



January 17, 2017

U.S. Department of Transportation
Federal Railroad Administration
Attn: Ms. Rebecca Reyes-Alicea
One Bowling Green, Suite 429
New York, NY 10004

Dear Ms. Reyes-Alicea,

I write to you as Executive Director of the Westerly Land Trust, on behalf of myself, the Westerly Land Trust Board of Directors, and Land Trust members and supporters to express concerns about the proposed NEC rail project and provide useful information for your team.

The Westerly Land Trust has reviewed the FEIS for the NEC as released on December 17, 2016 and has the following comments regarding the alternative that is identified as the preferred alternative. **We respectfully request that the Federal Railroad Administration and U.S. Department of Transportation include the Westerly Land Trust as a participating stakeholder during the Tier 2 evaluation process due to the serious impacts proposed to our open space conservation lands.**

The preferred alternative as shown in the FEIS would directly impact two Westerly Land Trust preserves: Grills Preserve and Riverwood Preserve. Both preserves would be bisected, resulting in wildlife habitat loss and fragmentation, loss of public recreational trails and impacts to rare and endangered species. In 2008, a botanical inventory of the 550-acre Grills Preserve identified 17 rare plant species including 4 which are designated as State Endangered and 1 which is State Threatened. Several of the species found are located within the proposed alignment of the preferred alternative for the rail system. The Grills Preserve full botanical report including maps identifying plant locations is on file at the WLT office.

The Westerly Land Trust's acquisition of the Grills Preserve was funded with grant monies from the RI Department of Environmental Management (RIDEM), the Nature Conservancy, the Champlin Foundations, the Bafflin Foundation, the Doris Duke Foundation and the Forrest & Frances Lattner Foundation, as well as some individuals. Since purchasing the land in 2004, State funding from RI DEM and RI Department of Transportation and Federal funding from the US Fish & Wildlife Service and USDA Natural Resources Conservation Service have also been provided to the Land Trust to manage the property for invasive species control, wildlife habitat

enhancements and recreational trail improvements. These grant funded projects include the construction of a 75-foot aluminum pedestrian bridge over the Pawcatuck River that connects the Grills Preserve's many miles of public recreational trails to the Grills Wildlife Sanctuary owned by the Hopkinton Land Trust. Impacts resulting from the preferred alternative's construction, rail traffic and maintenance will greatly undermine the previous investment in this land by both State and Federal agencies, as well as private foundations.

It should also be noted that the Westerly Land Trust's Riverwood Preserve, a 148-acre nature preserve located just west of the Grills Preserve, is not identified in the FEIS. Therefore, the many acres of proposed impacts to this parkland are not included in the calculations, impact tables or narrative presented in the FEIS. Riverwood Preserve is shown on the enclosed map as the green conservation land west of Grills Preserve.

The FEIS describes the construction methods in Westerly to include tunnel and at-grade tracks. Because the proposed rail will be constructed within wetlands and over Westerly's Sole Source Aquifer that supplies the town's drinking water, tunnel construction impacts on groundwater flow and interception must be assessed and very seriously considered during impacts analysis.

In addition, the preferred alternative proposes multiple crossings of the Pawcatuck River, a vital natural resource within the Wood-Pawcatuck Watershed. Recognizing its significance, Congress passed the Wood-Pawcatuck Watershed Protection Act in 2014 which requires that the National Park Service complete a three year study to assess whether the Wood, Pawcatuck, Beaver, Chipuxet, and Queen Rivers meet the standards to be included in the National Wild and Scenic Rivers System. This study is currently underway but the protection it offers is not referenced anywhere in the FEIS. Construction activities necessary to erect the railroad bridges and elevated tracks through wetlands would be detrimental to river ecosystems, water quality and recreational uses of the river. Following construction, ongoing maintenance of these structures may pose additional concerns. WLT looks forward to the FRA's initiation of additional consultations with the National Park Service related to the CT and RI Wild and Scenic River segments that are proposed to be traversed by the preferred alternative.

