

Phillis Johnson-Ball
Surface Transportation Board
1925 K Street NW
Washington DC 20423
Attention: Finance Docket No. 34797

April 25, 2006

Dear MS Johnson-Ball,

I am writing to you to provide my further comments in support of the New England Transrail, LLC (NET), d/b/a Wilmington & Woburn Railway proposal to acquire, construct, and operate as a rail carrier approximately 7,500 feet of track on property owned by the Olin Corporation (Olin) in Wilmington and Woburn, Massachusetts.

I support the NET proposal in the interest of enhancing the most efficient modes of freight transportation that minimize environmental impacts in the region. Since retiring as a Department of Defense Certified Acquisition Professional I have been an active advocate for planning and enhancing efficient modes of transportation in Massachusetts. I participate in local and regional forums for improved public transit, modernizing of the freight transportation system, and have worked as a volunteer to apprise state and local planners of the relationship of transportation to economic development, land use, and the environment. I have exercised my advocacy by being appointed as the Town of Wellesley Massachusetts Representative to the Metropolitan Area Planning Council, MBTA Advisory Board, and Regional Transportation Advisory Council (RTAC) for the Boston MPO in Eastern Massachusetts and I now serve as RTAC Vice Chairman and Cochairman of the RTAC's Freight Committee.

The rapid decline of freight rail capability, performance, and access, in the Boston Metro Region became vividly apparent to me during my former position and administration of production contracts with the Department of Defense contractors in our area of responsibility in Massachusetts and New England. Contractors under my unit's surveillance and support were engaged in receiving and shipping millions of dollars of goods and materials to and from Massachusetts and New England. Beginning in the 1990's until my retirement from the Defense Department in 2001 virtually all of the freight moved on Government Bills of Lading via rail and sea were shifted to truck.

NET proposes development of a well-located rail transloading terminal on a brownfields site within 11 miles north of downtown Boston, and 2 ½ miles from the interchange of I-93 and I-95 in the Town of Wilmington. This terminal will take long-hauled materials (a wide-variety from salt, sand and gravel, coal, steel, lumber and liquids) from rail to be loaded onto local trucks for local distribution, and take materials (mostly waste products and tree trimmings) from local trucks to be loaded onto rail cars for long-haul transport. It is projected that this facility would handle 25 railcars per day, which will displace over 250 one way long-haul truck trips daily.

A report commissioned by NET on the environmental and externality cost benefits¹ (in addition to reduced transportation costs for local businesses and consumers) shows overwhelming benefits of over \$170 million annually from reductions in: congestion; pavement wear & tear; air pollution; noise impacts, accidents; and excess user costs. These costs are born by the general population and local governments throughout the State.

¹BRIAN KETCHAM ENGINEERING 175 Pacific Street, Brooklyn, New York 11201, "A Comparison of the Full Costs of Moving Freight by Truck Compared to Moving Freight by Railroad", February 9, 2006. Prepared by Brian T. Ketcham, P.E.

Significant annual reductions in key diesel emissions depending on average payloads range from:

Carbon Monoxide (CO)	165-391 tons
Nitrogen Oxides (NOx)	1,005-2,404 tons
Volatile Organic Compounds (VOC)	13-38 tons
PM 10	24-59 tons
PM 2.5	20-49 tons
Carbon Dioxide (CO2)	79,712-196,988 tons

and annual reduction in diesel fuel ranges from 7.6 million gallons to 18.8 million gallons. (The emissions and fuel reduction numbers are conservative since they are based on steady speed rural driving conditions and lower than speed-limit speeds of 55 mph.)

This project will be privately financed which means that the infrastructure transportation benefits will not detract from public funding for other freight and passenger transportation programs in the region.

I believe like many infrastructure projects which benefit an entire region, the project has received local opposition of the NIMBY nature fueled by vested private interests anchored to long-haul trucking as well as the solid waste and incinerator industries and local quarries threatened by competition posed by rail freight.

