



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

HISTORICAL PRESERVATION & HERITAGE COMMISSION

Old State House • 150 Benefit Street • Providence, R.I. 02903-1209

TEL (401) 222-2678

FAX (401) 222-2968

TTY / Relay 711

Website [www.preservation.ri.gov](http://www.preservation.ri.gov)

23 December 2015

Rebecca Reyes-Alicea  
NEC Future Program Manager  
USDOT – Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, New York 10004

Re: NEC Future  
Tier 1 Draft Environmental Impact Statement & Revised Draft Programmatic Agreement

Dear Ms. Reyes-Alicea:

The staff of the Rhode Island Historical Preservation and Heritage Commission (RIHPHC) have reviewed the *Tier 1 Draft Environmental Impact Statement* (DEIS) and the *Revised Draft Programmatic Agreement* (PA) including the *Rhode Island-Specific Appendix* to the PA. We understand that the ongoing process for this project divides it into tiers, with Tier 1 as the “NEC Future Investment Program” consisting of the preparation of an environmental impact statement (EIS) and Tier 2 as future improvements (potentially including construction of new alignments) along the Northeast Corridor (NEC).

At this juncture, the locations and scopes of future construction projects along the NEC have not been determined. In addition to work along the existing NEC segment in Rhode Island, additional routes through the state are being evaluated in the EIS. These routes have been presented to the RIHPHC only in maps at a macro scale, so the RIHPHC is not aware of the true location of potential new construction.

The RIHPHC has not identified any changes that need to be made to the main body of the DEIS.

Our only comment on the main body of the revised draft programmatic agreement is that the WHEREAS clause on lines 77 to 84 states that “FRA has taken steps during the Tier 1 process to... assess potential effects on historic properties.” This appears to be an overstatement – the only potential effects to historic properties that are mentioned in the DEIS are very general statements about potential effects to National Historic Landmarks. DEIS page 7.9-4 justifies the lack of assessment of effects as it states:

The information available in this Tier 1 process allows for the identification of potential effects on known historic properties, but the assessment of effects at Tier 1 is constrained by (1) the limitations of existing records, which do not comprehensively identify all historic properties that may be eligible for listing in the NRHP; and (2) the level of detail known about the Action Alternatives, which are developed only at a conceptual level during Tier 1.

In *Appendix E: Tier I Consulting Parties List*, the RIHPHC is listed as a consulting party. The RIHPHC agreed to be a signatory in a letter dated 8 January 2015 (copy attached).

In *Appendix N: Section 106 Consultation for Tier 2 Undertakings in Rhode Island*, we have the following comments:

- Line 6: “State” should be inserted between “Island” and “Historic”;
- Line 36: delete “Rhode Island Historical Preservation and Heritage Commission (RIHPHC)”, as this is the RISHPO referred to in line 32; and
- Line 74: there are other tribes listed in the DEIS page 7.9-8 which should also appear in this list.

These comments are provided in accordance with the *Procedures for the Registration and Protection of Historic Properties of the Rhode Island Historical Preservation Commission* and with Section 106 of the National Historic Preservation Act. If you have any questions, please contact Glenn R. Modica, Senior Project Review Coordinator of this office.

Very truly yours,



FOR Edward F. Sanderson  
Executive Director  
State Historic Preservation Officer

enclosure

C: John Brown, Narragansett Indian Tribe  
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)  
Ramona Peters, Mashpee Wampanoag Tribe  
Brona Simon, State Historic Preservation Officer, Commonwealth of Massachusetts  
Benny Bergantino, R.I. Statewide Planning, by email

NEC Future Letter  
CC List

John Brown  
NITHPO  
Narragansett Indian Longhouse  
4425-A South County Trail  
Charlestown, RI 02813

Bettina Washington  
Tribal Historic Preservation Office  
20 Black Brook Road  
Aquinnah, MA 02535

Ramona Peters  
Mashpee Wampanoag Tribal Community & Government Center  
483 Great Neck Road South  
Mashpee, MA 02649

Brona Simon  
State Historic Preservation Officer  
Executive Director and State Archaeologist  
Massachusetts Historical Commission  
220 Morrissey Boulevard  
Boston, Massachusetts 02125

*Esterle -  
I HAVE the info?  
Glenn*

*Extra  
address  
copy*