & Suburban New York Chapter (NAIOP CT & Sub NY), has reviewed the Draft NEC Tier 1 EIS. It is an impressive, informative body of work. Our local NAIOP (Commercial Developers Real Estate Association) respectfully submits our comments for your consideration. We encourage the FRA to proceed immediately identifying a preferred alternative and following through as soon as possible with a Service Development Plan. If Connecticut is going to participate in the 7 million population increase through 2040, the Universal First Phase needs to be implemented as soon as possible to bring the New Haven Line (NHL) portion of the NEC up to a "state of good repair."

The NHL is in such a poor state of repair and so congested that rider times are increasing (see Minutes Matter published by the Business Council of Fairfield County, January 2016). The absence of sufficient state and federal funding to participate in its repair\increased capacity (adding rails) and the current long repair period to bring it up to a "state-of-good-repair" will undoubtedly "continue" to increase both rider times and unplanned, often catastrophic service disruptions. The NHL is at capacity and congested ("Getting Back of Track" Regional Plan Association, January 2014 at www.rpa.org). Without swift action to implement the Universal First Phase along the NEC, including the NHL, communities and real estate markets along the NHL face:

- Losses in business development,
- Reduced desirability of housing stock and office buildings in towns and cities along the NHL, and
- Foregone population growth and real estate values.

NAIOP CT & Sub NY members want the benefit of bringing the NHL up to a state-of-good repair. Implementation of high-speed intercity and faster regional rail service will benefit greatly from the population and economic development created by quick implementation of the Universal First Phase. That said, we are extremely concerned that the FRA's EIS process and its next step, preparing the Service Development Plan (Tier 1 Draft EIS P 10-1) not delay funding and work necessary to bring the NHL up to a good-state-of-repair. Please proceed speedily to implement a "Preferred Alternative."

While the EIS purpose is to provide information for selecting a "Preferred Alternative" for both regional and high-speed inter-city rail service along the entire NEC, our comments address primarily the New York to Hartford routes. In our opinion the preferred alternative, by all measures, is Alternative-3 using the New Rochelle-Stamford-New Haven route to Hartford. This combination of "alternative and route" provides the necessary comprehensive rail services and access to ridership in place along the New York to Hartford portion of the NEC.

Comments - Speed Train Routes:

There is an important typographical error that misstates the Alternative-3 fastest travel time from Washington, D.C., to Boston on page 4-42; Section 4.5.4. The Intercity-Express travel time from Washington, D.C. to Boston is incorrectly stated as 5 hours 10 minutes. Obviously if the average decrease from the No Action Alternative is 2 hours 55 minutes and the No Action Alternative travel time is 6 hours 15 minutes, then the correct Alternative-3 travel time is 3 hours 20 minutes.

Alternative -3: NAIOP SubNY&CT's Preferred Intercity Route

Intercity routes that by-pass Stamford and Norwalk undermine economic developments underway in those cities, appear to be inconsistent with the State Plan of Conservation and Development and are contrary to the long-term investment priorities stated in the Regional Plan Association's (RPA) New Haven Line Plan (see "Getting Back on Track," Unlocking the Full Potential of the New Haven Line, January 2014 at www.rpa.org)

Not White Plains-Danbury Route

The excess time necessary to construct over 55 miles of tunnels for the White Plains- Danbury route under Alternative 3 appear to make that route unrealistic. A likely material impediment to this route will be the time lost to eminent domain cases moving through the courts, postponing the "taking" of right-of-way (ROW) and ruinously delaying construction of that scope. The unrelenting 7-million increase in population through 2040 requires a more logical and defendable route.

Not Ronkonkoma-New Haven Route

For same reason the Ronkonkoma-New Haven-Meriden route (still Alternative -3) is an equally inappropriate solution to meet the FRA's stated objectives to serve the anticipated 7 million population increase by 2040. Also the potential for environmental disruption and the huge cost of constructing and maintaining a tunnel under Long Island Sound make the Ronkonkoma-New Haven-Meriden route as untenable as the White Palins-Danbury route.

Favored New Rochelle-Stamford-New Haven Route

The New Rochelle-Stamford-New Haven route in Alternative 3 is the most realistic, achievable route and will certainly be the fastest way to implement an Inter-city speed train and regional rail services "necessary" to serve the NEC population anticipated to increase by 7 million people by 2040. This route also has access to the largest concentration of potential riders and, thus, the largest source of tickets purchase to best financially support both regional and Inter-city services along the entire NEC. Why? Because transfers are readily available from local commuter New Haven Line stations.

Unlike the other Alternative-3 routes, the New Rochelle Stamford-New Haven Route is consistent with economic developments underway in Stamford and Norwalk and consistent with the RPA's well thought-out, specific proposals in its 2014 report "Getting Back on Track."

Questions:

- Universal First Phase – There are many old stationary and moveable rail overpasses to be replaced on the NHL that are currently not funded in the foreseeable future. These types of repairs are included as "required" improvements in each of the Three Action Alternatives. Yet the Universal First Phase names these types of improvements in Sec. 10.2 as "required" to implement any of the three Action Alternatives.
    - To what extent are non-FRA design\construction plans and budgets prepared that can be incorporated in the Preferred Alternative and, the next step, the Service Development Plan?
    - In January 2014 the RPA released a New Haven Line Plan, including an "Emergency Action Plan" citing seven recommended investments estimated to cost $3.6 Billion in addition to budgeted funding through 2020. Should such plans for segments along the NEC be adopted and referenced to further document terms like "Universal First Phase" and "State of Good Repair?"
    - According to the RPA, the Hell Gate bridge and access to Penn Station should be used to add capacity (more trains) to service NHL commuters. Using longer trains into Grand Central Station will not meet ridership demands. Is use of Penn Station to add capacity to the NHL included in the Universal First Phase?

- How much additional ROW will be necessary along the New Haven Line? How does the number and complexity of "taking" of ROW along the ROW compare to "taking" of ROW on proposed routes through Danbury (55-mile tunnel) and Ronkonkoma (tunnel under Long Island Sound)? Ruinous litigation is a high risk to project success.

- How legitimate will eminent domain cases ("acquisitions") be in the courts? ROW "expansions" will likely have a better chance of success than taking copious amounts of "new" ROW on entirely new routes. Where ROW expansion is necessary, takings along the New Rochelle-Stamford-New Haven route in Alternative-3 have the most promising chance of timely success. Taking for new ROW tied to an improbable 55-mile tunnel construction (Alternate-3, White Plains-Danbury Route) will likely have a low chance of success in the courts.

- Assuming the New Rochelle- Stamford-New Haven route is the in Preferred Alternative, what improvements are within, and which are outside of, existing rail and I-95 ROW?
    - What impact will such rail use of highway ROW have on proposed improvements to I-95?

- Can you describe the terms aerial structure, embankment, trench and tunnel as proposed on the NHL in locations shown on maps in Appendix A, Mapping Atlas. Many are proposed on the NHL.
    - Please provide examples of such structures, where they are currently being used and what firms designed and built them.
    - How would "aerial structures" impact underlying stations and highways?

Ride Time, Occupancy, Value, Jobs

Timing is critical to bring the New Haven Line portion of the NEC up to a State of Good Repair for these additional reasons not stated in the EIS:

- Ridership times on the NHL have a large impact on office buildings ability to achieve high occupancy. Most suburban "office" buildings with a 15 minute "shuttle-bus" ride from NHL commuter rail stations were constructed 25 -35 years ago, designed for densities of 4 to 5 persons per 1,000-sq. ft. and zoned for parking at the old ratio of 2.5 to 3 spaces per 1,000 SF.
- Landlords are forced to rely on commuters to maximize occupancy. Today and increasingly in the future, tenants sign leases at densities of 5 to 6 persons per 1,000-sf. The inadequate old-ratio parking supply is quickly absorbed. Parking supply consumed by today's high density tenants can effectively limit the occupancy of a building and

reduce its value. There is no room in the parking lot for the last tenant, unless the tenant mix contains numerous employees who ride the train.

- Buildings accessible to a millennial labor pool can, therefore, achieve higher occupancies AND accommodate high density work spaces. Millennial employees need fewer parking spaces, but demand reliable access to trains and typically won't tolerate one-way commutes exceeding 45 minutes.
- Given the increasing travel time on the New Haven Line (see Minutes Matter published by the Business Council of Fairfield County, January 2016), many office buildings along the NHL risk being pushed outside the 45-minute commuter envelope. As rail travel times increase, access to labor pools declines and buildings suffer slowly increasing vacancy and value decline.
- As rider times on Metro North\New Haven Line increase, millennial workers and the firms they work for (tenants) refuse to occupy buildings too far from train stations. At 45 minutes total one-way commute, the landlord's shuttle bus is ineffective. Jobs are lost.

Hence it is crucial to accelerate the work to bring the New Haven Line to a State of Good Repair as soon as possible. Declining ridership and longer ride times threaten every office and apartment building along the New Haven Line with declining occupancy and slowly declining property value. Towns and cities suffer reduced ability to attract jobs. These conditions behoove the FRA to quickly identify the Preferred Alternative and move the next step, Service Develop Plan, toward implementing the Universal First Step and bringing the New Haven Line to a state-of-good-repair.

Respectfully submitted on behalf of the NAIOP Connecticut and Suburban New York Chapter,

John Stoddard , Project Chairman &
Member Board of Directors
Vice President, Jones Lang LaSalle
100 First Stamford Place, Suite 201
Stamford, CT 06902
John.Stoddard@am.JLL.com
Direct 203 705 2225 Mobile 203 918 5245
www.us.joneslanglasalle.com

Jon Cohen, President &
Member Board of Directors
President, J.Forrest Development
1200 High Ridge Road, 2nd floor
Stamford, CT 06905
Jon@jforrestdevelopment.com
(203) 842-8981
www.JForrestDevelopment.com

NEC DEIS Comments - RECORD #169 DETAIL

Status : [redacted]
Record Date : 1/13/2016
First Name : Ralph
Last Name : Napolitano
Stakeholder Comments/Issues :

$260Billion now..what would the cost really be As the project goes forward.
Before undertaking such a FUTUREISTIC PROJECT , why not consider eliminating the grade crossings on the MainLine, between Queens and Divide.
No doubt this will improve the OTP and enhance the safety of vehicular traffic, that traverse over the crossings on a daily basis.
Furthermore $$$$$s should be allocated to the LIRR
to build two fly- over tracks in Jamaica, which will improve the commute time, to Brooklyn, LIC, and Manhattan bound trains.
In addition tracks along the MainLine in the Westbury Area at Nassau IV Interlocking should be extended over the Meadowbrook Parkway, and connected to existing tracks near Quinten and Roosevelt street, which would provide LIRR access to a hub where the Nassau Coliseum is located.
COMMUTERS would have the capacity to travel on the Port Jefferson or MainLine branches to the planned Nassau Hub.
This project would not require the MTA to take over any private property, as the ROW currently exist,but has been long abandoned.
A huge benefit to Long Islanders.
To build a RailRoad from Ronkonkoma to the L.I. Sound for a highspeed train, seems to be an unrealistic and extremely costly undertaking.

NEC DEIS Comments - RECORD #1334 DETAIL

Status : [redacted]

Record Date : 2/14/2016

First Name : Joann

Last Name : Narkis

Stakeholder Comments/Issues :

Find another alternative. Old Lyme should remain as it isn't: a historic treasure

NEC DEIS Comments - RECORD #2290 DETAIL

Status : Pending

Record Date : 2/15/2016

First Name : Elizabeth

Last Name : Nash

Stakeholder Comments/Issues :

I oppose Alternate 1 of the northeast Corridor proposal because it will destroy the Lyme Academy Fine Arts campus of University of New Haven

NEC DEIS Comments - RECORD #377 DETAIL

Status : [redacted]

Record Date : 1/29/2016

First Name : Laura M.

Last Name : Schaefer

Stakeholder Comments/Issues :

Nassau County Legislator Laura Schaefer would like to request a meeting with representatives of the U.S. DOT Federal Railroad Administration with regards to the "Alternative 3" proposal for a high speed rail line through Nassau County!

Please let this office know of a date and time for representatives to meet with members and staff of the Nassau County Legislature on this very important matter!

Thank you

John Hommel
Legislative Assistant to
Laura M. Schaefer
Nassau County Legislature
Theodore Roosevelt Executive and Legislative Building
1550 Franklin Avenue
Mineola, New York 11501
(516) 571-6214

[Description: Description: Description: Description: NC Color]

NEC DEIS Comments - RECORD #326 DETAIL

Status : [redacted]
Record Date : 1/27/2016
First Name : Andrew
Last Name : Nauta
Stakeholder Comments/Issues :

I am in favour of any improvement of service to and from Waterbury as it will be beneficial to this city. I note your proposal via Danbury on alternate 3, and consider it viable. However, since this will not, if accepted, be sooner than proposed, it would be advantageous to improve the present service until the alternate 3 proposal is reality. Therefore, I propose an express train be utilized between Waterbury, Bridgeport, and New York City with bus service for points between Waterbury and Bridgeport, with the latter in both directions. Presently it requires a patron 2.5 hours to and from Waterbury and Grand Central during peak hours, and running express would cut that to under two hours, in my opinion. This is still too long, but better than existing.

Andrew Nauta

[redacted]

Waterbury CT

06708

NEC DEIS Comments - RECORD #727 DETAIL

Status : [redacted]

Record Date : 2/10/2016

First Name : Maureen

Last Name : Nayowith

Stakeholder Comments/Issues :

I'd love to see rail become a viable transportation alternative for the Northeast. I'd prefer to travel that way more often if it was faster, cleaner and safer. I'd go for Option 3 - let's start moving to where other countries are in terms of rail travel.

NEC DEIS Comments - RECORD #1499 DETAIL

Status : [redacted]

Record Date : 2/14/2016

First Name : Debra

Last Name : Nazar

Stakeholder Comments/Issues :

The only rail service that should be expanded is from New Haven to Hartford and stops between. Connecticut need rail service that entices manufacturing and corporations to locate here other than in Stamford and metro NYC. If new Haven and Bridgeport and Hartford are to grow and expand , Amtrak's plans do not help. You need local cT railway service like the Shoreline east to cross and go diagonal and vertical, not owned by Amtrak, MetroNorth, NYC Port Authority - strictly CT owned and operated rather than tolls on I95. Residents in Old Lyme will have the town designated as Hostoric Preservation to fight.. Malloy has sold is out.

NEC DEIS Comments - RECORD #406 DETAIL

Status : [redacted]

Record Date : 1/30/2016

First Name : Juliette

Last Name : Nazro

Stakeholder Comments/Issues :

Do not let this project get a foot hold! Old Lyme with it's historic museums and plain beauty needs to be preserved.

NEC DEIS Comments - RECORD #1636 DETAIL

Status : [redacted]
Record Date : 2/15/2016
First Name : Lucy
Last Name : Kempf
Stakeholder Comments/Issues :

Good Afternoon,

Please see attached comment letter regarding the NEC FUTURE Draft EIS, as prepared by the staff of the National Capital Planning Commission (NCPC).

Best,

[NCPC_2010_logo]
The Federal Planning Agency for America's Capital

Matthew J. Flis, AICP-CUD, LEED-AP
Senior Urban Designer | Urban Design & Plan Review Division
Main: 202.482.7200 | Direct: 202.482.7236
401 9th Street, NW | Washington, DC 20004
matthew.flis@ncpc.gov<mailto:matthew.flis@ncpc.gov> | www.ncpc.gov<http://www.ncpc.gov/>

Attachments : 7760 NEC FUTURE Draft EIS Comments 02.12.16.pdf (157 kb)

National Capital Planning Commission 401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel: 202.482.7200 Fax: 202.482.7272 www.ncpc.gov

IN REPLY REFER TO:
NCPC FILE No. 7760

February 12, 2016

Ms. Rebecca Reyes-Alicea
Federal Railroad Administration
United States Department of Transportation
One Bowling Green, Suite 429
New York, New York 10004

Re: Tier 1 Draft Environmental Impact Statement (EIS) for NEC FUTURE Comments

Dear Ms. Reyes-Alicea:

Thank you for the opportunity to provide scoping comments on the preparation of the Environmental Impact Statement (EIS) for the Northeast Corridor Future (NEC FUTURE) project, and for working with the National Capital Planning Commission (NCPC or Commission) staff early in the process. In general, NCPC supports the study's intent to enhance inter-regional and multimodal transportation service, and to improve access to the Nation's Capital. The *Comprehensive Plan for the National Capital*, which outlines planning polices for the National Capital Region (NCR), clearly states the importance of developing and maintaining a multi-modal regional transportation network that meets the needs of residents, workers, and visitors.

NCPC's comments on the EIS are based on our role as the central planning agency for the federal government within the NCR. In general, NCPC protects national interests in the form and character of the nation's capital and its function as the seat of federal government. We are interested in planning issues associated with the design and use of federal lands, buildings, and other resources; the protection and enhancement of parks and historic resources; transportation and mobility; environmental stewardship; livability; and quality visitors' experiences to the city.

The Commission approves site development and building plans on federal lands and transfers of jurisdiction in DC. (40 U.S.C. Section 8722(b)(1) and (d)). In addition, NCPC retains advisory review over federal projects within Prince George's County, Maryland. Given our potential approval role over particular elements (i.e. landscape improvements, new structures, etc.) of the project, NCPC requests Cooperating Agency status to help us satisfy any applicable environmental and historic review responsibilities under the National Environmental Policy Act (NEPA) and National Historic Preservation Act. As the project is developed further through the Tier II process, please use the following comments to help collect the kind of information that will allow the Commission to assess impacts to the federal interest within the NCR.

Future Development / Transportation

The NEC crosses through the Washington Metropolitan Area, which is projected to experience significant employment and population growth during the next 40 years. To help ensure that the project is as compatible as possible with local, State, and federal plans within the Region, the Tier II EIS should evaluate potential impacts from the project to local/regional plans and economic conditions, both during and after construction.

It is our understanding that NEC will terminate at Union Station, which serves as a major transportation hub and historic resource for the Washington, DC region. Any impacts to Union Station should be analyzed with a relatively high level of detail as the NEPA process continues. The Tier II EIS should also evaluate potential impacts to local, regional, and Interstate transportation systems, including inter-related changes in freight movement by trucking and rail, both during and after construction. For a list of NCPC transportation studies/initiatives that may be appropriate for coordination with the NEC study, please consult the NCPC website at: www.ncpc.gov. Also, please be aware of these on-going federal, District, and Washington Metropolitan Area Transit Authority (WMATA) studies:

- Union Station Expansion Project;
- Long Bridge Study;
- DC to Richmond Southeast High Speed Rail;
- Union Station to Georgetown Transportation Improvements Environmental Assessment; and
- Momentum.

Historic and Cultural Resources

As a seat of the federal government, the National Capital Region has many nationally-significant features, views, and landmarks, including Union Station, where the NEC terminates. The physical layout of the city of Washington is historic, and Union Station holds a prominent position in the city plan. Designed by Daniel Burnham, Union Station was placed on the National Register of Historic Places in 1969, and is the central hub for rail transportation in Washington DC. Union Station is described in the McMillan Plan as "the grand gateway to the capital." Recognizing that the proposed project has the potential to affect historic properties and the character of this area, the following historic views and properties should be analyzed in the Tier II EIS:

- Impacts to contributing view sheds, such as Louisiana, Delaware, and Florida Avenues.
- Impacts to surrounding historic properties, including but not limited to, the US Capitol and Capitol Grounds, Union Station, the Russell Senate Office Building, and Federal Home Loan Bank Board Building.

Parks and Open Space

The NEC currently bisects several large parks and open spaces, including the US Department of Agriculture's National Arboretum, US Fish and Wildlife Service's Patuxent Wildlife Refuge and the National Park Service's Kenilworth Aquatic Gardens, Brentwood Maintenance Facility, Anacostia Park, and Fort Lincoln. The Tier II EIS should evaluate potential impacts from station and infrastructure design on both the historic, natural and cultural resources, and visitor experience.

Natural Resources and Sustainability

The NEC crosses several major watersheds including the Anacostia River, Patuxent River, and Western Branch. The Comprehensive Plan's Environmental Element provides policies related to water quality, tree replacement, and wildlife preservation that should be used to guide the project's future planning and design. Every effort should be made to avoid construction within the floodplain (100 and 500-year); to remove trees in excess of the number of new trees planted as mitigation; and to avoid sensitive ecological and wildlife areas along the corridor. Specifically, the following topic areas should be analyzed in the Tier II EIS in enough detail to enable NCPC to assess potential future impacts to federal property within the National Capital Region:

- Changes in vegetation and tree canopy
- Stormwater runoff and management, including both federal and local requirements
- Impervious surfaces
- Energy use
- Impacts from construction, including noise and air quality

Significant Downtown Washington, DC Federal Properties

The NEC FUTURE study should document impacts to several important federal properties that are located near the railway corridor, including the: Thurgood Marshall Federal Judiciary Building, U.S. Government Publishing Office headquarters, and the U.S. Alcohol, Tobacco, Firearms & Explosives headquarters.

Study Coordination

To ensure a full and proper analysis of the proposed project, NCPC staff requests that FRA coordinate the preparation of the EIS with the following agencies and organizations: National Park Service (NPS), General Services Administration (GSA), Commission of Fine Arts (CFA), US Courts, District of Columbia Office of Planning (DCOP), District Department of Transportation (DDOT), DC State Historic Preservation Officer (SHPO), and the Architect of the Capitol (AOC). Furthermore, NCPC staff also recommends FRA coordinate the project with other relevant projects

and planning studies, including those for Burnham Place and the Union Station Expansion Project.

NCPC staff appreciates the opportunity to participate in the scoping stage and we look forward to continued involvement in the process and the project. If you have any questions regarding our comments, please contact me at 202.482.7257 or lucy.kempf@ncpc.gov, or Michael Weil at 202.482.7253 or michael.weil@ncpc.gov.

Sincerely,

For Lucy Kempf
Director, Urban Design and Plan Review Division

cc: Peter May, National Park Service
Mina Wright, General Services Administration
Stephen Ayers, Architect of the Capitol
Christine Osei, Maryland-National Capital Park and Planning, Prince George's County
Frederick Lindstrom, US Commission of Fine Arts
Mr. Andrew Lewis, District of Columbia State Historic Preservation Office

NEC DEIS Comments - RECORD #2747 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : Keith
Last Name : Rodgerson
Stakeholder Comments/Issues :

Levelling an art school in CT when there are very few left in the region is extraordinarily short-sighted. The project needs to be oriented around retaining the educational institution and the historic structures that comprise it and sustaining both the jobs and educational opportunities the school has provided for over 50 years.

NEC DEIS Comments - RECORD #2862 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : John
Last Name : Filchak
Stakeholder Comments/Issues :

northeastern connecticut
council of governments

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ashford - brooklyn - canterbury - chaplin - eastford - hampton - killingly - plainfield
pomfret - putnam - scotland -sterling - thompson - union - voluntown - woodstock

Attached please find the Northeastern Connecticut Council of Governments comments regarding the Environmental Impact Statement (Tier 1 Draft EIS).

John Filchak
Executive Director
125 Putnam Pike (PO box 759)
Dayville, CT
p. 860-774-1288 c. 860-942-3860 f. 860-779-2056
john.filchak@neccog.org
web - neccog.org

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Attachments : NEC Future Comments.pdf (214 kb)

neccog

ashford - brooklyn - canterbury - chaplin - eastford - hampton - killingly - plainfield
pomfret - putnam - scotland - sterling - thompson - union - voluntown - woodstock

February 15, 2016

Tier 1 Draft Environmental Impact Statement Comments

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

The Northeastern Connecticut Council of Governments (NECCOG) represents a sixteen town region in northeastern Connecticut. NECCOG's member towns are Ashford, Brooklyn, Canterbury, Chaplin, Eastford, Hampton, Killingly, Plainfield, Pomfret, Putnam, Scotland, Sterling, Thompson, Union, Voluntown and Woodstock. Each municipality is represented by their respective chief-elected official. We have concerns regrading the impacts to our region in the Tier 1 Draft Environmental Impact Statement.

First, we have no issue with the stated purpose of the NEC FUTURE. We concur that we must "*improve the reliability, capacity, connectivity, performance, and resiliency of future passenger rail service.*" Our concern relate directly alternatives 2 and 3. The alternatives traverse areas of our region that are currently in a rural condition as compared to using existing rail corridors such as the New England Central or the Providence and Worcester Rail corridors.

The NECCOG region is a rural region (by Connecticut standards) with a current population of just under 96,000 persons. Geographically, the Region is large (just over ten percent of Connecticut's total area) - covering 562.8 square miles; characterized by rolling hills, forests and farms. The concentrations of population are those that developed in the 19th and 20th centuries in association with water-powered manufacturing. According to 2010 data from the University of Connecticut, Center for Land Use Education and Research, northeastern Connecticut's land cover consisted of nearly 10% "Agricultural Field", Over 71% forested land, and just 9.3% "Developed" land cover. Our unique circumstances of being a largely undeveloped rural region led Congress to establish the Quinebaug and Shetucket National Rivers Heritage Corridor - now known as the Last Green Valley. We are also home to the Route 169 National Scenic Byway (which would be traversed by Alternative 2 and Alternative 3).

We ask that NEC FUTURE strongly consider the impacts on our region before selecting an alternative to pursue. NECCOG is supportive of passenger rail improvements and would like linkages from our region to regional centers such as Worcester, Boston, New London and beyond. Our preferred approach is to use the existing active rail corridors - such as the Providence and Worcester Rail Line - which runs north-south through our region to enhance passages rail options in the future.

We thank you for this opportunity to comment. Should you want additional information, please contact:

John Filchak, NECCOG Executive Director at john.filchak@neccog.org

125 Putnam Pike, Dayville, CT 06241 p. 860-774-1253 fax 860-779-2056 web neccog.org

NEC DEIS Comments - RECORD #278 DETAIL

Status : [redacted]

Record Date : 1/25/2016

First Name : Hubert

Last Name : Nealy

Stakeholder Comments/Issues :

Please, do not forget the Virginia connection to the NEC feeding from NPN, LYH, and RVR. As preparation to dovetailing an improved NEC into the SEHSR corridor, what considerations have been made on dual-mode electric/diesel locomotives that can run the entire NPN-BOS trip without the need for a locomotive change? The locomotive change at WAS is usually :30 to :35+, and I think more consideration needs to be given to rolling stock. Also, replacement of the Baltimore and Potomac tunnels, as well as adding additional track in to and out of NYP should be a priority.

I was angered to hear that Governor Cuomo cut a deal with Madison Square Garden to keep it where it is, rather than move it, thus giving designers of a NEC rebuild an opportunity to really make station and capacity improvements.

NEC DEIS Comments - RECORD #2788 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Rob

Last Name : Padgette

Stakeholder Comments/Issues :

Please accept the attached formal comment from the NEC Commission. We would appreciate a confirmation of receipt.

Thanks
Rob

Rob Padgette
Deputy Executive Director
Northeast Corridor Infrastructure and Operations Advisory Commission
840 1st St., NE, Suite 440 | Washington, DC 20002
202-847-0287 (o) | 202-368-6444 (m)
rpadgette@nec-commission.com<mailto:rpadgette@nec-commission.com>

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Investing in the Northeast Corridor
Advancing the American Economy

February 2016

The United States Congress established the Northeast Corridor Commission (the Commission) to develop coordinated strategies for improving the Northeast's core rail network in recognition of the inherent challenges of planning, financing, and implementing major infrastructure improvements that cross multiple jurisdictions. The expectation is that by coming together to take collective responsibility for the Northeast Corridor (NEC), these disparate stakeholders will achieve a level of success that far exceeds the potential reach of any individual organization.

