



# Comment Summary Report

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# 1. Introduction

NEC FUTURE is the Federal Railroad Administration's (FRA) comprehensive plan for future investment in the Northeast Corridor (NEC), the rail transportation spine from Washington, D.C., to Boston. NEC FUTURE will define a long-term vision and guide investments in passenger rail improvement projects on the NEC through 2040. This effort includes the preparation of a Tier 1 Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act (NEPA).<sup>1</sup> The Tier 1 EIS is a programmatic evaluation of investment alternatives for the NEC that will be followed by more-detailed project-level (Tier 2) environmental reviews.

In November 2015, the FRA released the Tier 1 Draft EIS,<sup>2</sup> along with a Draft Programmatic Agreement under Section 106 of the National Historic Preservation Act,<sup>3</sup> for public review and comment. The development of the Tier 1 Draft EIS reflected not only technical analysis, but extensive coordination and consultation with state and federal agencies, railroad operators, and the public. This coordination and consultation began with a scoping process in 2012 that helped to inform the development of initial alternatives and continued as the alternatives were refined and evaluated.

The FRA did not identify a Preferred Alternative in the Tier 1 Draft EIS so public comment could inform this key decision. To encourage a robust dialogue on the Tier 1 Draft EIS, the FRA established a public comment period lasting over two months, from November 13, 2015, to January 30, 2016. In response to requests, the FRA subsequently extended the comment period to February 16, 2016. Eleven public hearings were held during this period across the Northeast in Maryland, Delaware, Pennsylvania, New Jersey, New York, Connecticut, Rhode Island, and Massachusetts, and the District of Columbia. All Tier 1 Draft EIS materials were placed on the NEC FUTURE website, and hard copies were made available in libraries in each county along the representative routes of the alternatives. The FRA also sent information packets to local elected officials in each jurisdiction along these representative routes, as well as to environmental and transportation agencies in each state. As part of compliance with the Section 106 process, the Tier 1 Draft EIS and Draft Programmatic Agreement were sent to tribes as part of the government-to-government consultation process, and also sent to signatories of and consulting and concurring parties to the NEC FUTURE Draft Programmatic Agreement.

# 2. Comments Received

During the comment period, the FRA received over 3,200 submissions on the Tier 1 Draft EIS from individuals, agencies, and organizations. The entire set of submissions is included in the Appendix of this report. A majority (77 percent) of these were submitted through the website, while the remainder were

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<sup>1</sup> The National Environmental Policy Act requires an environmental review process before federal agencies make decisions about actions that could have environmental effects. In the case of NEC FUTURE, the environmental review process is a Tier 1 Environmental Impact Statement, and the action under review is the selection of an investment program for the Northeast Corridor.

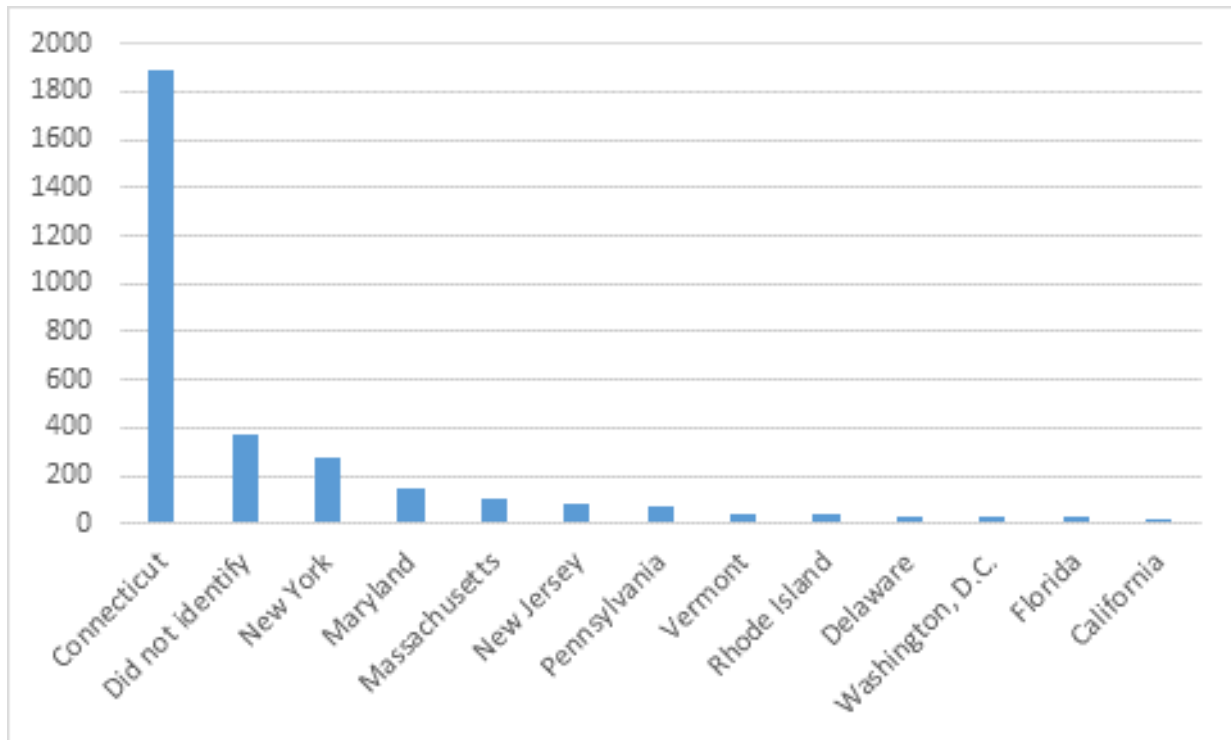
<sup>2</sup> Available at [www.necfuture.com](http://www.necfuture.com)

<sup>3</sup> Concurrent with the Tier 1 EIS, the FRA is conducting a review of potential effects on historic properties under Section 106 of the National Historic Preservation Act.

submitted by email (15 percent), public hearing transcript (4 percent), mail (2 percent), comment card (1 percent), or other hard copies (1 percent).

The submissions were also categorized by stakeholder type. Most (92 percent) were submitted by individuals. Special interest groups submitted 3 percent of the submissions, followed by local agencies (2 percent) and elected officials (1 percent). All other categories (federal agencies, state agencies, passenger railroads, freight railroads, tribes, and other) accounted for less than 1 percent of the submissions received. Individuals or organizations in the state of Connecticut submitted more than half (58 percent) of the submissions (Figure 1).

**Figure 1: Number of Submissions by State of Origin**



Source: NEC FUTURE team, 2016

The FRA analyzed the individual comments contained in each submission. Many submissions contained comments on more than one topic, resulting in a total of over 5,000 individual comments. The comments addressed the overall vision for the future of the NEC, the importance of rail connections and enhanced mobility, the relationship of rail service to the region's economy, environmental benefits and impacts, costs and funding. In addition, the FRA received comments on the methodologies used in the Tier 1 Draft EIS analyses and on the overall study process, including public outreach and the level of information provided.

