

**NORTHWEST MUNICIPAL
CONFERENCE**



***Celebrating 50 Years of
Excellence in Local Government Service***

February 13, 2008

Ms. Phillis Johnson-Ball
Section of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Environmental Filing, STB Finance Docket No. 35087 (via E-Filing)

Dear Ms. Johnson-Ball,

Thank you for the opportunity to comment on the proposed scope for the Environmental Impact Study of the Canadian National's proposed acquisition of the Elgin, Joliet, & Eastern railroad. The Northwest Municipal Conference (NWMC) is a council of governments serving the north and northwest suburbs of Chicago, with a membership of 47 municipalities and three townships, and a combined population of over one million residents.

The communities of the Northwest Municipal Conference appreciate the broader impact that this proposed acquisition can have on the local, regional, and national freight network. Some members have the potential to see a dramatic drop in the number of trains, while others face considerable disruption due to increases in freight traffic. However, there are a number of concerns that are collectively shared and deserve detailed consideration in the EIS. We are pleased to see that many of these issues are already addressed at some level in the proposed scope.

Impact on Proposed STAR Line Service

Village Presidents, council members and staff from NWMC communities have been leaders for well over ten years in championing the much needed suburb-to-suburb commuter rail line known as the Metra STAR Line. Potentially the first of its kind in the country, the STAR Line would ease congestion in the northwest, west, and southwest suburbs and encourage redevelopment and transit-oriented development at station locations. The proposed route runs along the EJ&E tracks from Joliet north to Hoffman Estates, then east along the Jane Addams (I-90) Tollway to the O'Hare International Airport area. All communities along the line have contributed resources to consulting services, staff time, and many have acquired land or made zoning and comprehensive plan changes at potential station locations.

However, CN's plans would prohibit Metra from running service as planned on the existing EJ&E, and instead require Metra to construct its own parallel tracks

- MEMBERS**
Antioch
Arlington Heights
Barrington
Bartlett
Buffalo Grove
Carpentersville
Cary
Crystal Lake
Deerfield
Des Plaines
Elk Grove Twp.
Elk Grove Village
Evanston
Fox River Grove
Glencoe
Glenview
Golf*
Grayslake
Hanover Park
Harwood Heights
Hawthorn Woods
Highland Park
Hoffman Estates
Inverness
Kenilworth
Lake Barrington
Lake Forest
Lake Zurich
Libertyville
Lincolnshire
Lincolnwood
Morton Grove
Mount Prospect
New Trier Twp.
Niles
Northbrook
Northfield
Northfield Twp.
Palatine
Park Ridge
Prospect Heights
Rolling Meadows
Roselle
Schaumburg
Skokie
Streamwood
Vernon Hills
Wheeling
Wilmette
Winnetka

President
Anthony Arredia
Des Plaines

Vice-President
Karen Darch
Barrington

Secretary
Jill Brickman
Northfield Township

Treasurer
James H. Norris
Hoffman Estates

Executive Director
Mark L. Fowler

*Affiliate Member

within EJ&E right-of-way. This added cost could jeopardize the project and the potential transportation and development benefits associated with it. The EIS must take into consideration the impact that the proposed purchase will threaten the future of this innovative transit service.

Impact on Existing Metra Service

Existing Metra service on three lines will be impacted by the proposed purchase. Freight traffic on the Wisconsin Central, used by Metra's North Central Service is projected to drop under the proposed purchase. However, these projections are only for three years, leaving the future for expansion of service unknown. The EIS must consider longer term projections and whether the traffic decrease will allow for more transit service in the future.

The Metra Union Pacific Northwest Line intersects with the EJ&E in Barrington and the Milwaukee District-West Line intersects with the EJ&E in Bartlett. These two lines collectively serve over 56,000 riders each weekday. Beyond the EJ&E, both of these lines serve fast growing areas in Lake, McHenry, and Kane Counties. Additionally, Metra has completed a federal Alternatives Analysis for a large expansion of service project on the UP-NW line. The EIS must take into consideration potential service disruptions to current Metra service on these lines and restrictions on future growth due to volumes on the EJ&E.

Need for mitigation efforts

Under the proposed purchase, communities with minimal levels of freight traffic currently would see a dramatic increase, disrupting established traffic and development patterns. The need for mitigation efforts including underpasses and grade separations with substantial CN involvement must be explored to prevent simply shifting gridlock from one portion of the region to another. The NWMC urges the STB to work with local communities to address specific mitigation efforts to ensure the viability of both well-established and fast growing areas.

Impact on existing or planned quiet zones

Under federal rules published in 2005, new quiet zones of a half mile or more could be created if all crossings in the zone met a minimum safety standard and the collective risk of the zone fell below preset safety thresholds. Since that time NWMC and non-NWMC municipalities have worked cooperatively to create quiet zones along rail lines which had limited or no pre-existing quiet zones. In 2007, a quiet zone went into effect along the CN-owned Wisconsin Central line from Antioch to Prospect Heights, and thousands of residents have benefited from the reduced horn sounding. Also in 2007, a quiet zone was created which now runs between Martin Luther King Drive in North Chicago and Oakwood Drive in Lake Zurich. The next stage in this quiet zone, set to take effect in February 2008, would stretch from Main Street in Barrington to West Bartlett Road in

Bartlett. The goal of the communities is to incorporate the remaining crossings in Barrington and Lake Zurich during 2008.

Given the resources invested and benefits to residents along the EJ&E, the EIS must take into consideration these existing and pending quiet zones and what mitigation efforts, including highway and crossing improvements, may be necessary to keep them in place.

We appreciate the work that the Surface Transportation Board has done so far in this process and look forward to being a resource in the future. Please contact Mike Walczak, Program Manager for Transportation at 847-296-9200 x34 if you have any questions.

Sincerely,

Bill McLeod
Chair, NWMC Transportation Committee
Mayor, Village of Hoffman Estates

Kerry Cummings
Vice Chair, NWMC Transportation Committee
President, Village of Glenview

Cc: NWMC Executive Board
NWMC Transportation Committee