The Commission is governed by a board comprised of one member from each of the NEC states (Massachusetts, Rhode Island, Connecticut, New York, New Jersey, Pennsylvania, Delaware, and Maryland) and the District of Columbia; four members from Amtrak; and five members from the U.S. Department of Transportation (DOT). The Commission also includes non-voting representatives from four freight railroads, states with connecting corridors, and commuter rail operators in the Region.

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Executive Summary

This report illustrates how current and potential future levels of investment in the Northeast Corridor (NEC) could shape the economy of the Northeast region and the nation. It is not a cost-benefit analysis or a full economic impact study. Its purpose is to provide an economic context for deliberations regarding a vision for the NEC through the NEC FUTURE planning process under the leadership of the Federal Railroad Administration (FRA).[1]

Economic Engine for the Region and Nation

The NEC region is home to nearly one-fifth of the U.S. population and, with $3 trillion in annual economic output, the fifth largest economy in the world. Nearly a quarter of the country's top universities, a fifth of Fortune 500 company headquarters, and many top hospitals are located in this region which consists of just 2 percent of the nation's land area.

Economic activity depends on the efficient movement of people, goods, and ideas. Rail service along the NEC plays an essential role in this most densely populated part of the country, relieving congestion from the highway and aviation networks and unlocking access for families to higher-paying jobs and more affordable housing markets.

Over $20 billion is needed[2] – on top of typical annual investments of between $400 and $500 million – to restore existing NEC infrastructure to a state of good repair, sustain existing service levels, and thereby protect current economic productivity. Levels of investment would have to exceed those figures in the coming decades to allow the economy of the Northeast and the country to advance alongside global peers.

Protect the Economy

As rail infrastructure along the NEC ages, the system is becoming more vulnerable to service disruptions. A previous study by the Commission found that a theoretical loss of all service along the NEC for just one day would cost the economy $100 million.[3] The present study finds that the cost of actual delays – measured in lost time and productivity – combined with the extra time users build into their schedules "just in case," totals nearly $500 million every year. That figure will grow in the coming years if historic levels of capital investment persist.

However, historic low levels of capital investment have even graver consequences. Aging infrastructure on the verge of failure has the potential to suspend or severely reduce rail service. Hundreds of thousands of workers depend on these rail services to access jobs in core markets, communities with affordable housing options, or both. If infrastructure is not restored to a state of good repair, the link between workers and jobs could be disrupted, increasing household costs in the short term and impeding regional business growth in the longer term.

A complete loss of NEC service could cost the economy $100 million per day

Service disruptions already cost the economy $500 million per year

Advance the Economy

Higher than historic levels of capital investment in the NEC – such as in the build alternatives under consideration in the NEC FUTURE process – could drive economic expansion and support U.S. global competitiveness. Additional capacity, improved travel time, and new origin-destination pairs could increase the attractiveness of already-strong U.S. markets, fuel the development of centers of innovation, and grow mid-sized cities throughout the region. Global competitors are benefiting from investments that take advantage of these principles and plan to invest many billions more. Relative to gross domestic product (GDP), countries like China, Switzerland, India, Spain, and Russia spend three to 15 times the amount the U.S. does on rail infrastructure.

Economic impacts related to transportation system use are easiest to forecast. NEC FUTURE estimates that once completed, the build alternatives would provide approximately $4 billion in transportation-related benefits for users of the rail system. In addition to these direct user benefits, NEC FUTURE forecasts approximately $500 million in potential non-rail user benefits, including increased safety and reduced emissions.

The Commission's previous study focused on the benefits for users of the highway and aviation systems – such as reduced congestion, emissions, operating and fuel costs, and traffic accidents – of investments to increase NEC capacity to keep pace with travel demand growth. That study forecast approximately $8 billion in annual potential benefits.

Investments in the NEC to keep pace with travel demand growth could benefit the economy $8 billion per year by 2040 in transportation-related cost savings alone; economic development benefits could be even greater

The potential benefits of investment related to increased global competitiveness and stronger connections between markets are difficult to quantify and thus are explored qualitatively in this report.

Bolstering markets that already lead the economy – the major job centers in New York, Washington, Boston, and Philadelphia – is crucial. Particularly in New York, investment in transportation capacity may be required to ensure the viability of projected job growth.

The potential for more transformative economic gain may lie in mid-sized cities such as Baltimore, Hartford, Newark, New Haven, Providence, and Wilmington. Their economies, with anchors such as research universities and corporate headquarters, stand to benefit from more reliable and frequent service, providing faster access to the financial and human capital resources of major hubs. Investment could attract more residents and employers to these communities where lower costs of living would be paired with high-quality rail connections to the larger markets. Such investment in infrastructure would support recent economic and demographic trends and align with local economic development plans already in place.

Downtown Boston and the Charles River

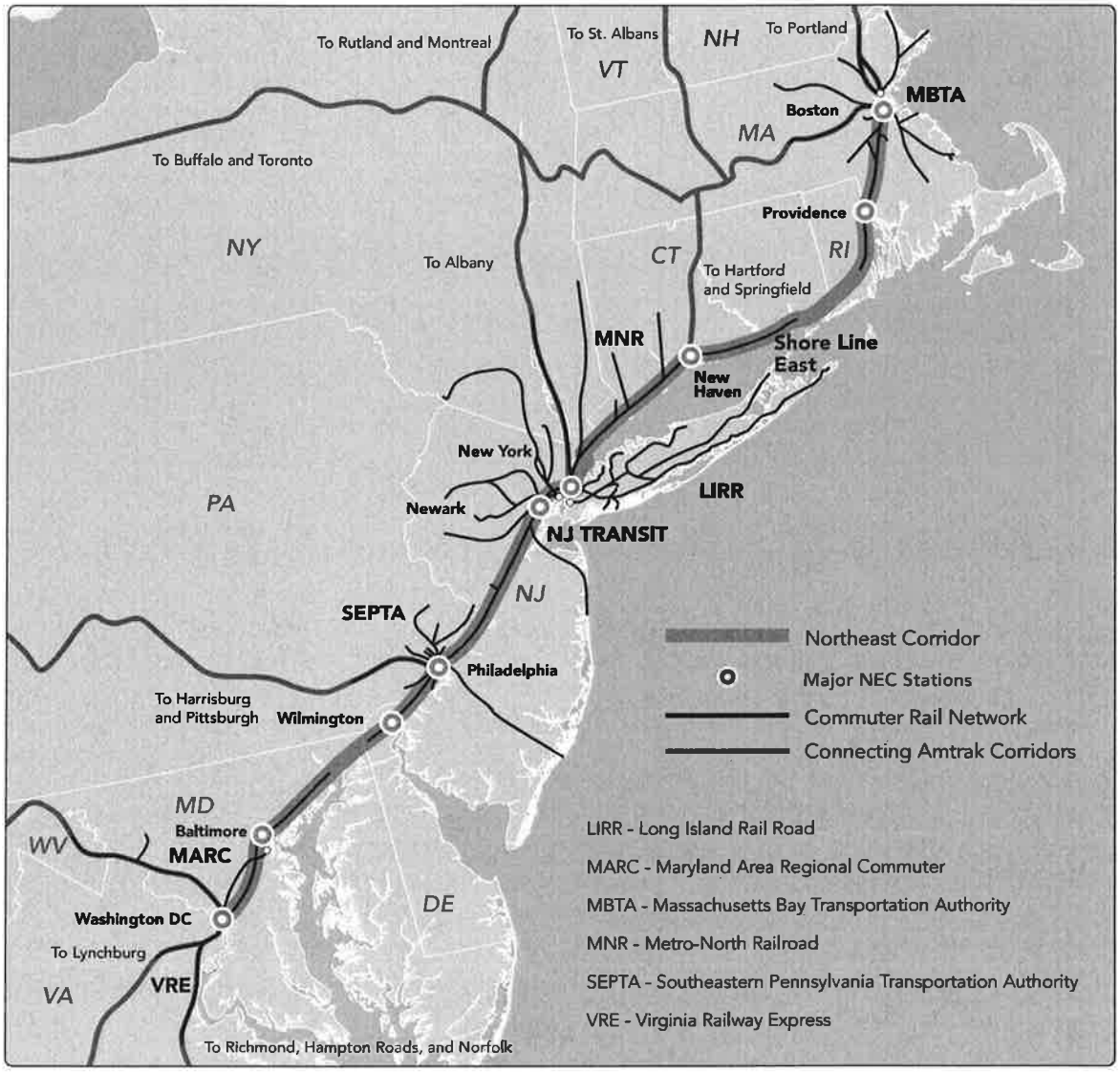
Introduction

Higher than Historic Funding Required to Protect and Advance the Economy

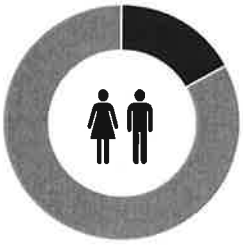
This report illustrates two ways in which higher than historic levels of capital investment in the Northeast Corridor (NEC) could impact the economy. The first increment of additional capital investment would be required to *protect* current economic productivity by sustaining existing service levels. A second increment of additional capital investment could *advance* the national economy in line with global competitors by improving access to markets.

This report builds on prior work of the Commission to outline the NEC's capital needs and critical economic role. This report is not a cost-benefit analysis nor an exhaustive economic impact study. Rather, the purpose of this report is to lay out how current and potential future levels of investment in the NEC could define the economic potential of the region and the nation. This work is intended to provide context for investment decisions framed by the NEC FUTURE planning process led by the Federal Railroad Administration (FRA).[4] This report does not evaluate the specific investment scenarios under consideration but seeks to articulate how different levels of investment relative to recent history would impact the economy. It should be noted that the "No Action Alternative" outlined in the NEC FUTURE Draft Environmental Impact Statement (EIS) itself assumes increased investment — i.e., higher than historic levels of investment are required just to maintain current operating conditions.

Northeast Corridor Rail Network



U.S. Population



Home to 17% of the U.S. Population

Source: U.S. Census Bureau, 2010

U.S. GDP

Producing 20% of U.S. GDP

Source: Bureau of Economic Analysis, 2010

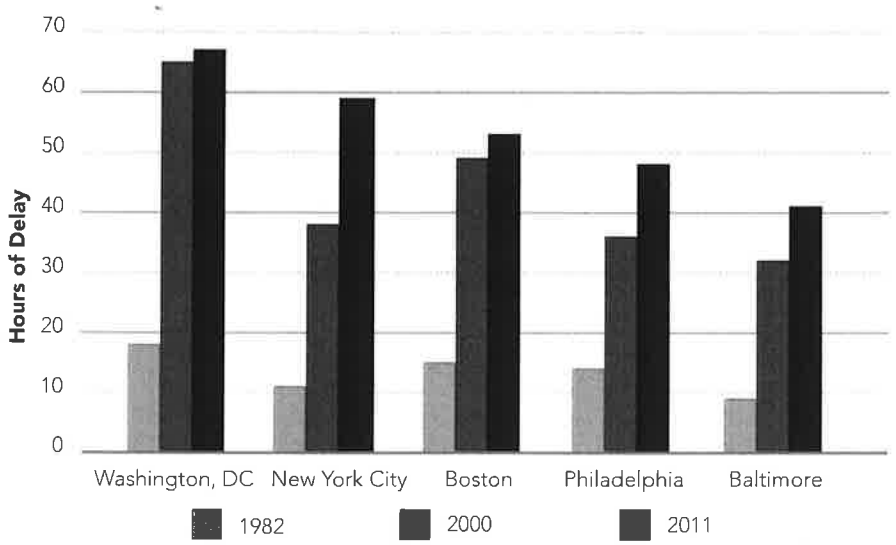
U.S. Land Area

On just 2% of U.S. Land Area

Source: U.S. Geological Survey

Traffic Attempting to Enter New York City

Annual Hours of Delay Per Auto Commuter: Select Metropolitan Areas, 1982-2011



Source: Texas Transportation Institute, 2012 Urban Mobility Report

487 Million

miles are traveled each day by drivers in the NEC region

>$1,000

cost per year for drivers due to congestion

High-Density Region with Diverse Transportation System and Unique Needs

The NEC region has a greater need for diverse transportation options than the country as a whole with 17 percent of the U.S. population on just two percent of the U.S. land area.[5] With 170 of the nation's 328 worst highway bottlenecks, rail offers millions of annual travelers a safe and reliable escape from traffic. For over a century, rail has helped shape the economy where today seven million jobs (one third of all jobs in the region) are within five miles of a rail station.[6]

Rail options for daily commuting expand both the range and quality of jobs to which workers have access, and allow companies to find and attract the right workers for their needs. Of the 1.2 million commuter rail trips per day in the region, 710,000 use a portion of the NEC. For business travel between cities in the Northeast, rail provides an important alternative to congested highways and airports. Intercity rail services on the NEC carry more travelers within the region than all airlines combined.

Rail also supports the movement of goods throughout the country, with the NEC transporting 14 million car-miles of freight each year and linking seaports with manufacturers to export goods.[7] In particular, the NEC provides a critical connection between Midwestern manufacturing plants and global markets via the Ports of Baltimore and Wilmington.

Investment Needed to Maintain and Advance Vital Economic Role

Over $20 billion is needed – on top of typical annual investments of between $400 and $500 million – to restore existing NEC infrastructure to a state-of-good-repair, sustain existing service levels, and thereby protect current economic productivity. Additional investment could advance the economy of the Northeast alongside its global peers. As the workforce shifts toward preferences for communities with more diversity in people, activities, and transportation choices, access to rail and other transit is increasingly important as regions compete for skilled workers and the businesses that chase them. Investments in higher frequency service, reduced travel times, and new travel patterns could unlock additional growth in the already powerhouse markets of New York, Boston, Philadelphia, and Washington, DC. Such investments could have an especially significant impact on business growth in mid-size cities like Baltimore, Wilmington, Newark, New Haven, Hartford, and Providence by integrating their economies with the larger hubs of activity.

Executive Summary / Chapter One Notes and Citations

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Amtrak Trains Navigating Winter Conditions

Protect the Economy

Inadequate Investment Threatens the Vitality of the Region's Economy

Merely continuing historic levels of capital investment would not only fail to address key chokepoints on the NEC, but would put existing service levels at risk. Daily commuters depend most heavily on today's NEC. One of rail's greatest advantages is superior travel time reliability compared to congested, accident-prone roadways where automobile commuters lose more than $32 billion annually in the Northeast due to delays.[8] Yet, the failure to invest in a state of good repair or expand NEC infrastructure to keep pace with growing ridership already costs the economy nearly $500 million annually in lost productivity due to train delays. That number could rise with more frequent service outages and delays without higher than historic levels of investment. That figure also does not account for a broader range of impacts related to economic competitiveness that are not easily quantified.

As the region's population grows, more workers will be commuting to jobs each day, placing a strain on the entire transportation system. For rail systems that have experienced years of under-investment and service interruptions, additional demand with no infrastructure expansion could add to delays and reduce reliability across the rail, highway, and aviation networks. At certain capacity chokepoints, the continuation of insufficient levels of capital investment could actually result in reductions in available train service. Higher levels of investment are required to protect the economy from lost productivity due to service delays, service disruptions, and insufficient capacity relative to forecasts of job and population growth in key markets.

Over 750,000 Daily Trips Depend on Fast, Reliable Service on the NEC

The great majority of the approximately 750,000 daily rail trips taken on the NEC are by commuters on the eight regional rail operations to access jobs in the four major economic centers in the region – Boston, New York, Philadelphia, and Washington. Commuter railroads link these higher-paying job centers with more affordable housing markets, as highlighted in Regional Spotlights on pages 7 and 12.

While accounting for fewer trips, intercity rail travel also plays an integral role in supporting the economy of the Northeast by carrying more travelers within the region than all airlines combined. The majority of trips taken on Amtrak's Acela and Northeast Regional trains are for business purposes, taking advantage of the NEC's convenient connections between the metropolitan economies of the Northeast.

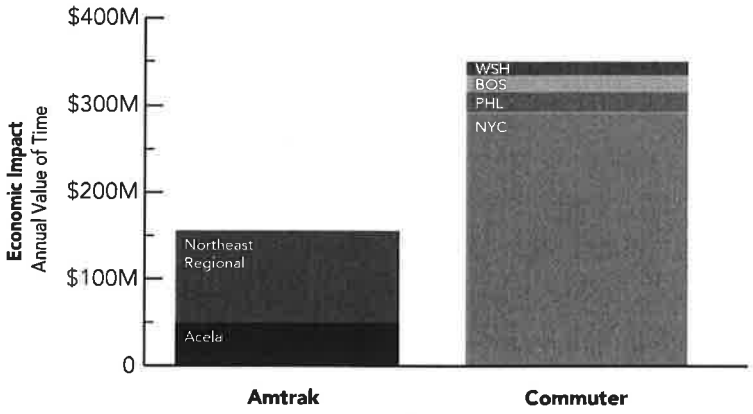
Costs of Delay are Substantial and Growing

For this study, train performance data from Amtrak and NEC commuter rail operators were reviewed and analyzed. Simply adding up the delays experienced by all passengers that currently ride on the system and placing a value on that lost time — lost time at work, missed meetings, but also lost time with family, social events, and the aggravation and stress that results from unpredictable service — comes to a $120 million annual price tag.

This understates the true cost of delays, however. About 30 percent of all delay costs on the NEC occurs in the morning peak period when people are using the railroad to get to work. Travelers build in additional buffer time in making trip plans as a hedge against significant unexpected delays.[9] On a system that operates on-time most days, passengers will build in little to no buffer and choose a train that gets them to their destination "just in time." On a system like the NEC, where delays are more frequent and unpredictable, travelers do not have that luxury. By applying a buffer time to estimate the additional economic "penalties" imposed on rail users from current patterns of trip time variability, the cost of the current delays on the NEC increases four-fold — to nearly $500 million annually.[10]

The costs presented here attempt to place a value on the day-to-day inconvenience to passengers that result from the unreliability of current service on the NEC. They do not capture the more infrequent major delays that result from an acute failure in infrastructure (e.g., bridge outage), which are discussed on page 11. They also do not account for the service constraints imposed from existing capacity limitations and the potential benefits to the broader transportation system if these constraints were relieved.

Annual Cost of Lost Time Due to Service Delay, including Planning Buffer



Data Source: NEC Commission analysis of NEC train performance data, 2015

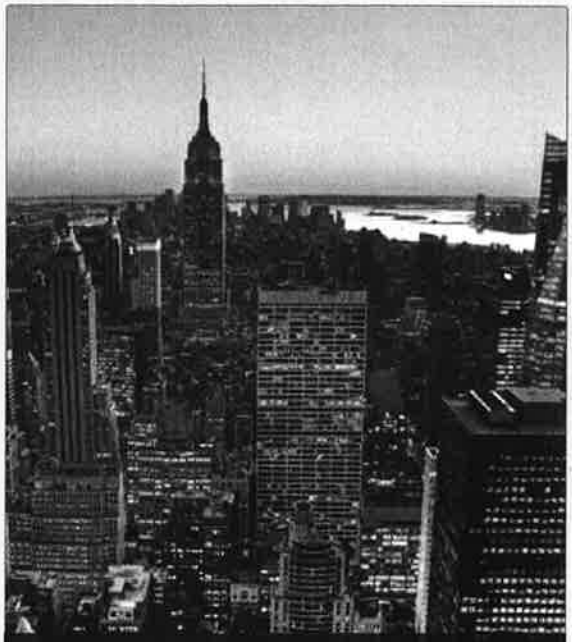
Spotlight: Trans-Hudson Rail Access

The New York metropolitan area is the clearest case where continued historic levels of investment would fail to protect our economy. The New York metropolitan area is the largest economy in the U.S., and the Manhattan core provides the regional economy with more than 2.1 million jobs, many of them in high-paying, high-growth knowledge sectors fields. These jobs are filled by workers from throughout the region, resulting in more than 1.6 million people commuting into Manhattan each day.[11] With employment exceeding pre-recession levels, average wages higher than anywhere in the nation, and greater economic diversification, Manhattan is a powerhouse employment destination for the entire metropolitan area and Northeast region.

Without higher capacity and more reliable rail service to the New York core from areas west of the Hudson, Manhattan may be unable to realize current projected growth. At the same time, those local economies west-of-Hudson that currently benefit enormously from the capacity and accessibility to New York provided by trans-Hudson rail services stand to lose in the wake of impaired rail service.

If recent trends are an indication, Manhattan's revived importance as a job generator, and the west-of-Hudson's role as labor provider, will continue and grow. Since 2004, there has been a remarkable reversal in the economic fortunes of New York City and its Manhattan core versus the rest of the region. While other parts of the region held steady or lost jobs over the last ten years, New York City has gained 550,000 jobs. That is more than six times the number of new jobs New York City gained in the previous five decades combined.[12]

The existing trans-Hudson train tunnel, completed in 1910, was already in need of investment when it suffered flooding and significant damage during Hurricane Sandy in 2012. The tunnel now faces closure for crucial repairs within the next 20 years. Without new infrastructure, rail service will be significantly reduced from current levels, pushing tens of thousands of commuters off rail and onto other parts of the already congested transportation network.



Midtown Manhattan

NJ TRANSIT passengers wait to board at Penn Station New York

Source: U.S. Census Bureau, 2009-2013 American Community Survey

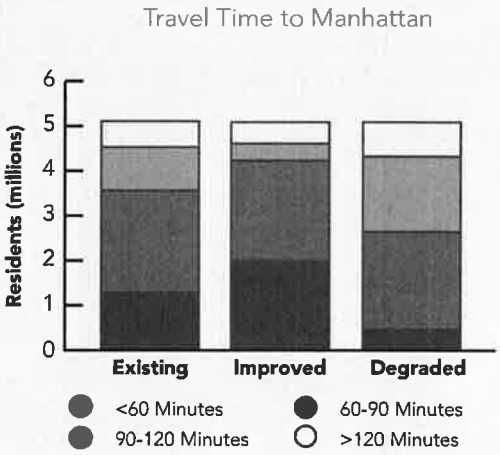
The share of Manhattan workers commuting from areas west of the Hudson is increasing, while the outer boroughs of New York City, Long Island, Connecticut, and suburban New York counties have stable or slightly declining shares of the total workforce. New Jersey, the largest portion of the west-of-Hudson area, supplied 13.6 percent of Manhattan workers in 2013, a figure up from 11.6 percent a decade earlier. The total number of Pennsylvania workers making the journey to Manhattan more than doubled over that period, from fewer than 9,000 in 2002 to 18,000 in 2013.[13]

Key factors contributing to these dynamics are Manhattan's generous supply of jobs and compensation rates 75 to 100 percent greater than adjacent communities,[14] paired with its extremely high cost of living. West-of-Hudson communities in New Jersey, New York, and Pennsylvania boast median housing prices less than half of Manhattan's.

Benefits for Manhattan Businesses and Existing and Future Commuters

Investment in a package of rail capacity improvements between Newark, New Jersey and Penn Station New York, including a new trans-Hudson tunnel, expansion of train and passenger handling capacity in or near Penn Station, and replacement of bridges, would prevent the disruption of rail service and improve access to the Manhattan labor market. Not only would this package of investments allow for higher frequency of service for existing riders, it would reduce travel time and introduce one-seat commute access via rail to Manhattan for millions of additional west-of-Hudson residents.

Newark Broad Street Station, New Jersey



West-of-Hudson to Manhattan Rail Connection

Travel Time
- <60 Minutes
- 60-90 Minutes
- 90-120 Minutes
- >120 Minutes

Connection to Manhattan
- One Seat Ride
- Requires Transfer

If additional rail investments are realized, including a new rail tunnel and Secaucus Loop, the number of people with access to one-seat, direct rail service to Manhattan could more than double from 2.4 million to all 5.1 million residents living near NJ TRANSIT stations.

Forecasts of strong growth in Manhattan's economy could mean 195,000 to 420,000 new jobs by 2030. Recent commuting trends indicate that 31,000 to 72,000 additional workers could be looking to cross the Hudson every rush hour to fill these positions, a 10-20 percent increase from current levels.[15] Given the relative saturation of capacity by car, bus, and PATH, commuter rail services offer a compelling opportunity to accommodate growth in west-of-Hudson commuting and enable Manhattan firms to efficiently meet future labor needs.

Today, more than 300,000 commuters cross the Hudson River each day. By 2030, recent trends indicate that number could increase by up to 72,000 new commuters.

Benefits for West-of-Hudson Communities

Manhattan would not be the only economy to benefit from improved access to workers. There are several key ways that communities west-of-Hudson would benefit economically:

- **Real estate value.** When the Access to the Region's Core (ARC) project was under review, the Regional Plan Association (RPA) analyzed the impact on housing values of direct-to-Manhattan service along the Morris and Essex Lines afforded by the Midtown Direct, Montclair Connection, and Secaucus Transfer improvements.[16] Using a large statistical sample, RPA researchers found that it raised the average home sale value by two to seven percent, depending on distance from the station. Assuming consistency with the RPA findings, enabling one-seat-ride service from Glen Rock, New Jersey, for instance, could raise the median home price (about $630,000 presently) by about $40,000 for homes within one mile of the Glen Rock station.

- **Personal income.** Access to Manhattan jobs results in significant wealth brought back to commuters' home communities. With an estimated 300,000 workers from the west-of-Hudson region holding jobs in Manhattan,[17] and with Manhattan's average salary 75-100 percent greater than average salaries in home areas,[18] trans-Hudson commuting supports approximately $35 billion in annual wealth brought back to New Jersey, Pennsylvania, and suburban New York counties. Approximately $5.5 billion of that total is attributable to the 50,000 trans-Hudson NEC commuters today.[19]

- **Reverse commuting and revitalization of west-of-Hudson urban centers.** Trans-Hudson commuting has a strong impact on the labor force of the communities outside of Manhattan as well. Statewide, "reverse" commuting from New York City to New Jersey has risen by 12 percent between 2002 and 2013, even amid flat job growth overall in the State. In city centers like Newark and New Brunswick, where a nationwide trend of companies relocating to transit-friendly locations can be seen, commuting from New York City has increased by more than 11 and 42 percent, respectively.[20]

  In Newark, this trend is exemplified by Panasonic. Before the company moved its North American headquarters from a sprawling suburban campus to Newark's center in 2013, transit commuting accounted for four percent of employees. Since moving to a new building just one block from Newark Penn Station, the share of employees using transit has skyrocketed to 57 percent, with the company shooting for an eventual goal of 75 percent.[21]

Reverse Commuting Trends

	NJ Statewide	Newark, NJ	New Brunswick, NJ
Percent of Workers Commuting from New York City, 2013	3.2%	4.8%	2.0%
Percent Growth 2002-2013	12.1%	11.4%	42.4%

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics.

