

Dennis Scheppler
212 North Owen
Mount Prospect, IL 60056

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Surface Transportation Board
Office of Environmental Analysis
395 E Street SW
Washington, DC 20423-0001

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To Whom it May Concern:

The proposed Great Lakes Basin Railroad will have numerous negative consequences on the communities and environment the line runs through. This project is not in the public interest and does not pass a public necessity review.

Building this line will have a severe impact on the rural communities it dissects, many homes and businesses will be rendered unusable/inhabitable due to their close proximity to the rail line. Many of these homes and farms have been in their families for generations. Non-farm businesses will also be impacted, as consumers will seek alternatives in order to avoid crossing a dangerous rail line. While the non-farm businesses can move, unfortunately the farmland will be forever destroyed. Many people have moved from the noisy suburban areas to be in the rural countryside and this line will force them to either tolerate the incessant noise or move yet again. These relocations will harm the environment as yet more land will be taken from elsewhere to accommodate these moves to escape the noise and pollution of the train, and will cost the public money as the moves will need paid for and home values decline. Existing farmsteads and homes abandoned by their families will become nuisances and eyesores. GLBT has no plans in place to help families move or to help restore abandoned farmsteads and home sites to productive uses. Such restoration is extremely expensive and the nominal price GLBT is offering the landowners for the stolen acreage would not cover the cost of restoring homesteads and building new homes away from the tracks. Worse, homeowners, subdivisions and towns will receive no compensation from GLBT for the decreased property values that will result from this line. How are these small rural areas supposed to re-coop the lost tax dollars as housing values fall and farmland is taken

out of production and becomes untaxable? How will farmers be compensated for the loss of income? The price of the land is nominal compared to the loss of income for perpetuity. The smaller a farm becomes the less likely the farm is to remain viable and profitable; rural America can not lose more farms. As you can see these affects are not in the public's interest and will result in the public seeing substantial losses in property values across the area GLBT seeks to build in. This loss of value to thousands and thousands of homes and business allows the STB to deny the project for not meeting public necessity.

Many of the communities this line runs through can be classified as low-income, this line directly violates the U.S. DOT Order 1510.2, compliance with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations (EA 1994), as it targets low-income towns for increased train frequency, increased train noise, increased train vibration, and a significant increase in safety concerns. Vehicle delays in these communities will shift the economies of surrounding areas, as residents will seek alternative providers of goods and services that are located on "their" side of the tracks. This shift will harm the economy of the area as the loss of just a few consumers can greatly affect the profitability of the area businesses. A negative disruption to this fragile economic system further harms low-income communities. The lowering of home values and loss of a portion of the local tax base will further harm the low income towns located near the tracks. This plan unjustly targets low income households in violation of Executive Order 12898. This situation also allows the STB to deny the project as not meeting public necessity requirements. This project harms the public and will result in more poverty in the area.

These rural communities will also face closed roads and increased traffic on main roads that have a rail crossings. These road closures will add miles of additional travel daily for area residents, which will be a severe hardship to the elderly and low income residents of the area, of which there are many. Who will pay for the increased gas these residents must purchase? This line's proposed numerous at grade level crossings are particularly concerning as they pose serious safety risks to travelers. How will safety be maintained in adverse weather? Blizzards are common and switching and signaling devices are known to freeze placing the safety of the crossing in question. In rural areas winters are brutal and a new massive high speed rail line in this area is unprecedented and dangerous given the environment of the area. The safety of the

