

EI-2299

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Ms. Phyllis Johnson-Ball  
United States Surface Transportation Board  
1925 K Street NW  
Washington, DC 20423

Re: New England Transrail, LLC d/b/a Wilmington and Woburn Railway -- Petition for Exemption from 49 U.S.C. 10901 to Acquire, Construct, and Operate as a Rail Carrier on Tracks and Land in Wilmington and Woburn, Massachusetts

Dear Ms. Johnson-Ball:

In response to your letter of April 7, 2006, requesting comments addressing the environmental impacts of the proposed intermodal transload facility to be built and operated by New England Transrail, I am writing in support of the NET facility to address what I perceive to be misperceptions regarding some of the purported detrimental environmental impacts and to explain some of the proposal's positive environmental effects.

First, let me introduce myself. My name is Domenic Bua and I'm a railroad track design engineer. I support the proposed NET transload facility because I feel the project would be an asset to the local community and should help the local job market in an industrial area

I have familiarized myself with the NET proposal by reading the pleadings filed in the proceeding along with the various comments filed by politicians, local citizens, and community activist groups in response. While I understand the concerns expressed by the citizens whose communities will be affected by the operation of the proposed transload facility, much of their concern appears to be driven by unfounded fear and misinformation. Given that many of the comments contain similar themes, I suspect that the misinformation is being provided by a common source. I would like to address a few of these concerns.

First, many of the commenters express concern over the potential increase in noise. The site upon which this facility will sit is currently an industrial site located between two existing sets of railroad tracks. The operation of an intermodal transload facility will undoubtedly create noise, but, given its location, the net effect on the local residents will be minimal. Because of the small increase in train traffic coupled with the significant distance of the facility from potential noise receptors, any increase in noise will likely fall below established thresholds. With appropriate mitigation measures, any detrimental noise impact would be negligible.

Next, many of the commenters oppose the operation of this facility because of the perceived increase in air pollutants negatively affecting the surrounding communities. This perception is

false. To the contrary, the operation of a facility such as this one will *actually decrease* air pollution in the region, thus, positively affecting the neighboring communities. As stated, the facility will be located in what is currently an industrial compound that is heavily serviced by trucks. In addition, the affected communities are bordered on two sides by Interstate 93 and Interstate 95, which are closer in proximity than the proposed transload facility. It is undisputed that both of these highways are extremely congested and serve as thoroughfares for a large volume of long-haul trucks serving the Boston metropolitan area.

Numerous studies have concluded that long haul trucking is extremely harmful to the environment, particularly affecting air pollution. On the other hand, the air quality benefits of transporting freight by rail as opposed to truck are well-documented. Presumably, the lack of railroad capacity and increased reliance on long-haul trucking is one of the reasons that the Boston area continuously fails to meet Clean Air Act attainment standards, to the detriment of area residents.

In view of those facts, the proposed transload facility will serve two beneficial purposes. First, it will help remove a large percentage of the long-haul trucks that travel on the highways bordering the local communities. This will have a positive net affect on the quality of the air in a region known for its poor air quality. It should be noted that one of the sanctions for non-attainment of Clean Air Act standards is the withholding of federal highway funding for the construction and repair of roadways. Therefore, a secondary affect of removing a significant number of trucks that cause pollution and roadway damage, is to help the Boston metropolitan area gain attainment status so that it may receive the highest possible allotment of highway funds for the repair of existing damaged roadways due to the high truck traffic.

In addition to the negligible impact on noise and the positive net impact on the air quality and the transportation infrastructure of the region, by removing long-haul trucks from the highways, NET's proposed facility will also enhance transportation safety and will serve to promote the private investment in rail transportation. These important policy considerations will have a broad-reaching positive impact on the rail transportation industry. With appropriate mitigation measures, NET's transload facility will have minimal detrimental impacts on the environment and will add needed rail infrastructure to the currently underserved Boston metropolitan area and New England as a whole.

Thank you very much for your consideration of these comments.

Very truly yours

  
Domenic T. Bua