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Joshua Wayland
Surface Transportation Board
Environmental Filing, Docket No. FD 36500
c/o VHB
940 Main Campus Drive Suite 500
Raleigh, NC 27606

RE: Comments on Canadian Pacific and Kansas City Southern Merger Draft Environmental Impact Statement - Docket FD 36500

Dear Mr. Wayland:

I am submitting these comments regarding the draft environmental impact statement (DEIS) for the Canadian Pacific (CP) acquisition of the Kansas City Southern (KCS). My remarks pertain to northeastern Illinois, the counties of Cook, DuPage, Kane, specifically the portions within the current Chicago urbanized area (UA) west of Chicago city.

Two things that should be emphasized further in the analysis are the history of train traffic on the subject line and the extent of surrounding urbanization. First, according to Table 2.2-1. of the DEIS, the number of freight trains between Bensenville Metra and Randall Road will increase from about 3.2 to 11.4. While this is an increase of about 250 percent, when considering the 40 daily weekday Metra trains, it is only about a 19 percent increase. Further, the Chicago Metropolitan Area for Planning (CMAP) reported a range of 7-12 freight trains daily on the segment (CMAP, 2018). Thus, the increase in trains could be considered negligible. Canadian Pacific has stated that the proposal will result in less freight trains than historic peaks (Putzger, 2022). To substantiate this, the DEIS could be improved by comparatively quantifying data for train miles per track mile and car miles per track mile for the historic peak against the proposed action. Such data could be added by segment to Table 2.2-1 of the DEIS.

Insight on the amount of railroad traffic issue is provided by the following comparative data. Table 3.1-2. in the DEIS reports total main track train-miles for CP and KCS of about 18 million. The combined companies have about 21,400 miles of track. This is about 841 train miles per track mile (18M train miles/21,400 track miles). The Milwaukee Road operated the subject line for most of the 20th Century. A 1950 Milwaukee Road annual report (p. 32) reported respective total systemwide train miles and road miles of 26.5 million and 10,671. Assuming road miles and track miles are equivalent, this computes to 2,483 train miles per track mile (26.5M train miles/10,671 track miles). Thus, recent train traffic is about one-third that of a period when train traffic was likely at or near its peak.

The second point concerns mitigation. Most if not all Chicago UA railroad lines have been in existence for more than 100 years. Some of these currently accommodate far more freight trains than numbers projected for the subject line (CMAP, 2018). In 1900, similar to all of the Chicago area railroads, very little of the subject line west of Chicago city was in the present UA (less than about 10 percent). By 1950, more than 50 percent was in the UA. By 2000, this increased to 100 percent (Encyclopedia of Chicago, 2000).

The precipitous urbanization surrounding the subject line and all railroads in the Chicago UA was a collective decision by the public through their elected officials. The resulting conflicts were not created by the railroads. Further, suburbanization in the Chicago UA imposes exorbitant social costs on the region such as excessive roadway travel demand, congestion, traffic accidents, deaths and injuries (e.g., Arkell, 2021); poor health (e.g., Douglas et al., 2011); biodiversity losses (e.g., Simkin et al., 2022); global warming (Bart, 2010); and inner city violent crime (e.g., Skogan, 1977; Stafford and Gibbs, 1980; Farley and Hansel, 1981). Consequently, it would be irrational for CP to substantively mitigate impacts caused by entities choosing to reside and work near the subject line while disproportionately contributing to much larger problems.

40 CFR § 1502.22 articulates the option to conduct a cost-benefit analysis as part of the environmental review. A social cost-benefit analysis is recommended to quantify all conventional and social costs or externalities and benefits resulting from the merger. Such an evaluation would provide further clarity on the impacts.

In summary, the following main points are provided by DEIS section regarding impacts of the CP-KCS merger to the Chicago UA west of Chicago city:

- Proposed Action and Alternatives:
 - The increase in number of trains appears negligible compared to historic peak traffic on the subject line and all area railroads. For clarity, the DEIS could more precisely document past and current train miles per track mile and car miles per track mile.
 - For improved transparency, the DEIS could include a social cost-benefit analysis to monetarily quantify value of the undertaking to society.
- Mitigation: Since the subject railroad line preceded area urbanization, it is not incumbent upon CP to mitigate the majority of perceived or real impacts. It is recommended that the DEIS mitigation section emphasize this point and underlying justification to improve accountability by the local communities for self-imposed impacts.

Thank you for the opportunity to comment.

Sincerely,



Reginald Arkell, AICP

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