



City of Woburn Massachusetts

City Hall
10 Common Street
Woburn, MA 01801

Tel: 781-897-5901
www.cityofwoburn.com

Scott D. Galvin
Mayor

November 29, 2016

Ms. Danielle Gosselin
Office of Environmental Analysis
Surface Transportation Board
395 E Street NW
Washington, DC 20423-0001
(via Electronic Mail)

Docket No. FD 34797 (Sub-No. 1)

Dear Ms. Gosselin:

Thank you for the opportunity to comment on the above referenced Docket item, the petition before the Surface Transportation Board by New England Transrail d/b/a Wilmington & Woburn Terminal Railway ("NET") to acquire the Olin Chemical site at 51 Eames Street in Wilmington to construct and operate a rail-to-truck commodities transloading facility.

The Olin Chemical property proposed for redevelopment by NET is partially located in the City of Woburn and will have significant impacts in Woburn since the majority, if not all, of the rail and truck traffic will pass through the City. In addition, environmental concerns on the Olin property, including surface runoff and underground contaminants, directly affect the safety and quality of life in the City of Woburn and threaten to undo years of environmental remediation already completed in the contaminated Aberjona River watershed. These concerns are nothing new, as the City has had them since the first petition by NET proposing a similar facility in 2003 (Docket No. 34391).

Despite these potential adverse impacts, the City has not had sufficient time to review the available documentation put forth by NET prior to the November 29 deadline for comments on the Draft Scope of Study for the EIS. The City respectfully requests an extension to more fully understand the most recent petition for the redevelopment of this site and the available supporting documentation to ensure the EIS thoroughly evaluates the project's impacts in the City of Woburn.

The City presently offers the attached comments related to traffic and transportation impacts from the City's consultant, WorldTech Engineering as well as comments on the Draft Scope of Study from the Woburn Neighborhood Association (already submitted to you independently).

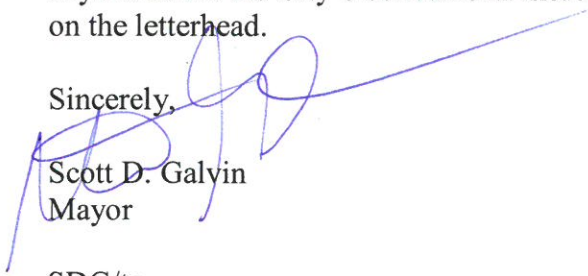
Ms. Danielle Gosselin

November 29, 2016

Page two

Thank you for considering the City's comments on NET's petition. I would be happy to speak to anyone about the City's concerns in more detail. You are welcome to contact me at the number on the letterhead.

Sincerely,

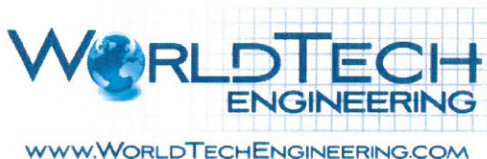


Scott D. Galvin
Mayor

SDG/tc

cc: City Council President Richard Haggerty
Ward 6 Councilor Ed Tedesco
City Engineer Jay Corey
Planning Board/WRA Director Tina Cassidy
Woburn Neighborhood Association

Attachments



November 29, 2016

Ms. Danielle Gosselin
Office of Environmental Analysis
Surface Transportation Board
395 E Street NW
Washington, DC 20423-0001
(via Electronic Mail)

Docket No. FD 34797 (Sub-No. 1)

Dear Ms. Gosselin:

On behalf of the City of Woburn, WorldTech Engineering has reviewed the petition by New England Transrail d/b/a Wilmington & Woburn Terminal Railway ("NET") to construct and operate a rail-to-truck transloading facility at 51 Eames Street in the Town of Wilmington, formerly the site of Olin Chemical Corporation. Given the limited timeframe to submit comments on the Draft Scope of Study and the limited nature of information presented thus far, our review primarily focused on the Draft Traffic Impact and Access Study (TIAS) completed by Bayside Engineering in June 2016; however, we have also noted other transportation related concerns based on the siting of the facility and probable impacts in the City of Woburn.

