

May 10, 2006

Phillis Johnson-Ball
 Surface Transportation Board
 1925 K Street NW
 Washington, DC 20423

Attention: Finance Docket No. 34797

Dear Ms. Johnson-Ball,

This letter is in regard to the notice that we received recently concerning the application of New England Transrail, LLC to build a rail transfer facility in Wilmington, MA. I have three reasons to oppose this facility.

Concern #1: As stated in the notice, NET plans to have up to 400 trucks per day entering and exiting the site which would mean 2 trips per truck (one in and one out) using roads that would most likely be inadequate to support that amount of truck traffic. This comes down to 800 truck trips per day or one truck passage every 108 seconds. Since NET has not proposed any changes to the roads or intersections, there will remain only a few routes of access to the facility.

From 93S: Trucks will exit either onto Rte 129W or Commerce Way. The Rte 129W path will have the trucks taking a left through an intersection that already is considered one of the worst intersections in town for accidents. They would then proceed through a residential neighborhood on Woburn St and bear right onto Eames St. The Commerce Way exit is mainly industrial but it will have the trucks making a sharp reverse-angled turn from Woburn St onto Eames St.

From 93N: Trucks will exit either onto 129W (as stated above) or Rte 62W. The Rte 62W path will bring the truck traffic through the center of town through residential neighborhoods and school zones. The trucks will then turn left onto Rte 129E/38S and enter Eames St by means of another sharp reverse-angled left turn from Rte 38S or through Woburn St.

From Rte 95/128: Trucks will exit either onto Washington St and follow the Commerce Way path or take the Rte 38N exit proceed through Woburn and into Wilmington past residential and industrial areas.

Concern #2: As also stated in the notice, the types of material that would be loaded would include municipal waste (trash) from various sources. Until recently (2005) there was a local recycling center in the area of concern for the Wilmington residents to bring grass clipping, leaves, and other yard waste. This was discontinued because of the complaints about the odor that accompanied the decomposition. I can only imagine that if the scale of the NET business is allowed, the odor from the area will be nauseating.

Concern #3: Finally, the practice of accepting construction debris into the facility is also distressing, particularly because of the stated plans to shred this material before loading it onto rail cars. The crushing and shredding of construction debris could potentially release asbestos, lead paints, UFI, and other harmful and carcinogenic pollutants into the air around the facility. Even though it is stated that no hazardous debris will be brought in, most older construction will contain some form of hazardous materials. As well imagined, the noise around this process also gives cause for concern.

Sincerely,



David Garvin