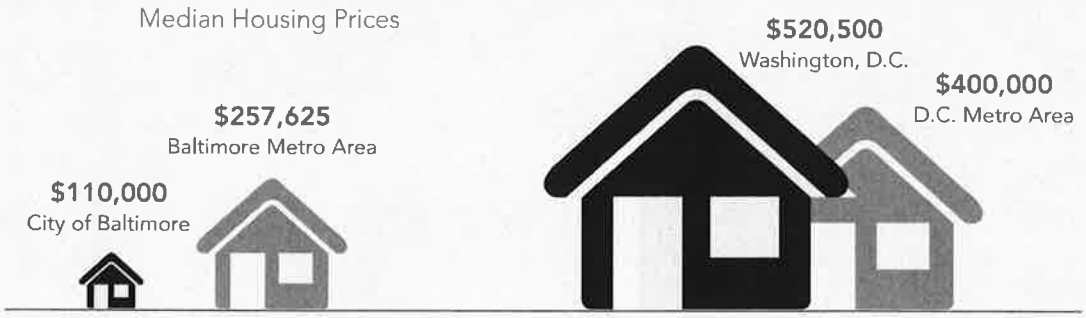
Baltimore Penn Station

Spotlight: Economic Revitalization of Baltimore

Higher than historic levels of investment in the Northeast Corridor could protect and support the ongoing redevelopment as well as future growth of the City of Baltimore and surrounding communities. Located 38 miles from each other, the Baltimore and Washington metropolitan areas share residents, jobs, and cultural destinations, making the two cities economically interdependent. Washington is decidedly the stronger of the two economies, but investments in the NEC offer benefits to both regions.

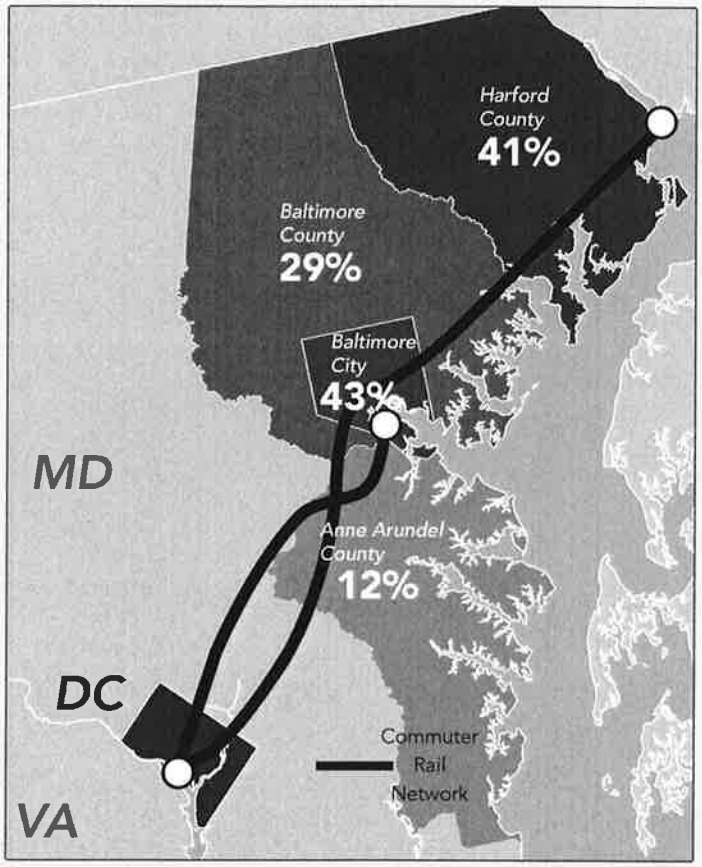
There are 2.7 million jobs located in the Washington, D.C. metropolitan area, 7.4 percent of which are filled by residents of the Baltimore metropolitan area.[22] Washington, D.C. jobs offers a higher average salary than in the City of Baltimore, $85,877 versus $59,944 in 2014.[23] The average salary of a MARC commuter is $100,373, which reflects a long-standing national trend of long commuting distances correlated with higher income jobs.[24] The District also offers a larger overall job market, with 783,500 jobs, compared with 323,148 in the City of Baltimore.

The NEC increases labor access to the job market in Washington while also providing opportunities for employees working in D.C. to reside in the lower cost Baltimore-area housing market. The median home sale in the District in 2015 was $520,500, whereas the median home sale in the City of Baltimore is only $110,000.[25] The housing market in the D.C. metro area outpaces the Baltimore metro area as well. The rental market in Washington is similarly difficult to afford, with approximately 36 percent of renters paying more than $1,500 per month and 18 percent paying $2,000 or more per month.[26] In comparison, 12 percent of renters in the City of Baltimore pay $1,500 or more per month and only 3 percent pay $2,000 or more per month.



Source: U.S. Census Bureau, 2009-2013 American Community Survey

Rail Mode Share for Trips to D.C.



A Core Service for Baltimore and Maryland

Just over 43 percent of residents of the City of Baltimore that work in the Washington, D.C. metro area travel via the NEC.[27] At just under an hour, the trip is approximately as long as driving but with vastly superior reliability. These residents benefit the Baltimore economy by increasing income spent in the City, stimulating residential development, increasing residential property values, and raising local tax revenue. Without access to jobs in Washington, D.C. via an efficient rail commute, many of these residents might choose to leave the City of Baltimore or to settle for lower-paying jobs closer to home.

A Critical Connection at Risk and Benefits of Investment

The Baltimore and Potomac (B&P) Tunnel opened in 1873 and is in dire need of replacement. While safely in operation today, the tunnel undergoes frequent inspections and could be called out of service at any time. If the tunnel is deemed unsafe to continue operation, all train service between Baltimore Penn Station and West Baltimore would be suspended, affecting the busiest portions of the MARC Penn Line as well as Amtrak service north out of Washington.

The 19,250 passengers who commute daily via MARC into Washington, D.C. on the Penn Line would be most immediately affected. Approximately 20 percent of current Penn Line riders might be able to switch to the Camden Line before it also reaches capacity. The net increase in travel time, however, would be 22 minutes per person, which is a 34 percent increase in travel time.[28] Assuming the remaining displaced passengers shift to driving alone, commuter buses or telework, the net increase in travel time would be approximately 9,000 hours lost per day, or more than $110 million per year lost when monetized by the average salary of a MARC commuter. This ignores many other costs such as increased automobile congestion and additional costs imposed on the aviation network as Amtrak passengers are diverted to air travel.

Investment in a replacement tunnel offers the opportunity to accommodate the 48,000 daily passengers between Baltimore and Washington projected for 2040,[29] more than double the current ridership. With an average annual income of $100,373, the additional capacity could bring $2.9 billion in employee wages into the Baltimore region, and an estimated $650 million in wages to the City of Baltimore itself.[30]

Costs Imposed on Rail Operators

Beyond the costs incurred from extra passenger travel time, rail operators also must pay for the additional operation time beyond scheduled hours. This includes labor costs for crew, standby equipment, and other operational strategies. Considering the additional crew costs alone, average delays for Amtrak and commuter trains are estimated to cost an extra $24 million annually in operating expenses.

Costs Imposed by Extreme Events

In addition to the systemic delays on the Corridor discussed on page 6, extreme events can result in more acute costs to rail passengers and the transportation system. A previous study by the NEC Commission found that a single day without rail service could cost the economy up to $100 million in impacts to transportation system users, to the environment, and through lost productivity. Though this value is useful to conceptualize the integral role the NEC plays in the economy of the Northeast and the economic loss the region would suffer without it, an NEC-wide loss of rail service is unlikely.

More frequent are events that cause extreme disruptions at specific locations and are beyond the buffer time for which passengers plan. These events might be caused by weather, power supply failures, or aging movable bridges stuck in the "open" position, effectively severing rail service on the NEC for an extended period. The fragility and vulnerability of NEC infrastructure was made clear during Superstorm Sandy in 2012. Another example, in the fall of 2013, Connecticut's New Haven Line suffered a nearly two-week-long power outage limiting service for over 60,000 riders a day with an estimated economic impact of over $60 million.[31] Such periodic economic productivity losses from extreme events must be added on top of the average impacts estimated at nearly $500 million annually.

Tie Replacement on the Northeast Corridor

Baltimore and Potomac (B&P) Tunnel

Sum of Costs is Greater than its Parts

While the combination of costs described in this chapter are significant, they do not tell the complete story. If average delays increase and very long delays become more common and more extreme, the long-term risks to the regional economy would increase as well. Costs would cut into household income and the productivity of firms, eroding wealth in the region. Moreover, these costs might ultimately cause some households and businesses to rethink their decisions to locate in the Northeast or the U.S.

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Downtown Newark, New Jersey

Advance the Economy

Higher Levels of Investment Offer Opportunities for Growth

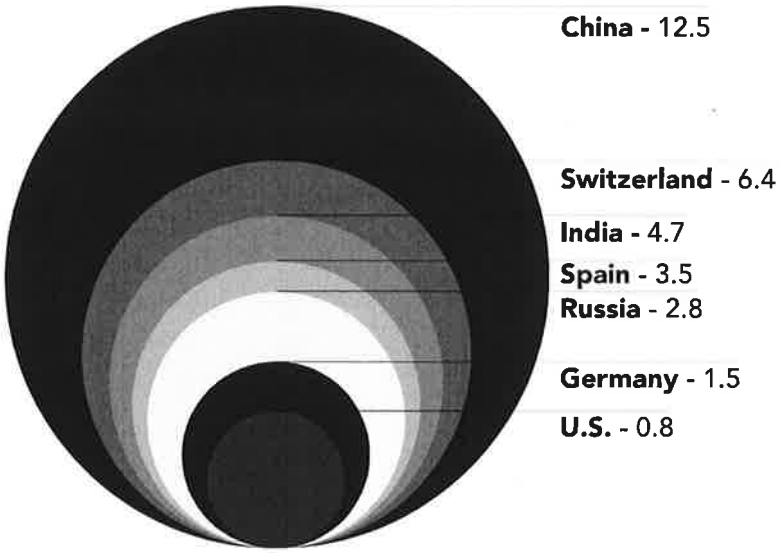
Higher than historic levels of capital investment in the Northeast Corridor would offer an opportunity to drive economic expansion and support U.S. economic competitiveness into the future. At the very least, higher levels of investment in additional rail capacity could limit future strain on the broader transportation system and reduce overall transportation-related economic costs. Improved travel time and new origin-destination pairs could solidify the attractiveness of existing strong markets on a global scale, fuel the development of centers of innovation, and grow mid-sized cities throughout the region. Such investments in infrastructure would align with recent trends and local economic development plans already in place. Additionally, investments that benefit freight rail could shape the competitiveness of East Coast ports and manufacturers across a broad swath of the country.

For decades, peer economies abroad have been investing in railroad infrastructure as a means of shaping and sparking economic growth. As detailed in the previous chapter, thriving job markets benefit from railroad investments through dependable access to labor. High-performing railroads serve another important function by spreading the economic success of one core market to others across a wider geography. Global competitors have benefited from investments that take advantage of this principle and are planning to invest many billions more.

Investments to Reduce Transportation-Related Costs

The economic impacts of higher levels of NEC investment related to transportation system use are easiest to forecast and quantify. NEC FUTURE estimates the capacity provided and ridership generated by the build alternatives would result in approximately $4 billion in annual transportation-related benefits for users of the rail system, once built. In addition to these direct user benefits, NEC FUTURE forecasts approximately $500 million in potential non-rail user benefits, including increased safety and reduced emissions.

National Investment in Rail Infrastructure, 2008
Dollars per $1,000 of GDP



Source: SCI Verkehr - Worldwide Railway Funding and Investment Budgets 2009

A previous study by the NEC Commission[32] focused on the potential benefits for users of the highway and aviation systems of increasing NEC capacity to keep pace with travel demand growth. Such benefits included reduced congestion, emissions, operating and fuel costs, and traffic accidents. That study forecasted approximately $8 billion in annual potential benefits.

These figures do not capture the full economic impact, but they demonstrate the potential for return on investment. Forecasts of economic benefits related to increased global competitiveness and stronger connections between markets are more difficult to quantify. Examples of these benefits, including evidence from abroad, are explored in the subsequent sections.

Investments to Improve Commuter Service

The benefits of higher investment levels to improve commuter rail service go far beyond reduced highway congestion and transportation-related costs. Governments around the world have invested in large-scale rail projects to connect workers to jobs in major metropolitan areas, especially in regions with multiple activity centers and employment nodes such as those in the Northeast.

From 1970-2000, France undertook a concerted effort to improve and expand the existing regional rail network in Paris, known as the Regional Express Rail (RER). During this period, the Paris metropolitan region grew both in terms of population and geographic spread. Investments in the RER improved existing service and increased access to jobs centers in new areas of the region, facilitating enchanced regional economic growth. The number of jobs in outlying cities with station access grew by 12.8 percent over what would have occurred without the RER.[33]

Spotlight: Centers of Innovation

The knowledge sector that drives much growth for the U.S. in the modern global economy may rely on intellectual capabilities over physical inputs. However, the activity underpinning today's economy remains highly dependent on physical location, proximity, and accessibility. That is why economic growth is increasingly taking place in what many are calling "innovation districts." Transit, including commuter rail, is a key asset to these emerging clusters. Rather than the auto-centric suburban developments of previous decades, today's creative, scientific, and technology workers favor denser, more walkable environments accessible via transit.

High-performing transit, though imporant, is not by itself enough to create an innovation district. Fortunately, the Northeast possesses many other assets, including research institutions, an educated and skilled workforce, and established firms in innovation industries, that contribute to a successful innovation district. Furthermore, local governments, industry groups, and anchor institutions in the Northeast are already enjoying success attracting businesses and workers and are planning their futures around this model.

Innovation District, Boston

The City of Boston's Innovation District, an initiative to revitalize 1,000 acres of land on the South Boston waterfront, is located near Boston's South Station. The Boston Innovation District launched in 2010 to create a new community that attracts and supports innovative and entrepreneurial companies, building off of access to the myriad university and institutional partners such as Harvard University, the Massachusetts Institute of Technology, and others, located in Boston and nearby Cambridge.

Since that time, the area has added more than 5,000 new jobs in over 200 companies. The companies locating in the Innovation District are diverse: technology firms provide 30 percent of new jobs; firms in creative industries (e.g., design, advertising) provide 21 percent of new jobs; while life science and green technology firms provide 16 percent. Firms locating in the Innovation District also vary by size, with a quarter of firms having fewer than 10 employees and 40 percent of firms sharing space with others in co-working spaces or incubators. Companies that have announced moves to the Innovation District will bring another 4,000 jobs to the area.[34]

Drexel University Innovation Neighborhood, Philadelphia

Drexel University is developing a 12-acre Innovation Neighborhood that can accommodate 6.4 million square feet of development directly adjacent to Philadelphia's 30th Street Station.[35] The Innovation Neighborhood will feature space for Drexel University's teaching and research activities, private firms that collaborate with Drexel to bring research to market, and public space designed to foster interaction and serve as a gateway to University City from 30th Street Station. Located in proximity to the Innovation Neighborhood are Drexel's ExCITe Center incubator space and the University City Science Center research park (two existing examples of university/industry synergy), as well as the Cira Centre office tower, which has a direct connection to 30th Street Station. Drexel University estimates that 9,500 new jobs directly related to the Innovation Neighborhood will be generated by the development.[36]

Renderings of Drexel's Innovation Neighborhood

20 percent

of U.S. patents since 2000 were granted in the NEC Region, more than Silicon Valley

6 of the 10

top-ranked U.S. universities are located along the NEC

10 of the 28

top U.S. adult and children's hospitals are located along the NEC

Taking advantage of the accessibility provided by Amtrak and SEPTA Regional Rail at 30th Street Station is at the center of Drexel's vision for the Innovation Neighborhood. In an Op-Ed in the Philadelphia Inquirer, "Philadelphia's 30th Street Can Be More Than a Train Station," Drexel's President John A. Fry wrote that the Northeast Corridor service provided by Amtrak "can produce considerable returns with reasonable investments" and that its "potential extends well beyond expanded transportation infrastructure. It can significantly affect long-term economic growth through commercial, residential, and retail development." He went on to say that "we are witnessing a revival of transportation-oriented development to meet new demand. In this new era, urban rail stations can once again be centerpieces not only of travel, but also of commerce and learning."[37]

In the time since the Innovation District concept was announced, Drexel has seen the concept repeatedly validated by market interest. In November 2015 the university announced the opening of a new medical device accelerator in the Innovation Neighborhood, PHL Next Stage Medical, which will provide a shared, supportive work environment for early stage and established medical device manufactures, as well as life sciences talent and capital firm Militia Hill Ventures. The PHL Next Stage Medical accelerator, the first announced resident of the Innovation Neighborhood, will occupy approximately 20,000 square feet in a building directly adjacent to 30th Street Station. Access to 30th Street Station was a key factor in the location of PHL Next Stage Medical in Innovation Neighborhood.

The Innovation Neighborhood lies within Philadelphia's greater University City neighborhood, which encompasses Drexel University and the University of Pennsylvania, that is the center of the city's 'Meds and Eds' economy. University City, driven by the synergy of university and hospital research and commercial partners, has grown significantly within the past decade, recently reaching a milestone of 75,000 jobs. Middle to high-wage positions grew by 79 percent between 2008 and 2013, at a time when the rest of Philadelphia experienced much slower job growth. Today, University City has a 97 percent office occupancy rate, 79,000 square feet of retail space under development, and 1,420 recently completed or under construction residential units.[38]

University of Delaware STAR Campus, Newark, DE

The NEC is facilitating the creation of innovation districts not only in major metropolitan centers but also in smaller mid-sized cities throughout the corridor. The University of Delaware, for instance, is seeking to capitalize on its proximity to the NEC to catalyze regional economic development through partnerships between Delaware's flagship university and the private sector. Its new Science Technology and Advanced Research (STAR) Campus is being built on a 272-acre site directly adjacent to the Newark, Delaware Amtrak and SEPTA regional rail station. The master plan for the campus includes a new transit center that will enhance access between the station, the STAR campus, and the existing campus, located one mile away. Committed STAR campus partners include Thomas Jefferson University Hospital, near the NEC in Philadelphia, and the U.S. Army's Aberdeen Proving Ground in Maryland. The University considers rail service a critical part of its strategy to attract corporate partners based in Baltimore, Philadelphia, and elsewhere.[39]

Crossrail Station - London

In London, a new regional rail connector, Crossrail, is currently under construction to link the city center with suburban job and activity centers. At £14.8 billion (approximately $21.9 billion based on current exchange rates), it is one of the largest investments in transportation infrastructure in the world today. In addition to improving the region's gridlocked traffic, the project is expected to have a significant positive impact on London's regional economy by connecting, for the first time, all of the region's main employment centers. Crossrail is projected to add 181,000 jobs to the regional economy, while increasing commercial and residential property values in central London by 10 percent and 25 percent, respectively.[40]

In Toronto, transportation officials are reevaluating the role of their regional rail network in fostering economic growth in the greater metropolitan area. Rather than focus on peak-period only service, Toronto has taken steps to increase off-peak service, leading to a 30 percent increase in ridership.[41] The City plans to expand bi-directional all-day service to the burgeoning technology and start-up corridor between the cities of Toronto and Waterloo. They estimate that the enhanced service will generate 40,000 jobs and $567 million in annual personal income tax revenues.[42] By expanding all-day commuter rail service, Toronto recognizes that contemporary metropolitan economies are regional in nature and have multiple economic nodes, including those outside the urban core.

Investments to Improve Intercity Service

Higher investment levels to improve intercity service offer benefits that include solidifing the attractiveness of existing strong markets on a global scale as well as expanding the reach of those strong markets to support the economies of smaller cities in the Northeast. Examples from abroad provide some key insights on the potential economic impact of intercity rail improvements on regional economies.

Across Japan, the country's high-speed rail network, known as the Shinkansen, has had a broad impact on the regional and local economies where stations have been located. These areas have achieved higher population and employment growth rates relative to other parts of the country.[43]

One city that capitalized on the introduction of Shinkansen service is Saku City. Sakudaira Station, located just outside the City's downtown and 100 miles from Tokyo, opened in 1997. The City actively sought to facilitate development of the station area by developing an integrated land use plan. Saku City sponsored development of the station building, and rezoned the land near the station for retail, commercial, and residential uses. The opening of Sakudaira Station has been credited with increasing the City's population by eight percent in the 15 years following the station's opening. Tax revenue generated in the station area rose from ¥4.35M in 1996, the year before opening, to ¥535.59M in 2012, a 123-fold increase.[44] Between 1987 and 2001, across Nagano Prefecture, population growth in cities with Shinkansen access was six percent, versus just two percent for cities lacking a Shinkansen station.[45]

In Germany, the Neubaustrecke Köln-Rhein high-speed rail line opened in 2002, connecting the major metropolitan regions of Cologne and Frankfurt. Two small towns, Montabaur and Limburg, with populations of 12,500 and 34,000, respectively, have stations on this line. Following the opening, the economic output of these two towns grew by 2.7 percent more than the surrounding area, as residents gained access to jobs in both Cologne and Frankfurt, and conversely, firms gained access to inexpensive real estate in both Montabaur and Limburg.[46] Researchers determined that every one percent increase in market access (as defined by GDP weighted by travel time) resulted in 0.3 percent GDP growth.

In both cases, successful local economic development efforts had at their foundation significant rail infrastructure investment on behalf of regional and national governments. These investments either reduced the travel time between cities or created new connections between cities where they did not previously exist. Such efforts can unlock growth, especially in smaller markets, where both potential residents and employers can take advantage of lower real estate costs.

Sakudaira Station.
Saku City, Japan.

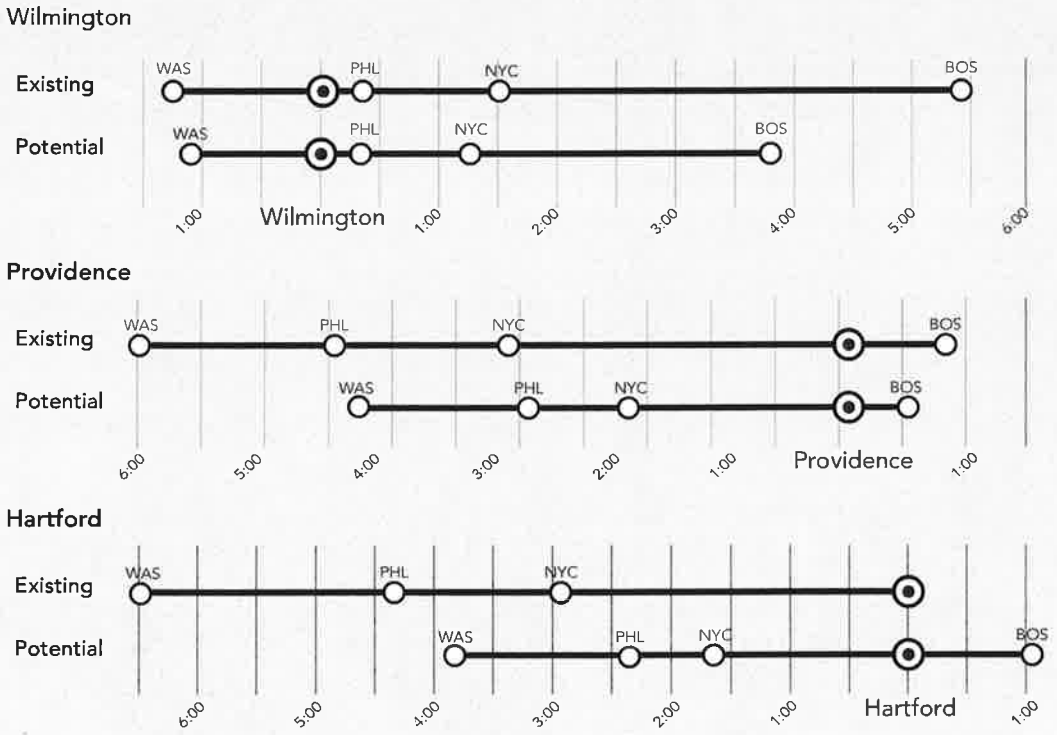
Spotlight: Mid-Sized Markets

Rail service is a vital link for mid-sized cities throughout the Northeast – connecting them with the capital, talent, and business opportunities in larger metropolitan centers. Mid-sized cities also provide less expensive locations for business operations of major firms. Cities such as Wilmington, New Haven, and Providence have benefited from their mainline location through connections to the major metropolitan economies and cities throughout the corridor. Other cities, such as Hartford, not on the NEC mainline, have the potential to benefit with higher levels of investment.

Today, infrequent service and lengthy travel times place limits on the potential growth mid-size cities might realize in terms population and jobs. With higher levels of investment in improved service, such cities would be able to better retain and attract workers commuting to nearby major metropolitan areas and firms that depend on periodic access to them. Service improvements in consideration through the NEC FUTURE process would dramatically decrease the travel time from mid-sized cities such as Wilmington, Providence, and Hartford to the larger strong markets in New York, Boston, and Washington.

For business travel, service improvements translate into direct economic gains. U.S. Travel Association research has found that 42 percent of business travelers believe that without face-to-face meetings they would lose customers, and that potential customers are nearly twice as likely to become customers following a face-to-face meeting. For every dollar spent on business travel, U.S. firms generate $9.50 in additional revenue.[47] Using today's intercity fares as a conservative baseline along with projected ridership increases and travel-time improvements shown below, a total of $1.4 billion in additional revenue would be generated by business travel to and from Wilmington, Hartford, and Providence alone.

Travel Times to Major Cities Along the NEC



Wilmington, Delaware

Wilmington, Delaware has capitalized on its easy access to the nation's financial center in New York City and its regulatory center in Washington, D.C. to build a robust financial services center. Supported by the Financial Center Development Act in 1981, the State of Delaware is now home to 2,000 financial services firms employing more than 36,600 people. Companies with significant operations in the State include Barclays, Capital One, Deutsche Bank, Wells Fargo, BNY Mellon, Bank of America and JPMorgan Chase.[48] Many of these firms are located within walking distance of Wilmington's Amtrak Station and rely on convenient access to firm headquarters and offices in New York City.

Providence, Rhode Island

Providence, Rhode Island, historically a manufacturing-based economy, is today transitioning to an economy based on innovation, tourism, and creative industries. The Providence metropolitan area experienced a sharp decline in employment following the recession that began in 2008, falling from 584,000 employed in the region in December 2004 to a low of 537,200 in December 2009, and recovering to 570,200 by December 2014. The types of jobs that have grown in the region post-recession have been primarily in the professional and business services and tourism sectors.[49] The NEC is providing Providence firms and workers with access to the highly-educated greater Boston area workforce and partners, customers, and capital in Boston and New York.

