



NORTHWESTERN FLAVORS, LLC

120 North Aurora Street
West Chicago, Illinois 60185
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September 26, 2008

Surface Transportation Board
Attn: Phillis Johnson-Ball
Environmental Filing
395 E Street, SW
Washington, DC 20423

RE: STB Finance Docket No. 35087

Dear Ms. Johnson-Ball:

I serve as Factory Director of Northwestern Flavors LLC, a wholly-owned subsidiary of the Wm. Wrigley Jr. Company that has operated a production facility at 120 North Aurora Street in West Chicago, Illinois for the past 59 years.

On behalf of both our business and the 36 employees who work at our facility, I write to voice concern and opposition regarding the proposed acquisition of Elgin, Joliet & Eastern Railway (EJ&E) by Canadian National Railroad (CN).

According to estimates provided by CN, this deal would increase the average number of daily trains from 4.4 to 24.4 on the EJ&E rail segment that runs through West Chicago north of the Union Pacific (UP) tracks. On the rail segment that runs south of the UP tracks, CN estimates an increase from 10.7 to 34.5 trains per day.

The sole driveway to our facility off of North Aurora Street is traversed by the EJ&E rail line, as depicted in the attached schematic. With the current EJ&E traffic of approximately 5 trains per day, with passing times that are sometimes as long as 10 minutes each, we already experience periods of no access to and no egress from our facility. In addition, an average of twice per month, trains are stopped on the EJ&E tracks over our driveway for approximately 20 minutes, thus creating a more serious problem.

In addition, our facility is also greatly affected by the east-west travelling UP trains, which – with more than 100 trains per day – restrict access to our facility by blocking North Aurora Street.

The projected increase in the volume of train traffic that would be associated with the proposed CN/EJ&E deal – together with the projected increase in train length – would unquestionably result in more frequent blockages of both the driveway to our facility and North Aurora Street, with negative impact to both our access to emergency services and our ability to move ingredients and finished goods in and out of our facility as our business requires.

Additional train traffic as a result of this deal also would exacerbate an existing public safety issue related to truck traffic. To access our facility, trucks must cross both the EJ&E tracks and the UP tracks eastbound on Washington Street and then turn north onto North Aurora Street. Already with the current high level of trains on the UP line, westbound traffic on Washington Street becomes backed up toward downtown West Chicago, making it difficult for trucks to turn north onto North Aurora Street.

As a result of traffic backups caused by the current number of trains, trucks have become stranded on the EJ&E and UP tracks and have been forced to turn onto North Aurora Street

many times after the railroad gates have already lowered. These gates have been replaced on a monthly, weekly or sometimes even daily basis due to trucks striking the gates to avoid a collision with an oncoming train.

After the trucks turn onto North Aurora Street they then have to cross the EJ&E line again upon entering our driveway. There are no gates at this crossing and the current EJ&E building blocks the view of approaching northbound trains, creating another significant hazard.

If – as CN has indicated – the new trains would be approaching at the faster speed of 40 mph (versus the current 10-20 mph) this high hazard crossing will become an area of even greater concern for our employees and for the numerous trucks that serve our facility on a daily basis.

For the reasons outlined above, Northwestern Flavors LLC respectfully requests that the Surface Transportation Board carefully consider all ramifications of this acquisition, and in the interest of ensuring the public safety of our employees and the efficient operation of our business and other businesses of West Chicago, I urge the STB to vote against this proposal.

I appreciate the opportunity to offer comment on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Bicking". The signature is fluid and cursive, with the first name "Don" and last name "Bicking" clearly distinguishable.

Don Bicking
Factory Director
Northwestern Flavors, LLC
120 North Aurora Street
West Chicago, IL 60185

Attachment (1)

ATTACHMENT

Northwestern Flavors LLC Facility, 120 North Aurora St, West Chicago IL

