

**Comments on NEC Future Alternative 1,
Tier 1 Draft Environmental Impact Statement**

The following comments are submitted in opposition to NEC Future Alternative 1, on behalf of these organizations:

Connecticut River Gateway Commission, Connecticut River Museum, Connecticut Trust for Historic Preservation, Florence Griswold Museum, Lyme Academy College of Fine Arts of the University of New Haven, Lymes' Youth Service Bureau, Lyme Art Association, Lyme-Old Lyme Chamber of Commerce, Mentoring Corps for Community Development, Old Lyme Phoebe Griffin Noyes Library, Old Lyme Land Trust, Old Lyme Historical Society, Roger Tory Peterson Estuary Center of the Connecticut Audubon Society, Town of Old Lyme, Town of Old Lyme Historic District Commission and Town Historian, Town of Old Lyme Open Space Commission

We oppose NEC Future Alternative 1. So severe is the impact on our town that the proposal amounts to a taking of the entire Town of Old Lyme.

We note the following factual inaccuracies and/or omissions in the Tier 1 Draft Environmental Impact Statement:

Summary Table S- 4:

Middlesex County is omitted as a county "with highest potential ecological resource impact." The Connecticut River Estuary borders both New London and Middlesex counties, so this is factually incorrect.

Cultural/Historical Properties: it is unclear if the "143 NRHPs" (National Register of Historic Places) include the 50+ structures in Old Lyme's Historic District within the 1 mile impact zone that predate the year 1900.

The Florence Griswold Museum has NHL (National Historic Landmark) status, is centrally located in the identified impact zone of Alternative 1, but is not listed.

Summary Table S-3:

Geologic Resources: the 3,000 foot wide impact zone will adversely impact drinking water in Old Lyme's Historic District which is served by wells and which includes schools in Regional School District 18, and Lyme Academy College of Fine Arts of the University of New Haven.

Noise and Vibration: the 5,000 foot wide impact zone will encompass the Regional School District 18 schools and the aforementioned college.

We note the following detrimental, i.e. destructive, impacts of NEC Future Alternative 1:

Historical and Archaeological

The Town of Old Lyme in the Connecticut River Valley is a functioning piece of American history that has persevered through centuries of active preservation and stewardship. This history cannot be recreated if destroyed by NEC Future Alternative 1. The proposed industrial corridor is incongruous with the unique historical and cultural value of the area.

Old Lyme is home to prehistoric and historic resources of national significance. Engineering for the industrial corridor required by NEC Future Alternative 1 will be detrimental to archaeological sites of tremendous significance. Ranging in age from 3,000 to 5,000 years old, these sites have been nominated for inclusion on the *National Register of Historic Places*.

Old Lyme is a *Preserve America* community. Since its establishment in 2003, *Preserve America* has recognized communities that protect their heritage, use their historic assets for economic development and community revitalization, and encourage people to experience local historic resources through education and tourism programs. Long pre-dating this significant designation, Old Lyme has worked diligently to steward a unique mix of natural and built resources that are the basis of this community's setting and quality of life.

Old Lyme's Historic District, central in the identified impact zone of NEC Future Alternative 1, has been listed on the National Register of Historic Places since 1971. The Florence Griswold Museum, also in the identified impact zone, has National Historic Landmark status.

The Historic District is home to 80+ properties, including non-profit arts, cultural, youth services and social organizations, residences, regional public schools, Old Lyme Memorial Town Hall and the Old Lyme Phoebe Griffin Noyes Library, and Lyme Academy College of Fine Arts of the University of New Haven campus. Approximately 50 of the structures in the Historic District were either built in the late 19th century, or predate 1900, thus falling well within the State of Connecticut's definition of "historic."

Many of these structures have been sensitively renovated and expanded within the last three decades.

The John Sill House, 1817, located on the Lyme Academy College of Fine Arts property, and immediately in the path of the rail proposal, has been documented by both the Colonial Dames's book, "Old Houses of Connecticut," 1915, the WPA "census of old buildings in Connecticut," 1938 and again in 1985, the Historic American Buildings Survey by the National Park Service. This structure should be evaluated for National Historic Landmark status.

The 1971 National Register nomination was prepared by Old Lyme resident Mrs. John Crosby Brown, then President of the Lyme Historical Society and Florence Griswold Association. It is excerpted below to underscore the integrity and uniqueness of our community in 1971 and equally as evident today:

Statement of Significance:

"Old Lyme is situated at the mouth of the Connecticut River on Long Island Sound, giving it a unique setting with a long and varied shoreline, many tidal marshes, and extensive open land. These very attractions threaten the town with incongruous development. Within the established historic district of Old Lyme, the main street has retained many agreeable characteristics now difficult to find even in historic New England. Nevertheless, the pressures for change in an age when decisions are made without careful evaluation are increasing."

