



Barrington Area Council of Governments

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Surface Transportation Board (STB)
395 E Street, S.W.
Washington, DC 20423

Attention:

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

Dear Members of the Surface Transportation Board:

I am writing in my capacity as the Executive Director of the Barrington Area Council of Governments (BACOG) about the Canadian National Rail Road (CN) proposed purchase of the EJ&E Rail Road (EJ&E). BACOG serves the greater Barrington area, including the villages of Barrington, Barrington Hills, Deer Park, Lake Barrington, North Barrington, South Barrington, and Tower Lakes, plus Cuba and Barrington Townships. The region's 35,000 residents are contained in parts of the four counties of Lake, Cook, McHenry and Kane.

BACOG is a regional planning organization that was created in 1970. As I noted in a letter dated 11/12/07, the BACOG Comprehensive Plan provides the framework for BACOG's land use, policies and programs, guiding growth within the area through its goal of a balance between environmental preservation and development. The Plan links the BACOG area's goals to those of the region as a whole. The organization also researches and maps the area's groundwater resources; administers the regional GIS mapping program; provides legislative advocacy for local needs; provides training to local officials; and addresses community development and services issues. It is within this context that I submit comments on the Scope of the Environmental Impact Statement (EIS) for the CN proposed purchase of the EJ&E.

Land Use and Comprehensive Planning

This is a community with an articulated regional plan. The plan has been implemented over the past 38 years, and it has produced an area that is unique for its character and environmental

quality. In addition to offering a wide range of housing choices and business opportunities, BACOG is a green area -- serving to filter the air, recharge the water, shelter rare species of plants and animals, and provide scenic and recreational opportunities for the region and the metropolitan area. The successful implementation of the BACOG plan is a triumph in the state and nation.

The concept of the BACOG regional plan holds the Village of Barrington as the hub that provides community features for all adjacent municipal members of BACOG, such as public transportation, commercial downtown, schools, library, public services and other. Many of the districts are regional by design, consistent with BACOG planning. This plan causes people to travel from outlying towns and neighborhoods to the central town of Barrington for these purposes; it also causes services to be delivered from the hub to the outlying areas. In the regional school district, the single high school is located in Barrington, both middle schools are located in Barrington. The Barrington Area Library district covers all of the BACOG communities, and it has a single library facility in Barrington. The Barrington Countryside Fire Protection District covers a great deal of the BACOG communities, with the primary station in Barrington. The region functions as a whole, with residents from six other municipalities moving in and out of Barrington. It is thus that changes that impact the Village of Barrington also impact the other BACOG communities. The EIS must evaluate impacts of the CN transaction on not only the Village of Barrington, but on all the BACOG municipalities and townships and the region as a whole. Map 1, "BACOG Member Villages & Townships," and Map 2, "BACOG Land-Use Policies Map," describe the area and its land use.

Barrington and the BACOG communities have many progressive planning initiatives in addition to employing traditional planning concepts. Initiatives include "smart" growth and sustainable growth plans, transit-oriented development design in the downtown, conservation design and planned unit developments, "green" growth, etc. Some of the best environmental planning in the state is carried out in the BACOG area, with examples such as the new Flint Creek Watershed Plan, best management practices and ordinances. It is not just traditional development that would be lost under the CN expansion proposal, it is our investment in new planning concepts that are part of the progressive planning movement across the Chicago metropolitan area and the nation.

The land uses planned and implemented in the area will be impacted by the CN proposal for expansion. The proposal is an unanticipated change to the planning assumptions made by the community and in the local and regional comprehensive plans. Residential communities affected by noise and pollution and obstructed by traffic congestion will experience loss of residents to other areas. Abandonment of neighborhoods results in declining property values, and subsequent redevelopment may be significantly different from existing patterns due to changed local conditions and markets. Open space and natural areas will be impacted by the CN proposal, and environmental quality will decline; there may be increased pressure to develop green spaces as local conditions decline. The business community will suffer as businesses are lost as BACOG's regional residents are no longer able to reach Barrington downtown because of congestion and blocked crossings, and shoppers will migrate to other communities for their needs; this will undermine the stability of the local economy. Revenues will decline, local governments' ability to maintain services and infrastructure will be compromised, and residents will see a change in community character and quality. Though these effects on land use may not occur immediately,

they are the real consequences that will be felt by this community as a result of the CN proposed expansion and must be considered in the EIS. An economic impact analysis should be conducted for the greater Barrington area that addresses loss of businesses and loss of tax base.

