



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Administration
DIVISION OF PLANNING
One Capitol Hill
Providence, RI 02908-5870

January 31, 2017

Ms. Rebecca Reyes-Alicea
U.S. DOT Federal Railroad Administration
One Bowling Green, Suite 429
New York, NY 10004

RE: Preferred Alternative within the Northeast Corridor (NEC) FUTURE Tier 1 Final Environmental Impact Statement (EIS)

Dear Ms. Rebecca Reyes-Alicea,

The Department of Administration, Division of Planning serves as the single statewide Metropolitan Planning Organization for Rhode Island. The Division coordinated a multi-departmental review of the FEIS this month. This letter presents consolidated technical comments attached in a table format from the State of Rhode Island on the Northeast Corridor Rail Line Tier 1 Final Environmental Impact Statement (EIS). The Table reflects an inventory of concerns of the Rhode Island Departments of Administration, Environmental Management, Health, and Transportation, and the Rhode Island Historical Preservation & Heritage Commission. Previously, the State submitted comments to the Federal Rail Administration (FRA) in February of 2016 on the Tier 1 Draft EIS.

The State is appreciative of the FRA's response to include Providence and TF Green as hubs in the Preferred Alternative. High speed rail will provide many benefits to the State including; creating jobs, helping to reduce dependency on petroleum products, helping to relieve congestion, and providing efficient mobility that can move people and goods without delay and waste. The use of high speed rail can be fast and efficient allowing Rhode Islanders to save time, energy, and money.

As Rhode Island continues to develop its strategic position between the regional hubs of New York City and Boston within the Northeast corridor, the State realizes improving rail is vital to the Region's transportation network in order to enhance economic growth. The state land use plan, *Land Use 2025*, outlines how transportation infrastructure plays an important role in defining our state's development and promotes the development and maintenance of first class infrastructure for transportation. The state transportation plan, *Transportation 2035*, documented the crucial importance of regional transportation linkages to Rhode Island's future economic strength, identifying the State's location along two major instate-highways, high speed rail, and proximity to international shipping lanes as strategic assets. Improving high speed rail service can help Rhode Island capitalize on these strategic strengths.

The State supports the Preferred Alternative except for the Old Saybrook, CT – Kenyon, RI bypass portion in Southern Rhode Island. This Bypass contains a conceptual 6-mile re-alignment of tracks which poses tremendous environmental and land use impacts to unique resources that are largely irreplaceable. The attached table offers additional data on our concerns regarding potentially impacted natural and cultural resources within the proposed bypass well as other economic and public health impacts of the Preferred Alternative.

Additionally, the impacts on freight movements along the NEC to existing freight movements need to be analyzed by the FRA. According to the *Rhode Island State Freight and Goods Movement Plan* (2016), Rhode Island's freight distribution system is fundamentally important to Rhode Island residents and businesses. It facilitates the movement of all types of commodities, including home heating oil, food, clothing, production inputs, and nearly everything else businesses and consumers use on a daily basis.

FRA and Rhode Island need to continue to work together make top quality high speed rail service become a reality for Rhode Island, while also ensuring that natural resource systems are not degraded, that farmlands, public parks and wildlife management areas are preserved, that recreational resources are maintained and that historic resources are protected.

Sincerely yours,



Parag Agrawal, AICP
Associate Director

Attachment: NEC Tier 1 Final EIS –Preferred Alternative, Rhode Island Concerns

Cc: Lisa Vura-Weis, Deputy Chief of Staff, Office of Governor Gina M. Raimondo
Michael DiBiase, Director, Department of Administration
Janet Coit, Director, Department of Environmental Management
Peter Alviti, Jr., Director, Department of Transportation
Nicole Alexander Scott, M.D., M.P.H, Director, Department of Health
Edward Sanderson, Executive Director, Rhode Island Historical Preservation & Heritage Commission