"This is still an area that has staved off the irreparable damage that is removing much that remains of our natural, cultural, and historical background. The town's long awareness of the necessity for strong stewardship for both the historical and environmental aspects of Old Lyme needs strengthening. This is especially so when the destructive forces of accelerated change are all too apparent."

Last paragraph of the Description:

"Route I-95 cuts a four-lane swath through a portion of Lyme Street adjacent to Belcher's John Sill House and only two properties away from his Florence Griswold House. This is the major damage this area has suffered."

Construction of most major rail corridors in the United States predate the National Register program. In Old Lyme, our National Register designation pre-dates the proposed new industrial rail corridor. NEC Future Alternative 1 will severely impact the integrity of our National Register District. What kind of precedent will this establish?

Ironically, 2016 marks the 50th anniversary of the *National Historic Preservation Act* of 1966, far-reaching federal legislation intended to preserve historical and archaeological sites in the United States. If historic designation recognition offers no protection, what are we celebrating with this anniversary?

Cultural

Old Lyme has a cultural heritage which belongs to all Americans. Its national significance is recognized by the federal government through its designation of the Old Lyme Historic District on the *National Register of Historic Places* and the designation of the Florence Griswold House and Museum as a *National Historic Landmark*, a program administered by the National Park Service.

At the turn of the last century, Old Lyme's natural beauty and historic character inspired leading artists from across the country to come to this village where they founded one of the largest and most significant art colonies in America. These artists were devoted to interpreting the special qualities of the Old Lyme region — its estuaries, its coastal light, and its village — in ways that can still be seen by visitors coming to the town today. In fact, the close alignment between the art created here and the natural setting as it exists today is perhaps unique in America. Works created by the Old Lyme artists can be seen in museums throughout the country and the world at large. A landscape painting by the Old Lyme Impressionist painter Willard Metcalf greets visitors to the White House in Washington, D.C.

Old Lyme's art colony eventually gave the town its identity as an arts community, one whose lineage flourishes today through the Florence Griswold Museum, housed in the original boardinghouse of the colony; the Lyme Art Association gallery, where artists have shown their work for over 100 years; and Lyme Academy College of Fine Arts, where the next generation of fine artists are being trained.

NEC Future Alternative 1 will eliminate the entire campus of Lyme Academy College of Fine Arts, accredited by the New England Association of Schools and Colleges (NEASC), the National Association of Schools of Art and Design (NASAD) and the Connecticut Office of Higher Education. Founded in 1976 by noted artist/sculptor Elisabeth Gordon Chandler, Lyme Academy College of Fine Arts became the sixth college of the University of New Haven in 2014. Lyme Academy College of Fine Arts is nationally known as one of the only schools in the nation working in a classically academic tradition of fine art that prepares students for a lifetime of contemporary

creative practice. In addition to degree granting programs, the school also supports a robust series of programs and workshops in the arts for the surrounding communities.

NEC Future Alternative 1 would replace cultural heritage with an industrial corridor that slices through the heart of the Old Lyme Historic District, literally and figuratively dividing the cultural institutions and campuses that serve the public today.

NEC Future Alternative 1 creates an irrevocable fissure which will destroy the legacy and integrity of how the town's natural beauty, cultural assets, and historic character all complement each other for the benefit of the region, and the nation as a whole. The development of an industrial corridor with two to four tracks and associated utilities, fences, and no trespassing zones, along with the proposed expansion of the adjacent Interstate 95, will eliminate these cultural institutions and campuses, never again to be experienced in their natural and historic settings.

Environmental and Ecological

Summary Table S-4 correctly identifies New London County for high potential ecological resource impact from NEC Future Alternative 1, although it fails to name Middlesex County. The Connecticut River connects Middlesex with New London County. The Baldwin Bridge along Interstate Route 95 spans the river at this juncture. Clearly, the installation of a massive bridge structure with longer approaches than currently exist will seriously impact the biodiverse river estuary and ecological balance in the region on both sides of the River and Long Island Sound. The Connecticut River provides 70% of the fresh water that drains into Long Island Sound.

Connecticut River Estuary is the longest and largest river system in New England. The Estuary consists of open water, fresh, salt and brackish tidal wetlands, floodplains, river islands, beaches, and dunes. It provides essential habitat for numerous species and forms a biological corridor linking marine and estuary waters of the Atlantic Ocean. Native birds include 18 species of waterfowl, the Osprey and American Bald Eagle. Scores of others, including migratory Tree Swallows, the Piping Plover, the Sharp-tailed sparrow and the Seaside sparrow, many elusive rail species, and wading and shore bird species nest or migrate here.