Maps 3 and 4, "EJ&E Rail Road and Adjacent Parcels - North & South," illustrate existing land uses the large number of developed parcels immediately adjacent to the tracks. In a geographic extent of about nine (9) miles, the maps show all of the parcels within 300 feet of the rail road (in red) or parcels that are partly in a 300 foot buffer around the rail road (blue). An aerial photo from 2005 is the backdrop for this map. Most of the parcels adjacent to the rail road are homes or businesses, and a smaller percentage is open space. Of those parcels contained in the 300 foot buffer, a relatively tiny area in a limited BACOG region, there are 443 parcels - and it is estimated that 85-90% of parcels are built. In the total highlighted parcels (intersect) which number 747, some percentage less than 85% are built but it remains in the majority. All these parcels and their attendant residents or businesses will be directly impacted by noise, construction improvements, emissions, environmental quality diminution, vibrations, and other effects of the CN proposal. The economic impact and loss of value to property owners in the near vicinity of the tracks should be analyzed in the EIS.

An increase in rail traffic will impact residents and businesses adjacent to the rail. The extra trains passing through at grade crossings will increase traffic in all of these areas. Since two different rails pass through Barrington, traffic is already very difficult in addition to regular rush hour traffic caused by more cars traveling at certain hours. The addition of more trains and the fact there are few through roads or optional routes will cause problems not only for the residents adjacent to the rail road, but it will cause problems for everyone who works, lives, or passes through the area.

BACOG planning is linked within, among all the municipal and township plans, and it also has ties to regional plans outside the area. The BACOG regional plan helps to achieve the goals of other regional and county plans, especially through its green components. Changes here will have a ripple effect, thwarting the ability to perform on these agreements outside the area or carry out planning at other levels. Other entities rely on the implementation of the BACOG plan for the success of their plans. The EIS must evaluate impacts on all land use and comprehensive plans in the metropolitan region and the ability of impacted communities to perform on agreements with other entities.

Existing Rail Conditions

Many of the communities that would be impacted by the CN proposal have stated they are not equipped to receive the increased level of traffic. There are rail roads that were built for moving high volumes of rail traffic such as many in the City of Chicago, the hub of the entire metropolitan region. These projects recognized the impacts of traffic on vehicular and pedestrian traffic and were planned and built accordingly, with multiple grade separations to address traffic flow and safety. Other rail roads were built for low levels of traffic, such as the EJ&E, and they do not contain such mitigating features.

In some of the areas where train traffic would decrease as a result of the CN proposal, the rail infrastructure already includes grade separations. In other areas where rail traffic will increase

significantly, such as the BACOG area, there are no high volumes features in place. The EJ&E in this area is not built for this kind of high use, and using track that is not right for high train volumes is not right, especially when track that IS right for high volumes is available and stands to be under-utilized as a result of the proposed CN expansion. The EIS scope does not provide enough information to consider the safety tradeoffs of removing traffic from downtown Chicago and placing it in the less dense suburban areas surrounding the City. The EIS should analyze the economic and safety impacts of moving high volume rail from existing lines that can already accommodate it to lines that are not prepared or able to accommodate it; the cost of mitigation measures required to neutralize the effects of the rail expansion proposal should be included in the analysis.

Safety

Safety is of highest concern to the BACOG area. The proposal increases the potential for accidents between rail and vehicles, and between rail and pedestrians, at four crossings within the Village of Barrington and nine crossings throughout the BACOG area. Community Unit School District 220, which is a regional district serving all of BACOG, serves a student population of 9,200 over 72 square miles. CUSD 220 has statistics showing that busses cross the tracks a minimum of 375 times daily. The regional nature of the district requires the movement of thousands of children daily. Increased train traffic will add substantially to the risk of busses crossing rail road tracks each trip, endangering thousands of children multiple times a day. The line traverses residential neighborhoods and public areas where children are apt to be near or crossing the tracks. The EJ&E Main Street crossing is only 600 feet east of the CUSD 220 high school, and hundreds of students walking from town must cross the line on foot every day to get there. The risk to bussed students, walking students, and driving students will increase dramatically.