NEC TIER I FINAL EIS – PREFERRED ALTERNATIVE 1

RHODE ISLAND CONCERNS

Communities	Resource Category & Issue	Concern(s)
<p>Westerly East Greenwich Warwick Providence State of RI</p>	<p>Stations, Hubs & Transportation Infrastructure:</p> <ul style="list-style-type: none"> • Westerly, T.F. Green, Providence Stations • Freight • Old Saybrook, Ct-Kenyon, RI - new segment • East Greenwich – Warwick, RI - New Track • Pawtucket, RI – Sharon, MA New Track 	<ul style="list-style-type: none"> • Maintaining existing Intermodal stations & Hub designations -- Table 4-9, Modify existing description for Providence Station Ongoing Improvement Project • Economic Impacts to existing freight rail & movements- modify Figure 4-2 to identify the freight track. • Environmental and private property impacts, and effect on existing NEC ROW and Westerly & TF Green Stations • East Greenwich to Warwick- has significant cultural resources. During the State's construction of the third track from Providence to Davisville, RI 10-15 years ago, a 5-mile segment within the Preferred Alternative's New Track was left as two tracks only due to the constraints identified in the corresponding EIS. We recommend taking considerable caution when proposing additional tracks within this segment. • Technical correction: Figure 4-2 on page 4-29 should show the change in track configuration occurring in RI.
<p>Westerly Charlestown Richmond</p>	<p>Environmental and Public Health Impacts - Public & Private Drinking Water Supplies:</p>	<ul style="list-style-type: none"> • Impacts to public and private drinking water supply and quality impacts • US EPA designated Sole Source Aquifer

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RHODE ISLAND CONCERNS

Communities	Resource Category & Issue	Concern(s)
	<ul style="list-style-type: none"> Bradford I, II and IV & White Rock public wells & wellheads and or recharge areas, owned by Town of Westerly Water Department Numerous community, non-community wells Numerous private wells 	
<p style="text-align: center;">Westerly Charlestown Richmond</p>	<p>Environmental Impacts - Water Resources:</p> <ul style="list-style-type: none"> Pawcatuck River Wood River Usquepaug River (cold water tributary) Beaver River (cold water tributary) 	<ul style="list-style-type: none"> Under Review by US National Park Service for designation as Wild & Scenic River Impacts to streams and associated freshwater wetlands. Impacts in the FEMA Floodway and 100-year flood zone of the Pawcatuck River Clearing along streams and rivers has the potential to introduce or increase sedimentation and erosion to wetlands and streams and to reduce shade and increase stream temperatures. Several cold water tributaries to the Pawcatuck River are within or adjacent to the footprint of the easternmost section of proposed new alignment

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<p style="text-align: center;">Westerly Charlestown</p>	<p>Environmental Impacts – Land Use/Conservation/Open Space:</p> <ul style="list-style-type: none"> • Grills Preserve – 550 acres, 2.5 miles of Frontage on Pawcatuck River, has 17 rare species of plants-9 endangered and 1 State Threatened, owned by Westerly Land Trust • Riverwood Preserve- 148 acres, adjacent to Pawcatuck River, owned by Westerly Land Trust • Hidden Meadow Open Space – 25.3 acre conservation area, conservation easement to Town, Owned by subdivision residents • Burlingame Estates – 31.5 acres, conservation/passive recreation area, conservation easement to Town, Owned by subdivision residents • Botka Woods – 116 acres, private ownership, conservation easement to Town • Francis C. Carter Memorial Preserve -1,112 acres, owned by TNC, home to several rare species of plants • Heines property- 45 acres- conservation easement held by Charlestown Land Trust and TNC, contiguous to Stoney Hill Farm • US Fish & Wildlife (USFW) Refuge System- Great Thicket NWR Focus Area - RI East-West Focus Area- the recently approved (10/2016) Refuge target areas which encompasses the entirety of the corridor. 	<ul style="list-style-type: none"> • Frontage on and adjacent to candidate Wild & Scenic River • Potential impacts to US Fish & Wildlife Great Thicket National Wildlife Refuge • Loss of locally and regionally identified corridor of protected conservation/ passive recreation lands adjacent to Burlingame State Park and The Nature Conservancy conservation (TNC) lands • Fragmentation and possible loss of rare pitch pine/scrub oak barrens, intact core forest habitat, numerous vernal pools, migratory bird habitat, and grasslands on TNC lands • Possible loss of rare plant species throughout the project area • Significant impacts to wetlands throughout the project area • Significant loss of passive recreational opportunities on preserved open space
<p style="text-align: center;">Charlestown Richmond South Kingstown</p>	<p>Environmental Impacts –Public Recreation & Parklands:</p> <ul style="list-style-type: none"> • Burlingame State Park and Campground - 3,100 acres that surrounds Watchaug Pond, owned by the State of RI- DEM¹ • Biscuit City Fishing Area - Pawcatuck River access point provides parking for fishing and canoeists. 	<ul style="list-style-type: none"> • Loss of public recreation & parklands • Impact to outdoor tourism economy in southern RI • Impact to 720 camping sites in Burlingame