numerous fly-overs for major roads are also of grave concern as these flyovers will be massive in size, as they must accommodate a 1% grade to maintain train speeds of 70 mph. These fly-overs will need to be at least 25 feet high to accommodate farm equipment; a standard combine is 18 feet tall, as are double stack semi-truck trailers. Having trains speeding along at 70 mph 25 feet in the air is especially worrisome. Most likely higher as GLBT states for one section of their preferred route they can not move to another because the bridges would obstruct air travel. Who will respond when there is an accident on one of these bridges? How will access to this high-speed, with one train every 15 minutes, line going to be restricted to protect pedestrians and the curious? How will the safety of livestock and wild animals be ensured? Where will the materials to create the massive fly overs come from? Whose land will be harmed by the taking of fill materials to build the GLBT bridge/fly-over ramps? The importation of non-native stone and dirt can lead to invasive species being brought into the area. Additionally the removal of trees and other environmental materials from the affected areas can also lead to invasive species being moved to new areas. A good example is the Emerald Ash Borer, many communities already restrict wood being brought into them or taken out, to prevent the spread of this bug. The GLBT proposal will only make travel for the public more difficult and less safe. In terms of traveling for the public there is no public necessity for the line, and as a result the STB needs to deny this project. There are also numerous environmental issues that harm the public, a few were mentioned above, such as the loss of trees that provide beauty and enjoyment to everyone, land destroyed to obtain fill for ramps, and changes to the environment as a swath of the country will be converted to barren railroad tracks, none of these situations are in the public interest.

GLBT's proposal to provide at grade crossing for farmers whose fields are dissected is ludicrous. These crossings will be dangerous for farmers. Tractors are extremely slow moving and one misjudgment of train speed or train location will be deadly. Heavy farm equipment can also harm the tracks resulting in an increased risk of derailments. Who and how are these crossings going to be maintained and how will safety be ensured? There are too many risks associated with these unguarded crossings for slow moving bulky farm equipment to cross them at will, as GLBT proposes. Who too will pay for the insurance needed to allow for private rail crossing, anyone crossing or using the line privately is required to have insurance. With one train every 15 minutes, GLBT states 110 trains a day will use this line, and it will have 6 tracks, (this is mentioned in the fine print, they only mention 2 tracks in most places, but their goal is 6)

per GLBT's proposal, the risk to slow moving tractors is enormous. 200 feet may not seem like a long distance in a car, but for a tractor with wagons or other equipment, such as highly explosive pesticide tankers, attached this is a huge distance to cross in a matter of minutes, not to mention they will have to judge train distance and speed. Relying on farmers to judge train speed and distance is not acceptable. This situation alone clearly shows this project does not meet a public necessity review. This project places the farmers at risk, and the public at risk for a serious accident.

The rural first responders are already forced to service huge areas of the countryside. Most of these fire departments and paramedics are volunteers. These brave men and women struggle to maintain standard fire and ambulance services, they can not handle a large train derailment, especially one involving hazardous chemicals. Who is going to ensure these departments are trained to handle a multi-car train accident or a train derailment from a fly-over? Who will pay for the increase in auto and pedestrian accidents that are sure to occur, as with each new crossing new risk is introduced? The rural first responders are not prepared and are not large enough departments to handle this unprecedented volume of freight traffic in a rural area. The STB must consider the stated GLBT proposal is for 110 trains per day to use this line, more if they can. Road closures and crossing blocked by passing trains will also cause first responder delays putting rural lives at risk. Rural lives matter. Unlike urban residents who have multiple hospitals or urgent care clinics to travel to, most rural residents have their closest hospital over 30 miles away, we can not add to these already long travel times to seek emergency care. These residents have little or no choice for emergency care and a train delay can and will be deadly to the most urgent of cases. In terms of public safety this project does not meet any standard of public necessity. We must also factor in visitors to the area, as they too will face longer times to receive medical care if they were in need. We can not allow one company's greed to overshadow public safety.

A derailment of hazardous chemicals can also result in the permanent loss of even more farmland. The contamination of water supplies is of special concern. How is GLBT going to ensure a hazardous spill is contained and quickly cleaned up, given the nearest emergency response companies are hours away? GLBT's lack of addressing this issue, clearly shows they

have no plans in place in the event an emergency occurs, as a result again the public interest and necessity are not served by this line.