The additional traffic also poses a safety threat to residents of the entire BACOG region because of vehicular traffic congestion and gridlock that will result from blocked crossings. One idling CN train at the stated length of 7,500 to 9,500 feet has the potential to block all four Barrington crossings at the same time. This is represented in Map 5, "EJ&E Crossings". Blocked crossings will effectively split the community into halves -- though emergency response, medical care, education and every other aspect of life in the greater Barrington area is planned and addressed as a whole.

The proposal will result in increased time of response for medical emergencies to get to a person in need and increased time of transport to Good Shepherd Hospital or another medical facility. This will potentially cause the loss of life. For other emergencies, blocked crossings will mean the inability of police and fire vehicles and personnel to get to accidents, fires and crimes. This also will potentially result in the loss of life, property and personal safety.

The potential for spills of hazardous materials will increase due to increased number of trains carrying such materials. The expanded line will service freight from include steel, coal, plastics and processing industries. Trains will carry chemicals in highly populated areas such as the Village of Barrington and near schools and other points of congregation. Map 1 shows points of congregation in the vicinity of the tracks, in the relatively small portion of BACOG depicted, that include at least seven schools, five fire/police stations and village halls, public works

facilities, a regional library, ten or more parks, multiple churches, two retirement housing facilities, a nursing home, and numerous other facilities that contain high numbers of people. These facilities and the numbers of children and adults served should be considered in the EIS scope of evaluation.

In light of recent reports of derailments, spills and safety issues on CN lines, the company's operational safety record and maintenance plans in both Canada and the United States should be examined. The ability of the Village of Barrington and communities adjacent to the EJ&E line to adequately respond to a derailment, spill or other safety issue should also be part of the EIS evaluation.

Transportation and Traffic Congestion

The CN proposal would create a fourfold increase in freight traffic from approximately five trains per day up to 26 trains per day. These numbers are expected to go even higher in the future as intermodal traffic on CN increases in volume.

The increased train traffic through the area will result in significant traffic congestion and potential gridlock in Barrington. The EJ&E crosses three main arterial roads that carry heavy daily commuter traffic. Route 59, Highway 14 and Lake-Cook Roads currently have a combined average daily vehicle count of 72,000 vehicles traveling through the Village of Barrington. The EJ&E also crosses the Metra Union Pacific Northwest (UP) line that travels from Harvard to downtown Chicago. The Metra UP carries 42 trains that cross the line during weekday commuter rush hours, and an average total of 65 Metra & UP trains that cross the line each week day.

Congestion will result in a host of far-reaching side effects, such as increased vehicular fuel use and greater levels of pollutant emissions to the air, as cars, truck and busses idle and wait for blocked crossings to clear. Arterials and local roadways will experience increased traffic from vehicles seeking a way around blocked crossings or around the town of Barrington. Drivers unfamiliar with the area will investigate ways to get around the train traffic, causing confusion on the roadways and more traffic in areas that are not through streets. This will disrupt traffic patterns for the roadway network with negative consequences to transportation planning, infrastructure and maintenance. Additional funding will be needed to maintain local roads which become "cut-throughs" and experience high traffic levels they were not designed to carry.

Motorists delayed by blocked crossings may experience a different kind of safety risk, through the use of cell phones, text messaging and other electronic activities. For example, text messages started while idling in traffic waiting for clearance may be completed as vehicles begin to move - causing very dangerous situations.

There are likely to be extensive delays in moving people and goods into and through the village of Barrington and the BACOG region. There may be an effect on growth in McHenry County and regions to the west because of residents' and businesses' inability to travel to work, to shopping and for services. The cost of the congestion caused by the CN expansion is loss of productivity for the residents and businesses of this area and depressed growth.

The EIS scope should evaluate traffic effects on arterials and local roads well beyond Barrington's boundaries. It should include an analysis of increases in vehicular fuel usage and increase in vehicle emissions due to additional traffic congestion and idling time.

Locomotive Engines and PM

Particulate pollutants, particulate matter (PM), are of major concern. PM is composed of minute particles and liquid droplets and can consist of a number of components including acids, metals, soil or dust particles, and organic chemicals. According to the USEPA, "diesel-powered vehicles and engines contribute more than half the mobile source particulate emissions", and diesel-powered vehicles and equipment account for almost half of all nitrogen oxides emission.

