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Waterbury Regional Chamber



March 3, 2006

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

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Office of Proceedings

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Re: Comments by Stephen R. Sasala, II, President & CEO, Waterbury Regional Chamber, 83 Bank Street, P.O. Box 1469, Waterbury, CT 06721 on the New England Transrail, LLC D/b/a Wilmington & Woburn Railway--Petition for an Exemption from 49 U.S.C. Section 10901 To Acquire, Construct and Operate As a Rail Carrier on Tracks and Land In Wilmington and Woburn, Massachusetts FD-34797

Dear Secretary Williams:

Enclosed please find my comments on the New England Transrail, LLC d/b/a Wilmington & Woburn Railway--Petition for an Exemption from 49 U.S.C. Section 10901 to Acquire, Construct and Operate As A Rail Carrier on Tracks and Land in Wilmington and Woburn, Massachusetts, Finance Docket No. 34797.

As the President & CEO of the Waterbury Regional Chamber, a business advocacy organization with over 1100 members, we are making these comments because of our strong interest in reducing the economic, social and environmental impacts from long-haul freight trucks destined for Eastern Massachusetts on Connecticut's highways

Because of years of contraction and neglect of the rail infrastructure in Eastern Massachusetts, our region lags behind the rest of the nation in revitalization of rail freight transportation.

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 Connecticut's already congested levels as measured in 1998. The planned decade long repair project for the Quinnepiac River Bridge at the intersection of I-95 and I-91 will lead to even a greater diversion of long-haul truck traffic through the I-84 corridor passing directly through Connecticut's central Waterbury and Hartford region.

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 eastern Massachusetts hauls 20 tons of freight, that equates to a hidden cost of 5 cents per mile borne by the Connecticut residents.

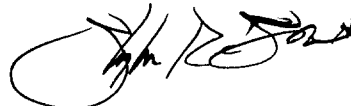
Other hidden costs of long haul trucking are: pavement wear and tear, 18 cents per mile; congestion costs, 5 cents; accident costs, 27 cents; excess user costs, 8 ½ cents; and noise impacts, 8 ½ cents. These costs are based on constant highway driving and average national conditions, and do not take into account the higher costs encountered in the congested central Connecticut region 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 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 moving materials as diverse as lumber, salt, sand & gravel and steel eastbound to waste and wood chips westbound. We understand that local NIMBY interests and vested business interests with ties to the trucking industry have opposed this development. We urge the Board to take into account the broad downstream impacts on millions of Connecticut residents and businesses caused by the lack of adequate rail transload facilities serving the Boston metropolitan area, and approve the NET facility. Delays in approval of this facility will only perpetuate the impacts of long-haul trucking through Connecticut.

Consequently, the STB should grant NET's Petition expeditiously.

Sincerely,



Stephen R. Sasala, II
President & CEO

c: Robert Varney
Regional Administrator
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