GLBT's contention that this line will be an economic boom is ill conceived. Trains are not new to America. Any business wanting to be located by a train and wanting to have access to a rail line has millions of miles of existing tracks they could have built next to. What is special about the GLBT line that would result in any business relocating? This is a short line, supposedly bypassing a metro area, even though it simply moves existing trains in the same metro area. This line does not run from coast to coast or even from major city to major city. There is no economic reason for an existing or new business to choose to build along the GLBT line. Perhaps that is why GLBT admits the line runs next to no industry in their application. (This of course is a lie as farming is the nation's ORIGINAL industry.) Trains are not new and any business wanting to be near a train line currently has the ability to do so. The GLBT proposal that local farmers will unload crops onto the train field-side is at best a childish view of farming operations. Not to mention that most grain elevators are currently serviced by rail lines, but they do to use them. In Serena, Illinois the Farm Supply Co-op has a rail line running directly through its property and it goes unused. This same situation can be found throughout rural Illinois. Added to this situation is the fact Union Pacific and Norfolk Southern Railroads have stated they have no intention of using the GLBT line, this eliminates 1/3 of the area's railroads from using the line. This line will not have the capacity to be profitable without every railroad on board. The sheer lack of any verifiable economic data from GLBT and the obvious lack of need as NO railroad has supported this plan, clearly shows there is no public necessity for this line.

In 2008 the STB approved the purchase of the Elgin, Joliet, and Eastern Railway by the Canadian National Railroad. This purchase provided the CN Railroad a Chicago bypass. It is highly unlikely CN Railroad would use the GLBT line either as the STB already approved their bypass plans. The EJ and E line is historically known as the Chicago bypass line as it only has one spur going into the city itself, the rest of the tracks are in suburban areas. We now have 3 of six railroads that have no need for this line. Public necessity can be determined by the preference for the project over existing projects, there is clearly no public necessity for the GLBT project as railroads would be in support of the project if it was a good and viable project.

Energy use from this line construction will negatively impact the public, it will not only take years of continuous construction, it will add to traffic idling as traffic waits to cross the line. The use of lights and signal bells going off every 15 minutes or more a day also increases energy use and increases noise and light pollution, all of which is harmful to the public interest. How is GLBT going to restore the land the heavy construction equipment compacts during construction? How are toxins going to be contained during construction, especially during the construction of bridges over rivers and streams? Where does all the construction waste go to? What are GLBT's plans to recycle unused construction materials and packing supplies and what are their plans to use recycled materials? Where is the GLBT carbon impact statement for this project's construction and the operation of the line? This line's construction and operation, if approved, would negatively impact the public.

This line has cultural and archaeological impacts as well. This line runs through hundreds of miles of land steep in history. It is in the public's interest to preserve these sites. Native American sites, early settler sites, and even Civil War sites abound in these areas. This area had a Civil War battle near Millington, IL, less than 15 minutes from Serena, IL and there are many underground railroad and Abraham Lincoln sites in the area of the proposed GLBT line. We need to protect the historical integrity of the rural areas from further desecration. This train will alter the scenic views, the serenity and the historical environmental context of the sites. Serena Illinois is home to the Serena Massacre, a small Native American uprising. Adding yet another train line further takes the rural environmental context away from this historical event. The Illinois River Valley in the greater Ottawa area, of which Serena, IL and Seneca, IL are part of, is also home to the largest Indian residential camp in Illinois. People need the ability to visit rural Illinois and experience the peace and solitude of the land, just as the Native Americans did. They need to be able to see unobstructed views, so they can appreciate the enormity of the rural areas and the country as a whole. They need to connect with America's farm roots and experience silence that is broken only by the rustle of leaves and the chirps of birds, not the screeching of train wheels and the blowing of a train whistle. There are untold archaeological sites along this route that need to be observed, such as the Native American Wintering and Spring Camping Grounds along Indian Creek in Serena Township, to name just one. The National Park Service determines a site's importance based on if the area made a significant contribution to the broad pattern of our history, or if it embodies the significant characteristics of a type, period, or method of

construction or represents the work of a master. They further evaluate sites to determine if the site is likely to yield information about our history or pre-history. These rural areas satisfy these preservation requirements, they represent our combined rural heritage and the generations of master farmers who have honed their craft and have created the farms that feed the world. Too many Americans have no connection to the rural roots of our nation and we must preserve as much of this way of life as we can, this line harms our ability to do this. This line further removes the areas it dissects from it's rural past and history. Many of the affected fields served as homes to Native Americans and archaeological finds are common, from arrowheads to other hand tools. These finds and the open spaces of the fields help us better understand the hunting and cyclical way of life of the Native Americans. The public needs places they can go an experience quiet and how life was for early settlers, this line would take that away from a huge number of people and as a result again the public interest is not served by the line.