Wilmington, DE Station

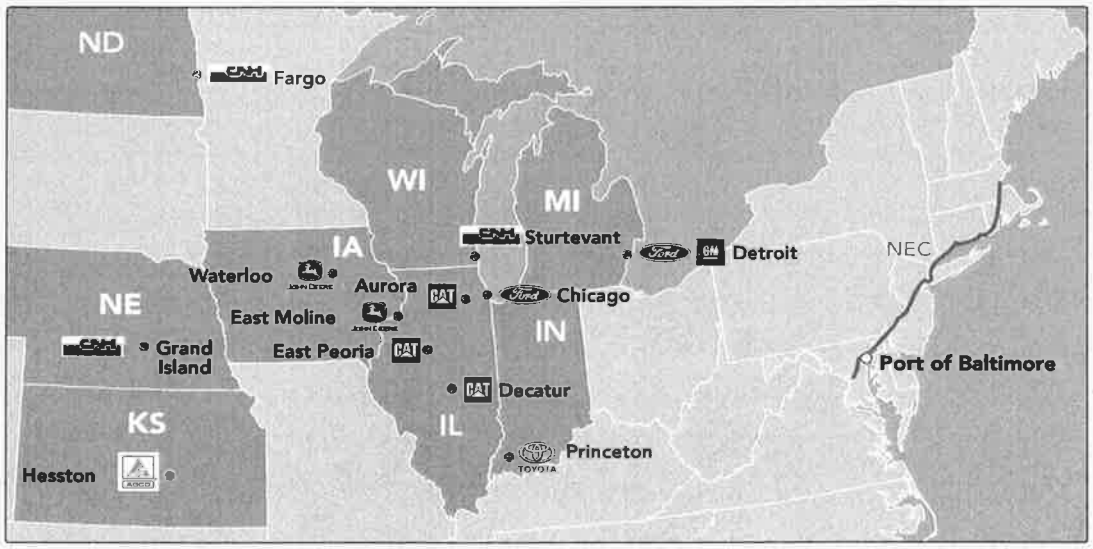
Cargo Being Loaded at the Port of Baltimore

Spotlight: Port of Baltimore and the Nation's Economy

The Port of Baltimore, ninth in the nation among all ports by the value of cargo processed and thirteenth by cargo weight, is a crucial economic asset. The nation's top seaport for handling "roll on/roll off" cargo, automobiles, light trucks, construction equipment, and farm equipment in 2014, the Port of Baltimore handled nearly 29.5 million tons of international cargo worth nearly $53 billion, setting a record for the Port.[50] The Port of Baltimore has transitioned over the past decade from predominately importing foreign cargo (just 21 percent of cargo by weight in 2003 were exports) to one that is a major exporter of American -made goods and commodities, with 53 percent of all cargo by weight being exports in 2013.[51]

The manufacturers of cargo exported from the Port of Baltimore are located across the Midwest in places such as Detroit, Michigan (Ford Motor Company and GM), Waterloo, Iowa (John Deere) and Hesston, Kansas (Agco).[52] The economic viability of

Midwest Communities and Firms that Depend on NEC Access to the Port of Baltimore



these manufacturing plants is directly influenced by access to the Port of Baltimore. Additionally, the port itself is a major component of the Baltimore regional economy, providing 33,920 jobs in the state of Maryland and $2.9 billion in personal income. An additional 93,700 jobs in Maryland are directly related to activities at the Port, such as manufacturers, distributors, and automobile dealers.[53]

Demand for freight rail access to the Port via the NEC exceeds capacity, with the maximum number of trains on the schedule currently. Any delay or issue related to the NEC, such as the need for maintenance, causes expensive delays for shippers.[54] In the era of just-in-time manufacturing, the time to market for goods is intricately planned. Goods leave factories so that they will make vessel calls at the port with minimum time stored at the port; vessel calls are infrequent so if a shipment misses its vessel it may be waiting for weeks for the next vessel at a very high cost.

The Port handles cargo that is not easily transported via truck, such as construction and farm equipment. Rail is often the most practical and economical way to ship these goods for export to foreign markets. Though automobiles can be transported by truck, one automobile manufacturer estimated that if it were unable to use the NEC to access the Port, the result would be an additional $150 to $200 in per vehicle freight costs to ship vehicles via a car carrier.[55]

Farm equipment manufactured in the Midwest at the Port of Baltimore for export

Potential Future Conditions at the Port of Baltimore

Ensuring reliable access and capacity for freight rail to reach the Port is crucial. Investments to enhance freight rail access could play a key role in the Port's competitiveness as well as the competitiveness of firms that rely on it.

- **Time to Market.** Increasing the capacity of the NEC to carry freight traffic could decrease time to market. Even a day's reduction in travel time can make a big difference for a manufacturers' bottom line.[56]
- **Improved Reliability.** Manufacturers calculate production in terms of units per day, including the time it takes to travel on rail to port, literally down to the minute. One manufacturer, Case New Holland (CNH), typically plans for their equipment to arrive one week in advance of their shipping date – creating a "hedge" or "buffer" to accommodate rail-related delays. Today, it takes 17 to 22 days to get CNH's product to the Port of Baltimore via rail. Investments that reduced the buffer time could be transformative – driving improved cash flow and the opportunity to reinvest in manufacturing plants. Today, CNH exports $3 billion worth of farm equipment annually.[57]
- **Greater Volumes.** With additional capacity on the NEC, shipping rates could fall, making it more attractive for firms to expand manufacturing plants in the United States rather than abroad.[58]
- **New Types of Cargo.** Currently, the NEC cannot accommodate double-stacked container traffic. While the Port of Baltimore is prepared to handle the larger Post-Panama Canal expansion container vessels, infrastructure investments would be required on the NEC to move double-stack containers for shipment to and from the Midwest.

Investments for Economic Growth

Over $20 billion is needed – on top of typical annual investments of between $400 and $500 million – to restore existing NEC infrastructure to a state of good repair, sustain existing service levels, and thereby protect current economic productivity. Levels of investment would have to exceed those figures in the coming decades to allow the economy of the Northeast and the country to advance alongside global peers.

This report illustrates two ways in which higher than historic levels of capital investment in the NEC could impact the economy. The first increment of additional capital investment would be required to *protect* current economic productivity by sustaining existing service levels. A second increment of additional capital investment could *advance* the national economy in line with global competitors by improving access to markets.

This work is intended to provide context for investment decisions framed by the NEC FUTURE planning process led by FRA. The "No Action Alternative" outlined in the NEC FUTURE DEIS itself assumes increased investment — i.e., higher than historic levels of investment are required just to maintain current operating conditions. This alternative was developed because the National Environmental Policy Act (NEPA) requires a baseline against which to compare alternatives. But even the additional increment of capital investment required to achieve a baseline of maintaining current service is unlikely to reduce the nearly $500 million per year this study estimates that NEC users suffer in lost productivity due to poor infrastructure condition, congestion, and other factors. The future impact on users of the highway and aviation networks is likely to be even greater. Failure of NEC service to keep pace with population and travel demand growth in the future could cost those travelers up to $8 billion per year in congestion and other transportation-related costs.

Economic impacts related to transportation system use are relatively easy to forecast. But those figures only measure part of the potential economic benefit of infrastructure investment. Higher levels of capital investment in the NEC – such as in the build alternatives under consideration in the NEC FUTURE process – could drive economic expansion and support global competitiveness. Additional capacity, improved travel time, and new origin-destination pairs could ensure the viability of projected growth in major markets, spark growth in mid-sized markets, and put the U.S. on par with peer regions around the world when competing for economic growth.

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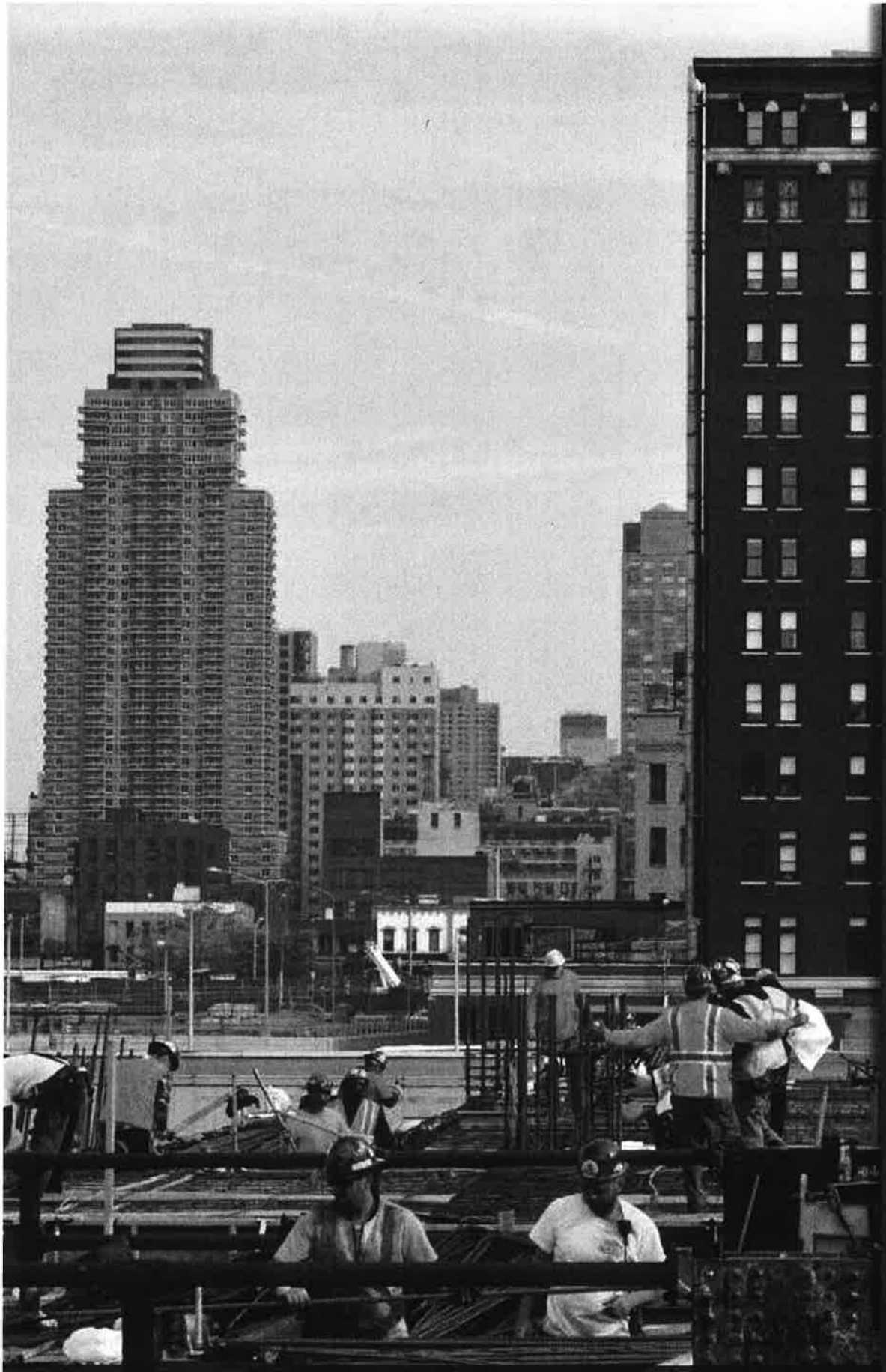

Front Cover: Center City Philadelphia and 30th Street Station

Back Cover: Early construction of the Hudson Yards development project over rail yards adjacent to Penn Station New York

www.nec-commission.com

NORTHEAST CORRIDOR COMMISSION
840 First Street NE, Suite 440
Washington, DC 20002
(202) 847-0280
www.nec-commission.com

February 16, 2016

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

Re: Draft Environmental Impact Statement for the Northeast Corridor

The Northeast Corridor Commission ("the Commission") with its U.S. Department of Transportation ("USDOT") members abstaining, 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"). See 80 Fed. Reg. 70206 (November 13, 2015). This effort is part of NEC FUTURE, a comprehensive planning effort to define, evaluate, and prioritize future investments in the NEC.

The Commission's top priorities for the Corridor's future are:

- Maintaining safe and reliable rail transportation at 2016 service levels;
- Achieving a state-of-good-repair; and
- Investing to improve reliability, performance, connectivity, and capacity to deliver improved intercity, commuter, and freight services.

The NEC is composed of publicly owned infrastructure and facilities that require extensive repair and modernization. The Corridor, used by nine passenger rail operators and four freight railroads, faces a state-of-good-repair backlog in excess of $20 billion. These needs cannot be met without substantial action and investment by the federal government. The Corridor is already an integral part of the transportation network and the economy, where a service loss would have an estimated $100 million per day economic impact. Protecting and improving the safety and reliability of its services is paramount.

About the Commission

The Commission was authorized by the U.S. Congress and codified at 49 U.S.C. § 24905 to create a new forum for collaborative planning and decision-making. The Commission is composed of one member from each of the NEC states (Massachusetts, Rhode Island, Connecticut, New York, New Jersey, Pennsylvania, Delaware, and Maryland) and the District of Columbia; four members from Amtrak; and five members from the USDOT.

The Commission provides coordinated regional leadership to develop strategies to stabilize the NEC and establish a foundation for future growth. The Commission has statutory requirements to annually produce a five-year capital plan for the Corridor; report on capital program delivery and train operations and performance; and develop and administer an operating and capital cost-sharing policy. In addition, the Commission conducts research and studies covering economic analysis, travel demand, and other topics that may help guide investment decisions.

In September 2015, the Commission successfully met its statutory mandate to develop a cost-sharing policy to ensure each intercity and commuter service is assigned the costs associated with its sole-benefit use of the NEC and a proportional share of costs resulting from joint-benefit use. As a result—for the first time—there will be a multi-year, minimum amount for annual Corridor investment. Further, the policy sets forth recommendations for federal policy changes and highlights the need for a federal-state partnership to address the Corridor's significant investment needs.

This financial commitment is part of a comprehensive framework for collaboration that will address capital planning, operational performance and project delivery, with an emphasis on increasing transparency and accountability.

However, funds generated by the cost-sharing policy are not nearly enough to bring the Corridor to a state-of-good-repair, or build the capacity necessary to maintain existing services, let alone expand services to accommodate future demand.

As part of this new partnership for the Corridor, the Commission released the first Northeast Corridor Five-Year Capital Plan, which contains inputs from all NEC owners and operators. The Plan charts a common course to ramp up capital investment if additional funding were available. This integrated, unified investment plan is intended to inform the federal budget and appropriations process and is a key Commission recommendation to Congress, required by 49 U.S.C. § 24904(a)(1). Future plan iterations will incorporate methods for prioritizing unfunded capital needs.

The Region and the Economy

The Corridor contributes to the nation's economic growth by supporting essential intercity, commuter, and freight rail services. Each day, its 457-mile main line between Boston, MA and Washington, DC carries over 700,000 commuter rail and 40,000 Amtrak passengers on over 2,000 trains; people who might otherwise use the region's congested highways and airports.

Home to over 50 million people — or one out of every six Americans — the NEC Region is an economic powerhouse, generating $1 out of every $5 in gross domestic product on two percent of the nation's land area. Further, the Corridor provides reliable access to core employment centers that contain one out of every three jobs in the region, where the economy measured alone would be the fifth largest in the world, ahead of France. A one-day service loss could cost the nation $100 million in additional highway congestion, productivity losses, and other transportation impacts.

NEC FUTURE Process

The NEC FUTURE EIS is a National Environmental Policy Act (NEPA)[1] requirement to undertake a rigorous environmental review to evaluate potential effects of the NEC FUTURE program on the built and natural environments. The Final EIS and Record of Decision (ROD) will determine an envelope for the NEC's growth through 2040.

While NEC FUTURE is a critical planning process that will establish a framework for future investments, it does not commit the region to specific projects and service plans, nor does it represent a funding commitment by the region's stakeholders. In recent years, the states in the NEC Region and Amtrak, in partnership with USDOT, have committed significant resources to improving the NEC. Across the region, planning and construction are underway on critical projects that will advance state-of-good-repair and improved performance efforts and support continued economic growth. Recognizing these recent investments, the states and Amtrak look forward to participating in future discussions on the funding partnerships that will be required to deliver new projects.

To date, the FRA has led a transparent, thorough, and deliberative process built on collaboration and should continue working closely with the Commission and other key stakeholders to identify outcomes that are achievable and implementable. The Commission provided data collection for travel demand forecasts and looks forward to continued engagement in completing the Final EIS, ROD, and Service Development Plan (SDP).

The Commission notes that while the analytical work informing the Draft EIS is sound, certain technical constraints pose challenges to evaluating the proposed alternatives. For example, many assumptions used rely on analysis of past trends which do not capture the potential game-changing impacts of transformational investments.

Preferred Alternative

The Commission recognizes that completing the EIS and the SDP will require additional coordination between the FRA and the region's diverse stakeholders, including transportation providers, local community members, and businesses. This process must not hinder planning and other pre-construction activities underway for several major, proposed Corridor

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[1] 42 U.S.C. § 4321 *et seq.*

investments. The outcome of NEC FUTURE should focus on a longer term vision. The outcome should help advance and not preclude short- and medium-term investments already underway.

While additional work is required to complete the EIS and the SDP, the No Action Alternative is not an acceptable outcome. A misnomer, the No Action Alternative presumes funding levels far higher than historic investment and yet still fails to achieve a state-of-good-repair. Even with these funding assumptions, the No Action Alternative would cause degraded conditions across the transportation network due to the system's failure to accommodate new travel demand in a growing economy.

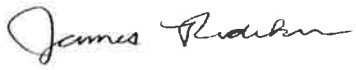
The Commission's recently completed study *Investing in the Northeast Corridor: Advancing the American Economy* concludes that the national economy stands to gain between $4 and $8 billion per year by expanding rail capacity and performance to keep pace with population growth. These productivity gains result from congestion avoided on the highway and aviation networks. The total benefits, however, could be significantly higher. That figure does not account for additional investment benefits such as jobs created by the construction industry and business activity attracted to a more globally competitive region.

In addition to worsening congestion on the region's highway and aviation networks, the No Action Alternative would cause increasingly overcrowded trains and continued reliability challenges. Notably, the study finds that Corridor delays due to infrastructure failures and rail congestion already cost the U.S. approximately $500 million annually in lost productivity.

To achieve a state of good repair and sustain current service levels requires a level of investment above and beyond the No Action Alternative. Over $20 billion would be required to replace the backlog of aging assets, in addition to ongoing, capital investments between $400 and $500 million per year for typical maintenance and repairs.

NEC FUTURE represents an important and necessary step forward for the NEC, the region, and the country. The Commission looks forward to continued partnership with federal, state, and local governments and the public to identify a responsible, viable long-term plan for the Corridor.

Sincerely,



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

Enclosure: *Investing in the Northeast Corridor: Advancing the American Economy*

NEC DEIS Comments - RECORD #153 DETAIL

Status : [redacted]
Record Date : 1/12/2016
First Name : DERA
Last Name : NECKANOFF
Stakeholder Comments/Issues :

I'm a homeowner in Salisbury Estates, NY, who will be directly affected by the Eisenhower Park & Stewart ave proposed 'trench' rail system. You cut off this 'public comment period' on Jan. 30th without ever informing the public of this and you schedule ONE PUBLIC MEETING/HEARING for both Nassau & Suffolk Counties on Jan. 12th. Shame on you. We went through this same kind of sleazy tactic when OTB tried to push through a Video Poker Casino and killed that project. We in Westbury and Long Island will fight this. Ceasing 40 acres of our beautiful Eisenhower park & destroying the peace & quiet of the surrounding neighborhoods, filling it with noise pollution & vibrations & who knows what else. . You want a high speed rail, put it underground. Tunnel under the LIE expressway, or other parkways and then have it surface at the stations.

NEC DEIS Comments - RECORD #1937 DETAIL

Status : [redacted]
Record Date : 2/15/2016
First Name : Mike
Last Name : Necklas
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."

Please be aware that the deadline for comments is Tuesday, Feb. 16, so please act now and share this information your with friends, colleagues and family.

Thank you for helping us protect and preserve Lyme Academy College of the University of New Haven.

NEC DEIS Comments - RECORD #247 DETAIL

Status : [redacted]

Record Date : 1/23/2016

First Name : Natasha

Last Name : Neef

Stakeholder Comments/Issues :

I strongly support alternative 1 - Amtrak may not realize it, but significant numbers of people in the New London to Providence segement commute to Boston daily and this would shorten journey times and make the ride safer. I notice in the NEC documents that a "commute" seems to be assumed to be 30 minutes or less - in reality, it is often much longer.

NEC DEIS Comments - RECORD #2483 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : Margaret
Last Name : Neill
Stakeholder Comments/Issues :

Please don't destroy a school with your proposed rail line. You would take an important piece of history away from American citizens.

NEC DEIS Comments - RECORD #246 DETAIL

Status : [redacted]
Record Date : 1/23/2016
First Name : David
Last Name : Nelson
Stakeholder Comments/Issues :

Rerouting the tracks to follow Rt 95 will put the noisy train through our historic district. The Lyme Art academy will be torn up if it is south of 95. If north of 95 our only shopping center will be wiped out.

By the time this extremely expensive construction is done, trains on steel rails will be old technology. Decades from now it could be magnetic levitation or vacuum tubes. This low friction technology is likely to be faster than today's jet airplane travel.

Vacuum tube trains may have the least impact to areas that it is traveling through. Quiet, narrow and can be hidden or covered in sensitive areas. Who knows in some segments it could be supersonic or hyper-sonic, but no one will hear it. NYC to Boston in a matter of minutes

NEC DEIS Comments - RECORD #447 DETAIL

Status : [redacted]
Record Date : 1/31/2016
First Name : David
Last Name : Nelson
Stakeholder Comments/Issues :

What a mess. A long diagonal bridge across the CT river, then wiping out some homes, then disturbing coastal wetlands, then ruining the Lyme Art Academy and then over historic Lyme Street. A wide swath with many gantry poles holding overhead wires. Worse yet frequent bullet trains accelerating or decelerating through this area. Yes I am for modern high speed efficient transportation, but not at this kind of expense here or elsewhere.

By the time this is built, trains on steel tracks may be an antiquated old technology. Two future possibilities are magnetic levitation and compression/vacuum tube trains. A magnetic levitation train car floats using an electro-magnetic field and is nearly frictionless. Only air resistance. The one I know of that is in operation in China. Center of Beijing to the air port 19 miles away in 9 minutes, station to station at speeds of up to 300 mph. This on a straight more direct inland route from NYC to Boston should be considered. Faster yet, is vacuum tube technology moving capsule cars with air compression in the back and vacuum in the front. These whisking by in sound insulated tubes may not be noticed by those outside the tube. Siting through sensitive areas will be easier. Unfortunately for the airlines, future train travel will cut into their business. Check these two technologies out on You Tube.

Helpful Hint: To send your comment out to multiple venues type it up on your word processing, then copy and paste to the location you want.

NEC DEIS Comments - RECORD #1740 DETAIL

Status : [redacted]
Record Date : 2/15/2016
First Name : Katherine
Last Name : Nelson
Stakeholder Comments/Issues :

I would like more information on the proposed changes to the NEC. What is the purpose of moving the service north when the majority of the population that uses the service lives along the coast. Service and speed does need to improve but I don't think the proposed move would be an improvement. Can't the current route be upgraded to support faster service?

NEC DEIS Comments - RECORD #1930 DETAIL

Status : [redacted]
Record Date : 2/15/2016
First Name : Kaylin
Last Name : Nelson
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 #2924 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : Leslie
Last Name : Nelson
Stakeholder Comments/Issues :

I am 63 years old. I grew up in Old Lyme when it was a small town. It is still a beautiful town and I have relatives living there. To destroy the historic district in Old Lyme would be a travesty. Please rethink this. I am planning on moving back in the near future.

NEC DEIS Comments - RECORD #1379 DETAIL

Status : [redacted]

Record Date : 2/14/2016

First Name : Paul

Last Name : NELSON

Stakeholder Comments/Issues :

A new rail line is a must; there is really no need to ut the heart out of Old Lyme, in order to complete the task.

NEC DEIS Comments - RECORD #764 DETAIL

Status : [redacted]
Record Date : 2/10/2016
First Name : Susan
Last Name : Nerlinger
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:

I am writing as a citizen of Maryland, a member of the Audobon Society, a teacher and a lover of the few remaining wild places where we can have some contact with untrammeled nature and its inhabitants.

I am writing to express my 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.

Increasing public transportation infrastructure is a critical priority, but in this part of Maryland, there have to be viable alternatives for a train line other that do not negatively affect the Patuxent Research Refuge.

Sincerely,

Susan Nerlinger

[redacted]

Olney, MD 20832

snerlinger@[redacted]

NEC DEIS Comments - RECORD #3 DETAIL

Status :	[redacted]
Record Date :	11/10/2015
First Name :	frank
Last Name :	nes PE
Stakeholder Comments/Issues :	The concept of incremental improvements appear the way to complete this project. However that increment must first meet the state of good repair of the present NEC. If there is a major failure of the North river bores, Portal draw bridge, B & P tunnel, or any of the Maryland or other draw bridges many persons will be unable to meet their job needs. In my opinion incremental work needs to be directed to the projects that will provide the most passenger minutes saver per dollar spent. The more passenger minutes saved per dollar the higher priority a project should be scored. Total number of revenue passenger miles increase needs careful analysis. Of course a factor needs to be given to what additional passengers any increment will add not only to that segment but also total thru traffic. An example would be if $100M spent either PHL - Wilmington or PHL - New York Penn and the Wilmington would add 500 passengers a day NYP - WASH and the PHL - NYP section would only add 500 a day NYP - PHL then the PHL - WIL should be scored higher. especially if more beyond passengers board trains.
Attachments :	DEIS_public_a00003_O.pdf (4 kb)

NEC DEIS Comments - RECORD #3 DETAIL

Status :	[redacted]
Record Date :	11/10/2015
First Name :	frank
Last Name :	nes PE
Stakeholder Comments/Issues :	The concept of incremental improvements appear the way to complete this project. However that increment must first meet the state of good repair of the present NEC. If there is a major failure of the North river bores, Portal draw bridge, B & P tunnel, or any of the Maryland or other draw bridges many persons will be unable to meet their job needs. In my opinion incremental work needs to be directed to the projects that will provide the most passenger minutes saver per dollar spent. The more passenger minutes saved per dollar the higher priority a project should be scored. Total number of revenue passenger miles increase needs careful analysis. Of course a factor needs to be given to what additional passengers any increment will add not only to that segment but also total thru traffic. An example would be if $100M spent either PHL - Wilmington or PHL - New York Penn and the Wilmington would add 500 passengers a day NYP - WASH and the PHL - NYP section would only add 500 a day NYP - PHL then the PHL - WIL should be scored higher. especially if more beyond passengers board trains.

NEC DEIS Comments - RECORD #2847 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : Gregg
Last Name : Nesemeier
Stakeholder Comments/Issues :

I agree with the Tier 1 Draft EIS as written. It is a well thought out, thorough analysis that clearly states the purpose and need for investment in the NEC; provides alternatives that meet the future needs of the NEC; uses an appropriate framework for evaluation of the alternatives; and accurately shows the anticipated benefits, costs and impacts of each alternative as well as for "no action" (maintaining the status quo).

The proposed federal action being evaluated in this Tier 1 Draft EIS is the adoption of an investment program to improve passenger
rail service within the Study Area. I strongly support the adoption of the proposed investment program. As far as which alternative to adopt, I would advocate adopting the largest scale alternative for which funding can be obtained. As the draft EIS states, the Northeast is home to 51 million people (1 in every 7 Americans) -- a number expected to grow to 58 million by 2040 -- and is a cornerstone region for the US economy. The NEC rail system is a key component of the region's transportation infrastructure and is critical to alleviation of highway congestion, and to affordable mobility for people who live, work, do business and visit in the region. The most forward-looking public policy will consider the growing rail transportation needs of this region well into the future, beyond 2040 if possible. In this regard, it should be remembered that it took close to 100 years to build the original corridor; and that electrification of the NEC was completed some 80 years ago (at least between New York and Washington). Therefore, it is reasonable to project that the next major infrastructure improvement to the NEC --at least the next truly transformative one -- will need to provide for a time frame close to the next 100 years as well. So, although each alternative is successively more expensive and has greater environmental impact associated with construction, it is an investment that can be anticipated to return commensurately greater benefits to the region for a greater period of time (and thus can be amortized over that greater period of time).

