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15 February 2008

Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Attention: Phillis Johnson-Ball
Environmental Filing
STB Finance Docket No. 35087

Re: Finance Docket No. 35087, Canadian National Railway Company and
Grand Trunk Corporation - Control - EJ&E West Company

Dear Ms. Johnson-Ball,

I am writing to express my support for the application by the Canadian National Railway Company and Grand Trunk Corporation (CN) to control the EJ&E West Company (EJ&E). I believe that this transaction will have a major beneficial impact on the Chicago area, the state and the nation. It will improve safety, transportation efficiency and reduce risk and environmental impacts.

As background about myself, I have been involved with research and teaching in railroad transportation engineering, safety and environmental performance for almost 20 years. I am currently an associate professor in the Civil and Environmental Engineering Department of the University of Illinois at Urbana-Champaign where I also serve as the Director of the Railroad Engineering Program. I teach four different courses in railroad engineering and transportation and am extensively involved with a variety of research topics related to rail engineering, transportation technology, environment and hazardous materials transportation safety and risk.

Before taking my current position in 1998, I worked for ten years in the Washington, DC office of the Association of American Railroads where I had principal responsibility for the railroad industry's environmental and hazardous materials safety and risk-related research programs. Over the course of my career I have authored, co-authored or edited over 70 books, chapters, reports, and papers describing a wide range of research results related to railroad transportation, especially in the areas of environmental impact, hazardous materials safety and risk. Until last year, I served as Chairman of the Executive Board of the Rail Group of the Transportation Research Board and am currently the Chairman of the Rail Transportation Committee of the American Society of Civil Engineers and serve as the Rail Transportation Area Editor of the Journal of Transportation Engineering.

As such I am well aware of the critical importance of the Chicago region to the nation's rail network and the critical need to improve the efficiency with which railroad freight and passenger traffic traverses the region. I am concerned as a citizen and as a transportation educator and professional that as a nation we are not doing enough to improve the capacity of our rail infrastructure to accommodate the anticipated growth in rail traffic. Failure to do so will negatively impact safety, the environment, and our economy, and thus the general well-being of U.S. citizens. I believe that the CN proposal to control the EJ&E is a distinctly positive step toward the goal of improving our nation's transportation infrastructure and rail transport efficiency for reasons I briefly describe below.

As I am sure you understand, the Chicago Region Environmental and Transportation Efficiency Program (CREATE) is a vital element in the long-term plans to address the congestion and capacity problems of the rail network in Chicago. Evidence of its importance is evident from the broad range of support demonstrated by the major freight railroads, Amtrak, Metra, the City of Chicago and the State of Illinois. I applaud these railroads and the other stakeholders for their support, cooperation and participation in this important project. The CN application to control the EJ&E is separate from the CREATE project but I believe the EJ&E transaction is an excellent complement to CREATE.

Although CN's proposed control of the EJ&E will not, by itself, resolve the rail congestion problems that CREATE intends to address, it will remove the majority of the CN's through traffic from Chicago thereby providing substantial relief to those lines in the Chicago terminal area affected by CN's traffic. It will enhance the benefits to the national rail system when CREATE is completed, and in the meantime provide near-term benefits. Since the CN plans to integrate the EJ&E into its network much sooner than the date by which the overall CREATE project would be completed, the region will see immediate benefits in terms of reduced environmental impact and improved safety, and the nation will see immediate economic benefits in terms of more efficient transportation of freight through the Chicago area. These benefits will continue to accrue after CREATE is completed. CN's control of the EJ&E could result in the need to make some changes to the CREATE program and all parties should be involved in the consideration of these to ensure the optimal outcome in restructuring the region's rail transportation infrastructure and operations.

As already mentioned, the transaction will have the effect of removing a substantial amount of rail traffic from the Chicago network. This traffic will be transferred to the EJ&E line circling the city. Although this might be perceived as a "zero-sum" gain and not yield a net benefit, in fact the relocation of CN traffic will yield substantial benefits for reasons fundamental to transportation capacity analysis and planning.

