

January 30, 2017

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

On behalf of The Nature Conservancy, thank you for the opportunity to provide comments on the Tier 1 Final Environmental Impact Statement (FEIS) for NEC FUTURE.

The Nature Conservancy is a global conservation organization dedicated to conserving the lands and waters on which all life depends. Guided by science, we create innovative, on-the-ground solutions to our world's toughest challenges so that nature and people can thrive together. We are tackling climate change, conserving lands, waters and oceans at unprecedented scale, and helping make cities more sustainable. Working in more than 65 countries, we use a collaborative approach that engages local communities, governments, the private sector, and other partners.

The Conservancy certainly recognizes the environmental and economic benefits of improving and expanding high speed rail service in the United States. We are working in all 50 states to develop practical solutions for a prosperous and cleaner future, and we support increased public and private investment in mass transit as an important strategy to reduce carbon emissions.

Nevertheless, the Conservancy has grave concern that the Representative Route -- as depicted in the Preferred Alternative -- has the potential to cause irreparable damage to critically important conservation areas in Rhode Island. I understand that this FEIS is a broad programmatic and planning document and that decisions about specific alignments will be made in subsequent Tier 2 project studies. FEIS, Vol. 1, p. 1-9. However, section 4.7.8 of the FEIS calls for a new two-track segment "shifting south through Branford and Wood River Junction, reconnecting to the NEC in Kenyon, north of the Pawcatuck River," at the eastern end of the proposed Old Saybrook to Kenyon Bypass. In so doing, the NEC would carve a two-mile path across the Francis Carter Preserve, the Conservancy's second largest nature preserve in Rhode Island. See the attached map, which shows the Representative Route and its impact on the Carter Preserve and three nearby conserved properties described below.

Established in 2001 and expanded in 2014, the 1,100-acre Carter Preserve in Charlestown, RI holds significant conservation value as part of a large, unfragmented coastal forest block. It includes a mile of the Pawcatuck River and provides habitat for five bird species listed by the US Fish & Wildlife Service as "highest priority" for recovery in the northeastern United States. In addition, the Carter Preserve is a treasured public asset for the residents of Charlestown and nearby communities and one of the most popular hiking destinations in southern Rhode Island. With six miles of trails, and more in development, it is a focal point for The Nature Conservancy's outreach and environmental education programs in Rhode Island, attracting more than 5,000 visitors each year. As described in the FEIS, however, the Representative Route would divide this flagship preserve in half, fragmenting grassland and forest habitat, disrupting

the entire trail system, interfering with the quiet enjoyment of this preserve, and substantially reducing the recreation opportunities available to the public.

Moreover, three nearby properties – all protected in recent years with the assistance of the Conservancy – may also see direct impacts as a result of the project: the privately owned Amos Green Farm (nearly adjacent to the Carter Preserve), and the Westerly Land Trust's Grills Preserve and Riverwood Preserve. These and other conserved lands in southern Rhode Island have unique ecological and historic attributes and provide outstanding outdoor recreation and education opportunities. Their permanent protection is paramount to the Conservancy's mission.

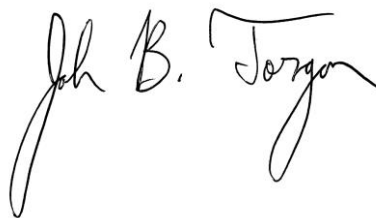
Regrettably, The Nature Conservancy was not notified during the NEC planning process, and only learned of the FEIS through an e-mail message from an individual member of the local conservation commission on December 18, 2016. Accordingly, we are providing comments at this time in the hope that we might still inform the Record of Decision and be invited to participate in subsequent planning processes, so that any proposed individual project's environmental impacts on the Carter Preserve and other conserved properties might be avoided or minimized by the Federal Railroad Administration.

Toward that end, the Rhode Island chapter of The Nature Conservancy very strongly wishes to be added immediately to the NEC FUTURE e-mail alert list. See FEIS, Vol. 1, p. 1-10. Notifications regarding NEC FUTURE should be sent to the attention of scomings@tnc.org. In addition, federal regulations (40 CFR Sec. 1506.6 (b)(1), 1506.6(b)(3)(viii)) require agencies to provide mail notice upon request regarding individual actions and any NEPA-related hearings, public meetings, and the availability of environmental documents, especially to owners of affected property like the Conservancy. The Nature Conservancy asks to be placed on the NEC FUTURE mailing list and to be notified at every stage of any individual action affecting the State of Rhode Island. Recognizing the critical importance of early planning to the NEPA process and the formulation of alternatives, we seek notification prior to the development of any feasibility studies or project studies which may potentially affect the Carter Preserve and other conserved properties and an opportunity to participate in the development of alignment alternatives to be considered in the Tier 2 NEPA process. See FEIS, Vol. 1, p. 10-9. In addition, we ask to be notified of each formal stage in the Tier 2 NEPA process for Rhode Island projects, including scoping, issuance of draft NEPA documents, and public meetings or public hearings. Mail notices should be addressed to Scott B. Comings, The Nature Conservancy, 159 Waterman Street, Providence, RI 02906. Finally, it is our understanding that after the Record of Decision the next steps will be the development of project lists for the Initial Phase and their incorporation in a Service Development Plan. The Nature Conservancy requests notice and an opportunity to comment directly on this next phase, as well.

