MEMORANDUM

TO:	Rebecca Reyes-Alicea, US DOT Federal Rail Administration
FROM:	State of Rhode Island Statewide Planning Program
DATE:	February 16, 2016
RE:	Northeast Corridor Rail Line Tier 1 Draft Environmental Impact Statement

Introduction

This document contains additional technical comments from the State of Rhode Island on the Northeast Corridor Rail Line Tier 1 Draft Environmental Impact Statement (T1-DEIS). Generally, the state is highly supportive of the alternatives described in the T1-DEIS and the Federal Rail Administration's (FRA) efforts to bring the Northeast Corridor (NEC) into a state-of-good-repair and build world-class rail infrastructure. Rhode Island recognizes that all options are contingent on funding. With this caveat noted, the progressive investment approach represented by Alternatives 1, 2 and 3 would each provide higher levels of economic return, not only to the region, but to the nation as a whole. The state believes that there are aspects and projects among Alternatives 1, 2 and 3 that would provide a framework for continued investment in the NEC, while at the same time allowing the FRA and regional stakeholders to take a step back and fully evaluate future options and alignments beyond what is included in this T1-DEIS.

Alternatives

No Action Alternative

The No Action Alternative, as defined in the T1-DEIS, is not an acceptable alternative for the Northeast Corridor and would ultimately lead to the deterioration of services on the corridor despite funding levels higher than today's levels. This alternative would severely affect travel demands in the already-congested Northeast, increase the number of over-crowded trains, and lead to less reliable service.

Alternative 1

Alternative 1 would be the minimum necessary for the NEC to continue to support the transportation needs of the region and bring the corridor to a complete, safe, and secure state-of-good-repair. The chokepoint relief, improved performance, increased capacity, more frequent service, and increased resiliency that Alternative 1 would provide are all critically needed if rail is to meaningfully contribute to economic growth and quality of life for the region.

Alternative 2

Alternative 2 proposes significant improvements to rail in the Northeast, and especially New England, through a new connection to Hartford that has the potential to change regional travelling patterns by

providing a more direct connection for travel from Hartford to Providence to Boston. The alternative would enhance service along the existing NEC and eliminate key choke-points on the corridor allowing for an expansion of inter-city and regional rail service.

Alternative 3

Alternatives 3.1 and 3.2 could have a transformative effect on the region by tying portions of Connecticut, including Hartford, more closely economically and socially to Providence and the rest of the Northeast. Both alternatives propose the construction of an entirely new, high-speed second spine to the NEC and better intercity rail connections throughout the region. Under these alternatives, the region would receive the best rail service of any of the alternatives in the T1-DEIS – hundreds of trains a day at hub stations, intercity service at T.F. Green Airport, and travels times between Boston, Providence, Hartford, and New York that would make daily commuting among the cities a feasible option.

Economic Impacts

Economically, Alternatives 2 and 3 would greatly strengthen the connections between New York City, Hartford, Providence, and Boston while also creating a resilient, inland alternative to both the existing NEC and Interstate Route 95. Economic growth depends on connectivity and access to labor markets that create economies of scale or agglomeration effects within the region, and any of the action alternatives would drive economic growth for the region.

Any new future alignment through Rhode Island would likely provide the greatest impetus for using rail to promote a world class, globally competitive regional economy, while at the same time creating the most impact. A frequent, fast rail connection from Boston to New York, through Providence and Hartford would build upon the region's existing strengths by serving the metropolitan areas where the densest concentrations of populations and jobs already exist and positioning these areas for further economic growth. For example, approximately 406,000 and 202,000 people live and work respectively within five miles of Providence Station. Thousands of workers in Rhode Island and Massachusetts already depend on train service at Providence Station to commute to and from work each day and travel to business markets along the NEC. Providence is the second busiest Amtrak station between Boston and New York, fifteenth busiest among 510 Amtrak stations nationally, and it is the third highest ridership station in the Massachusetts Bay Transportation Authority's (MBTA) commuter rail system. The same economic benefits that would accrue to people in the Providence metropolitan area would also accrue to the residents of Boston, Hartford, and New York with increased economic opportunities for millions of people.