The subsidized interstate highway system has contributed to the decline of railroad freight transportation. Railroads in Massachusetts owned extensive parcels of land in Eastern Massachusetts used for transfer terminals and other support functions. With skyrocketing real estate values in the Boston metropolitan area railroads realize profits in selling off these parcels for real estate development rather than continue in their transportation functions. This rationalization of rail assets has hindered the railroads' ability to transfer freight between rails and trucks for local deliveries, exacerbating the decline in rail freight. This trend continues with the current commercial/retail/residential development of a vital former Boston and Maine (now Guilford Industries) Rail Yard across from downtown Boston in Somerville, Massachusetts, abandonment of the Mystic Warf Branch Rail connections to the docks and terminals located on the Mystic River and Chelsea Creek, and the sale of land occupied by the Beacon Park Rail Yard (CSX) at Allston (Boston) Massachusetts for institutional development by Harvard University, which will limit the transfer functions of that yard.

The Federal Highway Administration projects that if we do not change our transportation system freight transported by long haul truck will increase 66% in the next dozen years over Massachusetts' already congested levels as measured in 1998. On a national average, trucks generate 10 times sooty particulates and hydrocarbons on a per ton per mile basis than rail freight, and almost 3 times the nitric oxides and carbon monoxide. Based on data compiled by the US EPA and American Association of State Highway and Transportation Officials, the health impact costs from medical bills and loss of earnings due to illness or premature death from this increased source of air pollution from long-haul trucking based on 1997 dollars equals 2 ½ cents per ton for each 10-miles traveled. Assuming that on average a long-haul truck traveling to or from Massachusetts hauls 20 tons of freight that equates to a hidden cost of 5 cents per mile borne by the Massachusetts residents.

Other hidden costs of long haul trucking are: pavement wear and tear, 18 cents per mile; congestion costs, 5 cents; accident costs, 27 cents; excess user costs, 8 ½ cents; and noise impacts, 8 ½ cents. These costs are based on constant highway driving and average national conditions, and do not take into account the higher costs encountered in eastern Massachusetts with greater stop-and-go traffic which increase air pollution, more overpasses and elevated roadways which increases pavement wear and tear, and higher construction and labor costs.

If we are not to suffer greater air pollution, larger hidden costs borne by all of us, and reduced quality of life from time-consuming congestion, we must foster changes to our freight transportation system. A critical aspect for the revitalization of rail freight in the Boston

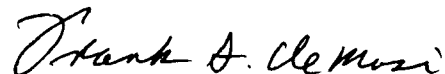
metropolitan area as part of a healthy and robust national rail freight system is development of rail terminals like the one proposed by NET necessary to allow an interface between long-haul rail transportation to transload freight for local truck deliveries or pick ups to serve local markets.

NET's proposed development of a rail freight terminal in Wilmington, Massachusetts is the type of facility which will be required to revitalize rail freight transportation in the Boston metropolitan area. The Wilmington terminal will handle a wide range of in-bound and out-bound products and materials, from lumber, steel, paper and other bulk commodities inbound. Since eastern Massachusetts' major export is waste products, waste will be a major component of the terminal's outbound freight. Vested interests in the solid waste industry, with businesses tied to long-haul trucking or local garbage burning incinerators has opposed the Wilmington project for fear that it will undercut their markets and pricing. Rail freight presents an overwhelming pricing advantage over trucking because of rail's inherent transportation efficiencies, and will save Massachusetts and its municipalities tens of millions of dollars per year in waste disposal costs; and will save Massachusetts, its municipalities and residents even more money from reduced impacts from air pollution, congestion, highway accidents, excess user costs, pavement wear and tear, and noise.

I support the New England Transrail LLC (NET) proposal to transload C&D and MSW because all of the C&D and MSW received by NET will be shipped to disposal locations outside the Commonwealth of Massachusetts and all C&D and MSW will be handled by NET in an enclosed structure with state of the art odor and dust controls. The Massachusetts DEP and the Town of Wilmington have been, and will be, afforded a full opportunity to participate in the STB's consideration of NET's proposal. NET proposes to Comply With All Applicable Health and Safety Laws and Regulations and has agreed to comply with all state and federal health and safety regulations applicable to the construction and operation of the NET facility which are enforced in a non-discriminatory manner and which do not unduly impede rail transportation. Consequently, there is no legitimate policy or legal reason to differentiate between trans-loading of solid waste and other commodities.

Consequently, I support the position that NET's proposed facility will not contribute to nor adversely impact potential or existing environmental issues associated with their development of the Olin property in question. I further recommend that the STB grant NET's Petition expeditiously.

Sincerely,

A handwritten signature in black ink, reading "Frank S. DeMasi". The signature is written in a cursive, flowing style.

Frank S. DeMasi