

County Board Office



LakeCounty

03156. 012508. O' KELLY. HOEL. 60085. X.N.

18 North County Street - 10th Floor
Waukegan, Illinois 60085-4351
Phone 847 377 2300
Fax 847 360 7322
Web <http://www.co.lake.il.us/>

January 25, 2008

The Honorable Anne K. Quinlan, Esquire
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 the opportunity to comment on the proposed acquisition of the EJ&E West Company by the Canadian National Railway Company. As the Chair of the Public Works and Transportation Committee of the Lake County Board, I would like to relate to you my comments on the proposed transaction and the scope of the Environmental Impact Statement.

The rerouting of freight traffic on to the EJ&E presents Lake County with a number of issues. We in Lake County understand that regionally, moving freight traffic efficiently around and through the City of Chicago is currently and will continue to be a major challenge. We also recognize that the CN's goal of shifting the majority of its traffic onto the EJ&E may provide benefits to improve freight but will be detrimental to some communities. While those Lake County communities located south of the Leithton interlock may realize some benefits due to reductions in freight traffic, those along the EJ&E west of Leithton will experience significant increases. My district includes Mundelein where the shift will negatively impact residential neighborhoods.

Your agency's review of the CN's acquisition of the EJ&E and the resulting operational changes must carefully balance the anticipated transportation benefits against the local and regional impacts. We are supportive of the Surface Transportation Board's (STB) decision to require a full Environmental Impact Statement (EIS) to measure the effect of the operational changes that will result from the acquisition. We understand that there are a myriad of unanswered questions at this point in the process. We believe that a thorough analysis of the impacts coupled with an extensive public involvement component is the

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prudent course of action to pursue prior to making a final decision on this proposal.

The scope of the EIS should address the impacts of the acquisition over a longer time horizon than the 3 to 5 years beyond STB approval. Lake County would much prefer 10 years beyond STB approval as the horizon. The scope of the EIS includes analysis of at-grade crossings involving only those highways currently carrying 2,500 vehicles per day. This threshold should be changed to analyze projected 2030 traffic levels. Similarly, the regionally approved long-range socio-economic forecasts should be employed to analyze anticipated impacts on land use, population and job growth. The 10-year horizon should also be used to estimate future levels of train traffic. Consideration should also be given to include some mechanism for tiered mitigation beyond the 3 to 5 year foreseeable future. Such tiered mitigation should correlate to defined threshold levels of rail traffic. Any accommodations for tiered mitigation will require that long-term STB oversight is maintained to ensure compliance.

Lake County also deems it important that the EIS address the issue of future commuter service on the EJ&E line. The adopted regional transportation plan for northeastern Illinois, "Shared Path 2030", has identified the EJ&E as the rail facility that will eventually accommodate the proposed Suburban Transit Access Route (STAR Line). A lot of work by numerous agencies has taken place to establish the feasibility of the STAR Line project. We feel that the future of this proposed transit service should receive a thorough analysis as part of the EIS process.

We understand that there is much work to be done before a Record of Decision is issued on this acquisition. Lake County plans to monitor the EIS and STB approval processes and is prepared to assist as may be appropriate.

Very truly yours,

Diana O'Kelly

Diana O'Kelly
Chair Public Works and Transportation Committee

Surface Transportation Board

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Division of Transportation

Martin G. Buehler, P.E.
Director of Transportation/County Engineer600 W. Winchester Road
Libertyville, Illinois 60048-1381
Phone 847-362-3950
Fax 847-362-5290**Fax Transmission**

To: Anne K. Quinlan
Acting Secretary
Surface Transportation Board Fax #: (202) 245-0458
Diana O'Kelly
Chair, Public Works and Transportation
From: Committee, Waukegan, Illinois Date: 1/28/08

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