Conversely, any new alignment that bypasses Rhode Island and Providence, would result in a lower potential number of people served than a Hartford - Providence connection and thereby is presumed to provide fewer economic benefits. Only 221,500 people live within 5 miles of Worcester Station and only 116,500 work within 5 miles. As a result, Rhode Island would oppose any high speed alternative that does not include Providence.

Environmental Impacts

The construction of new rail lines and associated infrastructure would inevitably impact the surrounding environment. The state recognizes that this is a Tier 1 EIS and detailed analyses of the environmental impacts of potential projects are not available. However, from information provided in the T1-DEIS it appears that the relative impact of Alternatives 1, 2, 3.1, and 3.2 on Rhode Island's farmlands, forestlands, and parklands would be roughly equivalent between each alternative. The impact to *total* wetlands differs by as much as 465 acres between Alternative 1 and Alternative 3.2 but we were unable to ascertain how many acres would be in Rhode Island.

As the FRA proceeds through the NEC Futures process, Rhode Island asks that the agency be cognizant of the fact that any of the alternatives that require new rail segments or alignments that cross drinking water resource areas, recreational resource areas, agricultural resource areas, and/or sensitive habitat areas will require further analysis and planning to minimize, or preferably avoid, significant impacts to the resource.

Demographic Forecasts

Rhode Island is concerned that the demographic forecasts used to estimate future ridership on the NEC underestimate the population and employment of the Providence metropolitan area. It is our understanding that the T1-DEIS defines the Providence metropolitan area as counties in Rhode Island only, a definition which ignores the social and economic interconnectedness of Providence and southeastern Massachusetts. The US Census's Providence-Warwick Metropolitan Statistical Area (MSA), which encompasses not only most of Rhode Island but also Bristol County in Massachusetts, including the cities of Fall River and New Bedford, is a more accurate representation of the Providence metropolitan area. If the MSA definition is used, the region's population and employment are significantly higher than the data shown in Tables 25 and 26 of the Ridership Analysis Technical Memorandum. The Census 2014 projection for population in the MSA is 1,609,000 and the Bureau of Labor Statistics' 2014 projection of employment is 649,000. The state recommends that the T1-DEIS be revised to include a definition of the Providence metropolitan area that matches the Census MSA.

Stations and Hubs

<u>Providence Station</u>

Providence should be listed as a "Major Hub" not a "Local Hub" (Alternative 1, Table 7-1-10). Intercity ridership at Providence Station rose by 31% from 2006 to 2012 and continues to grow, as the Providence Amtrak station is currently the 15th busiest station in the country and the third busiest station in New England. Providence Station is also the third busiest MBTA station in the MBTA commuter rail network, second only to South Station and Back Bay Station in Boston.

T.F. Green Airport

T.F. Green Airport is the only airport along the Northeast Corridor with direct connectivity to the NEC rail line, and it should be discussed further in Section 5 as a hub airport, and specifically be included in Table 5-6. The following presents enplanement data for inclusion in Table 5-6:

Airports	2006	2012	2040 Projection	Percentage Growth 2006-2012	Percentage Growth 2012-2040
T.F. Green (PVD)	2,607,160	1,830,602	2,666,663[1,2]	-29.8%	45.7%

1. Source: FAA Terminal Area Forecast, January 2015
2. 2040 projected data does not take into consideration the airport's demonstrated ability to provide international air service and the extension of its primary runway, scheduled to be completed in December 2017.

Transportation Infrastructure

New Providence Station

Alternatives 3.1 and 3.2 include a new Providence high-speed rail station, but the document does not make clear whether it will be an expansion of the existing station, a separate structure near the current station, or in another location entirely. More specificity is needed to better evaluate these alternatives.

Johnston, RI to East Providence, RI Tunnel

Alternatives 2, 3.1, and 3.2 propose a tunnel from I-295 in Johnston, RI, under the City of Providence, to East Providence, a distance of approximately 8 – 9 miles through the most densely populated area of the state. Additional information on the tunnel and the nature of any potential impacts from the tunnel and its construction would be helpful in evaluating these alternatives.

Old Saybrook, CT – Kenyon, RI New Segment

The state sees the benefit to trip time savings with a new segment between Old Saybrook, CT and Kenyon, RI and the need to avoid several moveable bridges in Eastern Connecticut, but more information is required on environmental and property impacts, particularly in Westerly and Charlestown. In addition, we would like to understand how this new track segment affects service on the existing NEC right of way and Westerly Station.