In considering which alternative to pursue, I would recommend that the following be considered as key factors in determining the most cost-effective alternative: capacity/frequency of service; operational reliability; travel time/speed; and environmental benefit (e.g. fuel savings compared to highway travel, reduced hydrocarbon emissions, etc.)

The No Action Alternative is not a viable option because, as the draft EIS states, it does not return the NEC to a state of good repair, and it provides insufficient capacity to meet future demand. Maintaining the status quo will result in reduced reliability, unanticipated repair costs to maintain service, significantly increased highway congestion, and associated environmental impact. Therefore, I consider Alternative 1 (Maintain) the minimum acceptable level of investment for this program. However, as previously stated, Alternatives 2 (Grow) and 3 (Transform) provide successively greater economic and environmental benefits to the region for longer periods of time, and would therefore be preferable options to the extent that funding can be obtained.

Thank you for the opportunity to comment on this important initiative.

NEC DEIS Comments - RECORD #2738 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : Mike
Last Name : Piscitelli
Stakeholder Comments/Issues :

Hello,
Thank you for the opportunity to enter prepared testimony concerning the Tier 1 DEIS. The City truly appreciates your efforts on this important matter. If you have any questions, please do not hesitate to call.
Mike

Michael Piscitelli, AICP
Deputy Economic Development Administrator
City of New Haven
165 Church Street, 4R
New Haven, CT 06510
(203) 946-2867

Attachments : City of New Haven Record Testimony NEC Future 021516.pdf (742 kb)

CITY OF NEW HAVEN
TONI N. HARP, MAYOR

PREPARED TESTIMONY OF THE CITY OF NEW HAVEN

RE: NEC Future Tier 1 Draft Environmental Impact Statement, Federal Railroad Administration

February 15, 2016

I. Summary

The City of New Haven ("City") respectfully offers this official testimony concerning the above-referenced draft Tier 1 environmental impact statement ("DEIS") for NEC Future. The City appreciates the work of the Federal Railroad Administration ("FRA"), its consulting partners and the many stakeholders who have developed the alternative scenarios for short-term and long-term investments along the Northeast Corridor.

The DEIS looks broadly over the entire Northeast Corridor system. While no single alternative truly captures the essence of New Haven's core objectives, namely dramatically improved commuter travel time to New York City together with improved travel time and more frequent service to Washington and Boston, the DEIS does advance a technical and analytical framework to make important decisions concerning the future of the Northeast Corridor.

Following careful review of the analytics for cost-to-passenger benefit, environmental impact and other factors, the City makes the following recommendations: (1) travel time and service frequency should be improved dramatically between New Haven to New York City along the existing Coastal

Route[1], upgraded beyond traditional state-of-good-repair investments to transform operating performance; (2) travel time and service frequency to and from Washington and Boston should be improved along on the Coastal Route, the Hartford-Springfield route and, if feasible, a Long Island tunnel, even though these alignments may not achieve the very highest operating speeds; and (3) the Central Connecticut alignment should no longer be considered and should not advance to the Tier 2 stage.

These recommendations are consistent with the City's forward thinking vision for sustainable development and, more importantly, are consistent with the interests of the United States by supporting economic growth, environmental protection and sustainable communities throughout the Northeast.

II. Context

The City of New Haven, City of New London, City of Norwalk, City of Bridgeport and City of Stamford ("the Cities") filed a joint letter dated October 19, 2012 to the FRA concerning NEC Future. At the time, the Cities offered that economic development should be a primary assessment factor; that the existing shoreline route should be a fully assessed alternative; that state of good repair should be a component of Phase 1 investments; and that operations and governance reform may be a mechanism to increase capacity and utility of the shoreline route. The DEIS does in fact consider all of these factors; however, the City offers the following points-of-emphasis in further support our three recommendations:

(a) Economic Growth. The City is the socio-economic center of south central Connecticut and among the fastest growing cities in New England in terms of both population and economic significance. For the first time since 1991, there are over 80,000 jobs in the City, making up approximately a quarter of the jobs in the New Haven MSA. Economic drivers in higher education, the life sciences, advanced manufacturing, IT, and supporting service industries are catalyzing new job growth. The knowledge-based economy, furthermore, is concentrating in the City and elevating our profile nationally and globally. In New Haven, Yale-New Haven Health System (YNHHS) and Yale University are also national leaders in their respective sectors.

YNHHS is the 4th largest hospital in the country, with 1,541 beds and 12,100 employees, making it the second largest employer in the region. YNHHS is widely considered one of the best hospitals in the United States, and is nationally ranked in 8 of 18 specialties by *U.S. News & World Report*. In

[1] The "Coastal Route" refers to the existing Northeast Corridor along the shoreline of Long Island Sound between New York and New Haven, CT.

2014, YNHHS had 78,529 inpatient discharges and 1.2 million outpatient encounters. In 2008, YNHHS opened its renowned Smilow Cancer Hospital in 2008 and is one of only 45 comprehensive cancer centers in the United States, as recognized by the National Cancer Institute.

Yale University, with 14,000 employees and over 12,000 enrolled students, is a global leader in higher education. Yale recently opened its new School of Management building, adding 200 students. In addition, Yale is building two new residential colleges, which will cost $600 million to construct and add 800 additional students, faculty and staff. New Haven's universities also provide a platform from which the City can compete in the global arena. For example, Yale has $360 million in federal R&D obligations, which ranks 14th nationwide, and its Cooperative Research Technology Transfer program has been instrumental in attracting new biotechnology companies to the region. Additionally, Yale has produced some 40 new start-up companies in Greater New Haven. These companies have attracted over $3.6 billion in private capital.[2]

The Yale School of Medicine ranks in the top 20 for NIH funding, placing New Haven in class with Nashville, Raleigh-Durham and other mid-sized cities with advanced technology centers. With the Yale School of Medicine driving growth, greater New Haven is now the 2nd largest biotech cluster in all of New England. This year, Alexion Pharmaceuticals relocated and expanded to the newly-constructed 500,000 s.f. med/lab office building at 100 College Street in the heart of the medical district. This is the first development at Downtown Crossing, the City's long-term USDOT TIGER-supported transformation of the Route 34 corridor from an expressway that separates neighborhoods to traditional urban street blocks that connect neighborhoods. The second development, at the 4.5-acre Coliseum site, will result in 1,400 additional jobs at a new 1.1 million s.f. mixed use, transit-oriented community, also within close proximity to Union Station.

Alexion's relocation to New Haven offers important lessons to the future economy as concentrated job growth fuels demand for new housing and for transit services. There are over 2,000 residential units in the City's development pipeline. The most recent project to open (with 160 units) is located just one block away from Alexion's new home. Moreover, housing demand is moving beyond the traditional Downtown district and into the surrounding neighborhoods of Wooster Square and the Hill, both within walking distance of Union Station.

The increase in residential density and the aggressive push to create jobs is entirely consistent with the goals and objectives of the HUD-DOT-EPA Interagency Partnership for Sustainable Communities ("the Partnership"). The City is honored to collaborate with the Partnership as we

share a common vision for affordable housing and transportation while preserving the environment. Our Hill-to-Downtown Community Plan was formulated with federal and state sustainability grants. The plan calls for the dramatic transformation of the area around Union Station, which is now characterized by deteriorating housing and surface parking lots. The plan is now being implemented and, at full build, will result in over 1,400 housing units, up to 1.0 million s.f. of commercial space and 2,500 new jobs.

The City requests that both Downtown Crossing and the Hill to Downtown Plan are added to Table 7.20-5 of the DEIS and are fully-considered in the context of the City's recommendations.

In no uncertain terms, New Haven is growing in a forward-thinking manner that focuses on all aspects of the Partnership's vision – housing, the environment and transportation. This growth is concentrated in close proximity to employment centers and is not dispersing throughout the region. The DEIS Central Connecticut alignment, if it were to move forward, would have a deleterious effect on our responsible growth trajectory and damage our shared-vision with the Partnership for a more sustainable future.

(b) Coastal Route. The City, as with many other stakeholders along the existing Northeast Corridor in Connecticut, is concerned that the DEIS does not fully support the transformation of this Coastal Route with higher-speed, higher-capacity passenger rail services. Based on analytics presented in the DEIS and on further work by the Regional Plan Association, one-hour service to and from New Haven and New York should be our goal and should be advanced to the Tier 2 level. New Haven is part of the Greater New York Combined Statistical Area (24 million residents), indicating the super-regional nature of greater New York and its influence on local economic conditions. In 2015, the MTA Metro-North New Haven Line set a new record with 40.3 million passengers over the course of the year.

From an inter-city perspective, New Haven also is the historic center of Amtrak service in Connecticut. Following electrification of the line easterly to Boston and following recent years of economic growth, Amtrak service has grown significantly. With over 700,000 annual passengers, New Haven is now a Top 10 station for the entire Amtrak system.

There remains, however, a significant unmet market demand to and from Washington, DC. According to analyses prepared for Tweed-New Haven Airport, only 56% of passengers take

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[2] Statistics collected and reported as part of the City's Official Statement, 2015

Amtrak out of New Haven to reach the Washington/Baltimore market.[3] Instead, passengers are forced to use airports inconveniently located in other cities as Tweed does not serve to Washington, DC. The final EIS can set forth a pathway for achieving enhanced service to New York City and Washington, which is to say that we must go beyond the "No Build" state-of-good-repair projects and instead fully explore solutions to choke points along the NEC, particularly in Connecticut where the basics alignment is already in place, and where the cost-effective application of capital will have the greatest beneficial impact on current and (as a result of the capital investment) induced users of the NEC.

The City further supports the State of Connecticut in its efforts to develop the Hartford-Springfield Line, which will open up a high-speed connection to Hartford on an existing rail corridor. The City likewise supports efforts to further extend this line to Boston through Springfield. This historic inland alignment is a more appropriate alternative than the new Central Connecticut route, which has far more significant environmental impacts in our state.

(c) Operations and Governance. Representatives from New Haven attended NEC Future events in Rocky Hill, Boston, Mineola, Hartford, New Haven, and Washington DC as part of this process. We likewise met with leadership teams from MTA Metro-North and Amtrak during this same time frame. Following these consultations, the City fully appreciates the challenges associated with operations and governance of the Coastal Route. Requests for enhanced service (let alone improved travel speed) are complex and daunting undertakings with no clear starting point.

The City strongly believes that the FRA and NEC Commission must provide national-level leadership and establish a collaborative problem-solving approach in order to achieve the desired outcomes, specifically the coordination of capital investments and service plans leading to 60+ minute service between New Haven and New York City, together with allocation of track for more frequent high speed intercity service to Boston and Washington.

III. Cost to Benefit

From a cost-benefit perspective, the DEIS indicates that the Alternative 3, Central Connecticut alignment will cost approximately $300 billion for initial construction. This is a staggering investment, particularly when considered against more cost-effective opportunities. There is an existing platform of current and planned investments that should be shared with the future high-speed service(s) contemplated in the DEIS.

[3] Tweed New Haven Airport, 2015.

The State of Connecticut is investing $1.4 billion on the New Haven Rail Yard Facilities Improvement Program, which is transforming the Rail Yard into a fully functional facility supporting rail transit service well into the twenty-first century. Already, the Rail Yard has been expanded to 74 acres to meet the needs of Metro-North, Amtrak and future services. Amtrak has made major investments in the Rail Yard and in commercial space in New Haven that would need to be replicated somewhere else in the NEC system, if the City did not remain the central hub in the system. For example, Amtrak handles routine maintenance and equipment repair in the Rail Yard. The facility also provides an opportunity for "running repairs" to quickly address minor issues on trains that are in-service without having to take the train out of service and disrupt the journeys of hundreds of passengers. The City, therefore, encourages the FRA to look not only at capital and operating costs, but also the potential for cost avoidance through more efficient use of existing systems.

Likewise, it is important to recognize and support the dramatic changes coming with the Hartford-Springfield Line. This is a high-speed service bolstered by a state/federal investment of $643 million to provide direct connections at Union Station in New Haven. Connecticut has identified this and other key projects in Let's Go CT!, a 30-year investment plan that needs to be advanced to Tier 2.

The annual operating and maintenance cost analysis does not support the Central Connecticut route. With estimated annual operating costs of $2.2 billion, the analysis presents aggressive revenue projections in order to estimate an operating profit of $445 million. On a cost per passenger mile basis, this investment is equally troubling as the margins are simply too narrow to be used as a basis for a $300 billion capital investment. Our focus in Tier 2 should again return to the Coastal Route and Hartford-Springfield line. With time-tested service models, the financial forecast can be measured against historical trends and economic growth. Moreover, an Obama Administration report validates the prudence and economic benefits of investment in the existing infrastructure:

> *"One important finding from the economic literature on the economic impact of infrastructure investments is that, in countries like the U.S. where a relatively well-developed transportation network already exists, the highest return investments will*

often arise from the maintenance of existing infrastructure, rather than from investments in new infrastructure."[4]

IV. Environmental Impact

We call your attention to the significant environmental impacts associated with the Alternative 3 route through Central Connecticut, which is anticipated to affect over 42,000 acres of developed land and another 30,000 acres of undeveloped land.[5] Such a pronounced change in development in largely rural portions of Connecticut is inconsistent with the State of Connecticut's *Conservation and Development Policies*, which calls for the State to "conserve and restore the natural environment, cultural and historical resources and traditional rural lands."

While the report strives to estimate changes in land use patterns, the City calls more specific attention to the adverse impacts associated with urban sprawl. Not all growth leads to beneficial social and economic outcomes. The highly-regarded Victoria Transport Policy has looked at this issue specifically in relationship to transportation investments:

> *"This analysis indicates that sprawl imposes more than $400 billion in external costs and $625 billion in internal costs annually in the U.S., indicating that smart growth policies which encourage more efficient development can provide large economic, social and environmental benefits."*[6]

In this context, we trust the FRA will more fully understand New Haven's concerns about the Central Connecticut alignment. The City is working extremely hard to re-build the density lost during urban renewal and the suburbanization of the last century. Connecticut now places a high emphasis on its existing urban centers, with focused reinvestment in center cities, inner ring suburbs and transit-rich environments.

One of the "new markets" presented is the University of Connecticut, our flagship university. UConn is located in a rural portion of our State, characterized by low-density and low-impact development. Public utilities (particularly natural gas and sanitary sewer) are limited. A sprawl-inducing high-speed rail line is not in keeping with the rural landscape and character of northeast

---

[4] The White House, "Recent Examples of the Economic Benefits from Investing in Infrastructure," November 2011, page 15.
[5] DEIS Page 7.2-5.
[6] Litman, Todd, "Analysis of Public Policies that Unintentionally Encourage and Subsidize Urban Sprawl," Victoria Transport Policy Institute and LSE Cities, March 2015,

Connecticut. Rather than encouraging urban sprawl, Tier 2 should advance Connecticut's policy objectives and avoid the unintended consequences of urban sprawl.

V. Closing

Thank you for your consideration of the City's comments on the DEIS. We again urge your support for Connecticut's center cities by focusing your recommendations on the existing Coastal Route and the Hartford-Springfield line. New Haven, and the other cities on these existing routes, need higher-speed, higher-frequency service in order to support economic development efforts and access to jobs. In no uncertain terms, the bypass alignments will have adverse effects on our community; do not support the knowledge-based and innovative economies of southern Connecticut and do not merit further consideration by the FRA.

Respectfully submitted,

CITY OF NEW HAVEN

Toni N. Harp
Mayor
City of New Haven
165 Church Street
New Haven, CT 06510
(203) 946-8200

VISIT
NEW HAVEN

T 203 777 8550
800 332 STAY (7829)
F 203 782 7755
www.visitNewHaven.com

545 Long Wharf Drive, 4th Floor, New Haven, CT 06511

Ms. Sarah Feinberg
Administrator
Federal Railroad Administration
1200 New Jersey Avenue Southeast
Washington, DC 20590

NEC Future
US Department of Transportation
Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

February 10, 2016

RE: NEC Future Tier 1 Draft Environmental Impact Statement

Dear Administrator Feinberg:

I am writing on behalf of Visit New Haven concerning the NEC Future Tier 1 Draft Environmental Impact Statement for the Northeast Corridor. As a tourism marketer for Greater New Haven, I am expressing deep concern about FRA's intent to analyze future route alignments which bypass Union Station in New Haven.

Tourism is a critical component of the region's economic well-being. With over 4.8% of Connecticut's workforce being employed in tourism related jobs, the industry contributes over $1.7 billion in economic impact. Since 2012, the State of Connecticut has made a significant investment to tourism marketing to attract visitors from all along the Eastern Seaboard. Removing New Haven from a major rail route undermines that investment.

Union Station is an essential transportation hub for New Haven and the surrounding towns. Our local airport has only a single carrier offering just three flights a day. Hoteliers, restaurateurs and retailers rely heavily on rail service to bring visitors from Washington, D.C., Philadelphia, New York City and Boston.

As Connecticut's tourism industry works to rebound from the effects of the recession, inclusion in the route is critical to its success. Our community has an embarrassment of riches in terms of cultural and historical attractions that rely on travelers for their financial viability. Quite frankly, we need rail passengers to regain the industry's vitality.

I urge you to work with the State of Connecticut and the Metropolitan Transportation Authority to upgrade the existing Northeast Corridor in Connecticut and introduce any and all new service on this shoreline route. In other words, do not analyze an inland route, which would bypass three of Connecticut's major economic centers - Stamford, Bridgeport and New Haven. Moving people in and out of New Haven on state-of-the-art rail systems is too important for us and for the many other businesses that are growing in this region. Instead, I urge you to invest the nation's infrastructure resources in a manner that supports the economic future of southern Connecticut.

Very truly yours,

Barbara Malmberg

Barbara Malmberg
Director of Marketing
Visit New Haven
545 Long Wharf Drive, 4th Floor
New Haven, CT 06511
203-777-8550

NEC DEIS Comments - RECORD #2826 DETAIL

Status : [redacted]
Record Date : 2/16/2016
First Name : Peter S.
Last Name : Trentacoste, Esq
Stakeholder Comments/Issues :

Please be advised that this firm represents the Incorporated Village of New Hyde Park (Village). The attached comments are respectfully submitted on behalf of the Village

---

Peter S. Trentacoste, Esq.

Spellman Rice Gibbons

Polizzi & Truncale, LLP

229 Seventh Street - Suite 100

P.O. Box 7775

Garden City, New York 11530

516-592-6835

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INCORPORATED VILLAGE OF NEW HYDE PARK

Written Comments Concerning
the NEC Future Tier 1 Draft EIS

February 16, 2016

Introduction

The following comments are submitted by and on behalf of the Incorporated Village of New Hyde Park (New Hyde Park) with respect to the NEC Future Tier 1 Draft Environmental Impact Statement (NEC Future).

NEC Future is a planning effort to define, evaluate, and prioritize future investments in the Northeast Corridor (NEC) from Washington, D.C., to Boston.

The Federal Railroad Administration (FRA) has developed three distinct Action Alternatives for evaluation in the NEC Future.

Alternative 1 maintains the role of rail as it is today in the region, with the level of rail service keeping pace with the growth in population in the Study Area.

Alternative 2 grows the role of rail, expanding rail service at a rate greater than the growth in regional population and employment.

Alternative 3 transforms the role of rail, supporting trips over longer distances and to places not currently connected by passenger rail, thereby positioning rail as the dominant mode for Interregional travel to urban centers along the NEC. Alternative 3 includes new route options operating between Washington, D.C., and Boston separate from the existing NEC. Specially, Alternative 3 proposes high speed rail service via Long Island by providing service through New Hyde Park and northern New Haven and Hartford Counties, CT.

These comments are intended to assist the FRA, in the preparation of an appropriate and useful EIS so that both the lead agency and the public may properly evaluate any proposal for the NEC, especially Alternative 3 as it relates to New Hyde Park and neighboring municipalities on Long Island. In the absence of a formal detailed plan and based upon basic information provided in the Draft EIS, New Hyde Park provides the following comments.

1. Based upon the information provided, the NEC Future is insufficient in evaluating the significant impacts which will occur in the communities through which the project will extend.

2. NEC Future must consider all potential property acquisitions needed.

3. NEC Future must consider all neighborhood and community disruption. Every development has a neighborhood impact. Those impacts must be considered.

4. NEC Future must consider traffic impact and conduct an appropriate traffic analysis and study.

5. NEC Future must consider the noise impact and conduct an appropriate noise analysis and study.

6. NEC Future must consider the impact in parking and conduct an appropriate analysis and study.

7. New Hyde Park is fortunate to have several parks within the Village. NEC Future must carefully study the impacts (both temporary and permanent) upon these parks.

8. NEC Future must consider if advancement will result in any loss of assessed valuation by the Village, a method to compensate New Hyde Park on a permanent basis for such loss must be devised.

9. NEC Future must conduct a careful analysis of impacts upon businesses.

10. NEC Future must consider the impact on public safety and security and conduct an appropriate analysis and study.

Conclusion

Commentary upon the NEC Future Tier 1 Draft Environmental Impact Statement prior to any presentation of a potential design for the proposed project is a very difficult chore. Without design detail (or even concept), one is left only to surmise what is proposed. Such surmise has not been made here. As a result, further comment will be made once a design shall have been proposed.

The residents of New Hyde Park strive to preserve and promote a quality of life which focuses upon safety, security, fine homes, manicured lawns, uncluttered roads, culture, recreation, education and a sense of community. Any project proposed for New Hyde Park must also protect and promote that quality of life.

New Hyde Park is also special as a business community. The business owners and professionals in the village are committed to complementing the residential community in promoting New Hyde Park as a wonderful place to visit or in which to live or work.

It is urged that the environmental review of the proposed NEC Future take into consideration and share in, at every phase and in every category of review, the promotion of the dearly-held values of the New Hyde Park community.

Respectfully submitted,

The Incorporated Village of New Hyde Park

NEC DEIS Comments - RECORD #1063 DETAIL

Status : [redacted]

Record Date : 2/12/2016

First Name : Michael E.

Last Name : Passero

Stakeholder Comments/Issues :

To Whom It May Concern,
Attached please find a letter submitted by the Mayor of the City of New London, CT commenting on the Tier 1 Draft EIS. Please note that the original letter is being mailed today via the US Postal Service.
Thank you.
-Ned Hammond

Ned Hammond
Economic Development Coordinator

City of New London
Office of Development & Planning
New London City Hall
181 State Street 2nd Floor
New London, CT 06320
(860) 437-6309
(860) 437-4467 (Fax)
nhammond@ci.new-london.ct.us<mailto:nhammond@ci.new-london.ct.us>
www.ci.new-london.ct.us<http://www.ci.new-london.ct.us/>

Attachments : NEC Future comment ltr NL_Mayor.pdf (2 mb)

City of New London
Office of the Mayor
181 State Street • New London, CT 06320 • Phone (860) 447-5201 • Fax (860) 447-7971

February 12, 2016

NEC Future
USDOT, Federal Railroad Administration
One Bowling Green, Suite 429
New York, New York 10004

SUBJECT: NEC Future Tier 1 Draft Environmental Impact Statement

On behalf of the City of New London I submit the following comments regarding the NEC Future Tier 1 Draft Environmental Impact Statement.

The City of New London clearly understands and appreciates the purpose and need of the NEC FUTURE program, and while the City fully supports improved rail service and performance throughout the Northeast Corridor, and affirm that the Northeast Corridor is critical to the future economic growth of this part of the country, we are concerned that the alternatives presented in the EIS may have greater adverse impacts upon the City of New London than the predicted economic growth impacts. We note that due to the general nature of a Tier 1 EIS, it is difficult to make specific comments about specific components of the project, and we do recognize that further analysis will be provided in the future pending the outcome of the alternative selected in the Record of Decision. However, we do have some concerns as to how the project might impact our municipality and the New London region as a whole which are expressed below.

In Alternative 1, a new segment would be constructed through our region (Old Saybrook, CT to Kenyon, RI) and we are concerned about how this new segment would relate to and disrupt existing land uses in this corridor; its impacts on environmental resources; and the potential for fewer intercity and regional trains having stops in New London and along the existing shoreline route.

The City of New London is approximately 5.67 square miles in land area and of this over 50% of the land area is non-taxable. New London's commercially developed land area comprises 270 acres (7.3%). The City is one of the most densely populated cities in the State of Connecticut and provides all the municipal services of much larger cities. As such, the City struggles to maintain a good level of municipal services while keeping the tax burden to its property owners from being corrosively high. Alternative 1 appears to create a new track ROW through the municipality that will likely impact significant tax generating property. New London simply cannot afford to lose any more taxable land without maximum annual compensation in lieu of taxes.

Additionally, the track location depicted in Alternative 1 appears to bypass the current Union Train Station in downtown New London. This train station stop is vital not only to our existing transportation needs, the needs of the region, and present and future Transit Oriented Development initiatives but is hugely important to the successful development and sustainability of the future $100 million National Coast Guard Museum to be located directly adjacent to and connected to Union Station. Any significant reduction in the number of passengers and train stops at this station will assuredly impact the City's growth.

In Alternative 2, a new route is proposed that would run northerly from New Haven through Hartford to Providence with a potential stop at UCONN (Mansfield/Storrs). The Tier 1 EIS identifies this route being provided to serve Intercity-Express, but again we are concerned that if constructed, it could result in less regional trains running along the shoreline route having stops in New London. On the other hand, if there are concurrent efforts to add passenger service to the New England Central Railroad (NECR) line from New London to Brattleboro, Vermont, known as the Central Corridor Rail Line, with a stop at or near Mansfield/Storrs then it is possible that Alternative 2 may be an opportunity for future economic growth in New London and the region.

In Alternative 3, four new route options are being considered for north of New York City, all of which would travel through Hartford before continuing to Boston via either Providence or Worcester. As all of these options would create a new rail line north of the existing shoreline route, we are deeply concerned about the negative impacts it could have for the future level of investment in the existing line through southeastern Connecticut and the number of trains that would pass through and stop in New London. Alternative 3, unequivocally the most ambitious and financially monumental action alternative of the three, will in all likelihood sacrifice essential and sustaining funding for the current Connecticut rail line from New Haven to Providence, R.I. While planning for future growth is prudent, sacrificing and diverting the necessary investment from the existing local and regional rail lines is simply a bad idea. Such as it is, we encourage the Federal Railroad Administration to remove Alternative 3 from further planning objectives.

Respectfully submitted,

Michael E. Passero

Michael E. Passero
Mayor

NEC DEIS Comments - RECORD #2155 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Brenda

Last Name : Newbegin

Stakeholder Comments/Issues :

I oppose Alternative 1 of the FRA's 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 #997 DETAIL

Status : [redacted]
Record Date : 2/11/2016
First Name :
Last Name : Patrick
Stakeholder Comments/Issues :

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,
Patrick Newcombe

NEC DEIS Comments - RECORD #1859 DETAIL

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

To: Ms Carol Braegleman Office of Environmental Policy and Compliance

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.

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,
Hazel Newell

Next speaker is Michael Piscitelli.