The Connecticut River is the only major river in the United States without a port at its mouth. This has resulted in significant recognition by national and international environmental organizations. Designated a *Wetland of International Importance* by the **Ramsar Convention**, the Connecticut River Estuary is one of only 34 U.S. sites among

2,000 so named. The Convention on Wetlands of International Importance is an intergovernmental treaty that provides the framework for national action and international cooperation for the conservation and wise use of wetlands and their resources.

In the early 1990's, the **Nature Conservancy** included the Connecticut River tidelands on its list of the Western Hemisphere's 40 "*Last Great Places*." When the **US Fish & Wildlife Service's** National Blueways System was active, the Connecticut River was the first and only designated *National Blueway River* in the country.

The Connecticut River was designated an *American Heritage River* under the **American Heritage Rivers Protection Program** authorized by President Clinton in 1997. The initiative was intended to deliver federal resources more efficiently and effectively in support of community efforts to protect rivers or river segments.

Recognizing the unique ecological value and the fragility of Old Lyme's estuarine marshes, situated as they are at the mouth of the great Connecticut River, as well as the conservation value, scenic beauty and rich history of Old Lyme's other resources-- rare and endangered species, ancient archeological sites, established greenways, unfragmented forest, salt marshes, sites for hazard mitigation, rivers, inland wetlands - the Town of Old Lyme and the Old Lyme Land Trust have been protecting open space and conservation land for 50 years.

Together, the Town and Trust now own almost 2,000 precious acres. This acreage, the product of passion, hard work, and a significant financial investment by individual residents and local taxpayers, among others, was to be a legacy for future generations. Given the small size of Old Lyme and the wide swath that the rail line would cut through it, much of that open acreage stands to be irreparably harmed by NEC Future Alternative 1.

The Town and the Trust could not have accomplished what they have done alone. The State of Connecticut, The Nature Conservancy and, most recently U.S. Fish and Wildlife through its acquisition of the Roger Tory Peterson property as a gateway to the Silvio Conte Fish and Wildlife Refuge, all recognize the critical importance of the lower Connecticut River estuary and the uniqueness of its ecosystem, and have partnered with us, investing significant sums of money, expertise and other support. In fact, they, too, own in fee or protect by easement additional conservation lands that are endangered by the rail proposal.

This is not just about Old Lyme. Two million people live in the river basin that supports active fisheries, tourist facilities and activities. Old Lyme is privileged to house and steward natural resources that are part of ecological systems that span the New England region, from Canada southward.

Tourism and Economic Impact

Unlike the Baldwin Bridge, which carries Interstate 95 over the Connecticut River, and the existing rail bridge, which provides service from stations accessible to Old Lyme commuters and travelers, NEC Future Alternative 1 will fail to support southeastern Connecticut economically in any way. Connecticut will continue to suffer from its reputation as a “drive- through” state and Old Lyme will change from a destination into a place to avoid.

Visitors to our area number one half million each year. Old Lyme is a gateway for those visitors. Annual attendance is currently estimated at: 160,000 (Essex Steam Train and River Boat), 120,000 (Goodspeed Musicals), 72,000 (Florence Griswold Museum) 11,000 (River Quest), 30,000 (Katharine Hepburn Theatre), 28,000 (Ivoryton Playhouse), 70,000 (Gillette Castle State Park), and 25,000 (Connecticut River Museum).

The Florence Griswold Museum, which attracts visitors from around the country, has experienced a 48% rise in attendance over the last decade and welcomed over 72,166 visitors to this region in 2015.

Based on a University of Connecticut economic impact study, the average out-of-state Florence Griswold Museum visitor spends an additional \$479 while in the area. Thus, those out-of-state museum visitors alone currently contribute \$8,622,000 annually to the local tourism-based economy. Under NEC Future Alternative 1, Old Lyme will no longer serve as a gateway, resulting in severe ramifications to tourism in the region and negative economic implications for the town, the region and the state.

Old Lyme’s small commercial district, its fine arts college, three buildings in its regional school system, its Town Hall, Public Library, youth services center, an Historic Landmark museum, nationally recognized art association, two historic inns, 50+ properties of a century-old or more, the Lieutenant River, and the Connecticut River all lie within the impact zone defined in the NEC Future Alternative 1, Tier 1 Draft Environmental Impact Statement.

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Old Lyme will lose its entire – its only – commercial district as well as its main jobs generator: employment in the arts and culture industry. The Town's only grocery store and single pharmacy, all of its banks and the majority of its medical, legal and real estate offices will be severely comprised under NEC Future Alternative 1. With the loss of the small businesses that serve the Old Lyme community's daily needs as well as its primary industry, tax revenue will decline and property values plummet.