East Greenwich – Warwick, RI New Track

Under Alternative 1, new track is proposed along the existing NEC between East Greenwich and Warwick, RI. We would like to know if this will be a passing segment for high speed rail or to be also used by slower passenger and freight trains.

Financing and Implementation

Finance Plan

To best make informed comments and a decision on a Preferred Alternative, the state requests more information on an investment plan to finance this multibillion dollar endeavor. Full Federal financing will be challenging, and even if there is an unlikely 90/10 Federal/state funding split, the ability for each state to fund the match would be extremely challenging as we struggle to finance our entire transportation system. A reasonable funding plan needs to be included that bridges today's NEC Five Year Capital Plan to 2040 with achievable resources and federal funding levels.

Phasing and Implementation

The T1-DEIS describes a Universal First Phase to include improvements that address the NEC's most pressing capacity and state-of-good-repair challenges regardless of the Preferred Alternative selected. Rhode Island sees the value of this approach, but it would like additional detail on how the FRA will develop phasing plans both in the Tier 1 Final EIS and in the Service Development Plan to be prepared following completion of the Tier 1 document. The state would also find helpful information on the anticipated approach to be taken in the development of the Tier 2 EIS.

Other Issues

Freight

The T1-DEIS addresses the economic impacts of the alternatives at a high-level, but it does not analyze in detail the impacts on freight, a key element of economic activity in the Northeast. The state would like to see the impacts of each alternative on freight movements along the NEC analyzed and discussed in a separate section. In Rhode Island, freight and passenger rail must share the NEC on several congested segments that connect the Quonset Business Park/Port of Davisville, the Port of Providence, and Class I railroads on the national rail network; it seems that the proposed alternatives would ease existing congestion and speed freight movements, but nowhere is that stated clearly with supporting data. A qualitative and quantitative analysis of the alternatives' impacts on freight would strengthen the T1-DEIS.

Data Organization and Consistency

The T1-DEIS provides data on trip-making, ridership, frequencies, and travel times for each of the alternatives, but it does so in a way that prevents easy comparison among the options presented. For example, the T1-DEIS includes a number of tables that list the number of daily trains at stations along the NEC. Some of the tables show data for each alternative and sub-alternative, but others show only an average across the four Alternative 3 options. Similarly, at some points in the document, data on trains and frequencies include both inter-city and regional rail, and at others they include only inter-city rail traffic. Consistency in data presentation and organization across the entire document would be enormously helpful as the Rhode Island seeks to understand and analyze the impacts of each alternative. Rhode Island could see vastly different service and impacts depending on the alternative chosen; the state needs to know specifically what service and connectivity the state's rail stations will have under each of the alternatives.

Conclusion

Rail is a vital part of the transportation infrastructure of the Northeast. Since the low point of the 1970s, rail passenger service has stabilized due to federal and state actions, and investments have led to improved service along the NEC. While these improvements have yet to reach a truly satisfactory level, a continuing series of investments to achieve a state-of-good-repair on the existing NEC in order to maintain economic growth should be paramount in this process. However, the state recognizes that a well-designed and well-maintained rail system can serve as a stimulus for more robust economic growth by providing access to jobs within and between metropolitan areas and commercial centers and by offering development potential near train station areas. By including significant new rail segments, Alternatives 2, 3.1, and 3.2 can provide a level of service that not only offers excellent service to riders familiar with the current NEC but with increased resiliency, service frequency, service types, and improved travel times can provide opportunities for commuters between areas not currently or adequately served. Of particular value would be the connection between Hartford, CT and Providence, RI which is currently connected by Route 6, a two-lane highway. A proposed interstate highway connecting the two cities was rejected in the 1990s due to environmental concerns.

As noted previously, the Northeast Corridor Rail Line Tier 1 Draft Environmental Impact Statement does not include sufficient detail on several matters to allow for a full evaluation of the impacts of the various alternatives and does not allow the State of Rhode Island to endorse a preferred alternative at this time. We hope the final EIS or the future Tier 2 EIS will include additional information on these issues.