The TIAS greatly miscalculates the potential distribution of truck traffic on the local street network. In the study, 99 percent of site generated traffic is assigned to Presidential Way, with the remaining one percent split between Main Street northbound and southbound. No traffic is assumed to travel to or from the I-93 at Route 129 interchange in the Town of Wilmington. Due to the prohibition of trucks carrying hazardous materials through the I-93 tunnel in the City of Boston, the primary route for most regional deliveries would be I-95 southbound, and the most direct route from the site to I-95 would be to turn left onto Eames Street and left onto Main Street (Route 38) to its interchange with I-95. This increased truck traffic would exacerbate existing operational and safety deficiencies along the already congested Main Street corridor, and would add truck traffic carrying hazardous materials through an Environmental Justice population in the City of Woburn.

It should also be noted that the right turn movement from Eames Street to Woburn Street, to which 99 percent of the truck traffic is assigned to in the TIAS, is a difficult maneuver, requiring trucks to turn into the oncoming northbound lane of traffic on Woburn Street. Trucks making this

maneuver today frequently must back up to complete the turn. Unless the project includes mitigation measures to improve the geometry at this intersection, trucks departing the site will be more likely to access I-95 via Main Street rather than Woburn Street and Presidential Way.

The study area itself ends at the intersection of Woburn Street/New Boston Street with Presidential Way and does not analyze potential impacts at the signalized intersection of Presidential Way/Commerce Way with Atlantic Avenue and the I-93 ramps, where, presumably, most of the loaded truck traffic would be turning left to access I-93. In all likelihood, a large portion of this truck traffic would also continue south along Commerce Way in the City of Woburn, passing shopping centers, restaurants, hotels, and the Woburn Mall, to access I-95 southbound at its interchange with Mishawum Road and Commerce Way or I-95 northbound at its interchange with Washington Street to avoid frequent gridlock in the I-93/I-95 cloverleaf interchange.

The traffic analysis in the DEIS should be based on a realistic distribution of trips along Main Street, and the study area should be expanded to include the following intersections in the City of Woburn:

- Presidential Way/Commerce Way at Atlantic Avenue
- Mishawum Road at Commerce Way/I-95 southbound ramps
- Washington Street at Mishawum Road
- Washington Street at Tower Park Drive/I-95 northbound ramps)
- Main Street at School Street/Elm Street
- Main Street at Alfred Street/Elm Street
- The I-95 at Main Street rotary
- The I-93/I-95 cloverleaf

The study also does not take into consideration the reconstruction of the New Boston Street Bridge, currently programmed by MassDOT for advertising in FY 2021. The reopening of the New Boston Street bridge would open up additional options for trucks leaving the NET facility to travel through the City of Woburn, including continuing south on New Boston Street to Industrial Parkway and Mishawum Road to the I-95/Mishawum Road interchange, or turning west on Merrimac Street and south on Main Street to access I-95 at the rotary interchange with Main Street. Trucks bound for North Shore destinations would likely continue south on Mishawum Road to Olympia Avenue on the south side of I-95 and enter I-95 northbound at its interchange with Washington Street. The EIS should include an alternate traffic analysis assuming the New Boston Street bridge is reconstructed, including all of the above locations plus the following:

- New Boston Street at Merrimac Street
- Industrial Parkway at Ryan Road
- Mishawum Road at Industrial Parkway

The Traffic Impact and Access Study also limits its analysis to weekday morning and evening peak hours, while the study admits that truck deliveries will typically occur outside of these hours. The reality along many of the roadways in this part of Wilmington and Woburn is that traffic “peaks” not just during traditional morning and evening commute times, but remains congested throughout the day. To fully understand the traffic impacts of the proposed transloading facility, the EIS should include a detailed temporal distribution of truck traffic, with estimated volumes of truck trips by hour for a typical day, indicating how many of said truck trips will be transporting hazardous materials. The EIS should analyze traffic operations not just during typical peak hours of adjacent street traffic, but also during the peak hours of truck traffic generated by the project.

