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August 24, 2007

The Honorable Vernon A Williams  
Secretary  
Surface Transportation Board  
395 E Street SW  
Washington, DC 20423-0001

Subject: Finance Docket No. 34797,  
New England Transrail, LLC

Dear Honorable Mr. Williams:

As a licensed Massachusetts Professional Engineer practicing in civil and environmental engineering, I would like to take this opportunity to respond to the request for comments from interested parties in your June 29, 2007 decision for the above referenced matter

Jacques Whitford Company, Inc. has been involved in the development, design, and construction of various transloading projects, including biofuels terminals. In addition to waste handling of construction and demolition debris (C&D) and solid waste, it is our understanding that some of the commodities to be handled at the proposed New England Transrail facility in Wilmington, Massachusetts include biofuels, road salt, and corn syrup, to name a few.

Local distribution of domestic road salt in New England requires a facility such as that proposed for the Wilmington location. This would allow domestic salt mining companies to utilize rail transportation to be competitive with foreign road salt sources that are delivered by marine transport.

In addition to road salt markets, there has been an increased demand for transloading bulk commodities like biofuels in the Boston metropolitan area where there is a shortage of strategically located facilities due to real estate development pressures that have resulted in the elimination of rail terminal capacity in locations around Boston. Recently, Congress passed energy legislation intended to increase the availability of renewable fuels and encourage the installation or conversion of supporting infrastructure. The beneficial impact of biofuels on the environment is evidenced by the use of ethanol in the Northeast as an additive to gasoline (10 percent ethanol blended with 90 percent gasoline) that has helped improve air quality. The driving force behind the increased use of biofuels such as ethanol is to reduce oil consumption and reduce its negative environmental impact. It is our understanding that local fuel distribution companies, as well as biofuels suppliers, have expressed an interest in utilizing the proposed New England Transrail facility as a vital link in their biofuels transportation supply chain.

Corn syrup is another commodity which requires a rail transloading terminal closer to the Boston metropolitan area so as to avoid negative impacts on our local roads and environment caused by long truck hauls from distant rail terminals.

**Jacques  
Whitford**

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**CERTIFICATE OF SERVICE**

I hereby certify that I served a copy of the foregoing comments to each person listed on the STB Service list for Finance Docket No. 34797

A handwritten signature in black ink, appearing to read "Nicholas C. D'Agostino". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Nicholas Charles D'Agostino, P.E.