MR. PISCITELLI: Thank you. My name is Michael Piscitelli. I'm the Deputy Economic Development Administrator for the City of New Haven.

On behalf of Mayor Harp and everyone on our team, we wanted to thank you for coming back to New Haven and for your commitment, quite frankly, to high-quality, high-speed rail service in the Northeast.

Provided you don't count it against my time, I will tell you as well, as an urban planner, I should acknowledge the fact that the quality of the work that you did on a complex topic does not go unnoticed. We read the entire document, and you've done quite a service, not only to the Northeast but to the nation. So we appreciate your efforts in crystallizing a set of alternatives.

I'll restate a little bit of what we've talked about in the past and maybe provide some new insights. As with many others, we're still working our way through the entire document, and we'll get you formal comments.

There's been a very significant, important relationship between the Northeast Corridor and New Haven's economic growth in recent years. To give you a sense for that, in 2014, we jumped over 80,000 jobs. So that's 80,000 of the 300,000 jobs in the region are in New Haven. We grew right through the recession, both in terms of jobs and in population growth.

And you'll see similar stories in the mid-size cities along the Northeast Corridor. Some of that was reported out in the NEC Commission report as well. We think that's important in part because of the relationship to rail.

So dialing it all the way back, when I started with the City back in 2000, we were doing about 250,000 rides per year on Amtrak. We do over 700,000 rides per year on Amtrak right now. We are a top-ten station on the Amtrak system, and that is wholly and singularly related to the change in our economy from a traditional manufacturing economy to one that's knowledge based. Health care, education, IT, new media, all of these new companies are moving into our market and, quite frankly, with people that are living downtown and close to work, are collaborative. We have a very important and specific need to maintain and improve those relationships between Boston, New York, Washington, and the center of our city.

You had said earlier -- it was in the video -- something about what did we miss or what can we do a little bit more and how can we better inform the document. I would make a couple of points that perhaps we can work on between now and final.

The first is more specific attention to what's happening in these center cities, in the smaller cities like New Haven and Bridgeport and Stamford. Although I've spoken a little bit about our growth, there's a whole other level of economic activity that we can achieve in order to be truly transit rich, diverse and high density in a manner consistent with state and federal policy. And there are a number of different initiatives, like our Hill to Downtown, which was funded by HUD, Downtown Crossing, which is the tear-down of Route 34. We'll help quantify for you what those economic impacts are, which we, again, think speaks to the real significance of the coastal corridor.

Related to that, I would suggest to you that the document could go a little bit further looking at the potential impacts of induced urban sprawl associated with some of the newer routes in newer areas. So you've quantified and we think importantly quantified the impacts on farmlands and environmental resources, that sort of thing. We might ask you to look a little bit more deeply at the potential economic benefits in these center cities along the coastal corridor, and likewise at the potential avoided impacts, if you will, of urban sprawl, which has been an incredible challenge for the state of Connecticut as we seek to grow and remain nationally competitive.

So with that, again, thank you for your time. We truly appreciate all of your extra efforts, and we'll stay with you along the way.

MS. SIEGEL: Thank you, very much.

NEC DEIS Comments - RECORD #2335 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Karen

Last Name : Newton

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 #2376 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Be

Last Name : Nguyen

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 #1465 DETAIL

Status : [redacted]

Record Date : 2/14/2016

First Name : Heidi

Last Name : Niblack

Stakeholder Comments/Issues :

No, no, no to Alternative I and the effect it will have on the Old Lyme community.

NEC DEIS Comments - RECORD #240 DETAIL

Status : [redacted]

Record Date : 1/23/2016

First Name : Emily

Last Name : Nichols

Stakeholder Comments/Issues :

I travel frequently from NYP to Massachusetts by rail and would love to have rollon bicycle service to Northampton, Greenfield, and Boston. I would use this at least 4 times per year. I am also a slow travel writer and encourage others to use bike/rail connections to explore the northeast.

NEC DEIS Comments - RECORD #177 DETAIL

Status : [redacted]
Record Date : 1/14/2016
First Name : William
Last Name : Nichols
Stakeholder Comments/Issues :

As part of the plan all management along the east coast corridor needs to develop a comprehensive trash abatement plan! I ride from Baltimore to DC every weekday. The lines are trashed the entire trip. I see the same abandoned cars/boats/large debris every day for years. Both Amtrak and CSX need to send cleaning crews out on a regular basis to pick up trash and debris including 100s of tires.

This waste contaminates streams and clogs drainage that can cause backups/flooding of tracks. This work cannot be done by volunteers since its too dangerous so that means YOU need to do more to keep the tracks cleaner and looking better. Its a sad way to travel when all you see is trash for miles on both sides of the tracks.

NEC DEIS Comments - RECORD #2817 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Colleen

Last Name : Nickerson

Stakeholder Comments/Issues :

It's going to destroy old lymes historical district and harm our marsh lands. There needs to be another option than alternative 1.

NEC DEIS Comments - RECORD #294 DETAIL

Status : [redacted]
Record Date : 1/26/2016
First Name : Ralph
Last Name : Nicosia-Rusin
Stakeholder Comments/Issues :

These comments address purpose and need with respect to scope and implementation-

The key decision is whether high speed rail is pursued with pragmatic or transformative vision. The pragmatic vision is seductive by the allure of achieving some improvement. But it begs off of the major capital and political costs that can potentially doom it to sub-par performance and low capacity. These in term prevent the economies of scale for long range success and fulfillment of public needs.

A transformative vision takes a cue from history when trans-continental rail and urban transit were financed largely by private interests seeking profit, not from transportation services, but from transforming the value of land and other resources by improved transportation resources.

A high speed surface corridor has disastrous consequences all along its route on adjacent land but intense benefits at its nodes. High speed rail can only have a few nodes in order to have desired short trip times between major destinations.

This effort therefore should be married with a comprehensive corridor land use plan. There should be redevelopment districts planned around each station with eminent domain for shared public ownership of land around each station and improvements to corridors used to access these stations. The capital for acquisition could be financed by lease payments for current uses. The capital for high speed rail will be financed by future land leases for higher intensity development around each station and incremental value taxation on a wider designated district surrounding the station core district. This designated district reflects property that has strong benefits from the high speed rail services due to easy ground access service to a high speed rail station.

High speed rail stations need to recognize their close relationship to airport terminals and provide the parking, shuttle vans, and moving walkways suitable for a high volume of passengers with luggage.

For a transformative vision to become pragmatic it needs to communicate to a broad public
- the scale of its vision,
- the public interest benefits,
- the unavoidable negative impacts, and
- a commitment for
    + fair compensation and
    + transparency in imposition of governmental authority to achieve a public good..

There then needs to be a broad scale legislative commitment to this vision by creating the authorities and intergovernmental agreements necessary for modernizing the Northeast Corridor.

This EIS may not be able to directly address this broader scope, but NEC FUTURE can use the EIS to

advocate for the requirement for a more comprehensive implementation program for accomplishing the purpose and need of this study.

NEC DEIS Comments - RECORD #310 DETAIL

Status : [redacted]
Record Date : 1/27/2016
First Name : Heather
Last Name : Nielsen
Stakeholder Comments/Issues :

As a resident of Garden City, NY, I am writing to express my opposition to the proposed high speed train project. Additionally, I am extremely frustrated by the lack of transparency that has been involved in this project and the lack of opportunities for the public to comment on the proposals. The residents of Garden City and many other towns on Long Island do not want this train running through our towns.

Sent from my iPhone

NEC DEIS Comments - RECORD #2811 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Carmen

Last Name : Niichel

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--my alma mater.

NEC DEIS Comments - RECORD #489 DETAIL

Status : [redacted]

Record Date : 2/2/2016

First Name : Leif

Last Name : Nilsson

Stakeholder Comments/Issues :

The lower CT River valley was called one of the last great places and I believe building a bridge across it between the bridges will ruin it forever. And the town of Old Lyme was almost ruined by I95 cutting straight through it and a new High Speed railway will certainly destroy what is left of that corner of town. What is wrong with where the tracks are now?

NEC DEIS Comments - RECORD #1638 DETAIL

Status : [redacted]
Record Date : 2/15/2016
First Name : Dennis J.
Last Name : Martin
Stakeholder Comments/Issues :

From: RTRoberts@njtransit.com [mailto:RTRoberts@njtransit.com]
Sent: Friday, February 12, 2016 3:48 PM
To: Reyes-Alicea, Rebecca (FRA); carol@pbworld.com; Baer@pbworld.com; Ruby.Siegel@aecom.com
Subject: NJT Formal Comment Letter on NEC Future and Technical Comments

The first attachment is NJT's formal comment on the DEIS signed by our Interim ED. The second attachment is what I call our "technical comments". These are for you to read not part of our formal record. These technical comments are laid out to do two things: provide more detail and background on our concerns and set the stage for upcoming discussions on the final outcome of the FEIS and ROD. At the end of the technical comments, there are thoughts on how I might wish to see this whole exercise end up for your consideration.

You will see some statements and references in these comments which are less about this process, what you are doing, and more about concerns NJT has generated because of our experiences negotiating directly with Amtrak for over a year.

Personally, I want to say you folks did a great job of trying to lay everything out, even if I still have questions and issues with some analysis and statements. You faced a mammoth task. The complexity of the material and the challenge you had in organizing it was evident.

Now, we can focus on what we want to result from this all this work. I look forward to continuing the dialogue, at least for a little while more (for me this adventure began around this time of the year in 2010 when we started thinking about preparing the application that went to FRA). Stay warm and have a nice weekend, Rich R

Attachments : Alicea-Reyes FRA-Comment on NEC Future Tier 1.pdf (785 kb)

Chris Christie, Governor
Kim Guadagno, Lieutenant Governor
Richard T. Hammer, Acting Commissioner
Dennis J. Martin, Interim Executive Director

NJTRANSIT
One Penn Plaza East
Newark, NJ 07105-2246
973-491-7000

February 12, 2016

Rebecca Alicea-Reyes
Northeast Corridor Joint Program Manager
USDOT-Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

RE: Comments on NEC Future Tier 1

Dear Ms. Alicea-Reyes:

NJ TRANSIT is pleased to comment on the Tier I Draft Environmental Impact Statement (DEIS) for the NEC Future planning effort. The document, a result of efforts by NJ TRANSIT and other states beginning in 2010 to outline the application to the Federal Railroad Administration (FRA), highlights a range of future improvement alternatives with a concomitant range of outcomes, including ridership growth forecasts, the physical envelope needed to accommodate capital improvements, operational changes, capital and operating costs, and associated benefits.

This specific environmental process, conducted to address the requirements of the National Environmental Policy Act, is not the end of the planning and decision-making that will be needed. In many instances, the information presented generates additional important questions, so additional work will be needed before specific courses of action are taken.

Notably, the relative ridership increases accommodated under the DEIS' various comparative operating assumptions and capital improvements demonstrated that simply offering trains traveling at super high speeds would not attract most of the identified potential new ridership market. This result is consistent with the expectations outlined in our scoping letter to you dated, October 12, 2012. In fact, the issues and concerns we summarized in that letter remain central to our current perspective on this analysis and its results. We are focused on the needs of our customers as well as the need to carefully examine future market demand. The market analysis contained in the DEIS assists in responding to many of our concerns, but it does not answer all of them.

NJ TRANSIT considers the most critical finding among the alternatives examined to be the need for added trans-Hudson rail capacity into Midtown Manhattan. The analysis makes clear that to achieve a future capacity of 42 trains per hour; any proposed new Midtown Station facilities must accommodate a run-through set of tracks that extend

across Manhattan and connect with the rest of the rail system in Queens, either with the Long Island Rail Road or the Hellgate Line into the Bronx, or both. From the analysis completed to date by NJ TRANSIT, it appears 42 trains per hour is a valid target to meet NJ TRANSIT's customer demand in 2040, based on our current rail system.

However, there would not be room for additional rail service further into the future. Decisions on achieving the capacity to handle projected rail ridership must be considered in coordination with an examination of total trans-Hudson transit capacity, using an analytic approach which is sensitive to future customers' needs.

NJ TRANSIT is greatly concerned about many of the proposed improvements on the Northeast Corridor within New Jersey because they necessarily would involve both huge expense and serious impact on many built-up portions of New Jersey along the Corridor. For instance, some of the statements in the DEIS point toward widening the Northeast Corridor or creating extensive tunneling in areas that would require removing existing dense development. This raises important questions of community impact and environmental justice. There are also implied impacts on all the NEC stations, especially with Alternatives 2 and 3. Notably, NJ TRANSIT has over the last decade invested tens of millions of dollars to improve some of these stations, for example Trenton Station and Metropark. Thus, any proposed changes to these stations must be carefully scrutinized and fully understood before feasibility is assumed.

NJ TRANSIT must also have it understood and explicitly acknowledged that we will be able to continue to work to achieve and maintain a state of good repair on the 14 New Jersey NEC stations we own, as well as to continue to make necessary safety and ADA compliance improvements to these stations. Additionally, NJ TRANSIT must continue to make other necessary specific improvements along the NEC in order to maintain our ability to meet our future rail operating and customer needs. NJ TRANSIT is now pursuing some of those improvements to make our rail operation more resilient following the effects of Superstorm Sandy.

As a successor to prior passenger rail operators with the right to use the NEC, none of the proposals in this DEIS can be allowed to prevent us from doing what is necessary to best serve our customers. For example, NJ TRANSIT has demonstrated our willingness to work with Amtrak on mutually agreed to longer-term projects, such as the reconstruction of the Elizabeth Train Station and its platforms. NJ TRANSIT worked with Amtrak, and at our cost, offered to relocate the eastern platform of this station to meet Amtrak's request to allow a fifth track to be added in the area. NJ TRANSIT would not accept a situation in which follow-on actions to this DEIS inhibited our ability to provide the rail services required to meet future customer needs.

As we have discussed, much of the DEIS analysis was performed in order to permit a comparison between the alternatives presented. We also explicitly noted during these

discussions that some aspects of the assumptions, factors and operational analysis employed did not reflect the actual functioning of NJ TRANSIT's rail operations. We accept use of these techniques because of the scale of the overall DEIS effort and the need to define a scope of work that was achievable within a reasonable timeframe. However, our acceptance of analytical techniques for those purposes does not translate into our accepting them in the "real world" within which we must function to serve our customers.

The scoping letter that NJ TRANSIT sent as this effort was being initiated also indicated that we were very concerned even then about potential impacts on the existing physical surroundings along the NEC and various limitations that might be created, such as upon station access and parking, among other local impacts. We suggested then and we continued to suggest as work on the DEIS was progressing that it was crucial to think more carefully about how many and which trains stopped in particular locations, as well about the ramifications of seeking much higher train speeds.

Due to those and other factors, NJ TRANSIT cannot endorse Alternative 3 and its project elements. Alternative 3 would cause the greatest impacts along the NEC in New Jersey, while providing the least benefits to our state. Greatly expanding the width of the NEC across New Jersey, going from the 150 foot wide existing right-of-way to one that is 280 feet, and creating whole new rail lines on new rights-of-way within this densely developed state cannot be supported given that the other alternatives examined provided evidence of much greater benefits.

We are anxious to have further discussions about Alternatives 1 and 2 and those portions of the NEC where specific projects can be mostly accommodated within the existing NEC right-of-way. We also are interested in discussing projects which can progress by utilizing vacant or underutilized property next to the existing right-of-way.

Meanwhile, the DEIS draft mentions the potential need for a new Amtrak rail yard in New Jersey, (see page 4-32, Table 4-7) but no potential location is indicated nor is there a broad description of the purpose and scope of such a new facility. Importantly, NJ TRANSIT will also require additional rail yard space to permit it to increase trans-Hudson rail services. We believe a new rail yard is a critical piece of infrastructure and it requires a large piece of well-located property. Defining the purpose and need for a new rail yard in New Jersey for Amtrak, along with NJ TRANSIT's own rail yard requirements, should be listed as needed analysis in any proposed next steps.

NJ TRANSIT also believes that more analysis must be done concerning future station impacts, access, parking and train service stopping patterns before we can be comfortable with some of the implications found in this analysis. This particularly applies to Trenton, Metropark and Newark Penn Station. Changing where trains stop and how

other NEC stations function might offset the suggested need to dramatically physically impact these facilities.

There is also a need to take further steps in future analyses to lessen the need to construct additional parallel track in those areas where the existing physical envelope of the current NEC right-of-way is constrained. For instance, an examination should be undertaken to determine whether more advanced signal system technology could permit more trains to operate on the existing NEC tracks; thus, reducing the need for adding additional parallel tracks.

This further analysis will help ensure that NJ TRANSIT is able to operate its train services to meet the needs of its customers, the New Jersey travelers; whether residents, workers or visitors -- who rely on our rail services and support the economy of our state and the region.

Going beyond the purpose of the DEIS to determine potential future impacts from proposed improvements and their mitigation, we must acknowledge that sufficiently investing in the NEC to achieve positive future outcomes is only possible with a substantial increase in Federal investment to make up for the long history of disinvestment in this vital transportation corridor. Also, a full partnership must be forged with Amtrak and the Federal government around investments to improve the NEC, under which NJ TRANSIT is able to effectively meet the travel needs of New Jersey residents, visitors and workers -- our customers.

We thank you for this opportunity to comment on this significant piece of work. It was a long time in coming and is critical to advancing our understanding of future needs and potential actions. We look forward to continuing to work with you to complete this effort, through the issuance of a Final Environmental Impact Statement and a Record of Decision.

Sincerely,

Dennis J. Martin
Interim Executive Director

c: Robert Lavell
Steven Santoro
Paul Wyckoff

Technical Comments on NEC Future Tier I DEIS

Opening

Peering into the future, even with the best of intentions and using the best available information and techniques is an exploration full of unknowns, and for as much as we may learn, more questions arise for which we must seek answers. The FRA Tier I DEIS is meant to fulfill requirements of the National Environmental Policy Act (NEPA) by defining future physical and operational alternatives such that a future potential physical envelope can be defined and examined as to its environmental consequences.

This environmental planning process for the Northeast Corridor spans across eight states and the District of Columbia and involves cities and communities which are especially important to the nation's current economic well-being and its future growth. This is not an exercise to define a specific capital investment program or an operating plan every operator must subscribe to. The resulting document is not prescriptive in determining what will be funded, nor where the funding will come from. It also does not present in the DEIS a defined specific rail operating plan which can be implemented. **The goal of the Tier I DEIS is to state what future physical envelope will be used to contain the proposed future physical improvements to the NEC, to delineate and mitigate general environmental impacts associated with the alternatives presented, and establish a foundation for future project level NEPA determinations as project elements are advanced.**

The DEIS is presented to us at a time when there are substantial unmet funding needs for the NEC just to insure it continues to reliably provide its current capacity and functionality. The burden of looking forward and imagining spending much larger amounts of money is tempered by a firm knowledge about what funding is presently available matched against an set of base line needs totaling more than $20 billion, which list already includes unfunded projects. And after spending more than $20 billion the NEC will not have fully achieved a state of good repair.

Nonetheless, this is a useful exercise to stimulate discussion among stakeholders concerning what future we wish to pursue and how we might do that. In this vein, the exercise has served a useful purpose as the first of its type stretching the length of the NEC.

Working Draft

General Comments:

- **The future outlined is only possible if the Federal government plays a robust funding role both to achieve a state of good repair and address other needs, including increased reliability, capacity and train speed.**

- The investments should be scaled and timed to address defined market needs using the best available information and forecasting methods to determine such future needs. Foremost in our minds must be the attractiveness of the proposed new and improved rail services and their use by people who wish to travel, the customers. Can we afford to invest the capital and support the ongoing operating costs? These are also questions to be more intensely examined.

- The "No Action" alternative is required within the framework of any NEPA analysis to define the base line. This is not by itself a bona fide investment agenda. It should not be considered as anything more than this base line for purposes of analysis and comparisons among the alternatives. It fails to achieve even the most obvious goal of preserving the existing rail system capacity and functionality.

- There are three immediate challenges faced on the NEC which face us: achieving a state of good repair with associated improvements to reliability of train services (this also includes investments for improved safety, security and resiliency); providing additional core system/service capacity to address the projected increase in market demand at key chokepoints; and, where prudent, investing in capacity for future growth in services beyond those presently provided.

- NJT is a successor the Pennsylvania Railroad and Penn Central Railroad previous owners and operators of the NEC, including especially the commuter passenger services. We own 14 of the 15 stations along the NEC and invest in them to both achieve a state of good repair and improve them. We operate the commuter rail service we inherited as those private railroads disappeared. We invest otherwise in rail improvements to allow us to continue to provide the commuter services we now operate and to increase them as market demand warrants. We have worked with Amtrak over the year to reach agreements on how we can co-exist together including seeking a common understanding about future needs. This DEIS reflects in various locations most of these planned and underway improvements to the railroad. In the next few months we will wish to refine those listings to correct a couple of inconsistencies.

- It is important to include recognition that NJT owns 14 of the 15 NEC stations and that NJT will not be encumbered in any manner from maintaining and improving these stations, many of which are not used by Amtrak, just because a plan emerges from this NEPA process.

  NJT is now progressing important plans to rebuild the Elizabeth Station, add an eastbound platform to the Jersey Ave. (New Brunswick) Station, rebuild the westbound platform at this station, add a new North Brunswick Station, rebuild and lengthen other station platforms plus undertake maintenance of these facilities. NJT has Federal funding to pursue projects to respond to the impacts of Superstorm Sandy and address current train operations issues. NJT is pursuing plans with other funding to anticipate how NJT and Amtrak services can co-exist more efficiently and reliably, e.g. proposed improvements at County Yard, Delco Lead, Mid-Line Loop and Hunter Flyover. These projects and other are included in this document both in the main body of the DEIS and in its appendices.

- Railroads and their services operate best when treated as systems becoming overly focused on segregating all needed improvements into those for intercity and those for local/regional rail services defeats our ability to optimize the future investments we face. This systems view applies whether from the perspective of efficient investing of capital or minimizing the impact on existing rail services when making improvements to existing infrastructure. From a public policy perspective, and within the context of managing and investing in a multimodal transportation system, our railroads are especially important given the scale and intensity of development along the Northeast Corridor. The ability of our highways and airports to sustain the projected growth in travel is much more limited than in the past and our railroad system offers us an ability to unnecessary impede growth in travel because of growing vehicular congestion and lack of airport capacity.

- Projecting outward 25 years is always a challenge given the changing world we exist in. For now, the focus should be on preserving the necessary envelope for those immediate term projects, from 2016 out through 2030, which mostly rely on using the current NEC right of way and assets. The Universal First Phase projects listing in Section 10, Table 10-1, is a useful place to begin a further conversation on a project listing that we can agree to advance but assuming a fuller funding role for the Federal government.

- Although the idea of having greater capacity on the NEC at major choke points, such as at the Hudson and East Rivers, as set forth in Alternative 3 opens the door for a discussion about a potentially needed longer range future capacity, much more information is necessary to confirm the dimensions, rationale and timing of this capacity need. There is insufficient market, operating and physical evidence presented in this DEIS justifying embracing these proposals at this time.

- Those proposed improvements which require expanding the property limits of the existing NEC right-of-way causing a taking of property not now part of the NEC are instructive but need further intense analysis to determine their real need, specific impacts and benefits. Generally, great caution should be shown to any proposal which suggests intruding on the existing built-up cities and communities in NJ along the NEC. Indeed, because we cannot have a perfectly knowable view of the future twenty-five years hence since future needs that far into the future seldom follow a fully knowable fixed trajectory, more analysis is needed to affirm such needs before going in a major way outside the limits of the NEC is accepted.

- There is a practical lens through which States and agencies having responsibilities for operating current NEC train services must employ in viewing the longer term future. This lens challenges what we can do given the information provided and our current empowerment and funding levels. Practical pragmatic concerns must be brought to bear on this exercise of future planning.

- There is a continuing interest in how the FTA will regard the selection of an alternative from this DEIS and the Record of Decision. This is especially since it is likely that some of the improvements identified will require funding from the FTA. The central issue is having the FTA accept this Tier I process and the ROD, support and accept the subsequent project level NEPA work in the future.

Working Draft

Specific Comments:

Trans-Hudson: Future Capacity Needs

The most critical finding in this DEIS from NJT's viewpoint results from the analysis of the future need for added trans-Hudson rail capacity into Midtown Manhattan. This analysis makes clear that to achieve a future capacity limit of 42 trains per hour for NJT trains in 2040, it is necessary for the proposed new Midtown Station facilities to accommodate a run-through set of tracks and train services that extend across the island of Manhattan and connect with the rail network in Queens, NY.

NJT is comfortable, based on its own analysis that providing about 42 trains per hour for NJT's existing trans-Hudson rail services into Midtown Manhattan should be adequate. It should be noted that at this capacity limit, room to accommodate added peak hour trains related to any planned extensions of service off the existing system would not exist. A caution from a trans-Hudson transportation system perspective is that the final decision on the future needed rail capacity into Midtown Manhattan needs to be considered in coordination with an examination of total trans-Hudson transit capacity and using an analytic approach which is sensitive to current and future customers' needs.

The Market Assessment

The work done as part of this DEIS to further document the potential future ridership markets for intercity and high speed rail within the NEC does a great deal to shed light on the where there is more opportunity and less in attracting new ridership to the trains using the NEC's intercity rail services. Especially useful was linking the future of highway travel on the I-95 and parallel interstate highways with the use of intercity rail in the examined future corridors.

The ingoing concern for greatly reducing trip times and elevating train speeds gave way to a greater focus on frequency of service, availability and cost to the prospective future customer. The idea that the business travel market was so pre-eminent that it should totally dominate decisions about capital investment and operations, gives way to more attention being paid to discretionary and other trips where travelers want to get there sooner but balanced with concerns about convenience and fares.

While this work does a lot to enlighten the discussions about future market potential, more work should be done as part of an ongoing effort and involving the other rail operators along the NEC other than Amtrak. Additionally, FHWA and FTA should be involved to encourage other forms of data collection on inter-regional travel between metropolitan areas which today is mostly dominated by auto trips.

Service Coordination

This document contains a number of proposals for service coordination which questions what is possible but leaves unanswered as many or more questions as are answered. There have and will continue to be discussions among various rail operators along the NEC about other ways to coordinate their services. The new technologies for communication and transferal of information have made possible more information being made available to customers about connecting transit services. Use of smart phones and like technology for collecting fares, informing travelers on a real time basis and helping them plan trips is also gaining momentum. NJT uses smart phones and apps to accomplish all these things.

There are doors which can be opened but there is much more to be known about how these ideas can be practically applied beyond what is presented in this document.

Seamless Transfers

This is an idea that has been around for decades and the fact that we still have seams in the transferring actions of customers speaks to the complexity of making this all work. NJT operates a multimodal system at a number of its major terminals and stations where we bring together geographically dispersed services and different modes. Deciding what modes and services need to be more coordinated is not simple and often involves trade-offs. Should there be an ongoing effort to make transfers more seamless, yes. That should continue to be a concern at the planning, design and implementation levels.

Train Consists

NJT has determined that in the peak morning and evening time periods on weekdays when ridership demand is at its highest, every effort should be made to increase the passenger capacity of every train so the use of train slots on the railroad and platform slots for trains to load and unload can be maximized. NJT has made investments in new passenger rail equipment to advance in this direction. It is believed the other rail operators and Amtrak should be encouraged to do the same, especially with regard to the NEC centered on train services to, from and through Manhattan in the peak morning and evening travel hours on weekdays. There may also be other peak time periods when such a focus is also needed.