### 3. Role of Comments in FRA’s Deliberative Process to Select a Preferred Alternative

The FRA is considering three factors in their selection of a Preferred Alternative: public and stakeholder input, the findings of the Tier 1 Draft EIS, and FRA policy objectives consistent with U.S. Department of Transportation strategic goals. Many of the comments received provide useful insights into the concerns of the traveling public and will help guide the FRA in developing a Preferred Alternative that is responsive to the needs of travelers in the Study Area, provides the best opportunities for economic growth, and minimizes effects to built or natural environmental features of particular concern. This summary provides early insight into the range of issues and concerns the FRA heard from commenters. Comprehensive information on all of the comments received and the topics covered, as well as FRA’s responses, will be provided in the Tier 1 Final EIS, scheduled for release in the fall of 2016.

### 4. Thematic Summary

The majority of the comments received addressed one or more of the following key themes:

- ▶ The **overall vision for passenger rail in the Northeast**, as articulated in the alternatives described in the Tier 1 Draft EIS
- ▶ The importance of **enhancing transportation connections and mobility at all levels of the system**, from roll-on bicycle access to improved ties to connecting corridors
- ▶ The critical role of passenger rail service in maintaining the **importance of the region’s economy**, along with opportunities for growth
- ▶ **Environmental benefits and impacts**, including support for the greenhouse gas benefits of increasing passenger rail ridership and opposition to infrastructure investments that would affect the built environment
- ▶ The **cost of improvements and availability of funding**
- ▶ The **data and methodologies used for the Tier 1 Draft EIS analyses**
- ▶ The **Tier 1 study process**, in particular, the need for more public outreach to potentially affected communities, and the difficulty of evaluating alternatives at a Tier 1 level of detail

The following sections summarize the comments received on each of these themes and includes excerpts from comments—as seen with the text in quotations—that represent the range of comments received on each theme. These excerpts are presented without attribution as examples of the language and sentiments articulated by those submitting comments. The FRA will consider all comments in identifying a Preferred Alternative. The Tier 1 Final EIS will provide a comprehensive summary of all of the comments received and the FRA’s responses.

## 4.1 OVERALL VISION FOR PASSENGER RAIL IN THE NORTHEAST

The Tier 1 Draft EIS presented three distinct visions for the future role of passenger rail in the Northeast transportation system. The visions represent a range of service levels designed either to maintain (Alternative 1), grow (Alternative 2), or transform (Alternative 3) the role of rail in 2040, with corresponding infrastructure investments. The Tier 1 Draft EIS compared each vision, or Action Alternative, with a No Action Alternative.<sup>4</sup>

The FRA received numerous comments on the alternative visions. These comments overwhelmingly stressed the importance of achieving a state of good repair, with clear support for going beyond the No Action Alternative. While there was some support for a transformative vision that would create a “world class” rail system, most commenters preferred a less ambitious approach, and many called on the FRA to fix the existing NEC before undertaking any expansion. Commenters also sought to ensure that improved Regional rail service be an integral part of the vision:

### 4.1.1 “FIX IT FIRST”

Achieving a state of good repair is the highest priority for many participants:

“...the NEC must be brought to a State of Good Repair and maintained in that condition as a baseline...many sections of today’s NEC are more than 100 years old and show evidence of functional or structural obsolescence.”

“Before extensive efforts (time and money) are expended to grow and transform the system beyond the base line, state of good repair projects should take priority.”

“We are deeply concerned about the current state of repair of the entire NEC...it is vital to all riders that the NEC and connecting lines be brought to a state of good repair before grandiose projects are built.”

### 4.1.2 NO ACTION ALTERNATIVE IS INADEQUATE

Commenters overwhelmingly agree that the No Action Alternative is inadequate for the region and should be rejected:

“The No Action Alternative...is not an acceptable outcome for the Northeast Corridor and would lead to network failure...The No Action Alternative would guarantee a continued erosion of service quality and

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<sup>4</sup> Alternative 1 *maintains* the role of rail as it is today, with increases in the level of rail service as required to keep pace with population and employment growth. Alternative 2 *grows* the role of rail, expanding service at a greater rate than population and employment growth and adding service to new markets. Alternative 3 *transforms* the role of rail, with a second spine the length of the corridor that supports faster trips and serves markets not currently well connected by passenger rail. The No Action Alternative is the baseline against which the FRA compared each of the Action Alternatives. It includes projects currently planned and programmed, and repairs to keep the railroad operating, but only at today’s level of service. Full details on the Action Alternatives and the No Action Alternative are available on the NEC FUTURE website at [www.necfuture.com](http://www.necfuture.com) and in the Tier 1 Draft EIS, also available on the website.



service reliability and fail to meet the most basic increased travel demands in a growing economy. The No Action Alternative would cause increasingly overcrowded trains, less reliable service, and threaten growth prospects for the region and nation, damaging a globally competitive economic environment.”

“The No Build Alternative is not a prudent alternative. In fact, the No Build Alternative has essentially been the operating model on the NEC which has allowed the overall system to enter into the state of disrepair in which it currently exists.”

“The ‘No Action Alternative’ should not be considered, as significant investment is vital, and critical to the current and future operation of the Northeast Corridor.”

“I think this investment is sorely needed. We need to modernize our rail corridor.”

“Obviously the current NEC desperately requires major infrastructure upgrades, but it is our view that NEC needs to GROW, at a minimum, and ideally be transformed into a higher capacity system.”

#### **4.1.3 SUPPORT FOR ALTERNATIVES 1 AND 2, WITH MODIFICATIONS**

Many commenters support the visions articulated in either Alternative 1 or 2 (“Maintain” or “Grow”) as the most appropriate level of service, or level of investment, for the NEC. One feature of Alternative 1 was strongly opposed due to potential environmental impacts in the town of Old Lyme, CT (see Environmental Benefits and Impacts).

Commenters tended to favor certain features of Alternative 2, including the high frequency of service and direct NEC service to the Philadelphia International Airport. However, there were mixed reviews about the new segment in Alternative 2 between New Haven and Hartford, CT, and Providence, RI. Many felt that this new segment would generate too many environmental impacts, while others welcomed new connections, such as the opportunity to connect to the University of Connecticut at Storrs with the new station under Alternative 2:

“...we believe that Alternative #1 is the best option for the NEC. Alternative #1 addresses the needed level of rail service required to support projected population and employment...”

Alternative #1 expands capacity, adds tracks, relieves key chokepoints, and serves the future of Connecticut well. This option is also by far the least expensive of the three options...”

“I would consider Alternative 2 to be the minimum.”

“I believe Alternative 2 is best compromise in terms of service expansion, reduction of travel times, and cost of construction. Alternative 2 also provides provision for future growth. It is not quite world class with 91 mph average speed from Boston to DC but still 50% better than current average speed of just 63 mph.”

“The proposal for a line that runs through Storrs, CT is exactly what the state and the Northeast needs to expand not only the access to the flagship educational institution, but more importantly, a hub of knowledge production, research and innovation that presents a host of economic opportunities for the region...The flow of innovation and ingenuity—literally and figuratively—would indeed bode well for us.”

“Alternative 2 Growth, is our preferred option as it goes beyond just keeping pace with expected growth. It adds capacity to accommodate demand at the Hudson River and encourages substantial transport mode of change - an estimated 93 million annual trips... to a passenger rail, a much more sustainable option than private vehicles in an area with already congested highways and bridges.”