Besides the potential traffic and safety impacts due to additional truck trips, the addition of rail traffic carrying hazardous and/or potentially explosive materials along the MBTA Lowell Line right-of-way is also concerning. NET states that train movements will occur between 11:00 p.m. and 6:00 a.m., which potentially will conflict with MBTA Train 314 before 6:00 a.m. and Train 348 after 11:00 p.m., as well as non-revenue MBTA moves. This line is also used by Amtrak for its Downeaster service between Boston and Brunswick, Maine. The EIS should include a detailed schedule of operations demonstrating that MBTA and Amtrak operations will not be affected. The EIS should also include a detailed traffic management plan in the event a derailment or spill disrupts MBTA or Amtrak service for an extended period of time, including provisions for accommodating the customers of both in the event of a service interruption.

The additional 800 daily truck trips will not only create traffic impacts in the City of Woburn, but there will also be impacts to noise levels, air quality, and public safety in the City of Woburn from these additional trips, as well as major impacts to traffic and life safety in the event of a crash or spill involving delivery of LNG or other hazardous materials from the NET facility. The EIS must evaluate all of these potential impacts in the City of Woburn as well. Noise will be of particular concern to those living near the railroad right-of-way, as train movements are expected to occur between the hours of 11:00 p.m. and 6:00 a.m. The EIS should include detailed analyses of noise and emissions levels generated by the additional truck and rail traffic and should include detailed emergency response plans, with respect to response times, cleanup, and traffic impacts, in the event of a crash or spill involving rail cars along the Lowell Line right-of-way, along any of the potential truck routes in the City of Woburn, and within the I-93/I-95 cloverleaf interchange.

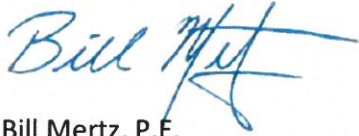
Ms. Danielle Gosselin
November 29, 2016

Page 4

Thank you for your attention to our comments. If you have any questions or require additional information please do not hesitate to contact me.

Sincerely,

WORLDTECH ENGINEERING



Bill Mertz, P.E.
Vice President

cc: Mayor Scott D. Galvin
Richard Haggerty, President, Woburn City Council
Tina P. Cassidy, Planning Board Director and WRA Administrator
John E. Corey, City Engineer
Michael L. Raymond, Co-Chair Woburn Neighborhood Association
Linda A. Raymond, Co-Chair, Woburn Neighborhood Association



Woburn Neighborhood Association, Inc

10 North Maple Street
Woburn MA 01801-1407

www.woburnneighborhoodassociation.com
(781) 935-2438 Email: fitwalker1@aol.com

November 21, 2016

Danielle Gosselin
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Docket No. 34797 (Sub-No.1)

Dear Ms Gosselin:

This correspondence is a letter of opposition to the intended above referenced submittal titled Construction, Acquisition, and Operation Exemption in Wilmington and Woburn, MA dated June 24, 2016 by the New England Transrail, LLC, d/b/a Wilmington & Woburn Terminal Railway. As requested the comments are directed toward the Draft Scope of Study for the Environmental Impact Study (EIS) ordered by the Office of Environmental Analysis of the Surface Transportation Board.

The Woburn Neighborhood Association, Inc. (WNA) was founded in August of 2002 by a network of many citizens of Woburn who were concerned with the environmental injustice involved in the North Woburn and South Wilmington area. In 2003, founding members and Woburn residents Michael Raymond, Linda Raymond and John Ciriello were appointed as voting members to a town of Wilmington Citizens Advisory Panel. At the time were charged with researching the drinking water quality problems in South Wilmington, and over the years have stayed involved in environmental issues that involve the residents of North Woburn and South Wilmington. The WNA has opposed the Transrail facility since its introduction in 2003, and on several occasions commented on the ongoing process to the Surface Transportation Board.