By moving more people on a given train maximizes the passenger capacity of that train and respects the capacity of how many trains can be operated on a section of railroad or serviced at a particular platform. It will be necessary to invest in station platform improvements also to complement this strategy so platforms widths and access to and from them is sufficient to permit a smoother flow of passengers. This DEIS did not get

into those issues but it is assumed they will be considered at the Tier II level of NEPA analysis.

Signaling and Train Control Technology

This DEIS did not assume further improvements to railroad signaling systems beyond what is available and being implemented today. However, other improvements seem likely to be available in the future similar to what is occurring with other modes where being able to precisely locate a moving object is possible as well as preserving a safe distance between those moving objects. The current railroad signaling technology will someday need to embrace this ability and allow trains to follow on another based on some form of GPS or similar locating system tied to their braking and motive power controls.

Train Service Stopping Patterns

In this analysis, many new train stops were added to existing train stops to create localized congestion as a much greater number of trains worked to access platforms, stop, handle passengers, accelerate and clear the station's track network. This has the effect of causing a need in some places for yet more new parallel track as well as adding more platforms. The future stopping patterns of trains needs to be examined to see if the market needs can be addressed differently by stopping some new or existing trains at other nearby stations. There are some complex trade-offs which should be examined in greater detail.

In NJ along the NEC, the DEIS indicates a need to make potential major changes to Trenton, Metropark and Newark Penn Station to accommodate greater numbers of trains. There is a need to undertake further analysis of the congestion on the railroad system related to these stopping patterns; local concerns related to expanding stations to handle much larger volumes of passengers in already built-up neighborhoods; and, the traffic consequences of attracting greater numbers of intercity and other rail riders to these locations. Consideration should be given to having these proposed added new rail services stop at other NJ stations on the NEC to address the same market access needs but potentially causing less impact on the built-up environment. The overall intent would be to maximize the use of the existing rail system, existing and proposed stations, avoid undue impacts to stations which will spill out into the neighborhoods in which they are located, and open up access for other important markets to the intercity and regional rail services that can be accommodated on the NEC.

Adding Parallel Track and Curve Straightening

There are locations along the NEC in NJ where it is possible to add new parallel track. There are also in some locations with sufficient right-of-way to allow existing railroad

track curvature to be reduced. But there are other locations where the existing built-up neighborhoods come in tight on the current property boundaries of the NEC. At this high level of review, there is not a comfort level with the proposals to add parallel track where the potential to require displacement of businesses, homes and other developments could result.

Also, if additional property is required outside the limits of the NEC today, how does anyone protect or preserve that property from being developed if it were vacant or underutilized and we are many years away from a real project being initiated?

It is suggested that new tunnel sections might be built in New Brunswick, Metuchen/Colonia, Elizabeth and Newark in these alternatives with few details on how these might look and how they will impact the developments surrounding them. We have major concerns with these proposals. It is recommended that more attention be focused on what can be done within the limits of the NEC right-of-way with some exceptions where requiring added right-of-way can be accomplished in a community sensitive manner and with minimal taking of existing development.

Increased Train Speeds

While showing that reductions in train trip times generates some added attractiveness for potential new future riders, the analysis in this DEIS shows that for substantial volumes of potential new riders, they value other train service attributes, such a frequency and affordable fares. NJT is not supportive of efforts to increase train speeds above 160 mph given this analysis. Among our concerns is the relationship between yet higher train speeds that increase the need for expending more capital funds on additional parallel track. These higher train speeds will consume more existing track capacity to permit clear signals ahead of the faster moving trains. This added track, more high speed switches, and faster speeds translate into higher maintenance costs. Regional rail operators such as NJT will be placed in a position of being asked to share in these added costs in order to maintain existing services and grow them to accommodate growing ridership.

Also, as can be discerned from the description of Alternative 3 raising the train speeds a lot higher will require substantial rebuilding the 14 NEC stations owned by NJT along the NEC. These comments along with others regarding expanding the NEC right-of-way in NJ reinforce our stated perspective.

Operating Efficiencies

Operating a more efficient rail system is important but the analysis contained in the DEIS does not do justice to the complexities of operating the existing rail system. The perspective taken is mostly focused on what needs to happen as trains enter, leave and

use the NEC and does not reflect requirements and conditions on the lines feeding into the NEC nor the basic need to operate trains on a schedule that meets the needs of the customers. There are several theories of rail operations discussed but there is no direct interface with the customers on whether they would agree with the resultant service schedules.

There are two areas where we suggest more attention should be spent examining how operations can be improved. One such area is the use of platform space in terms of the time a train occupies the platform to unload or load passengers. Platform space is a premium resource in the peak travel time periods. The ability to improve access to and from platforms should be examined to maximize the ability to load and unload trains in shorter time periods. Various operating practices, some required and some a function of custom, such as baggage handling, food handling, steps to turn trains in a station, should be examined to determine if changes to the practices or use of new technology can reduce the time needed to complete these tasks. Platform capacity, as will be discussed later, is an expensive limited resource and should be used accordingly. This DEIS speaks of spending large amounts of capital to save a couple of minutes by straightening track curvature but does not make reference to these other issues which impact the customers' total travel times.

There are instances, some of which are acknowledged in the DEIS where trains should operate more as run through services at certain times of the day to sustain a smoother flow of trains and minimize conflicting train movements which negatively impact on train handling capacity of that segment of the railroad. NJT is interested in these proposals and would hope more analysis of these ideas would continue. Instituting these run through services is not simple and the ridership market for these services is still largely unproven.

Regional Connectivity

Pivoting off the prior comment on run through train services, there is an argument to be made for more research into these concepts to seek a feasible approach to them where there is sufficient evidence of a travel market for them and adding such service makes other sense, as for example, how these services impact fleet size and composition, providing required train maintenance, labor issues, and the cost of operating the train versus the revenue gained or cost savings achieved. NJT has willingly participated in prior exploratory planning for such services and has been a partner with Metro North Railroad and Amtrak in operating the Sunday football special trains from Connecticut to New Jersey for Giants and Jets NFL games.

Conflicting Train Movements

There are comments made in the DEIS which allude to chokepoints. Many times these choke points are where today trains making conflicting at-grade movements. NJT and Amtrak some time ago when the Amtrak 2030 Master Plan was being developed, outlined a series of locations where at-grade conflicting train movements occurred and needed to be eliminated over a period of years to both allow an increase in capacity and train speeds. Such locations include at Morrisville Yard, Trenton Station, County Yard, NK where the Raritan Valley Line eastbound trains cross westbound tracks south of Newark, and by NJT's Meadowlands Maintenance Facility. The remedies to these at-grade conflicting moves are listed in different locations within the DEIS but they are not all listed consistently. So for example, the Westbound Waterfront Connection which is the remedy to the at-grade train moves into and out of the Meadowlands Maintenance Facility is missing in Table 10-1 but the remedies at the other locations are listed. It is recommended a consistent approach be adopted in speaking of and addressing these situations.

Resiliency

NJ learned the harsh lessons that Mother Nature can teach us by hitting us with Hurricane Irene and Superstorm Sandy to highlight two of the more recent weather events. NJT is working hard to address the lessons learned especially after Sandy using Federal funding to harden assets and make our system more resilient. Our actions are noted in the DEIS but not with the importance they deserve. These are funded priority projects from our perspective.

Missing in this report is a discussion of the flooding of Trenton Station following Hurricane Irene which was caused by the Assumpink Creek overflowing onto the adjacent NEC tracks at the Station. This creek flows into the Delaware River. The water level immediately following Irene at one point was over the existing train platforms. It took a week to allow the flood waters to recede and work done to the waterlogged track and switches before service on the NEC was restored.

Hudson Tunnel Project NEPA Work

The FEIS should make reference to the work underway to satisfy NEPA requirements for the Hudson Tunnel Project which has a focus on building two new rail tunnels under the Hudson River to preserve existing NEC capacity and functionality plus allow the rebuilding of the current very old existing Hudson River rail tunnels that were damaged by Superstorm Sandy. This work will be underway this spring of 2016.

Stations

Access Concerns

This DEIS indicates that at the Tier II level, more detailed traffic, parking and other analysis of access to rail stations will be undertaken. This is a source of concern, as previously noted, since the major rail stations in NJ used by Amtrak and NJT trains, such as Trenton, Metropark and Newark Penn Station, each have many issues with local area traffic congestion, ability to expand parking and ability to redesign and expand these stations. We have communicated these issues during the conduct of this work and will be redundant in raising them more than once in these comments. The idea that these challenges can be resolved later on a case by case basis is not a satisfactory response. The solution resides in examining the future use of the NEC stations in NJ as they relate to the projected future ridership markets, current traffic conditions, future traffic conditions, ability to resolve the shortfalls in capacity that are found, consider use of other nearby or new stations to handle portions of the projected ridership growth so the projected future demand is manageable and the need to spend additional capital is contained.

To a limited extent, the DEIS does allow for such possibilities where it proposes intercity trains stop at Secaucus Junction. Consideration of how other stations along the NEC, such as the Newark Liberty International Airport Station, should be folded into this future analysis.

An important added benefit of stopping more of the proposed new intercity trains and regional trains at other stations is to expand the rail service access benefits supporting new development at more locations in NJ. An intelligent approach will surround the rail needs, local needs and expand benefits for all.

Station Improvements

There are two situations which received less recognition than NJT thinks is useful:

- The improvements at Newark Penn Station to both achieve SOGR and accommodate near term increased demand; and,
- Improvements in the New Brunswick-North Brunswick series of NEC stations.

Newark Penn Station was opened in 1937 to handle a different mix and volume of passengers than it presently handles. For reasons to do with Amtrak's planning, this NEC Future plan, plans of NJT and the Port Authority Trans-Hudson Rail Rapid Transit System (PA of NY & NJ), Newark Penn Station may have to undergo significant investment in the immediate future. NJT has just concluded rebuilding the existing platform serving Track 5 to make it a smooth level well-lit and safe place to load and

unload trains. The other platforms serving NJT and Amtrak require the same rebuilding. There are also issues with the accommodating more passengers vertically given the existing narrow escalators, limited stairways and elevators. Amtrak and NJT have initiated planning work to define further the needed future improvements.

NJT is working to improve ADA access at New Brunswick Station and better connect it with the surrounding medical complex, Robert Woods Johnson Medical Center. Further south of this station is Jersey Ave, where there is a large existing park and ride facility. Built originally next to County Yard, the existing station has proven to be a success but depends on trains coming from County Yard and then using an at-grade conflicting move to travel eastbound. Increasingly this eastbound move has become a challenge to operate trains on reliability because of the increase otherwise in NEC trains. NJT is pursuing a series of independently useful projects which collectively will enhance the NJT services and serve growing ridership but also avoid the at-grade train movements and allow for a smoother operation on the NEC in this portion of the Corridor. The Mid-Line Loop and proposed North Brunswick Station are among these projects. With some forethought about future NEC needs, NJT and Amtrak worked to provide space for additional parallel track so train capacity will not be an issue in this portion of the NEC approaching New Brunswick. However, under the NEC Future Alternative 2, there is a proposal to construct a tunnel under New Brunswick and the Raritan River which has been commented upon previously. This is another example of where and why more homework is needed.

Multimodal Facility Perspective

The major NEC stations in NJ are points of convergence for various modes of public transit and intercity rail services. At Newark Penn Station for example, there are intercity rail, intercity bus, taxi, local and interstate bus, light rail, rail rapid transit and auto modes all compressed into one compact complex. The DEIS acknowledges this multimodal opportunity but does not sufficiently reflect on the need for more planning to determine not just the future NEC needs but the future needs of these other modes at these locations where everything comes together. History and experience have demonstrated that these multimodal needs often do not get the level of consideration and investment they require. This is complicated because at a station like Newark Penn Station which is a historic landmark, the ability to change it physically is limited. But as noted previously, the planning for facilities to continue to function adequately in the future needs to be part of a multi-station/rail service planning effort. Doing each station independently will prove to be a mistake.

Economic Opportunities

As noted in the DEIS, among the economic benefits that cities and communities with stations on the NEC or its feeder lines can enjoy is greater rail access because of a boost in rail services and connectivity between rail and other transportation modes. The high level information set forth in the DEIS needs to be brought down to a meaningful local level for many cities and communities for whom the benefits are not as evident nor are they as aware of what they must do to take advantage of the improved access.

NJT has almost two decades of experience being pro-active working with cities and communities in NJ through our Transit Friendly Development program which links with a program managed by NJ Department of Transportation to designate Transit Villages. These planning efforts plus other actions by the State of NJ under Governor Christie has caused economic development decisions to be made which do take advantage of the available public transit, including especially rail. Following along the path of prior comments, looking more thoroughly at a local level at these opportunities could be another aspect of a comprehensive examination of the future market needs, station capacities and future capabilities along with NEC rail infrastructure and service improvements.

Concluding Comment

Important is that this DEIS provides us with a basis for dialogue and decisions about further work which needs to be done. Without this documentation, the discussions would have nothing to stimulate them or help focus everyone's attention on a set of proposed outcomes and possible consequences. The question is not a simple as whether we want to embrace a long term vision or not. The question before us now is what steps can we take while we continue a dialogue about the vision, its benefits and the pathway forward.

Immediate Next Steps

As this work was undertaken to comply with the National Environmental Policy Act and not to develop a detailed capital investment and operating cost versus revenue plan, it always important to make the point that more work is needed to respond to these concerns. There should be more certain answers on where the funding can realistically come from. What are the real benefits from investing? Does the value of these investments return enough benefits to make them worthwhile? This question needs more intense scrutiny at a finer grain level. More must be known about the role of the

Federal government in meeting the capital investment agenda potentially resulting from this and other work. This investigation of funding needs to also document how the operating costs will be covered too.

Having outlined the need to know more about what funding is needed and where it will come from, here are some other comments on next steps:

- It is evident based on a close reading of this DEIS that a great deal more work is needed to outline the real impacts of specific physical and operating improvements that are stated in this document. But before initiating the preparation of a Service Development Plan and starting Tier II environmental reviews, it is evident that some high level analysis is needed to respond to several of the comments contained herein regarding how the NEC functions within a broader transportation system. For example, it is not appropriate to start advancing plans for rebuilding Metropark in NJ into a larger rail station until you examine how this and other stations serve the market and how a more reasoned plan can be developed across a longer portion of the NEC.

- It is stated that one of the next steps following the issuance of a Record of Decision based on some further indication of which NEC improvement projects should be advanced next, is completion of a Service Development Plan. NJT is concerned that this work will be driven more by how those operating the railroad think things should be and not adequately take into full consideration the current and future needs of those using the NEC rail services, the customers. This concern is voiced based on reading through some of the portions of the DEIS.

- Those not familiar with railroads and planning for a multimodal transportation system are seeking quick complete but simplistic answers. Working too quickly and oversimplifying the work which is needed, will result in poor future implementation and rail services. Time, staff resources and funding must be provided adequate to undertake the proper level of work. This does not mean taking an unnecessarily long time period to do the analysis and make decisions. It does mean establishing, staffing and funding an ongoing planning effort which is inclusive (including Amtrak and all the NEC rail passenger and freight operators along with the States), disciplined and managed to target solutions and decisions so we can advance forward and make improvements.

- A few things should come out of this effort:

  - A more defined set of physical limits/boundaries within which future specific NEC improvements can be advanced. The ROD should be prescriptive of

those limits where there is evidence a comfort level exists around them and allow for added future work where issues and future unknowns require more exploration.

- A sense of the magnitude in terms of physical and operating needs and how they interact allowing a more complete dialogue around funding needs and sources. This includes timing of project implementation, project sequencing, benefits, outages on existing infrastructure, existing service impacts, etc.

- An immediate timeframe, maybe covering 15-20 years, with a list of capital improvements around which a working consensus can form, such as proposed in Table 10-1, titled: Universal First Phase Projects - Aging Infrastructure and Chokepoints. The current listing in Table 10-1 can form a beginning point for further discussion. This listing can perhaps be further prioritized into a couple or a few categories based on some agreed to criteria and work can be initiated on the project level Tier II NEPA work for the listed projects and funding to do this work can be found.

Working Draft

Ancillary Comments on the DEIS Organization

Reviewing this DEIS has proven challenging. It is suggested that information be presented in the FEIS which speaks to the resulting capacity of the NEC as a system. The various discussions of discrete portions of the system produced confusion for some readers about what capacity would be provided by an alternative versus how it might be used from a systems perspective. This applies especially to the portion of the NEC from about Elizabeth, NJ into the Bronx.

Another suggestion on organization is that rather than having so many appendices which in turn have their own appendices; consideration might be given to simply providing everything as supplementary reports. Depending on the knowledge and experience of the reviewer, the desire to see how the detailed analysis was structured in terms of input data and assumptions, methods, outputs and conclusions required going below the first set of appendices.

NEC DEIS Comments - RECORD #3000 DETAIL

Status : [redacted]

Record Date : 2/16/2016

First Name : Cyndi

Last Name : Steiner

Stakeholder Comments/Issues :

Please see attached comments from us.

Thank you,
Cyndi

Cyndi Steiner
Executive Director
New Jersey Bike & Walk Coalition
www.njbwc.org
973-886-4142
*Register for the 2016 NJ Bike & Walk Summit here
<https://www.eventbrite.com/e/2016-new-jersey-bike-walk-summit-registration-16760289477>!*

Attachments : FRA NEC letter Feb 16 2016 NJBWC.pdf (289 kb)

New Jersey Bike & Walk Coalition

February 16, 2016

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

Via email: comment@necfuture.com

To whom it may concern:

The New Jersey Bike & Walk Coalition is New Jersey's only statewide advocacy organization representing the interests of individuals throughout New Jersey who bike or walk. Our mission is to work for better infrastructure for bicyclists and pedestrians in order to improve the safety, economy, health, environment, and general livability of our communities. Thank you for the opportunity to submit our input regarding planned improvements to the Northeast Corridor.

When considering the environmental impact of future Northeast Corridor improvements, it is absolutely essential that bicycling and walking be included as a key component of any development plan. Unfortunately, such an approach is somewhat lacking from the initial plan that has been outlined. We urge the Federal Railroad Administration to consider the benefits of a bike-inclusive approach to NEC planning that would allow for both increased connectivity and higher use with lower demand for parking. Even within the framework of the "No Action" alternative, these should be considered necessary improvements that would allow the network to maintain its existing service levels.

Bicycle service on NEC passenger rail lines has a positive impact on the overall transportation network. "Last mile" connectivity on both ends of commuting trips allows bicyclists to reach a passenger rail station from home or work, eliminating use of other modes (typically automobiles). This reduces automobile traffic and parking requirements. Bicycles can also be used from home or work to reach carpool lots, subway, light rail, and bus services which then connect to passenger rail stations with concomitant reductions in traffic and parking.

In addition to daily commuters, day-long and multi-day bicycle travelers arriving from other regions by any travel mode could use passenger rail with bicycle accommodations to reach destinations within the NEC. Bicycle travelers who start their trip by any travel mode within the NEC could use passenger rail with bicycle accommodation to reach destinations outside the

551 Valley Road, Suite 140
Upper Montclair, New Jersey 07043
cyndi.steiner@njbwc.org
973-886-4142

New Jersey Bike & Walk Coalition

NEC. These tourism activities reduce environmental impact both within and outside the NEC by shifting to lower pollution and energy-intense transportation modes.

It is also important to consider that accommodation at stations will not be sufficient if there is poor access for bicycles. Bike paths, bike lanes, or other facilities are needed to insure that cyclists can reach stations for "last mile" and "first mile" use. For that reason, it is essential to develop citywide and regional plans for bike infrastructure and facilities that will improve accessibility for bike riders seeking to utilize the NEC for long-distance travel. Many cities and towns with transit access in New Jersey are already developing these plans. Collaboration would work very well in these situations.

With those principles in mind we would like to request that both roll-on/roll-off bike access and secure bike parking at Amtrak stations be provided to NEC customers. In addition, the FRA should take advantage of opportunities for NEC expansion to provide a true multi-use corridor allowing for many modes of travel along the NEC right-of way. Using a rail-with-trail approach, right-of-way development should incorporate multimodal opportunities such as bicycling and walking. Trails, protected by walls or fencing and built according to current guidelines, should be constructed in vicinity of the railways along a shared right-of-way, thus enhancing opportunities for multimodal use.

In particular, we ask that specific attention be given to the inclusion of multi-use trails on rail bridges. Bridges are often barriers to full development of bicycle route networks when the bridges do not accommodate bicycles. When rail bridges in the NEC require replacement or refurbishment they should accommodate bicycle and pedestrian access. In New Jersey, the soon-to-be-replaced Portal Bridge comes to mind as an excellent opportunity to provide access to bike riders and pedestrians on what would be the only available facility allowing for the crossing of the Hackensack River.

By incorporating active transportation options into planned NEC infrastructure projects, the overall environmental impact of the project can be further mitigated in a manner that increases access with no subsequent environmental burden as it relates to energy use or pollution. A multimodal approach to NEC planning will not only improve access and connectivity across the network and throughout the cities and regions served, it will accomplish these goals with minimal need for additional capital investment by maximizing the effectiveness of already-planned infrastructure and already-acquired rights-of-way.

Sincerely,

Cyndi Steiner

Cyndi Steiner
Executive Director

551 Valley Road, Suite 140
Upper Montclair, New Jersey 07043
cyndi.steiner@njbwc.org
973-886-4142

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF PERMIT COORDINATION AND ENVIRONMENTAL REVIEW
P.O. Box 420 Mail Code 401-07J Trenton, New Jersey 08625-0420
Phone Number (609) 292-3600
FAX NUMBER (609) 292-1921

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

January 20, 2016

Ms. Rebecca Reyes-Alicia, Program Manager
U.S. Department of Transportation
Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

RE: Federal Railroad Administration - Northeast Corridor (NEC)
Future Rail Line Improvement Project Including
Trenton, Mercer County to Newark, Essex County
Comments on the FRANEPA Tier 1 Environmental Impact Statement

Dear Ms. Reyes-Alicia:

The New Jersey Department of Environmental Protection's (Department) Office of Permit Coordination and Environmental Review (PCER) distributed, for review and comment, the Federal Railroad Administration (FRA) National Environmental Policy Act (NEPA) required Tier 1 Draft Environmental Impact Statement (EIS) for proposed improvements to the rail lines of the Northeast Corridor through New Jersey between Philadelphia and New York City. The Department offers the following comments for your consideration:

Natural Resources -

In order for the NJ Division of Fish & Wildlife (DFW) to fully assess any potential impacts to plants, fish, and wildlife, please forward the GIS shape files for the any potential impact areas in New Jersey. The Department is concerned that any Green Acres encumbered land may not be fully represented in the Draft EIS and that some State owned lands may be impacted. A pre-application meeting at the NJDEP to discuss these issues would be helpful in resolving these questions. If you have any additional questions, please do not hesitate to call Robin Madden, Assistant Commissioner's Office, Natural & Historic Resources at Robin.Madden@dep.nj.gov or (609) 292-5990.

Historic and Cultural Resources:

The State Historic Preservation Office (HPO) is required to review any project affects to historic and archaeological resources as this project is subject to a NEPA regulatory review which considers effects to cultural resources. The Federal Railroad Administration (FRA) shall continue its' consult with the Historic Preservation Office and any other consulting parties pursuant to Section 106 of the National Historic Preservation Act, and it's implementing regulations, to identify if the proposed NEC Future project area contains any historic properties, and if so, provide an assessment of effects. The HPO looks forward to, additional consultation with the FRA pursuant to Section 106 to better understand the project, alternatives, and NEC Future location(s) to provide informed comment to both the FRA and the Department as well as to develop a Programmatic Agreement.

NJ HPO's cultural resources GIS data is available via NJ Geoweb or direct download at NJ DEP's Statewide Digital Data Downloads. Please also provide GIS shape files to Patty Chrisman (609-984-0850), NJ Transit Historic Preservation Specialist, Historic Preservation Office at the NJ Department of Environmental Protection, Mail Code

501-04B, P.O. Box 420, Trenton, NJ 08625-0420 or via email at Patty.Chrisman@dep.nj.gov . If you have any additional comments, please also contact Vincent Maresca at (609) 633-2395 or vincent.maresca@dep.nj.gov

Thank you again for providing the HPO with the opportunity for review and comment on the potential for this proposed NEC Future undertaking to affect historic and archaeological properties. Please reference the HPO project number assigned to this project (HPO-A2016-200; Log#16-0581-1 & 2), in any future calls, emails, submissions, or written correspondence to help expedite your review and response.

Land Use:

We have reviewed the "Tier 1 Draft EIS", dated November 2015, prepared for the NEC Rail Improvement Program. The EIS addresses the entire NEC Rail Improvement project from Boston to Washington D.C.

It is reasonable to expect that in NJ, the project will require an Individual Freshwater Wetlands Permit (N.J.S.A. 13:9B), a Flood Hazard Area Permit (N.J.S.A. 58:16A) and a Waterfront Development Permit (N.J.S.A 12:5-3).

Three alternative alignments were considered for the overall project. The EIS did not discuss the alternative alignments in NJ in the regulatory context of avoiding wetland or State open water impacts. The regulatory standard for Freshwater Wetland Individual Permits requires a rebuttal of the presumption that an activity has an alternative that does not involve disturbances to freshwater wetlands or State open waters. Any discharge of fill material into more than 5 acres of wetlands would be considered a "major discharge", which is an activity that the Department must transmit to the USEPA for review in accordance with the Department's 1993 MOA with the USEPA regarding assumption of the Federal 404 program.

Mitigation is required pursuant to N.J.A.C. 7:7A-15 in order to compensate for disturbances to wetlands or State open waters authorized by an Individual Freshwater Wetlands Permit.

The project will be required to demonstrate compliance with the regulatory standards for a Flood Hazard Area Permit (N.J.A.C. 7:13) and a Waterfront Development Permit (N.J.A.C. 7:7). Riparian zone mitigation may be required pursuant to N.J.A.C. 7:13 for riparian zone impacts.

If you have any additional questions, please contact Christopher Jones, in the Bureau of Urban Regulation, Division of Land Use Regulation at 609-633-6757.

Site Remediation

The NEPA Tier I Draft EIS for the proposed Federal Railroad Administration's (FRA) Northeast Corridor (NEC) is broad and programmatic in nature, the information required by decision-makers includes "big picture" constraints and opportunities. The Site Remediation Program does not have any specific comments on this draft Document at this time. For future assessments, the FRA should be aware of New Jersey's LSRP program http://www.nj.gov/dep/srp/ and specifically the Site Remediation Program Guidance for Linear Construction Projects http://www.nj.gov/dep/srp/guidance/srra/lc_guidance.pdf. If you have any additional questions, please contact Stephen E. Maybury, Chief, Bureau of Case Management at 609-633-1455.

Stormwater Management

We have reviewed the hydrologic/Water Resources section of the attached Draft EIS for the Northeast Corridor Improvement Project. Based on the information provided the only permits that would be required for this project would be for construction related dewater and I have attached a guidance document detailing information on the types of permits issued by the Bureau. Based on the length of the proposed project and the fact that it will cross various counties and municipalities the applicant would be required to submit an application of some sort for each municipality unless group of municipalities if the dewatering will occur within an area up to three miles on a side. If you have any additional questions, please contact Ken Komar at (609) 633-7021.