Some suggested that the components of the various alternatives be packaged in a different manner, with the most critical and readily feasible projects uncoupled from the more ambitious, off-corridor improvements:

“For Alternative 2 (‘Grow’), we would prefer a package of projects that is more than ‘Maintain’, but which does not make use of lengthy new rights-of-ways.”

“...a Preferred Alternative should be the mix of projects from among the alternatives presented that will create an immediate framework for investment while not limiting future options to the extent that is practical.”

#### **4.1.4 DESIRE FOR A WORLD-CLASS RAIL SYSTEM AND SUPPORT FOR ALTERNATIVE 3**

While there was less support for the vision articulated in Alternative 3 (“Transform”), some commenters believe that a world-class rail system capable of high-performance service at 220 mph is essential for the Northeast to remain competitive in the global economy:

“...Alternatives 1 and 2 fall far short of creating a world-class rail transportation system that will meaningfully impact the region’s global competitiveness...Alternatives 1 and 2 offer only minimal capacity for growth beyond the horizon year, leaving the region facing major costs to keep the NEC relevant past 2040.”

“We strongly support a long-term vision for true high-speed rail for the NEC. Trains are currently operating at speeds of 220 mph and above

throughout the world, and that goal should not be merely aspirational in the NEC but attainable...As a result, we support further consideration of Alternatives 2 and 3, which provide the strongest pathways for future growth of the NEC corridor and the region. We recognize that Alternative 3 in particular would provide for the most robust network and preserves the broadest set of options for the region to explore in years to come.”

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

#### **4.1.5 CONSIDERATION OF ALTERNATIVE 3 ROUTING OPTIONS**

There was no consensus on a second spine route option north of New York. Comments indicated considerable opposition to a Long Island route option, as well as disappointment that a second spine routing through Springfield, MA, to Boston was not advanced in the Tier 1 Draft EIS:

“...[We] must vigorously object to the Alternative 3 concept of the Plan, as it would cause irreparable harm and damage...This New York City-Connecticut via Long Island route will cause more harm than good, not only to the Village of Floral Park, but also to every Long Island community through which it passes.”

“While I welcome any upgrade of passenger rail in the northeast, I can’t believe that the plan for high speed rail bypasses the major urban area of Springfield, MA, instead creating an entirely new route through a rural part of northern CT that does not even have an existing right of way.”

“We are disappointed that the Tier 1 Draft EIS does not include the existing Inland Route alignment (Hartford/ Springfield/ Worcester/ Boston)... Current improvements to the Hartford Rail Line between New Haven and Springfield are scheduled for completion in 2018...By omitting the existing inland route from consideration, the NEC FUTURE project fails to leverage this impressive improvement program in a way that would further enhance the regional rail system while offering system redundancy for users of the existing NEC mainline.”

As with Alternatives 1 and 2, some commenters suggested repackaging the components of Alternative 3, so that the challenge of constructing the most expensive or difficult elements would not stand in the way of completing more readily feasible elements:

“Alternative 3 (also called ‘Transform’) contains several ideas that are certainly thinking ‘outside-of-the-box’ and would certainly transform the Northeast Corridor...We agree that it would be transformational to build a route that serves the Philadelphia Airport and also to build a new route from Hartford to Providence. These ‘relatively easy’ projects may need to be delineated from the extremely expensive and perhaps impossible to accomplish projects such as the construction of a new corridor north of New York City; the construction of a tunnel under Long Island Sounds and the installation of multiple new tunnels under the East River and Hudson River.”

#### **4.1.6 REGIONAL RAIL SERVICE IS CRITICAL**

Commenters stressed the importance of Regional rail service in any future vision for the NEC:

“...the study shows the vast majority of trips will be taken on regional rail. We recommend increased funding for the regional rail services that will make the high speed corridor a success.”

“...the most critical finding among the alternatives examined [is] the need for added trans-Hudson rail capacity into Midtown Manhattan. The analysis makes clear that...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...to meet customer demand [for commuter services] in 2040...”

“The primary concern and objective of our member businesses, their employees, and their customers, is the need for dramatically improved commuter travel time to New York City...”

“I suggest consideration be given to combining SEPTA and MARC service into a jointly operated low fare ‘through’ service making local stops between Trenton and Washington D.C. This would fill a gap on the corridor between Newark Delaware and Aberdeen Maryland.”

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

#### **4.1.7 FRA’S CONSIDERATION OF COMMENTS ON THE OVERALL VISION FOR PASSENGER RAIL**

The FRA presented a range of possible future visions with the Action Alternatives to allow the public and stakeholders to voice their perspectives on the future role of rail in the Northeast. Commenters provided useful perspectives on the importance of the existing NEC to the region and the need to “fix it first” and bring it to a state of good repair; others sought a world-class rail network. Although there was not agreement on any one vision, commenters overwhelmingly agreed that the No Action Alternative is inadequate for the region and should be rejected. Comments expressed concerns with the timeliness of some decisions—

specifically with regard to the Alternative 3 route options north of New York City. Comments also suggested that no matter what the vision, an incremental solution that can be implemented in meaningful phases is preferred.

The FRA is considering these views as it deliberates on a Preferred Alternative; finding ways to balance the desire for more-frequent, better connections to more markets with concerns about the condition of the existing NEC and the environmental effects of any change. The diversity of opinions suggest that the FRA seek a balanced approach that is forward-looking but also responsive to local or geographic differences within the Study Area, building from elements of each Action Alternative while focusing on a singular corridor-wide vision.

Based on review of the numerous comments received on a vision for the NEC, the FRA identified several overarching themes that broadly capture the sentiments about the role of rail: the importance of improved mobility; the need to strengthen communities and metropolitan areas along the NEC; enhanced operating efficiencies to deliver more service to more people; and constructability and phasing. These themes will further inform the FRA's deliberations on a Preferred Alternative.

## **4.2 ENHANCING TRANSPORTATION CONNECTIONS AND MOBILITY**

A second major theme in the comments on the Tier 1 Draft EIS is the importance of improving mobility through better connections at all levels of the system. This includes better connections on the existing NEC, to connecting corridors, to potential new markets, and to other modes of transportation. Commenters seek more rail options, whether for commuting to work or for Intercity travel. There is also interest in seeing a more integrated, customer-friendly NEC, with features such as a common fare card for greater convenience.

### **4.2.1 IMPROVE MOBILITY AND CONNECTIONS ALONG THE NEC**

The FRA received a wide variety of suggestions for improving connections between cities along the existing NEC. Some of these addressed travel time (such as a desire for a 60-minute ride between New Haven and New York City). Others urged that service be upgraded in specific locations, such as Chester, PA, and Secaucus, NJ. Still others advocated connections to new markets along the new segments in the Action Alternatives:

“...investments to enhance the capacity for intercity service should favor those locations, typically metropolitan areas, with a robust transit ridership to complement and interact with intercity service.”

“We're also very pleased to see significant discussion in the plan about connection among different rail lines and envisioning ways, for example, with appropriate scheduling, to move something closer to one-seat rides, even if we don't have actual one-seat rides, facilitating the connections. I'm very pleased to see that.”