- 1) Rail traffic delays increase exponentially as a railroad line approaches and then exceeds its capacity. As a consequence of this non-linear relationship between traffic and delay, the benefit of removing traffic from a congested line more than offsets the additional delay that will accrue due to addition of the same amount of traffic to a less congested line. The result is a net reduction in total delay. If the CN carries out satisfactory upgrades of the EJ&E route, as I believe they intend, this will be precisely the situation described above. CN will achieve a net gain in its transportation efficiency

through the region. Furthermore, all the other railroads whose traffic is currently sharing routes with CN's traffic in the Chicago network will also achieve the same exponential reduction in delay, so the CN transaction will benefit other railroads operating in Chicago in addition to its direct benefits to CN.

2) Part of the reason for the Chicago rail network's congestion is the many at-grade crossings and junctions. A train on one line frequently delays trains on other lines. Because of the denser, more congested network of rail lines within Chicago, there is a greater tendency for a "gridlock" type effect in which traffic from different lines affects traffic on other intersecting lines. Removal of the CN traffic will thus reduce these kinds of effects thereby improving the fluidity of the remaining traffic that must traverse the Chicago network. Although the EJ&E has many railroad crossings at-grade as well, the density of intersecting rail lines is less so the cascading effect of train delays on one line affecting others will be less compared to the same train volume operating within the Chicago terminal.

A corollary to these reductions in delay is the reduction in environmental impact. Trains will spend less time traversing the region and require fewer stops and starts. Locomotives will consume less fuel and expel fewer emissions thereby reducing the production of noxious pollutants and greenhouse gases. Furthermore, the resultant improvement in fuel efficiency has intrinsic benefits of its own as the nation tries to reduce its dependence on foreign petroleum resources. In short, the enhanced operational efficiencies will reduce fossil fuel consumption and improve air quality in the Chicago region.

As for hazardous materials traffic through the region, all of the points made above apply. Hazardous materials will travel more quickly along less populated routes around the city rather than through it. This has obvious safety benefits. In the event that there were to be an accident, fewer people would be exposed to the risk of a hazardous materials release. The average population density is roughly 2.5 times higher along the CN lines within the belt formed by the EJ&E, than along the EJ&E itself. There is a similar ratio of the total number of people potentially exposed along CN's lines compared to the EJ&E route outside the city. Furthermore, certain CN lines are within 1.25 miles of the Chicago central business district. These differences in population exposure translate directly to a reduction in risk due to hazardous materials transport in the Chicago region.

The differences in operation and population exposure discussed above both equate to security benefits as well. Chicago is one of the Transportation Security Administration's (TSA) designated High-Threat Urban Areas (HTUA). TSA's goal is to minimize exposure of the population to hazardous materials traffic through these areas. Routing traffic out of the high population areas and moving it more expeditiously are two of the key means by which this can be accomplished. The CN plan to route its traffic on the EJ&E will achieve both. Instead of hazardous materials traffic slowly wending its way through the densely populated Chicago railroad network with its frequent delays, it will travel with less delay along the less densely populated EJ&E route outside the city.

A major role of the Surface Transportation Board is to holistically consider the benefits of this transaction and determine what is best overall, rather than be influenced by local or parochial interests of those who perceive that the proposed changes will be harmful to them. The CN proposal has substantial net benefits for transportation efficiency, safety, security, the environment, as I have discussed above. However, the interests of the parties who will be affected should also be considered. It is reasonable to expect CN as a responsible corporate citizen to mitigate those areas that will experience an increase in traffic in a manner consistent with state, national and industry standards. Furthermore, CN's plans should not adversely affect the public transportation services offered by Amtrak and Metra. Thus, CN and the affected parties should undertake sincere, constructive, good faith discussion about what is required and then follow through with implementation of plans to accomplish the necessary mitigation.

Taken as a whole, I believe that the CN/EJ&E transaction offers numerous transportation and environmental benefits and is consistent with the vital, long-term goal of continuing to invest in the nation's railroad infrastructure. The health of our economy and the quality of life of our citizens are both dependent on railroads' capacity to provide safe, reliable, energy efficient transportation and to expand their role in regional and national transportation. Through its investment in the EJ&E the CN transaction will convert an underutilized transportation asset to a much more useful link in the national transportation network. Furthermore, it will remove traffic from the badly congested Chicago rail network, thereby improving the efficiency of other railroads' use of those assets as well.

Thank you for your consideration of my comments on this matter.

Sincerely,



Christopher P.L. Barkan, Ph.D.