



**Regional
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Authority**

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

Environmental Filing, STB Finance Docket No. 35087 (CN/EJ&EW)

Dear Ms. Johnson-Ball:

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HDR

We thank the Surface Transportation Board for this opportunity to comment on the scope of the Environmental Impact Statement (EIS) for the proposed Canadian National Railway Company's acquisition of the EJ&E-West Company. These comments reflect the position of the Regional Transportation Authority of Northeastern Illinois. The RTA was created by the State of Illinois to ensure adequate public transportation in the six county area surrounding Chicago. The RTA provides funding, strategic planning and oversight for three operators, Metra commuter rail, Pace suburban bus, and the Chicago Transit Authority.

RTA participated in the Agency Scoping Meeting, held on January 23, 2008 in Chicago and has contributed to the comments submitted by the Chicago Metropolitan Agency for Planning (CMAP). My comments today reiterate our concerns expressed in those forums. We think the Draft EIS Scope is comprehensive but needs improvement in three areas.

Time Horizon

The use of 3 to 5 years as the "reasonably foreseeable future" for assessing impacts is too short to adequately evaluate key impacts of the potential acquisition.. While we recognize the challenges in forecasting rail traffic over a conventional 20 year analysis horizon, we feel strongly that the environmental analysis needs to encompass activity forecasts of at least 10 years beyond acquisition. As discussed at the Agency Scoping Meeting, there are a number of approaches which can be used to deal with the uncertainty in longer term forecasts.

Existing and Proposed Passenger Rail Impacts

The proposed acquisition's potential impacts on the reliability of existing passenger rail operations needs to be examined carefully. Market research has established the importance of on-time performance to the success of our commuter rail services in attracting passengers. The analysis should include potential actions to ensure reliable commuter rail operations, such as transfer of control of key interlockings to Metra.

The definition of proposed passenger rail service presented in section 2 C. needs to be modified so as to include Metra's planned upgrades to the UP-West and Northwest Lines, and new services on the STAR and SouthEast Service alignments. While construction of these projects is not currently funded, planning is significantly advanced to warrant their inclusion as reasonably foreseeable improvements.

Pedestrian Crossings

The safety impacts section of the draft scope will consider at-grade crossing safety. The focus needs to be extended beyond rail-motor vehicle interaction, to examine pedestrian safety as well. We suggest that areas with pedestrian activity, including planned new commuter rail stations, be studied.

Sincerely,

Stephen E. Schlickman
Executive Director



Metra