Air Mobile Sources

The Bureau of Mobile Sources has reviewed this project and finds no long term diesel impacts due to the extensive if not exclusive use of electrified systems on the NEC within New Jersey. During the construction phase, however, there are likely to be short term diesel impacts due to the use of diesel powered equipment, especially if one of the more ambitions alternatives is chosen. While there is some mention of standard mitigation procedures during construction in the plan, please refer to the following recommendations:

Diesel exhaust contributes the highest cancer risk of all air toxics in New Jersey and is a major source of NOx within the state. Therefore, NJ DEP recommends that construction projects involving non-road diesel construction equipment operating in a small geographic area over an extended period of time implement the following measures to minimize the impact of diesel exhaust:

1. All on-road vehicles and non-road construction equipment operating at, or visiting, the construction site shall comply with the three minute idling limit, pursuant to N.J.A.C. 7:27-14 and N.J.A.C. 7:27-15. Consider purchasing "No Idling" signs to post at the site to remind contractors to comply with the idling limits. Signs are available for purchase from the Bureau of Mobile Sources at 609/292-7953 or http://www.stopthesoot.org/sts-no-idle-sign.htm.

2. All non-road diesel construction equipment greater than 100 horsepower used on the project for more than ten days should have engines that meet the USEPA Tier 4 non-road emission standards, or the best available emission control technology that is technologically feasible for that application and is verified by the USEPA or the CARB as a diesel emission control strategy for reducing particulate matter and/or NOx emissions.

3. All on-road diesel vehicles used to haul materials or traveling to and from the construction site should use designated truck routes that are designed to minimize impacts on residential areas and sensitive receptors such as hospitals, schools, daycare facilities, senior citizen housing, and convalescent facilities

If you have any questions, please contact Jeff Cantor at (609) 292-2232.

Thank you for giving the New Jersey Department of Environmental Protection the opportunity to comment on the Natural Resources Review for the proposed project. Please contact me at the above number if you require additional information.

Sincerely,

Ruth W. Foster, PhD., P.G., Acting Director
Permit Coordination and Environmental Review

Enclosure

c. John Gray, NJDEP-Deputy Chief of Staff
Ken Komar, NJDEP-Stormwater
Patty Chrisman, NJDEP- NHRG SHPO
Robin Madden, NJDEP-NHRG
Judeth Yeany, NJDEP-Green Acres
Christopher Jones, NJDEP-Land Use
Kelly Davis, NJDEP NHRG F+W
Jeff Cantor, NJDEP-Air Mobile Sources
Angela Skowronek, NJDEP-Air Planning and Conformity
Steve Maybury, NJDEP-SRP

Revised 8/2015

Bureau of Water Allocation & Well Permitting
Construction Related Dewatering Guidance

Various permits and approvals may be required for construction related dewatering activities from the Well Permitting and Water Allocation Permitting sections in the Bureau of Water Allocation and Well Permitting. Permits required are site and project specific.

Well Permitting

An approved Well Permit is required for dewatering wells or dewatering well points which are 25 feet or more in total depth or are 6 inches or more in borehole diameter. All drilling activity shall be performed and completed by a New Jersey licensed well driller of the proper class. N.J.A.C. 7:9D – 1.11(g) 5.

Water Allocation

If construction related water use (including trench dewatering) is required at rates exceeding 70 gallons per minute or greater pumping capacity from a single source or combination of sources in the same municipality then that activity would be regulated. Potential regulatory mechanisms include:

Diversion of more than 100,000 gallons of water per day ($\geq$ 70 gpm) for less than 31 days in a consecutive 365 day period- Short Term Water Use Permit-by-Rule (BWA-003) /Short Term Water Use Report (BWA-004), N.J.A.C. 7:19 – 2.17(a).

Diversion of more than 100,000 gallons of water per day ($\geq$ 70 gpm) from a confined area/space (coffer dam) – Dewatering Permit-by-Rule (BWA-005), N.J.A.C. 7:19 – 2.17(b).

Diversion of more than 100,000 gallons of water per day ($\geq$ 70 gpm) for more than 30 days in a consecutive 365 day period – Temporary Dewatering Permit (BWA-002), N.J.A.C. 7:19 – 2.3.

Diversion of less than or equal to 100,000 gallons of water per day at pumping rates of more than 70 gpm or larger – Water Use Registration (DWR-188), N.J.A.C. 7:19 – 2.18.

In addition –

Horizontal directional drilling – as this is part of the pipeline construction it would be included within the scope of the applicable regulatory mechanism for the project.

Pipeline pressure testing – water used for pressure testing pipeline segments has historically been done under a Short Term Water Use Permit-by-Rule (BWA-003)/Short Term Water Use Report (BWA-004), N.J.A.C. 7:19 –2.17(a).

Applicability – If the project is located in close proximity to a salt water body (ocean, bay, coastal river, salt water marsh) the native ground water and water in the adjacent water body should be checked for: chlorides and salinity. Water Allocation Permitting does not apply to diversions of salt water except where the Department determines that the diversion and the resultant usage may affect utilization of fresh water in accordance with N.J.A.C. 7:19 –1.4(a)2. Salt water is defined as water containing a chloride concentration in excess of 10,000 mg/L. N.J.A.C. 7:19-1.3

For additional information see – www.nj.gov/dep/watersupply

or contact – Bureau of Water Allocation and Well Permitting
Mail Code 401-04Q
P.O. Box 420
Trenton, New Jersey 08625-0420
(609)984-6831

HPO Project #16-0581-3
HPO-B2016-087

State of New Jersey

MAIL CODE 501-04B
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NATURAL & HISTORIC RESOURCES
HISTORIC PRESERVATION OFFICE
P.O. Box 420
Trenton, NJ 08625-0420
TEL. (609) 984-0176 FAX (609) 984-0578

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

February 23, 2016

Amishi Castelli, Ph.D.
U.S. Department of Transportation
Volpe National Transportation Systems Center
Environmental Science and Engineering Division
Volpe Center, RVT-34
55 Broadway
Cambridge, MA 02142-1093

RE: NEC Future Draft Programmatic Agreement

Dear Dr. Castelli:

Thank you for the opportunity to provide comments on the draft Programmatic Agreement (PA) for the NEC Future Project. The New Jersey Historic Preservation Office (NJHPO) is pleased to offer the following comments and suggestions on the submitted materials:

- Line 119; please add Newark Landmarks & Historic Preservation Commission, and historic preservation commissions for New Brunswick, Princeton, Elizabeth (there may be more).
- Lines 183, 189, 192 & 230; Inconsistent use of the term "other federal agency."
- Line 199; "this paragraph"; should this phrase be replaced with "IB.1, 2., and 3."?
- Line 210; "Federal" should be "federal" (or change throughout the rest of the PA for consistency).
- Line 215; "Responsible," would "lead" be a better word?
- Lines 217 – 219; do we need to address cooperating agencies?
- Line 249; add ")" after "receipt."
- Lines 257-263; Add full title for qualifications standards. e.g., archaeologist for archaeological survey, architectural historian for historic architectural survey, etc.

- Line 288; Definitions for PA are in Appendix A, not E.

- Line 341; Recommend using this area to lay out the survey methodology used by the federal agency to identify historic properties (phased archaeological survey, architectural survey, etc.) and reporting to inform Line 342.

- Lines 342-346; spell out what constitutes an historic property (eligible and listed etc.). For consistency use 106 language throughout.

- Line 448; "XIV" appears to be incorrectly cited, should be "XVI"; also mis-referenced in lines 567, 631 and 679.

- Lines 586-589; while this paragraph mentions historic buildings, it is unclear if archaeological concerns are also addressed ("the term monitoring" in Line 588). If not, we recommend expanding the paragraph referencing Secretary of the Interior's *Standards and Guidelines for Archaeology and Historic Preservation* to address affects to archaeological resources.

Please find below our editorial comments for the Appendices:

Appendix C: Standard Treatment Measures

- Line 43; add "the applicable" after "shall consult with."

- Line 87; There needs to be language on reporting the results of these surveys/actions to the signatories for comments, as well as, language that the federal agency shall prepare an archaeological data recovery plan and submit that plan to consulting parties for their review and comment prior to work.

Appendix E: Tier 1 Consulting Parties List

- For list of SHPOs, NJ should be listed as signatory to the PA.

Appendix K: Section 106 Consultation for Tier 2 Undertakings in New Jersey

- Line 10; delete repeated "by submitting."

- Add as data source, NJDEP's GeoWeb public GIS viewer program containing all known above-ground historic properties (archaeological properties are restricted): http://www.nj.gov/dep/gis/geowebsplash.htm

- Line 22; after "Commissions" recommend adding "Historic Preservation Commissions, Certified Local Governments."

- Lines 40-68; add parties from New Brunswick, Princeton Historic Preservation Commission, South Brunswick Historic Preservation Commission, Newark Landmarks &

Historic Preservation Commission, Pennsylvania Railroad Technical & Historical Society.

- Line 72; while New Jersey has no federally-recognized tribes in the State, there are federally recognized tribes with an interest in New Jersey. The NJHPO can provide you with a list.

- Line 84; Section IV—it is unclear if phased archaeological survey and architectural survey is planned as part of the identification process. Please clarify.

- Line 107; NJSHPO also requires one (1) digital copy (PDF) of all submission as part of our review.

- Line 127; Curation: State Register/National Register eligible and listed collections will need to meet 36 C.F.R. Part 79.

Finally, the Historic Preservation Office recommends to FRA that the PA shall make clear that the Tier 2 definition of "historic property" is the same as 36 C.F.R. Part 800.16(l). In addition, the PA shall make explicitly clear that phased identification and/or evaluation level surveys shall be conducted to identify and evaluate effects on all historic properties within the Tier 2 undertaking's area of potential effects.

Additional Comments

Thank you again for the opportunity to review the submitted materials. The HPO looks forward to additional consultation with FRA and other consulting parties as part of the NEC Future undertaking. If you have questions regarding historic architecture in New Jersey, please contact Patty Chrisman of my staff at (609) 984-0850 or at Patty.Chrisman@dep.nj.gov. For questions regarding archaeology in New Jersey, please contact Vincent Maresca at (609) 633-2395 or at Vincent.Maresca@dep.nj.gov. The NJ HPO looks forward to continuing consultation on this project.

Sincerely,

Daniel D. Saunders
Deputy State Historic
Preservation Officer

c. Rebecca Reyes-Alicea, Federal Rail Administration

DDS/KJM/PC/VM

Chris Christie, Governor
Kim Guadagno, Lieutenant Governor
Richard T. Hammer, Acting Commissioner
Dennis J. Martin, Interim Executive Director

NJ TRANSIT
One Penn Plaza East
Newark, NJ 07105-2246
973-491-7000

February 12, 2016

Rebecca Alicea-Reyes
Northeast Corridor Joint Program Manager
USDOT-Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

RE: Comments on NEC Future Tier 1

Dear Ms. Alicea-Reyes:

NJ TRANSIT is pleased to comment on the Tier I Draft Environmental Impact Statement (DEIS) for the NEC Future planning effort. The document, a result of efforts by NJ TRANSIT and other states beginning in 2010 to outline the application to the Federal Railroad Administration (FRA), highlights a range of future improvement alternatives with a concomitant range of outcomes, including ridership growth forecasts, the physical envelope needed to accommodate capital improvements, operational changes, capital and operating costs, and associated benefits.

This specific environmental process, conducted to address the requirements of the National Environmental Policy Act, is not the end of the planning and decision-making that will be needed. In many instances, the information presented generates additional important questions, so additional work will be needed before specific courses of action are taken.

Notably, the relative ridership increases accommodated under the DEIS' various comparative operating assumptions and capital improvements demonstrated that simply offering trains traveling at super high speeds would not attract most of the identified potential new ridership market. This result is consistent with the expectations outlined in our scoping letter to you dated, October 12, 2012. In fact, the issues and concerns we summarized in that letter remain central to our current perspective on this analysis and its results. We are focused on the needs of our customers as well as the need to carefully examine future market demand. The market analysis contained in the DEIS assists in responding to many of our concerns, but it does not answer all of them.

NJ TRANSIT considers the most critical finding among the alternatives examined to be the need for added trans-Hudson rail capacity into Midtown Manhattan. The analysis makes clear that to achieve a future capacity of 42 trains per hour; any proposed new Midtown Station facilities must accommodate a run-through set of tracks that extend

across Manhattan and connect with the rest of the rail system in Queens, either with the Long Island Rail Road or the Hellgate Line into the Bronx, or both. From the analysis completed to date by NJ TRANSIT, it appears 42 trains per hour is a valid target to meet NJ TRANSIT's customer demand in 2040, based on our current rail system.

However, there would not be room for additional rail service further into the future. Decisions on achieving the capacity to handle projected rail ridership must be considered in coordination with an examination of total trans-Hudson transit capacity, using an analytic approach which is sensitive to future customers' needs.

NJ TRANSIT is greatly concerned about many of the proposed improvements on the Northeast Corridor within New Jersey because they necessarily would involve both huge expense and serious impact on many built-up portions of New Jersey along the Corridor. For instance, some of the statements in the DEIS point toward widening the Northeast Corridor or creating extensive tunneling in areas that would require removing existing dense development. This raises important questions of community impact and environmental justice. There are also implied impacts on all the NEC stations, especially with Alternatives 2 and 3. Notably, NJ TRANSIT has over the last decade invested tens of millions of dollars to improve some of these stations, for example Trenton Station and Metropark. Thus, any proposed changes to these stations must be carefully scrutinized and fully understood before feasibility is assumed.

NJ TRANSIT must also have it understood and explicitly acknowledged that we will be able to continue to work to achieve and maintain a state of good repair on the 14 New Jersey NEC stations we own, as well as to continue to make necessary safety and ADA compliance improvements to these stations. Additionally, NJ TRANSIT must continue to make other necessary specific improvements along the NEC in order to maintain our ability to meet our future rail operating and customer needs. NJ TRANSIT is now pursuing some of those improvements to make our rail operation more resilient following the effects of Superstorm Sandy.

As a successor to prior passenger rail operators with the right to use the NEC, none of the proposals in this DEIS can be allowed to prevent us from doing what is necessary to best serve our customers. For example, NJ TRANSIT has demonstrated our willingness to work with Amtrak on mutually agreed to longer-term projects, such as the reconstruction of the Elizabeth Train Station and its platforms. NJ TRANSIT worked with Amtrak, and at our cost, offered to relocate the eastern platform of this station to meet Amtrak's request to allow a fifth track to be added in the area. NJ TRANSIT would not accept a situation in which follow-on actions to this DEIS inhibited our ability to provide the rail services required to meet future customer needs.

As we have discussed, much of the DEIS analysis was performed in order to permit a comparison between the alternatives presented. We also explicitly noted during these

discussions that some aspects of the assumptions, factors and operational analysis employed did not reflect the actual functioning of NJ TRANSIT's rail operations. We accept use of these techniques because of the scale of the overall DEIS effort and the need to define a scope of work that was achievable within a reasonable timeframe. However, our acceptance of analytical techniques for those purposes does not translate into our accepting them in the "real world" within which we must function to serve our customers.

The scoping letter that NJ TRANSIT sent as this effort was being initiated also indicated that we were very concerned even then about potential impacts on the existing physical surroundings along the NEC and various limitations that might be created, such as upon station access and parking, among other local impacts. We suggested then and we continued to suggest as work on the DEIS was progressing that it was crucial to think more carefully about how many and which trains stopped in particular locations, as well about the ramifications of seeking much higher train speeds.

Due to those and other factors, NJ TRANSIT cannot endorse Alternative 3 and its project elements. Alternative 3 would cause the greatest impacts along the NEC in New Jersey, while providing the least benefits to our state. Greatly expanding the width of the NEC across New Jersey, going from the 150 foot wide existing right-of-way to one that is 280 feet, and creating whole new rail lines on new rights-of-way within this densely developed state cannot be supported given that the other alternatives examined provided evidence of much greater benefits.

We are anxious to have further discussions about Alternatives 1 and 2 and those portions of the NEC where specific projects can be mostly accommodated within the existing NEC right-of-way. We also are interested in discussing projects which can progress by utilizing vacant or underutilized property next to the existing right-of-way.

Meanwhile, the DEIS draft mentions the potential need for a new Amtrak rail yard in New Jersey, (see page 4-32, Table 4-7) but no potential location is indicated nor is there a broad description of the purpose and scope of such a new facility. Importantly, NJ TRANSIT will also require additional rail yard space to permit it to increase trans-Hudson rail services. We believe a new rail yard is a critical piece of infrastructure and it requires a large piece of well-located property. Defining the purpose and need for a new rail yard in New Jersey for Amtrak, along with NJ TRANSIT's own rail yard requirements, should be listed as needed analysis in any proposed next steps.

NJ TRANSIT also believes that more analysis must be done concerning future station impacts, access, parking and train service stopping patterns before we can be comfortable with some of the implications found in this analysis. This particularly applies to Trenton, Metropark and Newark Penn Station. Changing where trains stop and how

other NEC stations function might offset the suggested need to dramatically physically impact these facilities.

There is also a need to take further steps in future analyses to lessen the need to construct additional parallel track in those areas where the existing physical envelope of the current NEC right-of-way is constrained. For instance, an examination should be undertaken to determine whether more advanced signal system technology could permit more trains to operate on the existing NEC tracks; thus, reducing the need for adding additional parallel tracks.

This further analysis will help ensure that NJ TRANSIT is able to operate its train services to meet the needs of its customers, the New Jersey travelers; whether residents, workers or visitors -- who rely on our rail services and support the economy of our state and the region.

Going beyond the purpose of the DEIS to determine potential future impacts from proposed improvements and their mitigation, we must acknowledge that sufficiently investing in the NEC to achieve positive future outcomes is only possible with a substantial increase in Federal investment to make up for the long history of disinvestment in this vital transportation corridor. Also, a full partnership must be forged with Amtrak and the Federal government around investments to improve the NEC, under which NJ TRANSIT is able to effectively meet the travel needs of New Jersey residents, visitors and workers -- our customers.

We thank you for this opportunity to comment on this significant piece of work. It was a long time in coming and is critical to advancing our understanding of future needs and potential actions. We look forward to continuing to work with you to complete this effort, through the issuance of a Final Environmental Impact Statement and a Record of Decision.

Sincerely,

Dennis J. Martin
Interim Executive Director

c: Robert Lavell
Steven Santoro
Paul Wyckoff

City of New London
Office of the Mayor
181 State Street • New London, CT 06320 • Phone (860) 447-5201 • Fax (860) 447-7971

February 12, 2016

NEC Future
USDOT, Federal Railroad Administration
One Bowling Green, Suite 429
New York, New York 10004

SUBJECT: NEC Future Tier 1 Draft Environmental Impact Statement

On behalf of the City of New London I submit the following comments regarding the NEC Future Tier 1 Draft Environmental Impact Statement.

The City of New London clearly understands and appreciates the purpose and need of the NEC FUTURE program, and while the City fully supports improved rail service and performance throughout the Northeast Corridor, and affirm that the Northeast Corridor is critical to the future economic growth of this part of the country, we are concerned that the alternatives presented in the EIS may have greater adverse impacts upon the City of New London than the predicted economic growth impacts. We note that due to the general nature of a Tier 1 EIS, it is difficult to make specific comments about specific components of the project, and we do recognize that further analysis will be provided in the future pending the outcome of the alternative selected in the Record of Decision. However, we do have some concerns as to how the project might impact our municipality and the New London region as a whole which are expressed below.

In Alternative 1, a new segment would be constructed through our region (Old Saybrook, CT to Kenyon, RI) and we are concerned about how this new segment would relate to and disrupt existing land uses in this corridor; its impacts on environmental resources; and the potential for fewer intercity and regional trains having stops in New London and along the existing shoreline route.

The City of New London is approximately 5.67 square miles in land area and of this over 50% of the land area is non-taxable. New London's commercially developed land area comprises 270 acres (7.3%). The City is one of the most densely populated cities in the State of Connecticut and provides all the municipal services of much larger cities. As such, the City struggles to maintain a good level of municipal services while keeping the tax burden to its property owners from being corrosively high. Alternative 1 appears to create a new track ROW through the municipality that will likely impact significant tax generating property. New London simply cannot afford to lose any more taxable land without maximum annual compensation in lieu of taxes.

Additionally, the track location depicted in Alternative 1 appears to bypass the current Union Train Station in downtown New London. This train station stop is vital not only to our existing transportation needs, the needs of the region, and present and future Transit Oriented Development initiatives but is hugely important to the successful development and sustainability of the future $100 million National Coast Guard Museum to be located directly adjacent to and connected to Union Station. Any significant reduction in the number of passengers and train stops at this station will assuredly impact the City's growth.

In Alternative 2, a new route is proposed that would run northerly from New Haven through Hartford to Providence with a potential stop at UCONN (Mansfield/Storrs). The Tier 1 EIS identifies this route being provided to serve Intercity-Express, but again we are concerned that if constructed, it could result in less regional trains running along the shoreline route having stops in New London. On the other hand, if there are concurrent efforts to add passenger service to the New England Central Railroad (NECR) line from New London to Brattleboro, Vermont, known as the Central Corridor Rail Line, with a stop at or near Mansfield/Storrs then it is possible that Alternative 2 may be an opportunity for future economic growth in New London and the region.

In Alternative 3, four new route options are being considered for north of New York City, all of which would travel through Hartford before continuing to Boston via either Providence or Worcester. As all of these options would create a new rail line north of the existing shoreline route, we are deeply concerned about the negative impacts it could have for the future level of investment in the existing line through southeastern Connecticut and the number of trains that would pass through and stop in New London. Alternative 3, unequivocally the most ambitious and financially monumental action alternative of the three, will in all likelihood sacrifice essential and sustaining funding for the current Connecticut rail line from New Haven to Providence, R.I. While planning for future growth is prudent, sacrificing and diverting the necessary investment from the existing local and regional rail lines is simply a bad idea. Such as it is, we encourage the Federal Railroad Administration to remove Alternative 3 from further planning objectives.

Respectfully submitted,

Michael E. Passero

Michael E. Passero
Mayor

515 North Avenue
New Rochelle, NY 10801

Phone: (914) 654-2140
FAX: (914) 654-2174

Charles B. Strome, III
City Manager

City of New Rochelle
New York

December 23, 2015

Rebecca Reyes-Alicea, Northeast Corridor Program Manager
U.S. DOT Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

Re: Northeast Corridor Tier 1 Draft Environmental Impact Statement Public Comments

Dear Ms. Reyes-Alicea:

On behalf of the City of New Rochelle, New York, I submit the following comments in support of Alternative Two – Grow regarding the Northeast Corridor (NEC) Tier 1 Draft Environmental Impact Statement.

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 bringing 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 North East which makes it clear that NEC's no action alternative is not a viable option.

New Rochelle is building a future around multimodal transportation in Southern Westchester and the broader region, and bringing the North East 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 Two - Grow is our preferred alternative 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 change, an estimated 93 million annual trips, to passenger rail, a much more sustainable option than private vehicles in an area with already congested highways and bridges.

We look forward to following the progress of this extremely important initiative.

Sincerely Yours,

Charles B. Strome, III
City Manager

All right. The next speaker, Michael Noda.

MR. NODA: Good evening. My name is Michael Noda, and I'm a local writer on transportation topics. And my transportation blog is at SICTransitPhiladelphia.org, and I am also an advisor to the 5th Square Political Action Committee. I am here on my own recognizance.

There are many, many flaws in this study. And while I am not quite as cynical as — well, actually, I'm not quite as optimistic as the blogger, Alon Levy, who believes that you could provide most of the performance benefits of the Alternative 3, you know, Transform Alternative at 95 percent cost savings.

I think he's off by a factor of three, which leaves it at 85 percent cost savings. I — you know, call me — call me a cynic at heart.

But, you know, the fact that the cost estimates are so inflated and the scope of each of these is, you know, inflated for, you know, for reasons that are — you know, sort of, you know, defy understanding, it sort of, you know, discredits what should be a bit — what should be, you know, a, you know, positive transformative process for all of us.

You know, the local examples would be the, you know, the much mocked tunnel under 12th Street to serve Market East Station which, you know, as earlier speakers have pointed out there's the — you know, the growing center of our, you know, central business district is around 30th Street. There's no real reason to bypass it, you know.

You know, the detours for Philadelphia International Airport is great if you can get American Airlines to pay for it, because they're the only ones who will ever benefit from it.

It's not a local transportation issue that, you know — or that, you know, interests anybody outside of them, as far as I can tell. Because there, you know, there just aren't that many people who are taking Amtrak to catch a flight out of Philadelphia.

And at the same time there are things — there are critical things that could be done to, you know, vastly improve service on the Northeast Corridor through this region.

Most of that is incredibly unsexy, but, you know, relatively cheap things that can be done to, you know, speed up and improve service through interlocking such as PHIL, which is where the Airport Line currently branches off; Zoo, which is the giant tangle north of 30th Street Station; you know, Shore, which is up in Kensington where the Amtrak 188 derailment took place, which is also where the New Jersey Transit Atlantic City Line branches off.

And, you know, just, you know, each of those is, you know, a set — is an interlocking set that slows down traffic on its own because, you know, the switches are old or at least of old design and are not capable of handling high-speed traffic.

And there are — you know, and there are sharp curves at each one of those. Plus the PHIL, definitely the Zoo and the Shore, that could — you know, that are, you know, just slow things down immensely.

And, you know, there seems to be, as far as I can tell going through all this documentation, you know, the — you know, the only — the only solution that has been, you know, brought for each of these problem sets is to bypass them widely by many, many miles.

And, you know, that's — you know, that's great in the land of infinite money, and if you let me know how to — how to get there, I will emigrate there at the first opportunity.

But in the meantime, we live here and our resources aren't finite.

And we cannot be committing ourselves to spend twice as much as the Japanese are spending on maglev between Tokyo and Nagoya on, you know, a — you know, on a, you know, vision of high-speed rail that only reaches between Boston and Washington.

Thank you.

THE MODERATOR: Okay. Thank you, Michael.

NEC DEIS Comments - RECORD #2355 DETAIL

Status : [redacted]

Record Date : 2/15/2016

First Name : Jean

Last Name : Nocito-Gobel

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 #3094 DETAIL

Status : [redacted]
Record Date : 2/29/2016
First Name : Pamela
Last Name : Lebeaux
Stakeholder Comments/Issues :

Forwarding comment.

From: Galin Brooks [mailto:gbrooks@nomabid.org]
Sent: Friday, February 19, 2016 2:14 PM
To: Lebeaux, Pamela <Lebeaux@pbworld.com>
Subject: RE: Your NEC FUTURE inquiry

Thanks so much, Pam. Please find attached.

All the best,

Galin

From: Lebeaux, Pamela [mailto:Lebeaux@pbworld.com]
Sent: Thursday, February 18, 2016 12:07 PM
To: Galin Brooks <gbrooks@nomabid.org<mailto:gbrooks@nomabid.org>>
Subject: Your NEC FUTURE inquiry

Hello Galin-

We received your question about submitting a comment. We ask that you please submit it as soon as possible, and we will make every attempt to review and respond as time permits.

Regards,

Pam Lebeaux
NEC FUTURE Public Outreach Coordinator
WSP | Parsons Brinckerhoff
Tel. 609-512-3568

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