On October 25, 2016, there was a EIS Scoping meeting held at the Wilmington, MA Middle School. I stated the following outline of concerns by the WNA:

- (a) Transportation of liquefied natural gas (2 Safety)
- (b) Type of commodities to be trans-loaded (2 Safety)
- (c) Proposed project start date (3 Land Use)
- (d) Side by side Superfund sites (13 Aesthetics)
- (e) Environmental Justice (14 Environmental Justice)

The WNA is requesting the OEA to consider these concerns as they relate to impact categories listed in the scoping request:

2. Safety

One of the commodities listed in the NET proposal is Liquefied Natural Gas (LNG). The container size as used in Alaska is 40 feet and the capacity is 12 tons or 30,000 lbs. of LNG. This is the only area of the country that allows the rail/truck LNG process. Our concerns are based on the following facts from the United States Department of Transportation:

- (1) About every hour and a half, a train collides with another object or is derailed. For example; in Westford, MA in February of 2014 a five-car freight train derailed on a train trestle on main street. Two of the derailed train cars were carrying liquefied petroleum gas. Local Government officials were not notified of the derailment. November 2, 2016 close to the same location and adjacent to the town of Westford's drinking water aquifer there was a second derailment, included in the derailed cars were two cars containing toxic cleaning material.
- (2) Every two weeks a train that is carrying hazardous materials derails in the United States.
- (3) Today rail companies rely on technology that was developed more than 70 years ago, and very little research and improvement has been made to update these dated safety measures.
- (4) Local governments often have no voice over the train traffic in their area, which can result in delays for local emergency responders.
- (5) According to the DOT's Federal Railroad Administration, about 80% of railroad crossings do not have adequate warning devices.
- (6) While vehicle on train collisions have decreased in the past few years, pedestrians involved in train collisions have increased.

Although we do not have a current traffic study to review and comment, we offer our concerns based upon our review of the site:

- (a) If the proposed route is through Woburn via Eames Street to Main Street (Rt. 38) to Rt. 95, this route is a highly populated residential area that contains two Elementary Schools, Day Care Center and an outdoor sports facility. Rt 95 for most of the day is bumper to bumper traffic due to the Rt. 95 and Rt. 93 interchange. If the proposed route is through Wilmington to Woburn via Eames Street to Woburn Street to Presidential Way to the Commerce Way Rt. 93 interchange, we believe this would be highly dangerous. The heavy truck loads during adverse weather conditions both on the roads in Wilmington and onto the single lane "fly-over" at the interchange of Commerce Way and Rt 93. Residents along Eames Street and off Woburn Street would be adversely affected with this fleet of trucks. The draft scope does not have a specific plan on how they will remedy the present road conditions to properly transport these materials.
- (b) Noise associated with trains and heavy axle truck traffic.
- (c) Truck traffic during nighttime hours will raise havoc at such hours.
- (d) Potential industrial accidents within the facility and potential accidents with the 800 trucks entering and leaving the facility and local traffic. There is no Community Emergency Response team in either Woburn or Wilmington. If an incident were to occur on Rt. 95 (128) during rush hour, it could be hours before a CERT would arrive.
- (e) Exposures to hazardous materials with any mishap at the facility not only to the employees at the site but also to the many residents along the transportation routes.
- (f) Environmental impact of potential spillage and releases of said material and further contamination of the already compromised property, with wetland considerations and surface water contamination.

NET anticipates moving goods and materials (e.g. bricks, newspaper, steel glycols, biofuels, liquid natural gas, vegetable oils, wood chips, sand and gravel).

- (a) Due to this sensitive material, which will be transferred on the property and transported from the property, there exist possible accidental spills and release. Over the past 30 years it has been determined that the North Woburn-South Wilmington area is overburdened by both ground water and air pollution. The two communities are quite nervous and concerned. Evacuations of the area community have taken place from releases at the Olin facility and the residents are not comfortable with the added threat.
- (b) Of equal concern to the residents is that NET continues to purport that their operation is consistent within a defined industrial area without giving attention to the residents and abutting neighborhoods of Wilmington and Woburn. One lingering question is noise? Does NET plan to use sound baffles during the loading and unloading times?