“We are particularly interested in alternatives 2 and 3 inclusion of pulse-hub operations that would better connect the Philadelphia 30th Street

Station with Intercity-Express, Metropolitan, Keystone Corridor and Atlantic City trains and provide transfer opportunities every 30 minutes during the peak period.”

“A Northeast Corridor stop at Secaucus would provide regional connections to New Jersey Transit rail lines and Metro-North, within New York, New Jersey, and beyond. In addition, economic development and investment would be further accelerated within the Meadowlands area as a result of this new accessibility.”

Some commenters were concerned that their cities not be bypassed by a new high-speed route. For example, there was concern from various stakeholders in Delaware about the lack of a connection at Wilmington to the second spine route proposed in Alternative 3. Similar concerns were expressed about Providence, RI and Alternative 3 routing options:

“The high speed rail should serve downtown Providence, one of the busiest stations in the Northeast Corridor...Regardless of the selected alternative, Providence should be the major station that accommodates all high speed rail service between New York and Boston...”

Any plan for expanded or future rail improvements must include Core cities like Wilmington Delaware. Keeping our urban centers connected will ensure the prosperity of Amtrak in the North East. Keeping Wilmington connected recognizes its past and future role as one of your busiest stations.

#### **4.2.2 IMPROVE SERVICE TO CONNECTING CORRIDORS**

Agencies and individuals commented on the importance of improving service on connecting passenger rail corridors. Comments received supported the need for expansion within the NEC and beyond to markets in Virginia, Pennsylvania, upstate New York, central Connecticut, western Massachusetts, Vermont, and Maine. Many commenters voiced support for including connections via the Hartford Line from New Haven to Hartford, CT, and Springfield, MA:

“Please do whatever possible to expand and improve service (including more high-speed service) in the NEC, including across Pennsylvania to Harrisburg and Pittsburgh.”

“It is important that any changes to the Northeast Corridor preserve the one-seat ride to New York City on the Keystone Service...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...”

“We specifically request FRA to include the proposed Hartford Line, which connects New Haven, Hartford and Springfield in the first phase of the Tier 2 EIS Program. The Hartford line runs across the Knowledge Corridor, which is the 20th largest metro region in the country...Multi-modal connections within this region, including rail connections, are very important for the vitality of this growing economic giant.”

Commenters looked for further explanation of how the Action Alternatives would allow for increased capacity for through trips originating on connecting corridors and continuing to destinations along the NEC. Interest in integrating connecting corridor service into the improved NEC was expressed for both electrified and non-electrified corridors:

“I agree there needs to be expansion, not just within the Northeast Corridor itself, where we are under wire, but also outside of the Northeast. More so in areas where there is market growth, such as Virginia, Upstate New York, New England and even try to get some of the market in the State of Pennsylvania.”

“Any report on the environmental impact of the Northeast Corridor should also include Amtrak’s 103-mile Philadelphia-Harrisburg line, which is -- like the NEC -- electrified and so already contributes to a cleaner environment.”

Overall, the importance of coordinating with ongoing planning efforts was noted with regard to each of the connecting corridors (Southeast to Virginia, Keystone, Empire, New Haven-Hartford-Springfield, Inland Route, and Downeaster north of Boston):

“... there may be conflict with operating and infrastructure plans currently being developed for the corridor jointly by CSX Transportation, VRE, and the Commonwealth of Virginia; It should be more clearly noted in the report that any discussion of the three service alternatives (Maintain, Grow, Transform) south of Washington Union Station are purely speculative and have not been fully scrutinized in this current study.”

#### **4.2.3 STRENGTHEN AIRPORT CONNECTIONS**

The FRA heard from a variety of individuals and organizations about the importance of rail connections to the region’s airports:

“I believe a direct ‘pass through’ connection to Philadelphia International Airport is critical as an enhancement to the NEC. This would enable travelers originating from points south of the airport to avoid bypassing PHL, traveling on to the 30th Street station, switching trains, and riding to PHL on the current SEPTA airport line. Taking a train is highly preferable to dealing with driving, parking, and shuttles to and from the terminal.”

“...riders must be able to connect directly to [Philadelphia International Airport] from the Joseph R. Biden Jr. Amtrak Station in Wilmington...”

“The Tier 1 DEIS does not currently contemplate a rail connection to Bradley International Airport. This omission is a significant concern...The Amtrak connection to BWI Airport, for example, has provided a major boost for the Maryland/Baltimore/Washington corridor. Service at Bradley is expanding and there needs to be coordination with the existing and proposed rail infrastructure.”

“A connection to Bradley International Airport (BDL, Gateway to New England) is critical. Service at the airport is expanding...”

#### **4.2.4 PROVIDE ROLL-ON BICYCLE ACCESS**

The FRA also heard from many cycling advocates who want to see better accommodation for bicycles on board trains, at stations, and in the design of rail infrastructure:

“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...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...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.”

#### **4.2.5 IMPROVE CUSTOMER CONVENIENCE AND AFFORDABILITY**

Other comments addressed the need for more convenient, customer-friendly service across the NEC, including a common fare card. There is also strong support for more affordable Intercity service:

“As you craft your plans, I urge you to build railroad cooperation into any blueprint for the NEC's future...Running commuter trains between Long Island and New Jersey & rather than terminating them at Penn...could double capacity while opening up jobs to those on both sides of Manhattan. Coordinated communications and ticketing could ease crowding and nerves. And other options, such as sharing services, would slow the rate of fare increases for riders of all stripes.”

“The new capacity provided by the alternatives can be expanded even further by maximizing opportunities for new connections among the regional rail providers. Issues such as regional fare integration and interoperability need to be addressed.”



“...NEC FUTURE should consider ways to maintain and expand the most affordable service...Providing affordable transportation options could help provide access to jobs for diverse income levels and populations along the corridor.”

“...tickets should be modular. Like if you need to get on multiple methods of transportation, there should be a seamless ticket...So if you want to get, let's say, Pennsauken, which I believe if you were coming from Queens, you need to take seven different methods of transport, at a minimum five or four. You want to have a ticket that covers all four of them instead of having separate forms.”

“Organizational changes should be done before electronics and concrete.”

“I welcome the idea of Metropolitan service. I travel on the Northeast Corridor a few times per year, always on personal trips. The Amtrak intercity fares are expensive, apparently geared to business travelers. I am always traveling on a budget. Furthermore, I often transfer to the North Jersey Coast line at Rahway, after transferring to NJ Transit. Maybe Rahway, being an important junction, would be served by Metropolitan trains. I would like that.”

“...a low-cost service on the corridor (no-frills) should be considered. While slower and less comfortable, the fares and unreserved nature would prove popular. For instance, NJ Transit and SEPTA's all local service between Philadelphia and New York is slow, but at less than \$30, it beats the Amtrak walk-up fare, which can be as high as over \$100.”

#### **4.2.6 FRA'S CONSIDERATION OF COMMENTS ON MOBILITY AND CONNECTIONS**

A majority of commenters expressed the importance of a better-integrated rail network that would improve the connectivity between communities along the NEC and those served by connecting corridors. Consistent with the purpose statement for NEC FUTURE, many stakeholders and individuals expressed the need for a future NEC that provides more connections between places that are currently underserved. This emphasis on connecting places along the NEC strengthens the argument for continued investment in the existing NEC—a key priority for the FRA throughout the NEC FUTURE process. Of particular interest to the FRA were comments about how to make the NEC a more customer-friendly, attractive transport mode with features such as “roll-on, roll-off” bicycle access, a common fare medium across operators, and better integration between Regional and Intercity operators. The FRA is looking closely at how to incorporate these and similar operating enhancements into the Preferred Alternative.

