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May 10, 2021

The Honorable Cynthia T. Brown  
Chief, Section of Administration, Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W.  
Washington, DC 20423

ENTERED  
Office of Proceedings  
May 11, 2021  
Part of  
Public Record

**RE: FD 36514, Canadian National Ry. – Control – Kansas City Southern**

Dear Ms. Brown;

As Chairman of the Metropolitan Mayors Caucus Executive Board, an organization that represents the Mayors of the eight-county Chicago region, I am contacting you about FD Docket 36514 and the intention of Canadian National Railway to merge with Kansas City Southern. Our Executive Board urges the Surface Transportation Board to carefully consider whether approval of CN's Voting Trust request is warranted at this time due to the potential that CN's freight trains will further burden the Chicago area with increased road network congestion by adding a significant increase in freight rail volumes.

While our region is a rail hub and has benefitted from the jobs that accompany that reality, the very existence of the CREATE program demonstrates that there must be a careful balancing of the broader public interest when it comes to a merger that has the potential to further burden communities, commuters, and the other regional economic drivers in the region. Whether a particular town has a rail line running through it, or a freight rail line creates roadway chokepoints for neighboring towns and communities, the impact stemming from 25% of U.S. rail freight touching the Chicago region each day is significant in the daily lives of millions living in the region.

For this reason, I respectfully request that the STB not approve the CN Voting Trust motion until it has done a review to answer the following regional concerns, as these impacts should help determine whether a CN-KCS merger is truly in the public interest of the region:

- How would a CN-KCS merger impact Metra operations?
- How would a CN-KCS merger impact Amtrak operations on its five Chicagoland lines given CN's history of issues vis-a-vis passenger rail service?
- To what extent are current CN operations on the former EJ&E rail line in conformance with what the railroad forecast in 2008, and how should updated operations data influence the Board's assessment of CN's operating plans in a 2021 CN-KCS merger?
- How many train movements would be added to all of CN's rail lines in the region, including the EJ&E?
- How many grade crossings in the region would become substantially impacted by increased rail traffic stemming from a CN-KCS merger?
- How would emergency response service times be impacted if more grade crossings are substantially affected?

City of Chicago · DuPage Mayors and Managers Conference · Lake County Municipal League · McHenry County Council of Governments  
Metro West Council of Governments · Northwest Municipal Conference · South Suburban Mayors and Managers Association  
Southwest Conference of Mayors · West Central Municipal Conference · Will County Governmental League

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- To what extent would the merged railroads be required to mitigate community harms at their own expense?

Thank you for your careful consideration of our Executive Board's concerns.

Sincerely,

A handwritten signature in cursive script that reads "Kevin Wallace".

Kevin Wallace  
Executive Board Chairman  
c/o [dbennett@mayorscaucus.org](mailto:dbennett@mayorscaucus.org)

**CERTIFICATE OF SERVICE TO STB DOCKET FD 36514**

I certify that a true and correct copy of this letter from the METROPOLITAN MAYORS CAUCUS has been served this 11th day of May 2021, on all parties of record.

Suzanne M. Devane  
On Behalf of MMC