The Westerly Land Trust is also concerned about the effect that the new alignment and high speed rail service will have on the Westerly train station. In addition to conserving open space, the Land Trust plays a key role in revitalizing downtown Westerly through its urban initiative with projects such as a public ice rink on Main Street and the United Theatre to be redeveloped as a multi-purpose arts complex. A viable and active train station is important to the growth, future and health of our community and Westerly station has always been viewed as an important element of this downtown. Keeping our train station open and available with frequent train stops is essential for continued resurgence of downtown Westerly. The Land Trust urges FRA not to reduce service to this long standing train station.

Please seriously consider these comments and points of information that were not part of the initial study during the selection of the NEC alternative. The alternative currently identified in the FEIS as the preferred alternative will have profound impacts on Westerly's natural resources and environment.

I can be reached at execdir@westerlylandtrust.org or 401-315-2610 for further discussion and for inclusion in the Tier 2 review process at the time it may occur.

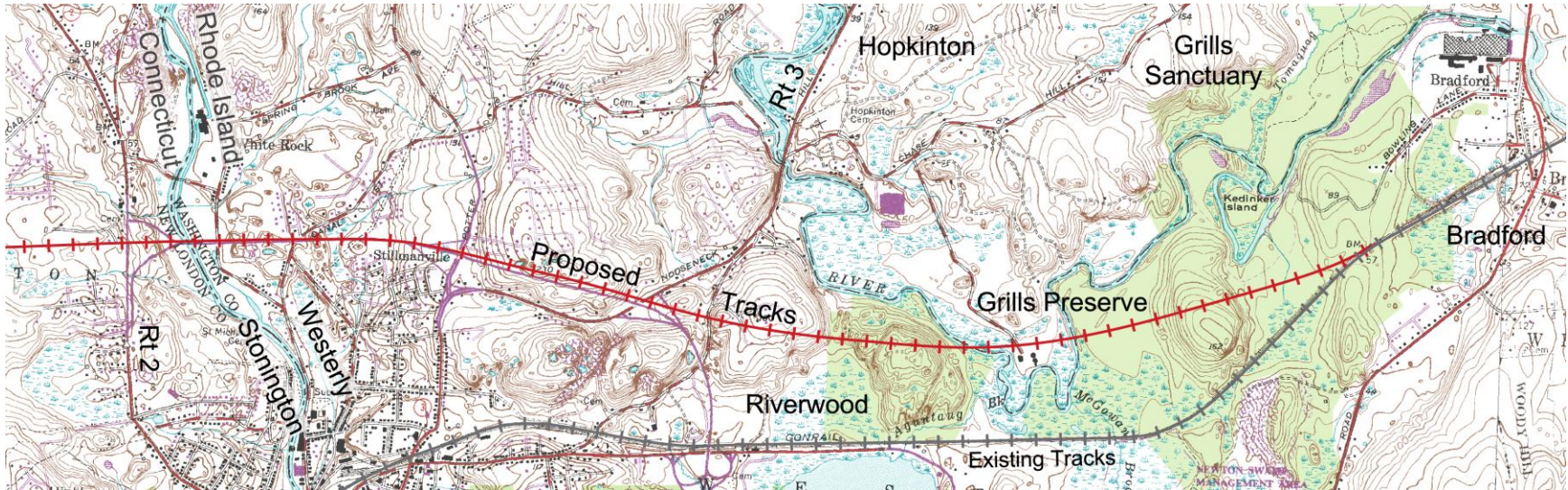
Sincerely,

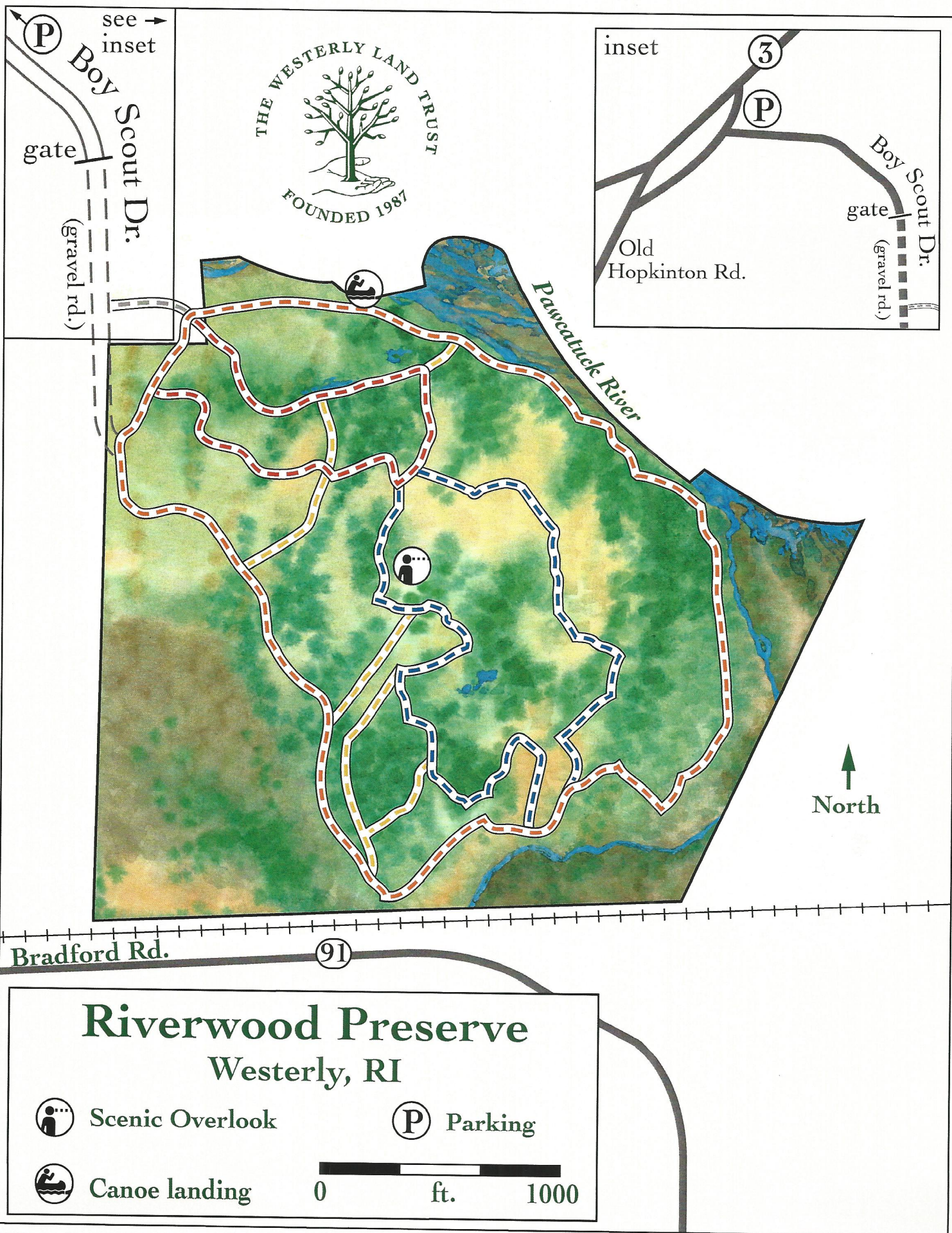
A handwritten signature in blue ink, appearing to read "Kelly Presley", with a stylized flourish at the end.

Kelly Presley
Executive Director

Enclosures

Westerly Topographical Map with Rail Alignment





Westerly Land Trust maps are made possible through the generosity of the Voss Hutton Memorial Fund.