- (c) The updated petition does not disclose the proportions of commodities it would handle, the types of trucks contemplated, its proposed days and hours of operation, the number of rail runs (e.g., day or night) the design of the proposed cross-docking warehouse, the scale of the proposed railroad equipment maintenance operations, or other information essential to identify the types and magnitude of nuisance, noise and air quality impacts likely to result from a facility that would affect the health, safety and welfare of the North Woburn and South Wilmington residents. Those impacts nonetheless are likely to be considerable and cumulatively, could prove intolerable. Contrary to NET's statements, the site is abutted by and near residential neighborhoods and other uses vulnerable to such impacts. Moreover, as noted, facility-related trucks would traverse other areas of homes and light businesses. Because the few existing railroad tracks at the site are not in use, there are no railroad-related background impacts to compare to those anticipated from the daily movement, unloading, loading, coupling and decoupling of 60 rail cars and locomotives. Additional noise and litter will result from 800 daily truck trips, rail equipment maintenance activities, dumping and loading a wide range of commodities and the operation of the cross-docking warehouse. Diesel fumes from innumerable trucks and locomotives also would have a substantial adverse impact on local air quality and the health, safety and welfare of the North Woburn and South Wilmington residents.
- (d) The list of materials that the proposed facility would trans-load is open-ended and subject to change. This calculated vagueness raises several concerns. While the updated petition states that NET would not handle "hazardous waste" hazardous material are another matter. NET's previous STB filings equivocated but the current petition states that NET would include hazardous materials, including specifically "natural gas liquids." NET offers no plan to address the risks inherent in handling such materials. It merely proposes to temporarily store all bulk liquids in holding tanks within a bermed area. Because any risk of spillage through derailment or other accident is unacceptable at this site. NET has the burden to address this matter in meaningful detail. As noted above if hazardous liquids are to be stored in the three barely distinguishable, lozenge-shaped tanks on the plan, those tanks location adjacent to the 20-acre conservation-restricted land is problematic. The updated petition also states that NET would not unload bulk liquids within the Groundwater Protection District. However, it does not identify where on the site such unloading would occur. This is no trivial matter at a Superfund Site whose groundwater is known to be contaminated but has not been fully characterized. NRT's proposed trans-loading of natural gas liquids and other hazardous materials also puts at risk the health, safety and welfare of Woburn and Wilmington residents near the site and along the roads to be traveled by trucks (and rail cars) that would transport it through this populous suburb. The separation of the project site from major truck route and highways compounds that risk.

3. Land Use

After a site is listed on the National Priorities List (NPL), a remedial investigation/feasibility study (RI/FS) is performed at the site. The remedial investigation (RI) serves as the mechanism for collecting data to characterize site conditions, determine the nature of the waste, assess risk to human health and the environment, and conduct treatability testing to evaluate the potential performance and cost of the treatment technologies that are being considered. The feasibility study (FS) is the mechanism for the development, screening, and detailed evaluation of alternative remedial actions. The RI and FS are conducted concurrently - data collected in the RI influence the development of remedial alternatives in the FS, which in turn affect the data needs and scope of treatability studies and additional field investigations. This phased approach encourages the continual scoping of the site characterization effort, which minimizes the collection of unnecessary data and maximizes data quality.

NET submits in their filing with you a list of commodities which they plan to transport to the site for transfer from train to trucks. They hint that the list is not limited to what they have included. In fact, in the original proposal they state that the list will include "any other products which can be transported in intermodal containers". The examples they did list are; bricks, newspaper, steel, glycols, biofuels liquid natural gas, vegetable oils, wood chips, sand and gravel... etc. all would pose additional risk if an accident occurred on this property. Any importation of chemicals and debris as stated above before there is a complete revelation of the chemicals of concern and before an appropriate remedial plan is implemented would be negligent. It would be contrary and indeed counter-productive to introduce this property and land to such a project of this magnitude. The latest information that we have is that the EPA is analyzing the chemicals of concern listing to determine which chemicals need to be included and addressed in their remediation.