### **4.3 IMPORTANCE TO THE ECONOMY**

Another topic of concern to many commenters is the importance of passenger rail to the Northeast economy. Comments on this theme addressed the role of rail in retaining the region's existing jobs and workforce, as well as the growth opportunities that significant rail service improvements could create. The

importance of continued service on the existing NEC along the Connecticut coastline was also emphasized, as well as the importance of enabling growth in freight rail.

#### **4.3.1 RETENTION OF EXISTING JOBS AND WORKFORCE**

The FRA received many comments about the economic importance of reliable NEC service and the vulnerability of the Northeast economy to disruptions or reductions in service quality. Many of these comments specifically addressed the importance of continued investment on the existing NEC along the Connecticut coastline:

”Without swift action to implement the Universal First Phase along the NEC, including the New Haven Line (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.”

“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.”

“Historically, the NEC has been a driver of coastal economic development all along its line, yet investment has been deficient, which has had a negative impact. This heavily traveled northeast megalopolis connector is worthy of the capital and operational investments needed to keep it vital.”

#### **4.3.2 ECONOMIC DEVELOPMENT POTENTIAL**

A number of comments addressed the potential of new or improved rail connections to spur economic development in specific locations. Others spoke more generally about the potential of improving rail service for the Northeast economy as a whole:

“[A] high speed connection for Wilmington will allow the region to attract new residents who can take advantage of the efficient train service for commuting and will foster continued economic growth for Wilmington’s business community due to the ease of business travel.”

“A robust rail network at all levels, connecting major and medium economic centers, will catapult Connecticut to being a key player in the region.”

“A bold investment in world-class high-speed rail and improved conventional intercity and commuter rail service in the NEC would have a transformational impact on the economic competitiveness, quality of life

and mobility for more than 50 million residents of the Northeast Megaregion...If this investment were made, weak market cities like Baltimore, New Haven and Providence would be brought into the economic orbit of strong market cities, including Boston, New York, and DC, to the benefit of all.”

### **4.3.3 IMPORTANCE OF FREIGHT RAIL**

Commenters suggested the need to proactively support freight rail growth in the region:

“We have serious concerns about any Action Alternative that could compromise the freight capacity in the key freight nodes in south Philadelphia and the Chester area. Economic growth in this region, particularly in the energy, petrochemical and manufacturing sectors, has led to an increase in rail traffic. Indeed, this region is experiencing greater volumes of rail traffic than it has seen in many years.”

“The NEC...serves as an economic development engine, as it is also the primary rail freight corridor for the entire Delmarva Peninsula.”

“Operating windows, dimensional limitations, and overall capacity create existing constraints on freight movement along the NEC and will only get worse over time as demand increases. With multimodal goods movement such an important component of Maryland’s economy...freight accommodations [should be] considered when determining the preferred alternative.”

### **4.3.4 FRA’S CONSIDERATION OF COMMENTS ON THE IMPORTANCE OF RAIL TO THE ECONOMY**

Comments received on the potential economic benefits of passenger rail confirmed the FRA’s initial focus on the critical role the NEC plays in the economy of the Study Area. Comments further highlighted the need to support existing freight rail operations and to ensure that planned improvements would not harm or negatively affect important freight rail activity. While economic development opportunities to areas served with new, off-corridor routes north of New York City were of interest to some, a majority of commenters emphasized the importance of more-reliable, faster, and more-frequent passenger rail connections to the economic vitality of urban centers along the existing NEC. These perspectives on how the NEC supports the economy of the Study Area are key considerations in the FRA’s deliberations on the Preferred Alternative. The FRA also recognizes the importance of freight rail, and although not the focus of NEC FUTURE, the interface between passenger and freight rail will be more fully discussed in the Tier 1 Final EIS.

## **4.4 ENVIRONMENTAL BENEFITS AND IMPACTS**

The FRA received a broad range of comments regarding both environmental benefits and potential effects associated with the No Action and Action Alternatives. Many articulated support for the air quality,

transportation and economic development benefits of improved passenger rail services. There were two issues that generated a significant number of comments: 1) a proposed aerial structure through the town of Old Lyme as part of a proposed rail segment (in Alternative 1) between Old Saybrook, CT, and Kenyon, RI; and 2) a possible routing via Long Island (in Alternative 3). Similarly, commenters raised concern with a potential rail segment (in Alternative 3) through both the Patuxent Research Refuge in Maryland and the John Heinz National Wildlife Refuge in Pennsylvania. Some supported a Central Connecticut routing to connect new markets, while others raised concern with the effect on open space and other natural features. While some supported proposed off-corridor representative routes, commenters asked questions about potential land use changes and effects to open space, forested and agricultural lands. Other environmental resources of concern include wetlands and marshes; wildlife and bird habitat; ecology; waterways, estuaries, and rivers. Several comments raised concerns about potential effects on Environmental Justice (low-income or minority) communities.

#### **4.4.1 AIR QUALITY BENEFITS**

The FRA heard support for the environmental benefits of the Action Alternatives, including effects on air quality:

“Expanded rail ridership is one of the best means available for our region to lower transportation emissions and improve air quality.”

“The positive greenhouse gas (GHG) implications and climate adaptation elements of the project are compelling and present an opportunity to make major strides in reducing the number of vehicles on the road. The DEIS presents a summary of changes in carbon dioxide equivalent (CO<sub>2</sub>e) emissions for roadways, and diesel and electric trains. Based on that analysis, net total GHGs decrease due to a reduction in vehicle miles traveled, with Alternative 1 reducing 274,650 tons of CO<sub>2</sub>c emissions and one Alternative 3 configuration reducing up to 581,525 tons of CO<sub>2</sub>e emissions per year.”

“A passenger rail network that accommodates bicycles will reduce the environmental impact of the transportation system.”

“The Tier 1 DEIS is, if anything, excessively stringent. It fails to sufficiently take into account the substantial benefits to the human environment that derive from improved rail access (and the resulting decrease in reliance on automotive and air traffic).”

#### **4.4.2 BENEFITS AND IMPACTS OF NORTHERN ROUTE OPTIONS**

Numerous comments addressed the potential benefits and impacts of a new segment between New Haven and Hartford, CT, and Providence, RI, in Alternative 2 and of the northern route options for a second spine in Alternative 3:

“... Hartford and UConn are huge economic engines for Connecticut, and can provide many potential riders under NEC FUTURE with such an ‘inland route’.”

“... 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...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’.”

“Proposals that by-pass Stamford and Norwalk (e.g. the northern route or tunnel under the Long Island Sound) undermine economic developments underway in those communities and do not appear to be consistent with the State Plan of Conservation and Development.”

#### **4.4.3 CONCERNS ABOUT POTENTIAL IMPACTS TO OLD LYME, CT**

Over 1,000 comments expressed concern about the impacts of a proposed aerial structure associated with a new segment through Old Lyme, CT, in Alternative 1:

“No railway route should be approved that will encroach upon or diminish the historical areas in and around Old Lyme and its estuary.”

