

March 3, 2017

Ms. Rebecca Reyes-Alicia  
NEC FUTURE  
Federal Railroad Administration  
One Bowling Green, Suite 429  
New York, NY 10004

RE: NEC Future Tier 1 Final Environmental Impact Statement

Dear Ms. Reyes-Alicia:

We represent states and rail operators with direct responsibility for or operating interest in the Northeast Corridor. We commend the Federal Railroad Administration (FRA) on the NEC Future program. It has provided a process for considering a long-overdue vision for the Northeast Corridor (NEC). More importantly, NEC Future has set the stage for an investment program that is essential to reverse decades of underinvestment in the corridor and advance significant infrastructure improvements. We see the issuance of the Record of Decision (ROD) as a critical next step to advance sorely needed investments on the NEC and to expedite their implementation. We recommend that the ROD be issued as soon as possible.

Our support of the Record of Decision is conditioned on the premise that it will:

- Focus principally on investments that will achieve a State of Good Repair to ensure continuation of existing services and handle the projected ridership demand for the next 10-15 years.
- Clearly identify specific projects that are empowered to advance in the No Action and Universal First Phase investments which were identified in Chapter 10 in the DEIS. These projects, such as replacement of aging tunnels and bridges, have broad support among all the NEC stakeholders and their advancement must not await the completion of a Service Development Plan (SDP).
- Incorporate specific references and recommendations regarding NEC connecting corridors.
- Articulate a simplified NEPA process which prioritizes and expedites projects based on their characteristics, potential impacts, costs, etc., including identifying projects eligible for Categorical Exclusions and Environmental Assessments that might result in Findings of No Significant Impacts (FONSIs), and limiting the need for Environmental Impact Statements/Records of Decision.
- Eliminate any specific “representative alternative alignments” along the NEC. Portions of the corridor which require evaluation of alternative investments and alignments to address capacity, speed, or which have other vulnerabilities should be identified without proposing specific options.
- Be adopted by all appropriate U. S. Department of Transportation Agencies, not just the FRA. There must be a clear path forward that does not require the states and operators to navigate and negotiate among the federal agencies to gain project approvals.

We also make the following recommendations regarding the Tier 1 Preferred Alternative and the process identified in the FEIS for advancing the Alternative:

- While we support investments in the No Action and Universal First Phase projects, we understand the long range improvements are aspirational and will have commensurate impacts that remain undefined at this time, and may or may not be resolved.
- The longer term opportunities require close coordination with respective states and operators through a more detailed project level transportation and environmental planning and review process. As noted above, this process should be as consistent, simplified and expedited as possible.
- The (SDP) process may be necessary for the longer term, but should be preceded by additional analyses. First, it is critical to assess the resource, staging, operational and construction requirements to implement the proposed capital investment program. This information is critical to support a future SDP activity. Second, evaluation of the economic impacts and benefit/cost evaluations should be performed for the core projects as well as the aspirational projects to also inform a SDP activity.
- The SDP process should be led by the NEC Commission. It is necessary for all states and rail operators to be engaged in the SDP along with AMTRAK, FRA and FTA. The Commission must be resourced accordingly to handle such a task.
- The SDP should include an extensive outreach plan that incorporates stakeholder and public input into any and all of the SDP recommendations. This plan should include towns, cities and other jurisdictions impacted by potential investments.
- Since states and operating agencies will be burdened with funding investments, they must have the authority for approving any project investments.
- The ultimate vision for a more robust NEC must be accompanied by a commitment by the Federal government to cover a significant portion of the estimated capital costs.

The FRA's work has spurred a broad public conversation on the future of this important national transportation asset. The ROD must now conclude with a clear set of near and long-term recommendations and next steps that enable immediate investment. There must be no ambiguity in what comes next.

Thank you for the opportunity to provide our comments on the NEC Future Tier 1 FEIS and the Record of Decision. We look forward to your response.

Sincerely,



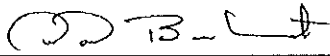
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James Redeker, Commissioner  
Connecticut Department of Transportation



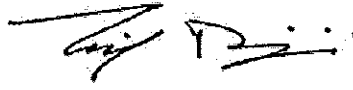
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Jennifer Cohan, Secretary  
Delaware Department of Transportation



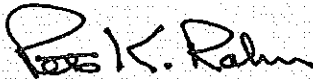
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David Bernhardt, P.E., Commissioner  
Maine Department of Transportation



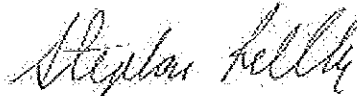
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Leif Dormsjo, Director  
District of Columbia Department of Transportation



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Pete Rahn, Secretary  
Maryland Department of Transportation



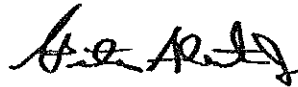
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Stephanie Pollack, Secretary  
Massachusetts Department of Transportation



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Toby Fauver, Department Secretary  
Pennsylvania Department of Transportation



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Peter Alviti, Jr, Director  
Rhode Island Department of Transportation



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Joe Flynn, Secretary  
Vermont Department of Transportation



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Steven H. Santoro, Executive Director  
New Jersey Transit