



547 W. Jackson Blvd. Chicago, IL 60661 (312) 322-6900 TTY# 1-312-322-6774

November 9, 2012

Ms. Diana Wood
Surface Transportation Board
395 E Street , SW
Room 1110
Washington, DC 20423

RE: STB Docket No. FD 35522: CSX Transportation (CSXT) Acquisition of the "Elsdon Sub"

Dear Ms. Wood:

Thank you for the opportunity to review and provide comment on the draft Environmental Assessment for the proposed CSX Transportation (CSXT) Acquisition of the "Elsdon Sub" of the Grand Trunk Western Railroad Company (STB Docket No. FD 35522).

We appreciate the attention given to Metra's concerns expressed in our letter of July 15, 2011, but it is unclear whether the proposed voluntary mitigations and mitigation measures will sufficiently address the concerns we identified.

Metra's primary concern with the proposed transaction is that the proposed mitigation measures do not sufficiently address the potential for increased delays to Metra passenger service on the SouthWest Service Line that may result from this transaction. There does not appear to be sufficient space to hold a freight train on the Elsdon Sub in the vicinity of that Subdivision's crossing of the NS at the Ashburn crossing, either to the north or south, without blocking a significant number of street crossings if a CSXT train has to be held to allow a commuter train to proceed. The current routing of CSXT trains across the Norfolk Southern (NS) at Ridge on the IHB allows CSXT freight trains to be held to north of the crossing with limited impacts on the surrounding community. While the EA contends that freight trains will only be dispatched onto the Elsdon sub when they have clear signals to traverse the length of the Elsdon sub, NS will continue to control the Ashburn crossing. If NS gives contractual priority to passenger trains and causes CSXT freight trains to be stopped on the Elsdon sub blocking nearby street crossings, this will become problematic for the surrounding community and will likely create community pressure to keep freight traffic moving through the corridor. The freight cross traffic is already a significant source of delay for Metra SouthWest Service customers with 38 delays at Ashburn and 36 at Chicago Ridge in 2011. Metra has serious concerns about any project that has the potential to increase delays for the 2.5 million annual passenger trips that take place on this line.

These potential delays further concern Metra as the existing high level of crossing traffic at Ridge would be shifted to and expanded at Ashburn. Ridge is identified as a candidate for grade separation in the CREATE program, while Ashburn is not, so the proposed transaction shifts traffic from a crossing location planned for grade separation to one where no such separation is planned or anticipated.

In light of these concerns, and to protect Metra's ability to operate high quality commuter rail service serving Northeast Illinois, Metra requests that the STB take the following additional actions.

1. The STB should require CSXT to evaluate the feasibility of a grade separation at Ashburn to alleviate concerns about delays at this crossing created and exacerbated by the proposed transaction.
2. The STB should monitor delays to Metra trains at both Ashburn and Ridge crossings for a minimum period of three years after the completion of the transaction to determine if the transaction results in a net increase in commuter train delays between the two crossings, and if this is determined, require that CSXT take corrective action to reduce those delays whether that be in the form of limiting the length of freight trains, creating grade separations or other appropriate corrective measures. Thereafter, should the transaction results in commuter train delays between the two crossings, CSXT should be required to take corrective action to reduce those delays with the appropriate corrective measures.

Voluntary Mitigation 8 and Mitigation Measure 3 require CSXT to engage Metra in exploring all options for future service and negotiate with Metra to the extent practicable regarding impacts to commuter rail service. We have had discussions with CSXT related to the proposed SouthEast Service, but the specific impacts of this transaction were not discussed. We look forward to additional engagement surrounding these issues, but we again request that as a condition of the approval of this transaction a specific commitment be made to evaluate and mitigate any reduced capacity to operate commuter service on the Villa Grove Sub that results from this transaction.

We appreciate the opportunity to provide feedback on this proposed transaction, and we look forward to working with CSXT and the Grand Trunk Western Railroad Company as this transaction proceeds.

Sincerely,



Alexander D. Clifford
Executive Director/CEO

cc: J. Bauer, Metra
L. Ciavarella, Metra
D. Orseno, Metra
T. Stuebner, Metra