Again, the Conservancy is supportive of the goal of increasing the role of rail transportation in the United States. We would like to work with the Federal Railroad Administration in a constructive fashion and would be interested in reaching out to the appropriate officials as this initiative moves forward. If appropriate, please share with me the best point of contact at the FRA so that we can continue this dialogue.

Thank you for your consideration of The Nature Conservancy's views on this important matter.

Sincerely,

A handwritten signature in black ink that reads "John B. Torgan". The signature is written in a cursive style with a large, looping initial "J" and a distinct "B." before the last name "Torgan".

John Torgan
State Director

Carbon Copy:

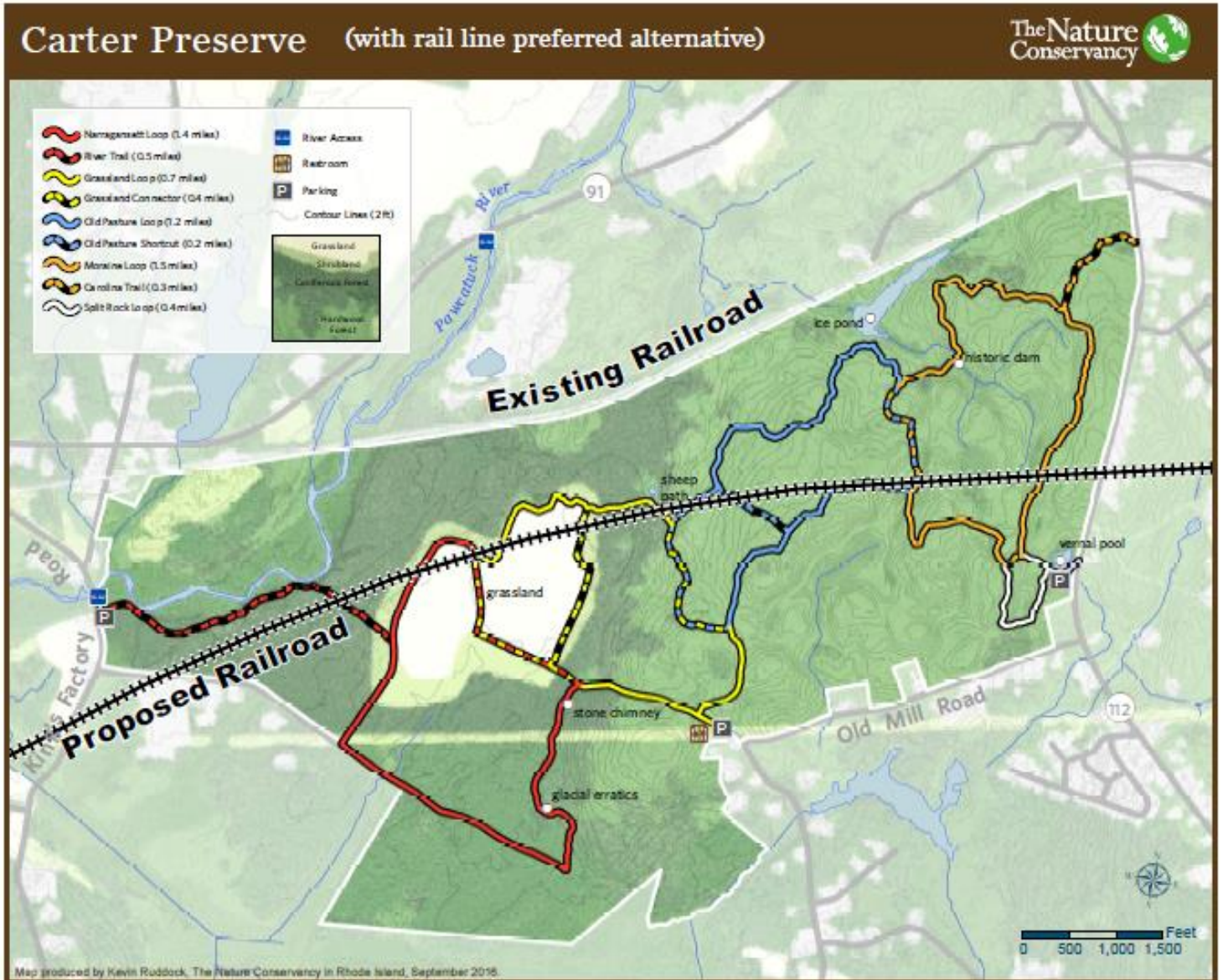
Rhode Island Governor Gina Raimondo

Rhode Island Senator Jack Reed

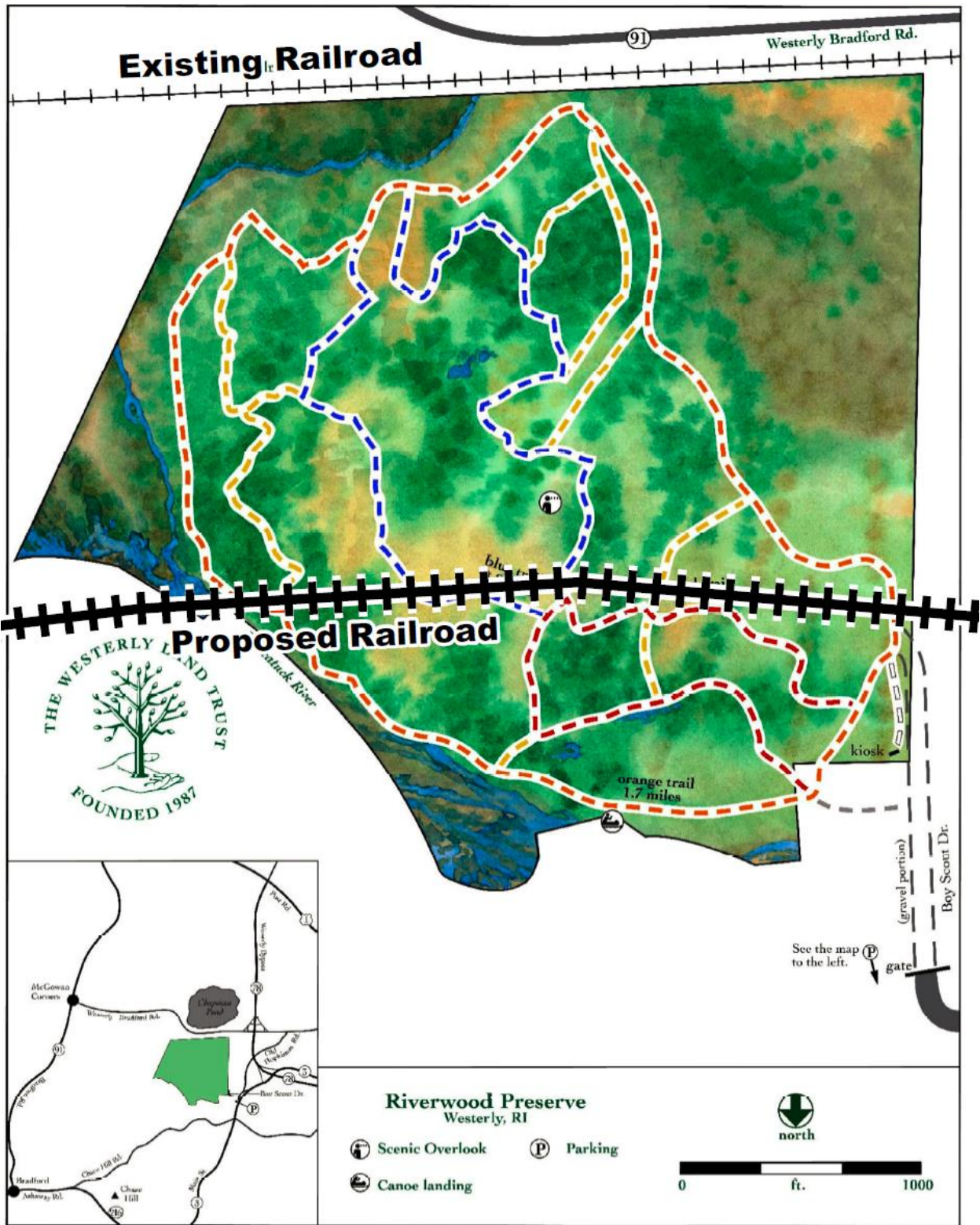
Rhode Island Senator Sheldon Whitehouse

Rhode Island Representative Jim Langevin

Attachments showing proposed railway over lands with Conservancy interest:







Amos Green Farm

Charlestown, RI