“This plan would: (1) have substantial negative impact on the Connecticut River Estuary and the various species of wildlife now living in (and in some cases returning to) this area, from bald eagles to salmon; (2) literally destroy the business, historic and cultural center of Old Lyme; and (3) have enormous, adverse consequences for the entire residential community.”

#### **4.4.4 OPPOSITION TO LONG ISLAND ROUTING**

The Long Island route options included in Alternative 3 were also of concern to many local residents:

“I am a resident of Garden City living in the neighborhood adjacent to the proposed railroad path. This is a highly contested and over utilized area that will definitely be impacted from a quality of life perspective by any more activity taking place near it.”

“I am against the proposal for the railway to go through Milford Harbor. The construction of a tunnel would be detrimental to the ecosystem of the sounds as well as the protected lands on Charles Island and those in the Gulf Pond. I grew up in Milford and it has taken DECADES, literally, to finally see an impact on the improvement of the quality of the water and

wildlife in that area. You would be going backwards for a half hour of 'progress'. It's not worth it."

#### **4.4.5 AREAS OF ENVIRONMENTAL SENSITIVITY**

Comments addressed a variety of areas of environmental sensitivity, including the Patuxent Research Refuge, coastal and shoreline areas, historical communities, and ecologically sensitive areas:

"We also share the concerns being expressed by Connecticut Shoreline East communities about the severe adverse impact that adding tracks and service would have on the important historic and environmental resources found in the coastal corridor between New Haven and Stonington... that would be adversely affected by the addition of new tracks and other measures in this corridor."

"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..."

"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."

"... south of the [Wilmington] station where the alternatives 2 and 3 are proposed, we have a lot of wetlands areas, endangered species, hazardous waste sites, flood plains, and areas subject to sea level. It would not be suitable for additional development."

#### **4.4.6 ECOLOGY AND WILDLIFE HABITAT**

Comments also addressed potential impacts to specific habitats and species:

"Major impacts to several Important Bird Areas including the Connecticut Audubon Society's Bafflin Sanctuary in Pomfret, the Audubon Center at Bent of the River in Southbury, the Quinnipiac River Tidal Marsh in New Haven, and Mansfield Hollow State Park in Mansfield... Even if some of these areas are proposed to be tunnels there will likely be significant disruption..."

"Additionally, this plan does not address impacts to the Federally threatened Northern Long-eared bat."

#### 4.4.7 FARMLANDS, PARKS AND OPEN SPACE

Other comments expressed concern about potential effects on farmland, parks, and open space. Some commenters were also concerned that new rail segments could induce development and encourage sprawl, unless local jurisdictions were to enact strong land use policies supporting transit-oriented development:

“The impacts on farmland already protected by the State, municipalities, and land trusts need to be evaluated. These lands are critical to the agricultural land base.”

“We strongly encourage you to select an alignment and station location that minimizes impacts to our agricultural lands, working farms, natural resources and rural character.”

“I am concerned about the effect a new rail line will have on our parks, wildlife, natural vegetation, and current unfettered enjoyable use by the public.”

“The massive development activities associated with each of the proposals, particularly options two and three, will result in a conversion of land protected for conservation to railroad infrastructure purposes.”

“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.”

“...several [trails] have the potential to be impacted...particularly the Washington-Rochambeau National Historic Trail due to the fact that it generally follows the NEC Future Corridor for its length...”

#### 4.4.8 ENVIRONMENTAL JUSTICE AND COMMUNITY CONCERNS

Several comments addressed potential community impacts in areas with low-income and minority residents:

“...through the City of Wilmington, DE...there is concern that the paths of Alternatives 2 and 3 would travel directly through an existing concentration of low income and minority residents in the Southbridge community.”

“...express concern with the two proposed alternative rail alignments through Wilmington, Delaware between the Christina River crossings...both proposed alignments would create an unfair burden on

Southbridge by detracting from the social, health, economic, and environmental well-being...”

“...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...”

#### **4.4.9 CULTURAL RESOURCES**

Comments were also received on potential impacts to cultural and historic resources:

“The report acknowledges that the Old Lyme Historic District...but it overlooks the fact that the Florence Griswold Museum ... is a National historic Landmark that would be irreparably harmed by such a development.”

“Alternative 2 is shown with a New Segment through western New Castle County, Delaware and virtually the entirety of Cecil County, Maryland. The areas at which the New Segment would divert from the present NEC are culturally- and historically-significant, incorporated employment and population centers...”

“Please preserve landmarks and heritage features when planning your rail beds.”

“According to the data presented, there are no National Historic Landmarks present that will be impacted by Alternative 1 and 2. We disagree with this finding, as three National Landmarks, Holy Trinity Church (Old Swedes), Fort Christina and Howard High School, are close to the current corridor. It should also be noted that Holy Trinity Church and Fort Christina are now included in the First State National Historical Park.”

#### **4.4.10 RESILIENCY AND CLIMATE CHANGE**

The FRA heard a variety of comments about the vulnerability of the NEC to sea level rise and storm surge events, as well as the potential to increase the resiliency and redundancy of the rail network:

“When taking a train to Boston I was enchanted to find us running along the beach at one point, but rising sea levels are an issue there and also coming across the Meadowlands into NYC.”



“Alternative 1 is the more susceptible to natural disasters such as hurricanes and rising sea levels because of its proximity to the LI Sound shoreline.”

“...global warming will have strong future impact on coastwise infrastructure.”

“An inland route from Hartford to Springfield would allow for alternative routing during catastrophic events of facilitate construction-related re-routing of trains when needed for coastal rail infrastructure projects.”

#### **4.4.11 OPPORTUNITIES TO MINIMIZE IMPACTS**

Several comments suggested methods for minimizing overall impacts through the use of existing transportation corridors. Others noted potential mitigation measures and opportunities to use green infrastructure:

“...we urge you to proceed with an alternative that follows and builds upon existing transportation corridors and leverages existing investments Connecticut is making to build faster and more resilient transportation lines while reducing greenhouse gases.”

“...evaluate the possibility of using existing right-of-way where possible -- such as between Providence and Boston -- where the line that currently exists is electrified and supports, on much of the route, speeds of over 100 miles an hour and has room for expansion on both sides.”

“I oppose Alternative 1...because development along the coastline is bad environmental policy. Building new tracks in environmentally sensitive regions such as our coastal marshes will impact migrating birds and further damage our already imperiled diadromous fish species...I would rather see rail service extended along the I-91 corridor...”

“So the impacts of this line are -- can be minimized with greenways, with tunneling, with aeriels, with sound barriers and other different things. And we must do this and we can't give in to the NIMBY-ism that is going to come at it. But we also have to make sure it is minimized.”

“Another area requiring additional assessment is the possibility of utilizing green infrastructure along the rail corridor. Green infrastructure offers pollution mitigation, flood control, and resiliency opportunities along the rail line.”