Human exposure has detrimental effects on the heart and lungs. There is a direct link to the potential for causing health problems, with smaller particles doing the most damage to the human body. Epidemiological studies show there is a correlation between exposure to particulate matter and negative health effects, and the higher the concentration of particles, the greater the effect on health. Exposure is most harmful to people with heart and lung disease, but healthy people who are exposed to elevated levels of PM may temporarily experience symptoms. The *Daily Herald* reported January 28, 2008, that "a growing pile of research suggests that even relatively low levels of air pollution may be more harmful than previously realized, to both heart and lungs." Also reported was that long-term exposures can produce diminished lung function, coughing, wheezing, cardiac arrhythmias, heart attacks, worsening of asthma, slowing of normal lung growth, damage to lung airways, and increased risk of dying from lung cancer and cardiovascular disease. The very young and the very old are most vulnerable to PM pollution.

The very substantial increase in the number of trains, as proposed by CN, will result in increased levels of PM pollutants throughout the region. Even a small increase in risk caused by more trains -- when multiplied by thousands of people breathing PM pollutants -- will result in negative health effects to the regional population such as illnesses and hospitalizations that otherwise would not occur. When combined with idling vehicle emissions from traffic waiting for trains to clear intersections, the damage to air quality and the health of residents is even more grave. The EIS scope should include an in-depth assessment of potential increases in PM pollution and the effect on the public health.

Particulate pollutants also threaten the natural environment and the resources it provides. Particulate pollution is a contributor to acid rain. PM can be carried long distances settling on the ground or water affecting the PH levels and nutrient balance in lakes and waterways, depleting nutrients in soil, and affecting ecosystem diversity. The EIS should include an evaluation of PM increases and the effect on the natural environment.

Groundwater / Water Supply

Groundwater is vital to the Barrington area, and is the only feasible source of water to the entire population. Population growth and development, recent droughts, declining quality and quantity of deep aquifer water, and the lack of other sources of water have increased the need for a greater understanding and reliance upon the shallow aquifer in the Barrington area. An international

treaty protects Lake Michigan water from new draw-downs by local governments, and it is not available to the Barrington area.

In the BACOG communities, the shallow aquifer system supplies water for drinking and all uses to the entire population of over 35,000 and to all businesses in the approximately 80 square mile area. There are only two municipalities in BACOG that provide public water, i.e., Barrington and Tower Lakes. The balance of wells are privately owned, and are either one well per residential property or a community private well (neighborhood). Homeowners and business owners bear the responsibility and cost of drilling and maintaining private wells.

Because of these conditions and concerns, since 2001 BACOG has conducted research on groundwater availability, aquifer geometry and capacity, and has also studied the water wells in the Barrington area. The Illinois State Geological Survey (ISGS) provided BACOG with every private and public water well record (last update 2004) available from the state repository. The database describes each well and the strata each well encounters and at what depth. Map 6, “Water Well Types and Occurrences”, characterizes the types of wells in the Barrington area.

The vast majority of wells in the Barrington area are finished in the shallow aquifer system, which is also the most vulnerable to pollution from the ground surface. Even the municipal water supply in the Village of Barrington is reliant completely on the shallow aquifer system. The four public wells in the Village of Barrington are all less than 305 feet deep. Well no.1 is 305 feet deep, finished in the Silurian dolomite. Well no.2 is 205 feet deep, finished in the Silurian dolomite. Wells no.3 and 4 are 148 and 151 feet deep and are finished in sand and gravel. All formations are part of the shallow aquifer system.

The majority of wells in the Barrington area are private wells (less than 2% of wells are public), and they all draw from the same water source, i.e., the shallow aquifer system. Since every home and business in the area is dependant on the same source of water, any threat to the water system is a threat to everyone who works or lives in the area.

Map 7, “Water Wells in Vicinity of EJ&E Rail Road,” shows the wells that are within 500, 1000, and 2500 feet of the rail road. The pink triangles represent wells that are within 500 feet, the green stars represent wells that are within 1000 feet, and the orange dots represent wells that are within 2500 feet. A digital elevation model (DEM) provided by the United States Geological Survey (ISGS) shows surface elevation as background.

There are more than 25 wells that are within 500 feet of the railroad within the map extent. All wells in the area are symbolized by a smaller dot. All of these locations should be considered points of entry for possible pollutants to the water supply. Many of these locations are at an elevation that is below that of the railroad. If there were a hazardous spill in any of these locations, there is an increased chance pollutants would travel to these points since they are downhill from the source.