The Tier 1 Draft Environmental Impact Statement clearly identifies three (there are actually four) counties in Connecticut for "the highest overall potential ecological resource impacts." All are impacted in NEC Future Alternative 1. Of all of the impacted communities, Old Lyme will be most impacted, with hundreds of feet of industrial steel dividing what is left of its north and south, and no means of crossing the tracks built for high speed rail.

The Tier 1 Draft Environmental Impact Statement clearly identifies impact to ESH (ecologically sensitive habitat), T&E (federally listed threatened and endangered species), and EFH (essential fish habitat). All are part of the Connecticut River Estuary which will be impacted by NEC Future Alternative 1.

We request that NEC Future Alternative 1 be removed from further consideration.

Old Lyme, Connecticut

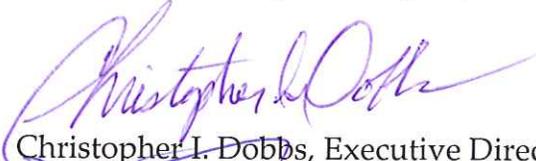
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Peter Cable, Old Lyme delegate, Connecticut River Gateway Commission



Christopher I. Dobbs, Executive Director, Connecticut River Museum



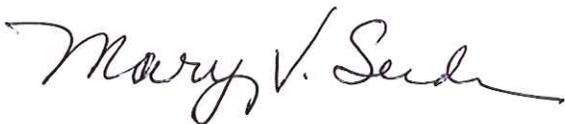
Daniel Mackay, Executive Director, Connecticut Trust for Historic Preservation



Jeffrey Andersen, Director, Florence Griswold Museum



Todd Jokl, Campus Dean, Lyme Academy College of Fine Arts, A College of the University of New Haven



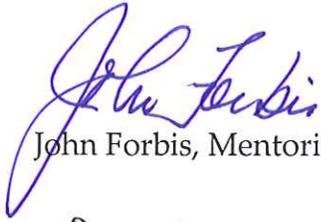
Mary V. Seidner, Director, Lymes' Youth Service Bureau



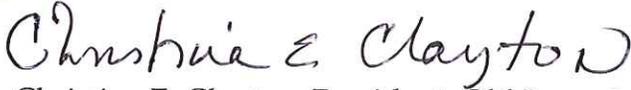
Gary Parrington, Director of Development, Lyme Art Association

Mark Griswold, President, Lyme-Old Lyme Chamber of Commerce



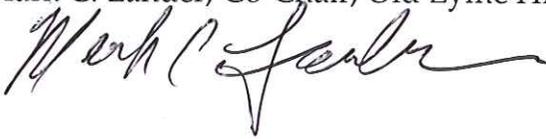


John Forbis, Mentoring Corps for Community Development

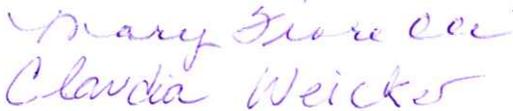


Christina E. Clayton, President, Old Lyme Land Trust

Mark C. Lander, Co-Chair, Old Lyme Historical Society



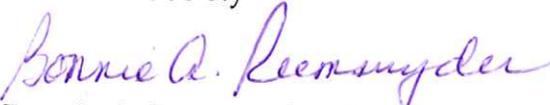
Mary Fiorelli, Director, Old Lyme Phoebe Griffin Noyes Library



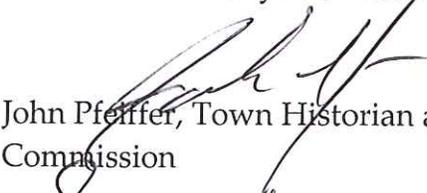
Claudia Weicker, Co-Chair, Roger Tory Peterson Estuary Center of the Connecticut Audubon Society



Eleanor Robinson, Co-Chair, Roger Tory Peterson Estuary Center of the Connecticut Audubon Society



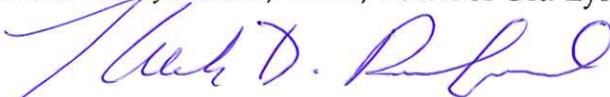
Bonnie A. Reemsnyder, First Selectwoman, Town of Old Lyme



John Pfeiffer, Town Historian and Chair, Town of Old Lyme Historic District Commission



Diana Atwood Johnson, Chair, Town of Old Lyme Open Space Commission



Keith Rosenfeld, Land Use Coordinator, on behalf of Town of Old Lyme Land Use Commissions

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The Rev. Cn. Mark K.J. Robinson, rector

The Rev. Cn. Mark K.J. Robinson, Saint Ann's Parish