



## TOWN OF OLD LYME

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### Old Lyme Historic District Commission

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To: Old Lyme Board of Selectmen (Martha Shoemaker, Jim Lampos, John Mesham)

From: Russ Todd and John Noyes, Co-Chairs, Old Lyme Historic District Commission

Date: July 31, 2026

Re: Comments on FRA/Amtrak Capacity Planning Study

We write to pass along comments and highlight urgent concerns regarding the Federal Railroad Administration/Amtrak Capacity Planning Study, now scheduled to be completed in about 21 months. This process could well result in the selection of a “preferred alternative” for rail rerouting at the expense of Old Lyme. We recall the huge public outcry in Old Lyme about this issue nine years ago – an outcry that garnered bipartisan support and undoubtedly influenced the FRA’s decision in its 2017 document NEC FUTURE to postpone a solution for New Haven to Providence rerouting. We believe similar intensive town-led efforts are required now – indeed, we believe time is of the essence. We’re prepared to work with and support the Board of Selectmen and other entities in town on this undertaking.

We also write to ask some questions, noted at the end of this memo, and we welcome your responses and further dialogue.

1. Thanks to Martha Shoemaker, who highlighted the Amtrak website (<https://newhavenprovidencestudy.com>) about the Capacity Planning Study in her Friday, July 17th weekly update about town issues.
2. We participated in Amtrak’s June webinar presentation about the Capacity Planning Study, which Martha Shoemaker had brought to our attention; that webinar is now reproduced on the Amtrak website. Also reproduced on that website is a list of questions asked during the webinar, along with Amtrak’s responses. Disturbingly, despite Amtrak’s promise during the oral webinar presentation to circulate all questions and Amtrak’s answers to them, some of our questions were neither listed nor answered. Some of the answers Amtrak elected to post could allow it to arrive at a “preferred alternative” for rail rerouting through a process that evades important consultation and community involvement obligations. And some of Amtrak’s answers are opaque, leaving us uncertain about whether Amtrak is bound in the current Study by the metrics specified in NEC FUTURE (e.g., time savings and capacity). If you like, we’re happy to go into detail about what questions were omitted and what answers we found opaque.
3. Amtrak presents the current planning process as one that may result in a “preferred alternative” but seeks to save for some later process a detailed evaluation of environmental and

historic preservation impacts. But the statutes that provide for evaluation of those impacts may well be weakened. The current Congress and Presidential Administration are considering modifications to the National Environmental Protection Act (NEPA) and to section 106 of the National Historic Preservation Act (see this link: [https://api.neonemails.com/emails/content/Fh0g\\_RDhXR28dghIOTZnT1pQFPMs8NFHv9P6DSKKoQA=](https://api.neonemails.com/emails/content/Fh0g_RDhXR28dghIOTZnT1pQFPMs8NFHv9P6DSKKoQA=)). These modifications are being proposed now and could eliminate or adversely affect the ability in the future to consider vital environmental and historic preservation impacts when rerouting railroad tracks.

4. We've learned from a reliable authority that town officials in Charlestown, RI, recently met with Amtrak. We see no reason why Old Lyme should fall behind Charlestown in developing face-to-face conversations and connections that may influence Amtrak decisions.

5. The Historic District Commission has devoted time to Amtrak's current Capacity Planning Study. Early in 2024, before the Study was officially launched, we sent a letter to Amtrak and the FRA (cleared by Martha Shoemaker) that reviewed the significance of Historic District resources and the impacts of a rerouting in or near the District. The letter reportedly received close attention from its recipients. It, along with some other information about the Capacity Planning Study, is posted on the HDC's website; we especially recommend that you review our 2024 letter. But a railway bypass in Old Lyme would radically affect the entire town, not just the Historic District. The HDC should not speak for the whole town in raising concerns about impacts that extend outside the Historic District, and we think a town-wide body should consult directly with government officials who will shape changes in NEPA and section 106 of the Historic Preservation Act. We believe that the Board of Selectmen, or another entity or committee representing the town as a whole, should closely monitor Capacity Planning Study developments, communicate with Amtrak personnel and government officials, lobby for needed changes to Amtrak's process, develop a local coalition of nonprofits and others concerned with impacts of a railroad rerouting through Old Lyme, and provide regular and detailed updates concerning the Capacity Planning Study process to the community.

## 6. Questions

a. To remedy procedural gaps in the current Capacity Planning Study, would it be a good idea to lobby Amtrak to commit to the following steps?

- a formal public comment period before any routing alternatives are eliminated
- publication, promptly, of all comments received (including municipal letters) on the project site (as is being done, for example, with responses to the proposed changes in the town's Zoning Regulations)
- provide written responses to substantive comments, to be published promptly by Amtrak on the project website
- provide timely publication on the project website of the scoring matrix, weighting, assumptions, ridership figures, cost assumptions, and criteria for fatal flaws that Amtrak will use in its evaluation of routing alternatives
- hold one or more public hearings, ideally with one in Old Lyme, after the draft alternatives are finalized but before a preferred alternative or recommendation is selected

- b. Would it be a good idea to press Amtrak to clarify opaque answers that were posted in response to questions asked during the June webinar, and to directly answer questions that were asked but not answered?
- c. Is the Board monitoring the details of proposed changes to NEPA and section 106 of the Historic Preservation Act, and communicating with Senator Blumenthal, Representative Courtney, and others to discuss sensible legislative wording?
- d. Do you think it would be a good idea soon to arrange a meeting in Old Lyme between Amtrak and the Board of Selectmen (or another town entity or commission) to present the town's concerns to Amtrak in person?
- e. We know you have been following Amtrak's current initiative, but is the Board in a position to undertake all the steps outlined at the end of paragraph 5 above? Do you think those steps are advisable? Should some or all of them be undertaken by some other town entity or committee that will work with the Board?

Again, we think these matters are urgent, and thank you for your consideration of these points.

cc. Old Lyme Planning Commission