Map 8, “Depth to Water Level in Vicinity of EJ& E Rail Road,” describes the water level in relation to the ground surface. This surface was interpolated using information from the ISGS water well data and the recorded water level information (historic). The water levels were subtracted from the ground surface (USGS DEM). The interpolated surface is the best known

data source for this information, and the map shows the depth to the water level in the Barrington area. The water wells nearest the rail road are symbolized to stand out and were overlaid on the interpolated surface. All wells in the area are symbolized by a smaller dot.

There are 2202 wells in the extent of Map 8. (Note: The ISGS database is a historical record and likely does not contain 100% of wells drilled, due to changes in well driller reporting requirements over the years. Additionally, more wells could have been added since data was collected for this project in 2004). In the vicinity of the EJ&E Rail Road the depth to the water level can be estimated to be anywhere from 35 – 135 US feet. These are relatively shallow wells. Of the 2202 wells:

- 15% of the wells are in an area where the water level is less than 50 feet from the ground surface
- 25% of the wells are within 75 feet of the water level
- The majority of wells are less than about 100 feet of the water level
- Over 80% of wells are less than 125 feet from the water level

West of the rail road, the depth to the water level becomes shorter, in some cases the water table is extremely close to the surface. BACOG has additional maps and data to support this information, including maps of area just outside the extent of this close-up map in the vicinity of the rail road.

Recharge is the process by which precipitation reaches and re-supplies the groundwater. After precipitation reaches the ground a significant portion runs off or immediately evaporates. A larger portion infiltrates into the surface soil and a portion of that reaches the aquifers and replenishes the aquifers. Areas within the watershed that have conditions that favor rapid recharge are the main areas where the shallow system groundwater is replenished. Recharge areas provide a fast conduit for precipitation to re-supply the groundwater. The characteristics that encourage rapid refreshment of the groundwater are the same characteristics that favor the travel of contaminants from the surface to the groundwater and which can degrade the groundwater supply. Activities that use materials that might generate contaminants when released to the ground, such as operation of diesel locomotives, have the potential to cause these contaminants to migrate rapidly to the groundwater. Spills of hazardous materials from trains also can be the cause of contaminants reaching the groundwater. Stormwater can carry contaminants on the ground surface away from the spill and into recharge areas, where contaminants may flow vertically into the aquifers. Stormwater also could carry contaminants into surface drainage channels and ponds, lakes and streams.

All groundwater in the Barrington area is recharged locally. Good recharge areas in the Barrington area are also typically west of the EJ&E rail road in Barrington Hills where the water levels are even closer to the ground surface. This area is vital to groundwater recharge in the Barrington area and it is also highly susceptible to pollution from the ground surface. It is characterized by having water levels very close to the surface and very porous materials that enable the transportation of liquids to quickly recharge the underground aquifers.

The scope fails to include specific mention and consideration of groundwater issues or the interaction of groundwater with surface waters and drainage. Groundwater issues are critically important to this area and must be addressed in the EIS. The water supply for thousands of

residents and businesses is generally very close to the ground surface and vulnerable to contamination from activities on the ground. All wells in the area are pulling groundwater from the same source -- the shallow aquifer system -- and thus contamination in one area may very well migrate to other areas and wells in the region. There is no other water supply for the BACOG area, and if there is aquifer contamination from rail activities or spills, thousands of residents, the public health, and quality of life could be severely impacted. It is important that the EIS analyze potential sources of contamination, increased risk due to higher volume of train traffic, geological formations and characteristics, soil characteristics, groundwater flow modeling, stormwater flow, and other factors in the assessment of groundwater issues.

Map 9, "Water Features in the Vicinity of EJ&E Rail Road," shows the surface water and streams, FEMA 500 year floodplains, sub-watersheds, and major watersheds, and wetlands as they were delineated by various government sources. The EJ&E in the Barrington area passes through the Upper Fox Major Watershed and several smaller sub-watersheds (Flint Creek and Spring Creek). All of the water in this area will eventually flow into the Fox River, which drains into the Illinois River. Simply, all of the water in the area drains westward.

The wetlands identified by Lake County and the National Wetlands Inventory, in addition to all waterways and natural areas, are sensitive environmental features that could be impacted by contaminants from rail road operations and construction activities or by spills from derailments. The EIS scope should include in-depth study of the potential for environmental degradation to water features and natural areas.

