



# Chicago Metropolitan Agency for Planning

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May 26, 2021

The Honorable Cynthia T. Brown  
Chief, Section of Administration, Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W.  
Washington, DC 20423

## RE: FD 36514, Canadian National Ry. – Control – Kansas City Southern

Dear Ms. Brown:

Thank you for this opportunity to comment on the Canadian National Railway Company’s proposed acquisition of the Kansas City Southern Railway Company. As the nation’s freight hub carrying rail traffic for six of the seven Class 1 railroads, any potential merger would likely have a significant impact on metropolitan Chicago and its residents.

Approximately 25 percent of all freight trains and 50 percent of all intermodal trains in the country pass through metropolitan Chicago, which serves as the continent’s main interchange point between western and eastern railroads. While providing broad economic benefits, freight activity can also have adverse impacts on nearby communities. Increased freight traffic can cause noise, congestion, air quality, and other negative impacts.

As the federally designated metropolitan planning organization for the Chicago region, the Chicago Metropolitan Agency for Planning (CMAP) believes both the positive and negative impacts of any merger on the freight network and communities that would serve as a pass-through for that increased freight traffic should be studied. Unfortunately, due to the lack of publicly available data, CMAP and its planning partners are not in a position to independently estimate the impacts of a potential Kansas City Southern acquisition on rail performance throughout the Chicago Terminal.

We feel strongly that the Surface Transportation Board (STB) should take into account the impact a potential acquisition would have on the national rail system, economic competition, and congestion due to grade crossing blockages. For this reason, we urge the STB require rail carriers to publicly release information and data about the potential benefits and harms to the public interest so that stakeholders like CMAP can better understand impact this would have on metropolitan Chicago.

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Erin Aleman

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Once again, we urge the STB to carefully consider the impacts a potential acquisition would have on the freight network and communities in the Chicago region. We believe additional data and information is needed, and should be made available to the public, to understand the potential substantial impacts a merger would have on metropolitan Chicago.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erin Aleman', with a long, sweeping underline that extends to the right.

Erin Aleman

Executive Director

TM:EA/stk

cc: All Parties of Record