



# Chicago Metropolitan Agency for Planning

233 South Wacker Drive  
Suite 800, Sears Tower  
Chicago, IL 60606

312-454-0400 (voice)  
312-454-0411 (fax)  
[www.cmap.illinois.gov](http://www.cmap.illinois.gov)

January 28, 2008

The Honorable Anne K. Quinlan  
Acting Secretary  
Surface Transportation Board  
395 E Street S.W.  
Washington, D.C. 20423

Re: STB Docket No. FD 35087 Canadian National Railway Company  
and Grand Trunk Corporation's Acquisition of Control of the  
EJ&E West Company

Dear Acting Secretary Quinlan:

Thank you for this opportunity to comment on the proposed Canadian National Railway Company's (CN) acquisition of the EJ&E-West Company. These are the official comments for the Chicago Metropolitan Agency for Planning (CMAP) as authorized by both the CMAP Board on January 9, 2008 and the Metropolitan Planning Organization (MPO) Policy Committee on January 10, 2008. Formed in 2005, CMAP integrates planning for land use and transportation in the seven counties of northeastern Illinois which have an estimated population of 8.5 million people and includes 283 municipalities. The region is expected to grow by 2 million residents and 1.2 million jobs by 2030. We work closely with local governments, transportation providers (both public and private), environmental agencies, business leaders and advocacy groups, among other interests. For more information, please see our website ([www.cmap.illinois.gov](http://www.cmap.illinois.gov)) or contact the undersigned.

Regarding CN's acquisition of the EJ&E and related operational changes, CMAP's review must carefully balance anticipated transportation benefits along with impacts at the local, regional and national levels. Our agency is officially charged to safeguard and enhance the transportation system, including important interactions with the region's freight and passenger rail systems. We are concerned with the viability of our freight and passenger networks as a key part of the economy and overall transportation system that serves northeastern Illinois.

A key CMAP goal is to protect and enhance the region's environment, economy, public safety, and other quality-of-life factors. In that light, we support the STB's decision to require a full Environmental Impact Statement (EIS) regarding the impacts of CN's proposed physical and operational changes. This should include public input on the scope of the EIS and ample opportunities for review and comment by affected and interested parties, as required by the National Environmental Policy Act (NEPA). CMAP also agrees with the STB's plan to postpone a final decision on the acquisition's merits pending the outcome of this important EIS process.

The Honorable Anne K. Quinlan  
January 28, 2008  
Page 2

We believe it is critical that any commitments made by CN in the EIS process should be required conditions when the STB decides whether to approve the acquisition. We are requesting that the STB ensure a full public discourse on the CN proposal.

More data and analysis are needed on several fronts. Upon initial review, it appears that the shifts in CN's operating patterns could improve freight throughput and divert a significant number of freight trains from a line that is also used by Metra passenger service. However, we cannot analyze impacts on freight traffic and passenger rail beyond the initial post-implementation stage unless we can get operating information from the CN for mid-term and long-term timeframes. It is difficult to analyze the full impact on connecting carriers and service in the region. Further, lack of detailed information impedes the ability of terminal carriers, line-haul carriers and short-line carriers to provide input to the plan. We are concerned about the viability of Metra's planned Star Line service on the EJ&E right of way. Similarly, there are concerns about the potential conflicts between increased and rerouted CN freight traffic and current and planned Metra passenger service. The impact on Amtrak service, both current and planned, is also among the issues that need to be thoroughly analyzed and assessed.

While there could be some benefits for certain communities and the region as a whole, much more analysis is needed to determine the location, extent, and type of impacts. That analysis must identify feasible options for mitigating negative impacts, including CN's specific commitments regarding safety and traffic mitigation measures at highway-rail grade crossings, as well as mechanisms for helping communities qualify for quiet zone status where there are significant noise concerns near the line.

While the CN's proposed acquisition of the EJ&E could ultimately benefit the region, CMAP is convinced that much more detailed analysis is necessary before such a conclusion can be reached. We look forward to remaining closely engaged throughout the EIS and STB approval processes and beyond.

Sincerely,

A handwritten signature in blue ink, appearing to read "Randall S. Blankenhorn". The signature is fluid and cursive, with the first name being the most prominent.

Randall S. Blankenhorn  
Executive Director