#### 4.4.12 FRA'S CONSIDERATION OF COMMENTS ON ENVIRONMENTAL BENEFITS AND IMPACTS

The comments received on environmental themes provided useful insights that will help guide the FRA in developing a Preferred Alternative that—insofar as is possible with a Tier 1 decision that does not determine exact alignments—minimizes effects to the built or natural environment. For example, due to the concerns raised in Old Lyme, CT, the FRA met with local representatives and has committed to avoiding an aerial structure through Old Lyme, should the proposed Old Saybrook, CT, to Kenyon, RI, route segment be included in the Preferred Alternative. Similarly, the FRA identified a Representative Route that minimizes effects on the Patuxent Research Refuge and the John Heinz National Wildlife Refuge, where commenters expressed concern about potential ecological impacts.

### 4.5 COST OF IMPROVEMENTS AND AVAILABILITY OF FUNDING

Another common theme in the comments is the cost of capital improvements and the feasibility of obtaining funding for any of the visions outlined. Many commenters felt that Alternative 3 was too costly. Others were most concerned about how funding would be secured. Given fiscal constraints, many stakeholders urged that the FRA's primary focus be on the near-term implementation of a first phase of priority projects:

“We...concur that maintaining SGR [State of Good Repair] 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.”

“Federal funding is necessary to make the implementation of any of the Action Alternatives successful...The sustainability and resiliency of the infrastructure on the Northeast Corridor has to be a priority.”

“We understand the planning needs of FRA to conduct an analysis such as this. Yet, the projected levels of investment of the three alternatives are staggering...These required levels of investment suggest the need for an alternative means of financing, such as some form of public private partnership...”

“Project costs must be controlled, and the NEC FUTURE DEIS doesn't explore potential cost-saving measures by minimizing phasing or through the use of various financing and project delivery alternatives.”

“...there is reason to believe that funding will continue to be a limiting factor into the future for projects such as the NEC...”

#### 4.5.1 FRA'S CONSIDERATION OF COMMENTS ON COSTS AND FUNDING

The FRA recognizes that a significant level of investment will be needed to fully implement any of the Action Alternatives, and that this work will need to be phased over time. The FRA will work with stakeholders and railroad operators to define a first phase of investments, or Initial Phase. Comments received emphasized

the importance of including stakeholders and railroad operators in a collaborative process to define an Initial Phase; allowing for agreement among stakeholders on project priorities; the dependencies or interrelatedness of projects, priorities, and alternative finance and funding strategies. The outcome of this collaboration will be an important element of the Service Development Plan (SDP) to be prepared subsequent to the issuance of the Tier 1 Final EIS and Record of Decision.

## **4.6 DATA AND METHODOLOGIES USED FOR THE TIER 1 DRAFT EIS ANALYSES**

The FRA also received comments about the methodologies and data used in the various analyses conducted for the Tier 1 Draft EIS. These comments principally addressed the ridership estimates, including underlying assumptions about pricing and demographic data. Comments were also received on the capital cost estimates and methodology.

### **4.6.1 RIDERSHIP ESTIMATES TOO CONSERVATIVE**

A number of commenters criticized the ridership estimates, stating that the assumptions used in modeling did not capture the transformative impacts Alternative 3 would generate:

“The ridership forecasts for 2040...are integral to any evaluation. However, the forecasts for Alternative 3 are surprisingly low, showing only a marginal improvement from a scenario without high-speed rail. High-speed service would provide fundamental differences related to speed, capacity, and additional connections to key hubs.”

“Other HSR and high-speed commuter services have experienced dramatic increases in induced demand, often way above ridership forecasts prepared before these services were introduced. We believe that there would be similar significant increases in demand for improved NEC services if they were created here. These should be incorporated into ridership forecasts for Alternative 3 services.”

“The assessment of population and employment growth...in Chapter 6 is very cursory...Additionally, the analysis lacks detail for future job and resident access to key markets served along the corridor, especially the central business districts of Boston, New York, Newark, Philadelphia, and Washington, D.C...Incorporating future population growth and employment growth into ridership estimates will improve the assessment of alternatives for the final cost-per-rider comparison.”

“...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.”

#### 4.6.2 FARE POLICY ASSUMPTIONS

Other comments addressed the assumptions about fare policy and their implications for the evaluation:

“Overall, the fare policy assumptions contribute to a number of counter-intuitive ridership outcomes, which materially affect the assessment of alternatives...The fare strategy within the Action Alternatives is not intended for a fare-maximizing or ridership maximizing analysis...In short, the DEIS lets a seemingly arbitrary determination of potential fares drive the entire analysis. More prudent fare assumptions that comply with federal law and that reflect Amtrak and commuter rail policies should be incorporated into the analysis for the Final EIS.”

“For the Tier 1 DEIS, fares are used mostly as a placeholder since the level of analysis is zoomed out. However, some important decisions are made about fare calculation that affect the viability of the alternatives, and therefore the evaluation process...With regard to pricing, other international high-speed rail systems, such as the AVE line in Spain, provide a wide range of ticket and ‘class’ options for their customers...We believe that creating similar fare systems in the NEC, designed to maximize ridership, convenience and economic returns on the investment should be incorporated into the DEIS ridership forecasts.”

#### 4.6.3 DEMOGRAPHIC DATA QUESTIONED

A concern was raised about the demographic data used in the analysis, specifically the use of Moody's data instead of U.S. census data and the geographic boundaries used to calculate population and employment for the Providence metropolitan area, and the implications for routing decisions:

“Table 7, NEC Population Forecasts and Table 8, NEC Employment Forecasts seriously underestimate population and jobs for the Providence area.”

“Moody's assumptions and methodologies for determining population and metropolitan area designations in the DEIS are not clear. U.S. Government census and employment data should replace Moody's data in the DEIS and final EIS...The set of population numbers in the DEIS Alternatives Report incorrectly implies that Providence is equivalent to Worcester instead of Hartford...If large sums of money are spent on a new HSR Hartford-Worcester alignment, no matter what the EIS might outline, it's highly unlikely that much will be done to improve the NEC coastal route or to upgrade it to a proposed 160 mph HSR service.”

#### **4.6.4 CAPITAL COST ESTIMATES QUESTIONED**

Some commenters questioned the capital cost estimates provided in the Tier 1 Draft EIS, suggesting they are too high in comparison to similar projects in other locations:

“The cost estimates for this project...are understandably high, but we find that the estimates skyrocket past what costs in similar projects have incurred in other countries, or even for comparable projects in the U.S., such as the California HSR project. Part of this comes from the phasing plan, which plans implementation over twenty or more years. Phasing the project this way balloons the cost estimates.”

#### **4.6.5 MULTIMODAL CONSIDERATIONS**

Several comments addressed the need to compare rail investments with investments in other transportation modes to fully understand the relative cost and environmental implications of the Action Alternatives:

“As the region’s population grows, demand for transportation grows, and transportation network capacity will almost certainly increase. If rail capacity does not increase, then road and air capacity will increase—the alternative is economic decline. The question must be this—what is the most efficient way to meet increasing transportation demand of a growing population? Each alternative should bear the cost of the impact on other modes’ capacity.”

“...if we end up with, you know, a low-end alternative, if you will, that doesn't carry as much as capacity, it doesn't go as fast, will we need to build more roads? And what would be the environmental impact of that? Will we need to build airports or more runways, and what will be the impact of that? We need to look at all of the modes instead of just looking at it as a single mode in looking at the whole corridor. And I think that's critical.”

