



May 4, 2017

Eleanor D. Acheson
Chief Legal Officer, General Counsel & Corporate Secretary
National Railroad Passenger Corporation
60 Massachusetts Avenue, NE
Washington, DC 20002

Dear Ms. Acheson:

I am writing to you in my capacity as the executive director of the Connecticut Trust for Historic Preservation. The Trust is a statewide historic preservation not-for-profit that protects and promotes the buildings, sites, structures and landscapes that contribute to the heritage and vitality of Connecticut communities. I write out of significant concern regarding the impending Record of Decision (ROD) for NEC Future, and your agency's role, along with the Federal Transit Administration (FTA), as chief inheritor of the Federal Railroad Administration's (FRA) planning process.

As you may know, the public and decision-makers in Connecticut have been presented with the significant additional burden of selecting between three distinct Alternatives; each offering an alternate plan for many additional unstudied miles of new rail corridor; each posing vast, but uncertain, impacts. This burden was well-reflected in the volume and topicality of public comment on the NEC Future D-EIS, most notably in the outsized controversy and quantity of public comment from along the proposed Kenyon to Old Saybrook Bypass through southeastern Connecticut and Old Lyme, amounting to roughly half of all comments submitted by the public.

With the notable exception of the New Haven to Springfield, MA route, which has been met with broad enthusiasm, these proposed new routes through Connecticut and Rhode Island have proven highly controversial for their impacts to historic, cultural and environmental resources. Over the last year, the NEC Future Preferred Alternative has been the subject of significant Congressional opposition in both states, three proposed bills in the Connecticut General Assembly, unanimous local municipal opposition along the proposed Kenyon, RI to Old Saybrook, CT bypass, [over 100 news stories](#), and the focus of widespread concern, uncertainty, and near-unanimous opposition among residents along the proposed bypass routes.

On February 22, 2017, the [Connecticut Trust submitted extensive public comments](#) on NEC Future planning process, detailing a raft of concerns regarding what is, in our view, an unprecedented effort to sidestep basic provisions the National Environmental Policy Act (NEPA).

Our comments were supplemented by the [National Trust for Historic Preservation's public comments](#) which further noted a failure to comply with Section 4(f) of the Department of Transportation Act, which prohibits the use of historic properties and park land for transportation projects unless there is no feasible and prudent alternative to doing so, and the project incorporates "all possible planning to minimize harm." 49 U.S.C. § 303(c).

With a rumored release of the NEC Future ROD by the FRA as soon as late May, 2017, I am writing to seek clarification about your agency's role in the NEC Future process. In particular, would you please explain:

1. How extensive a role has the National Railroad Passenger Corporation had in reviewing the NEC Future Tier 1 FEIS? Could you please provide the Connecticut Trust with submitted comments, if any?
2. What role does the National Railroad Passenger Corporation have in informing the NEC Future Record of Decision (ROD) that will be issued by the Federal Railroad Administration (FRA)?
3. To what extent is Amtrak bound by the operating and investment priorities and solutions outlined in the Selected Alternative included in the NEC Future Tier 1 ROD? Presuming the availability of funding, is the National Railroad Passenger Corporation committed by the ROD to construct new routes, tunnels and bridges proposed for Connecticut in the Preferred Alternative?
4. Is it the opinion of your office, that NEC Future planning to date is in compliance with NEPA and Section 4(f) of the Department of Transportation Act?

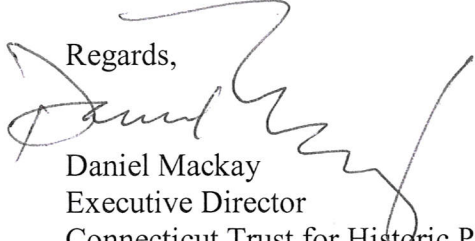
The Connecticut Trust has no interest in delaying investment or construction along the existing Northeast Corridor, and we welcome the integration and expansion of a New Haven to Springfield route into Northeast Corridor planning. However, we remain deeply concerned by the proposed New Rochelle, NY to Greens Farms, and Old Saybrook to Kenyon bypasses, which would require fundamental impacts to historic, cultural, and environmental resources along the New England coastline, without plausible or satisfactory mitigation.

Given these concerns, we ask that you support the complete omission of the proposed Old Saybrook to Kenyon bypass from the Tier 1 Record of Decision, and a commitment that this bypass plan not be reconsidered or reintroduced as part of later NEC Future planning. Additionally, in the case of the New Rochelle to Greens Farms bypass, we ask for your support in separating this portion from the Preferred Alternative into a distinct Environmental Impact Statement (EIS) process. This segment can be amended to NEC Future if warranted following more careful consideration of routes and impacts through those communities.

As you know, the National Environmental Policy Act, and Section 4(f) of the Department of Transportation Act, established baseline standards for environmental review, not to impede, but to foster worthwhile federal actions. We believe that the position of the Connecticut Trust on NEC Future planning is in keeping with this purpose and these baselines. Moving forward, we ask for your support in returning to well-established standards for federal planning, environmental and preservation law, as well as a rigorous and transparent public engagement process.

Thank you for your consideration of these concerns, and I look forward to your clarification of the National Railroad Passenger Corporation's role and concerns, as NEC Future planning process nears the conclusion of the Tier 1 process.

Regards,

A handwritten signature in dark ink, appearing to read 'Daniel Mackay', is written over the typed name and title.

Daniel Mackay
Executive Director
Connecticut Trust for Historic Preservation
dmackay@cttrust.org

cc: Senator Richard Blumenthal
Senator Jim Murphy
Representative John Larson
Representative Joe Courtney
Representative Rosa DeLauro
Representative Jim Himes
Representative Elizabeth Esty