¹ DEM = Rhode Island Department of Environmental Management
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	<ul style="list-style-type: none"> Great Swamp Management Area - 3,349 acres with forest cover, agricultural land, extensive forested freshwater wetlands, red maple and cedar swamps, owned by the State of RI- DEM 	<ul style="list-style-type: none"> Possible conversion of lands or facilities that were acquired with and or developed with National Park Service Land and Water Conservation Fund Act fund Under review for US National Park Service designation as Wild & Scenic River Potential loss of fishing area developed with USF&W and RI DEM Fish and Wildlife funds.
Westerly Charlestown Richmond	Economic /Social Impacts - Private Property: <ul style="list-style-type: none"> Multiple residential units, privately owned 	<ul style="list-style-type: none"> Displacement of individuals Loss of private property
Charlestown State of RI	Economic /Social Impacts - Agriculture: <ul style="list-style-type: none"> Stoney Hill Cattle Company – 142 acres on Shumankanuc Rd. Gordon Farm – 23 acres on Shumankanuc Rd., contiguous to Stoney Hill Cattle Company Heines Farm - 15.39 Acres, Kings Factory Rd, contiguous to Stoney Hill Cattle Company on Shumankanuc Rd. Noyes Farm - 59 acres, adjacent to Francis C. Carter Memorial Preserve owned by TNC Amos Green Farm – 101 acres, privately owned with conservation easement to Charlestown Land Trust Fenner Farm – 85 acres, conservation easement held by Town and the RI Agricultural Lands Preservation Commission 	<ul style="list-style-type: none"> Loss of active Farms in private ownership Fragmentation of active uses Possibly loss of prime agricultural soils, Displacement of individuals Loss of private property Loss of RI Farm Forest Open Space program properties Loss of permanently protected farmland Impact on state and local agricultural economy
Westerly Charlestown Richmond	Previously Identified Historical /Archeological Impacts: <ul style="list-style-type: none"> Bradford Village Historic District Historic Village & cultural, burial areas of the Narragansett Indian Tribe Amos Green Farm 	<ul style="list-style-type: none"> Impacts to and loss of above-ground resources listed in or eligible for inclusion in the National and/or State Registers of Historic Places

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	<ul style="list-style-type: none"> • Columbia Heights Historic District • Shannock Village Historic District • Kenyon Historic District 	<ul style="list-style-type: none"> • Impacts to and loss of significant prehistoric and historic archaeological resources • possible displacement of individuals and loss of private property
State of RI	Demographic Profile: <ul style="list-style-type: none"> • Providence –Warwick Metropolitan Statistical Area 	<ul style="list-style-type: none"> • use a definition which matches the Census's Metropolitan Statistical Area
State of RI	Other Public Health Impacts <ul style="list-style-type: none"> • Contaminated soil and hazardous materials • Noise and vibration • Access to recreational areas • Short- and long-term air quality impacts. 	<ul style="list-style-type: none"> • Public health, including effects of stress
State of RI	Financing & Implementation: <ul style="list-style-type: none"> • Investment plan and phasing approach 	<ul style="list-style-type: none"> • Financing details and unlikely State funding split
Charlestown	Settlement Lands: <ul style="list-style-type: none"> • Tribal Lands - Narragansett Tribal Settlement Lands, formerly part of Indian Cedar Swamp Management Area, owner Narragansett Indian Tribe, permanent conservation easement to the State 	<ul style="list-style-type: none"> • Loss of Tribal & conservation lands • Converted lands that were possibly acquired with Land and Water Conservation Fund Act funds