#### **4.6.6 FRA'S CONSIDERATION OF COMMENTS ON DATA AND METHODOLOGY**

The FRA received several comments on its ridership forecasting methodology and underlying assumptions about population and employment growth forecasts for the Study Area. In response to these questions, the FRA conducted a benchmarking analysis of the NEC FUTURE interregional ridership forecasting tools and results and then refined the intercity forecasting model based on that analysis. The model adjustments will be utilized for analyzing the Preferred Alternative and documented in the Tier 1 Final EIS. The FRA shares the interest noted about the possibility for induced growth in demand with improved services; the nature of that demand, however, requires further coordination with local and regional entities and is more appropriately analyzed in subsequent Tier 2 project studies.

## 4.7 STUDY PROCESS

The FRA also heard from a variety of organizations and individuals with concerns about the NEC FUTURE study process. These comments primarily addressed the need for more public outreach in potentially affected communities, the need for more time to consider the information, and the difficulty of evaluating alternatives at the Tier 1 level of detail.

### 4.7.1 INSUFFICIENT OUTREACH TO AFFECTED COMMUNITIES

Many commenters were concerned about a lack of direct outreach or notice to potentially affected communities, either during the development of the alternatives presented in the Tier 1 Draft EIS, or in preparation for its release and the public hearings. Most of these comments related to the potential effects of the new Old Saybrook-Kenyon segment in Alternative 1 on Old Lyme, CT. Others involved communities on Long Island potentially affected by route options in Alternative 3. Some felt that public hearings should have been offered in more locations, such as in Suffolk County and Nassau County, NY:

“...it is understandable that the NEC FUTURE Draft EIS has raised alarm among many Connecticut residents. Many in the region were surprised to learn about the potential placement of a new rail line in the towns...We recognize that FRA held listening sessions and public meetings in several Connecticut cities, and we understand that the proposals in the EIS are just the beginning of any analysis—a more thorough vetting with local stakeholders consistent with federal law would happen before any project moves forward...Still, it appears that little engagement was done in these communities to assess even the preliminary views and concerns of those potentially impacted by the proposed new segment in Alternative 1 prior to inclusion in the report.”

“The two January 12th public hearings in Mineola, NY were not well-publicized or well-attended in spite of the significant regional concerns regarding this project. It is important to note that 2.8 million people reside in Nassau/Suffolk Counties on Long Island, yet only two public hearings were held in central Nassau County on the same night. This would have forced most Suffolk County residents to travel twenty to ninety miles to attend the closest hearing.”

“It seems to me that you best start over by getting local input first.”

“As you move forward with a Tier 1 EIS, extensive community outreach will be needed in each of the affected communities to ensure that residents and other stakeholders have ample opportunity to understand and comment on the proposed action and mitigation measures. This is particularly critical in areas where new rail routes and stations are proposed...”

#### 4.7.2 MORE TIME NEEDED TO RESPOND

The FRA received requests for an extension of the public comment period, which originally ran from November 13, 2015 to January 30, 2016. In response, the FRA extended the comment period until February 16, 2016, resulting in a 95-day comment period. A few commenters felt that a longer extension should have been provided:

“The documents associated with the DEIS are extensive, and many stakeholders would have appreciated more time to review and study the materials.”

#### 4.7.3 CHALLENGE OF ASSESSING IMPACTS AT A TIER 1 LEVEL OF DETAIL

The FRA received comments indicating that the level of detail in the Tier 1 Draft EIS was not specific enough to allow readers to evaluate the environmental impacts of the alternatives:

“The devil is generally in the details with these massive projects and the details on specific impacts to habitats of importance to birds and other wildlife and on open space other than state or federal lands are very difficult to assess from the maps and text that are provided...It is disturbing and unfortunate that the DEIS does not take into account state listed species...”

“The high level concepts presented in Alternative 2 and 3 are difficult to grapple with. Alternative 2 seems to generally follow the existing right of way in Massachusetts, but it is not clear whether the new segments would require any land taking—an issue that would be important for state and local stakeholders to understand.”

“It is difficult to form an opinion on the plan with an EIS so lacking in detail...There is no indication of any but State and Federal lands that will be impacted by this project. It is impossible to address this issue unless the maps delineate other threatened lands such as those owned by NGOs like the numerous Audubon Societies and the Nature Conservancy; plus there is no mention of Municipal lands, lands under easement, land trusts or private holdings.”

“The information provided in the DEIS regarding Alternative 3 is so nebulous that it is difficult to see how it can provide a suitable basis for decision-making. The DEIS vaguely indicates that the potential new route on Long Island would be installed in a ‘trench’ through the Town of Oyster Bay, between Garden City and the Main Line of the Long Island Rail Road in Farmingdale. The DEIS does not even include a generic discussion of how this physically would be accomplished in an area that is already essential fully built-out...or how potential impacts during construction and operation would be mitigated...”

#### **4.7.4 FRA'S CONSIDERATION OF COMMENTS ON THE STUDY PROCESS**

In response to concerns about the time available for review of the Tier 1 Draft EIS, the FRA extended the comment period until February 16, 2016, resulting in a 95-day comment period. All comments received from potentially affected communities are being considered in identifying a Preferred Alternative, and the FRA will provide responses to the comments in the Tier 1 Final EIS. Comprehensive outreach to the residents of potentially affected communities will occur during Tier 2 project studies. At that time, detailed engineering and environmental data will be available to inform more thorough local discussion of the specific features, benefits, and impacts of each individual project.

## **5. Next Steps**

The FRA is continuing to review the comments received during the Tier 1 Draft EIS comment period. These comments, in combination with the findings of the Tier 1 Draft EIS and FRA policy guidance, are informing the FRA's deliberations about the Preferred Alternative that will be evaluated in the Tier 1 Final EIS. The Tier 1 Final EIS will include a detailed record of all submissions received, specific comments included in those submissions, and the FRA's response to those individual comments. As appropriate, the Tier 1 Final EIS will include updates to the Tier 1 Draft EIS itself in order to respond to comments received, to address errors, or otherwise clarify information.

The issuance of a Record of Decision (ROD), following the Tier 1 Final EIS, will conclude the NEPA process. The ROD will document the FRA's decision to adopt an investment program for the NEC (thereafter referred to as the Selected Alternative). The ROD will formalize the FRA Tier 1 decision and any commitments to subsequent project-level (or Tier 2) actions necessary to advance the Selected Alternative. The ROD will also clarify the role of U.S. DOT, notably the FRA and the Federal Transit Administration (FTA), the states and District of Columbia, and other key stakeholders in implementing the Tier 1 decision. As a framework for future rail improvements on the NEC, the Selected Alternative will not require any rail operator to fund or construct new infrastructure, but instead will provide a framework to guide future investments in a manner that is consistent with the vision of the Selected Alternative.

Finally, the FRA will prepare a Service Development Plan (SDP) for the Selected Alternative. The SDP provides the business case for the Selected Alternative and further details its benefits and costs, implementation approach, institutional and operational requirements, as well as funding and financing strategies. Most importantly, the SDP establishes an action plan for implementation by the federal government, states and District of Columbia, the NEC Commission, and the NEC railroads. The FRA anticipates releasing the SDP in 2017.