Biological Resources

Biological resources are also considered a regional resource in the BACOG area, with groups such as Citizens For Conservation (CFC) and the Barrington Hills Conservation Trust (BHCT) created to protect regional open space and resources. Forest preserves such as Cuba Marsh, Spring Creek, Crabtree and other preserves in Lake and Cook Counties, parks, playing fields, fens and bogs are considered resources to the regional population. Many of these areas are in close proximity to the EJ&E rail line and would be affected by the CN proposal for expansion.

The BACOG comprehensive plan describes the regional open space, trails and habitat, including cross-jurisdictional greenways and wildlife movement throughout the region. Construction for double-tracking if any, bed improvements and other expansion activities will destroy rare native species found along existing rail beds. Threatened and endangered species have been identified, and there are unique natural areas such as fens, bogs, prairies and wetlands in the region. Increased rail traffic, pollutants, noise and construction would disrupt wildlife habitat, movement patterns and habitat, and could introduce invasive non-native plant species carried by trains from great distances away to the local rail beds.

Because the region functions as a whole, with residents from all nine local governments sharing regional resources, impacts to properties along the EJ&E rail line would affect all residents in the BACOG region. The EIS must evaluate impacts of the CN transaction on not only the resources of the Village of Barrington, but on the resources of the greater BACOG community because they are interconnected. The EIS should include a study of all threatened and endangered species within several miles of the rail road, conditions of existing habitat, and the potential

changes to habitat as a result of construction activities, noise, air pollution and other environmental changes. The EIS should specify maintenance procedures and strategies for the rail bed for invasive species and vegetative control.

Excess Capacity

The EIS should include an analysis of excess capacity created in communities that are planned to lose train traffic under the proposal, and it should include projected leasing of trackage rights to other rail companies, amount of freight that would run over these tracks, and future uses of excess capacity on those lines. A longer planning horizon than the suggested 3-5 years should be employed, for example, a ten-year horizon. The evaluation should culminate in analysis of regional benefit under future scenarios.

Planning Horizons

The EIS will include an analysis of current traffic and future projections, which are in part based on population projections. The Chicago Metropolitan Agency for Planning (CMAP) is the primary trusted source for population figures for the metropolitan area. Traffic counts and vehicles on the road should not be based on existing conditions. The area is growing, growth is especially rapid in the regions to the west and McHenry County, and the numbers for this growth are available. The EIS should employ CMAP's population projections for 2030 to determine future vehicle counts.

The planning horizon for evaluating the impacts of the CN proposal should be longer than the three to five years previously suggested. Other information is available for a much longer planning horizon, such as CMAP's 2030 plan. The EIS should require train information to be estimated for a minimum ten year horizon.

All Regional Capital Plans Should Be Considered

All planned capital projects, included funded and as yet unfunded projects, should be part of the consideration of the EIS. This should include the STAR line plan.

Cost/Benefit Analysis

The cost/benefit analysis in the EIS should include alternatives to the CN proposal. The costs of mitigation needed in suburban communities as a result of train increases should be included in the EIS, in assessing the economic merits of the proposal. CN representatives have said this line will be the 294 Expressway of the Chicago train system; freight will move through this area from Canada and other countries very rapidly. The economic benefit to impacted communities should be assessed. The economic downside to US taxpayers who will pay for public allocations by federal and state governments for additional mitigation measures should also be assessed.

Mitigation

Any mitigation measures recommended by the STB should be in place before any expanded rail operations are allowed, as required by other federal agencies such as the FAA. If the impact is

recognized, it should be addressed by improvements that are in place before the problem arrives. This strategy would preclude the degradation and problems from occurring.

We would request the STB to require CN's commitment to mitigate the negative impacts of the acquisition and ensure that commitments are honored and implemented under a 10-year horizon of STB oversight.

Stakeholder Process

BACOG supports the suggestion made during scoping sessions to implement a stakeholder process, per the CEQ definitions, which would add a layer in the EIS development. Stakeholders would meet before the draft EIS is issued in order to provide additional data, help develop the issues, and develop mitigation ideas.

Thank you for the opportunity to comment on the scope of the EIS for this project.

Sincerely yours,



Janet L. Agnoletti
Executive Director

cc: BACOG Executive Board:

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