



new london main street

January 23, 2017

Ms. Rebecca Reyes-Alicea
Program Manager
Federal Railroad Administration
One Bowling Green, Suite 249
New York, NY 10004

Re: NEC Future Tier One Environmental Impact Statement

Dear Ms. Reyes-Alicea,

New London Main Street appreciates the opportunity to provide comment on the Environmental Impact Statement regarding the Northeast Corridor Future. New London Main Street is a nonprofit corporation committed to revitalizing New London's Historic Waterfront District and is one of five Main Street programs in Connecticut and is among the 1,200 programs nationwide developed from an initiative of the National Trust for Historic Preservation in the 1970's. We build community through activities and programs that enrich the cultural fabric, preserve and enhance historic streetscapes and support and expand the economic base of the city center.

Given our mission and goals, New London Main Street cannot support the proposed changes found in the NEC Future project Environmental Impact Statement and we write to show a lack of support for the project as proposed. Our concerns with the proposed Old Saybrook to Kenyon bypass and proposed high speed rail hub in Groton (called New London-Mystic in the EIC) are as follows:

- The proposed bypass will decentralize our region's transportation hub
- Downtown New London businesses will be threatened and will lose customers and revenue
- The City of New London's tax base will be diminished at a time when tax revenues are vital
- The project as proposed will threaten historic resources and quality of life

We provide additional details and explanation to our concerns below.

Decentralization of a Regional Transportation Hub

The proposed construction of the bypass and a new rail station in an underdeveloped section of Groton will decentralize a regional transportation hub that provides multi-modal access for nearly 1 million riders a year.

With the existing transit hub centered in downtown New London's historic waterfront, travelers have access to high speed rail, regional and commuter rail service, regional and local bus service, interstate ferry service, local water taxi service and ample parking in a nearby parking garage. The centralized transportation center allows travelers to change method of transit seamlessly.

Removing the high speed rail to another town means that travelers will not be able to transfer from high speed rail to make any connections at all. Rather, they will be presumably stranded near a highway exit that is neither in New London nor in Mystic, needing to call a taxicab or other livery service to travel to the existing regional transportation hub in New London, wasting time and money.

Threat to downtown New London businesses and property owners

Moving high speed rail access to another location means fewer customers for downtown businesses. Fewer high speed rail passengers means fewer cups of coffee, fewer sandwiches, and fewer newspapers purchased in downtown New London as well as fewer overnight stays for business travelers in New London's hotels. The economic impact on downtown New London businesses and restaurants will be detrimental to the many businesses that cater to passengers from the transportation center.

Detrimental Impact on City's tax base

The City of New London is very small in area at only 5.67 square miles. The City's only means of local revenue to pay for its local government and schools is through property taxes. As the proud home of several large nonprofit colleges, a nonprofit hospital, many churches and many federally, state and municipally owned government buildings, approximately half of the land is owned by non-profit entities. This means that the tax burden for individual households and businesses is high and increases in tax burden can be crippling.

The proposed rail bypass will run in close proximity to highly developed commercial property, meaning that more commercial land will be removed from the tax rolls, increasing the tax burden on families, small businesses and large companies alike. For a community where the median household income is \$44,100 and 20% of the population lives under the poverty level, there is only so much increased tax burden that can be shouldered by our tax payers.

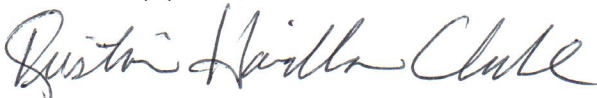
Threat to historic resources and quality of life

The Gold Star bridge spans loom large over the historic Hodges Square commercial area and the Old Town Mill. Hodges Square has been the focus of recent community driven revitalization efforts and was recently announced as a National Register Historic District. The Old Town Mill was built by former Connecticut Governor and founder of New London John Winthrop and was the first industrial building in New London. It is also listed on the National Register of Historic Places. These resources, in addition to the beloved Riverside Park, provide a strong and growing "Sense of Place" for this culturally rich neighborhood. The proposed bypass would further diminish the quality of life for this area's residents, whether these federally recognized, historically significant properties are physically damaged or not.

Reliable rail service and connections to multiple modes of transportation are important to any regional hub, and New London is no exception. The City of New London is still recovering from major urban renewal projects implemented in the 1960's and 1970's, when acres of housing and commercial land were lost to the creation of an overabundance of highway infrastructure. We have learned the hard way that destroying New London is not the way to bring progress or prosperity. We simply don't need another lesson in destruction in the name of progress.

We hope that you take our concerns, and those of our downtown and city-wide partners into consideration as you complete the public comment window and reconsider your proposal for Eastern Connecticut.

Sincerely yours,



Kristin Havrilla Clarke
Interim Director