STB's May 12, 2016 decision emphasized that granting NET permission to file an updated petition was no assurance that a project would be deemed exempt or environmentally appropriate the burden lay squarely on NET to supply STB – and the interested parties – with a "complete" petition that included data concerning the proposed facility and operations and expense of a high level environmental impact review. This proceeding already has lasted too long and drained too many public and private resources to tolerate a petition that falls short of that. Likewise, the Superfund Site on which NET wants to build and operate a facility has sustained too much damage and been too incompletely addressed to forego a diligent review for redevelopment.

13. Aesthetics

The Industri-Plex Superfund site (North Woburn) was listed as a superfund site in 1983 demonstrates proper Land use of a highly contaminated area. Over the years from 1983 constructed on the site are the Anderson Regional Transportation center, Presidential Way Industrial development, Commerce Way Rt. 93 entrance, and retail plazas. These projects have

and will generate hundreds of new jobs for the area and millions in new tax revenue. The WNA has worked closely with the EPA and developers to ensure that the Superfund construction projects would not add to the already highly contaminated area. Adjacent to Olin property is the closed and unlined Woburn Landfill. One of our proudest accomplishments as Environmental Activist was to ensure that the Landfill was properly closed. The North Woburn landfill, used as a dump from 1966 to 1985, was cleaned and capped between 1999 and 2006. Now, 40 acres of land is just waiting to be used. On September 8, 2011 as an Alderman for the City of Woburn, and one of the founding members of the WNA wrote the legislation to zone the 40 acres acceptable for Solar Photovoltaic Installations. The City of Woburn has leased the property to a Company that is in the process of installing 11,000 solar panels on the site. The site will generate income to the City in excess of \$400,000.00 per year over the next 18 years. The partnership of the City of Woburn, the Environmental Protection Agency and the developers have become a win-win situation for the residents of North Woburn and South Wilmington. It is important to note that before any construction commenced on the five major projects within the Industry-Plex site that a Record of Decision was in place. In 1979, in response to illegal filling of wetlands, the EPA obtained a court order to stop further development activities. The EPA and the State entered into a Consent Order with Stauffer Chemical in 1982, whereby Stauffer was to conduct an investigation and recommend cleanup actions. In 1989, the EPA and the potentially responsible parties signed a Consent Decree in which the parties agreed to implement the remedy (Industry-plex OU-1 under the 1986 ROD) for stabilizing the site and to reimburse the EPA for past and future oversight costs. In 1998, EPA successfully negotiated with the PRPs to comply with the Consent Decree and implement the Final GSIP.

The Olin property Superfund site (South Wilmington) was listed as a Superfund Site in April of 2006. According to EPA, Region 1 "historical wastewater disposal and general handling of chemicals and waste products at the plant led to significant environmental contamination". The feasibility study or remedial investigation was completed in 2009. After a site is listed on the National Priorities List (NPL), a remedial investigation/feasibility study (RI/FS) is performed at the site. The remedial investigation (RI) serves as the mechanism for collecting data to characterize site conditions, determine the nature of the waste, assess risk to human health and the environment, and conduct treatability testing to evaluate the potential performance and cost of the treatment technologies that are being considered. The feasibility study (FS) is the mechanism for the development, screening, and detailed evaluation of alternative remedial actions. The RI and FS are conducted concurrently - data collected in the RI influence the development of remedial alternatives in the FS, which in turn affect the data needs and scope of treatability studies and additional field investigations. This phased approach encourages the continual scoping of the site characterization effort, which minimizes the collection of unnecessary data and maximizes data quality. Once completed, a Record of Decision is negotiated. To date there is no record of decision (ROD) in place. In the United States Environmental Protection Agency, the **Record of Decision (ROD)** is a public document that

explains the remediation plan for the clean-up a Superfund site. The (ROD) is a signed contract between the EPA and the Primary Responsible Party (Olin Chemical). It has been proven that that chemicals of concern are present in the East Ditch of the Olin Property. The East Ditch of the Olin property empties into a drain on New Boston Street in North Woburn and from there migrates into the Aberjona River. The Aberjona River is the main tributary within the Industriplex Superfund site. Environmental impact of potential spillage and releases of said material and further contamination of the already compromised property, with wetland considerations and surface water contamination to two communities. NET intends to pave 23 acres of the 32-acre site (and cover the balance with buildings and structures) in order to minimize infiltration into already contaminated soil and groundwater. Yet NET does not explain how it would treat and manage the enormous burden of storm water and contaminated runoff from more than one million square feet of impervious surfaces, trucking and trans-loading operations, and railroad equipment maintenance activities. In a point of fact, the site cannot physically accommodate all of the paving and structures for NET purposes, much less adequate storm water treatment and controls. Many of the available types of subsurface storm water structures are not feasible for this site because of the severe constraints on excavation and disturbance of existing contaminated soils and shallow ground water table. While dedicated land is needed for storm water controls, NET has not allotted that in the site plan. According to NET's own data the total area in square feet of just the proposed access roads and buildings (1,440,000 – not including 16,000 liner feet of track, or railroad mechanical infrastructure, storage tanks, water tanks and the other features that NET list separately) exceeds the square footage of the entire 32-acre site (1,393,920).

14. Environmental Justice

The Environmental Protection Agency has defined Environmental Justice as: "Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. EPA has this goal for all communities and persons across this Nation. It will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work". The WNA believes that the quality of life for the residents of Woburn and Wilmington is already negatively impacted as the Olin property is within a half mile distance to the Woburn Landfill, Maple Meadow Landfill, the Industrial Plex Superfund Site and 6 major 21 E contaminated industrial sites. (See Attachment 1) The area in question is an area already impacted by serious industrial pollution, which may have serious consequences to the health, safety and welfare of the surrounding residents. The proposed trans-rail center brings with it odors, noise, unwanted and certainly added truck and train traffic to an already overburdened area and most importantly an additional worry to further exposure to hazardous and contaminated material from accidents and mishaps with a potential of further contamination of an already compromised property. The North Woburn – South Wilmington area have more than its share of environmental injustices. Enough is enough! The

WNA will forward their comments to the State of Massachusetts Environmental Justice Director & Program Manager for review, comment and action.

In conclusion; the nightmare on Eames Street is an unusual one. It is one the residents of North Woburn and South Wilmington have lived with and struggled with for decades. The fact that it is undergoing change from the Superfund clean-up process, including changes that we don't even know about yet, underscores the need for OEA to take special care in preparing a Draft Environmental Impact Statement. For all the North Woburn and South Wilmington concerns listed above, the Woburn Neighborhood Association, Inc. will continue to respectfully request the Surface Transportation Board to deny New England Transrail, LLC, d/b/a/ Wilmington & Woburn Terminal Railway - Updated Petition as non-compliant and dismiss this proceeding.

We, the Woburn Neighborhood Association, Inc. believe that contamination knows no boundaries and will continue this fight until all issues are resolved.

Sincerely,



Linda A Raymond
Chairman, Woburn Neighborhood Association, Inc.



Michael L Raymond
Chairman, Woburn Neighborhood Association, Inc.

Attach/ Current Site Features off Property Areas

Cc:

US Senator Edward Markey
US Senator Elizabeth Warren
US Representative Katherine Clark
State Senator Kenneth Donnelly
State Representative James Miceli
State Representative James Dwyer
State Representative Jay Kaufman
US EPA James DeLorenzo
US EPA Joseph Lemay
Wilmington Town Manager Jeffrey Hull
Wilmington Woburn Collaborative Kathleen M Barry
Wilmington Environmental Restoration Committee Martha Stevenson
Woburn Mayor Scott Galvin
Woburn Planning Board Director Tina Cassidy
Woburn City Council President Richard Haggerty

Attachment 1

Showing close proximity of Transrail Project to residents of North Woburn and South Wilmington
WNA Comments to the Draft Scope of Study for the Environmental Analysis. 11/28/16