Natural resources are greatly impacted by the proposed line. This line will take Prime Farmland forever out of production. Prime Farmland is the most fertile and productive land in the world. Hundreds of acres of Prime Farmland, as denoted by the USDA, will be lost forever if this line is built. A complete and through USDA review of this proposal is needed to fully determine if this loss of Prime Farmland is in the nation's best interest. I am requesting this review to be completed. This line takes very little land that is currently urbanized; we can not afford to lose more Prime Farmland. Our national security depends on our ability to feed the world and ourselves. Prime Farmland produces more corn than less fertile land, corn is used for ethanol fuel which is a renewable fuel and is adding to our nation's energy independence. Our nation's farms keep us from being dependent on other nations for food and they keep us secure as other nations need the food we produce. Ethanol also allows us a fuel source in the event of a global crisis. Our farms are vital to our national security and need protected from unnecessary development, this loss of PRIME farmland alone shows there is no public necessity for this route..

This line runs through many habitats that are home to endangered species, such as the following species identified by the Illinois Department of Natural Resources as endangered or threatened and living in the proposed areas:

1. Indiana Bat

2. Eastern Prairie Fringed Orchid
3. Sheepnose Mussel
4. Northern Harrier
5. Peregrine Falcon
6. Least Bittern
7. Loggerhead Shrike
8. Black-crowned Night Heron
9. Franklin's Ground Squirrel
10. Kirtland's Snake
11. Ornate Box Turtle
12. Lined Snake
13. Virginia Bunchflower
14. Heart-leaved Plantain
15. Tubercled Blossom

All of these species will be affected as this line slices through the heart of Illinois. This line will also serve as an unnatural barrier to migration for smaller animals and will conversely serve as a way for other species to easily migrate into new areas. This unnatural migration due to easy travel along the desolate land on either side of the tracks will disrupt already fragile ecosystems in the area. We have harmed the earth enough we do not need to harm it more with this new line. Even more disturbing is that the Federal Railroad Association requires railroads to control vegetation, so they routinely spray herbicides to create virtually inhabitable conditions along the track. These chemicals run into our streams and lands, as do the chemicals from the train rails and general train operations. We do not need this line and we should not allow more land to be forever altered from its more natural state into a barren track bed. How too will the farm fields be protected from this runoff and from the potential invasion of weeds, from a poorly maintained line? Again this line is not in the public interest as it will have a negative affect on the environment.

How will this line affect air quality in the area? Trains pollution is know to cause asthma and other lung disorders. How will the EPA's National Air Quality Standards (NAAQS) be monitored and how will existing air quality be protected? A review of this issue is mandated by

the Clean Air Act and the 1990 Clean Air Act Amendments. Who will be responsible for conducting this review? When will this review occur? When will mobile source air toxics (MSATs) be evaluated due to this project? MSATs are composed of 188 hazardous air pollutants, these include acrolein, benzene, 1,3-butadiene, diesel particulate matter plus diesel exhaust organic gases (diesel PM), formaldehyde, naphthalene and polycyclic organic matter, all of these chemical air pollutants are associated with trains. Air quality needs to be thoroughly researched and addressed by the Surface Transportation Board. With 110 trains per day projected to use this line the air pollution will be substantial. This line will also be in rural areas surrounded by fields and gravel roads. How will the STB and GLBT railroad control the dust pollution generated by these high speed trains traversing the rural countryside at 70 mph? Dust is a significant air pollution issue along this track and it needs addressed in any environmental review of the project. Increased air pollution from idling cars waiting for the trains to pass must also be accounted for. The public is not served by the increased exposure to the toxins from trains and if the track was built by the increase in exhaust fumes as vehicles idle waiting for the trains to pass.

Related to this issue is the potential for fires caused by sparks from train operations. Dry farm fields are quickly set ablaze by a spark. Who will be responsible for crop loss and the pollution caused by fires started by trains? In the event of a derailment in a dry field how are first responders, with no access to hydrants, going to extinguish a train and quick moving field or prairie fire? What precautions will be in place to prevent sparks from reaching ignitable materials? Fire dangers from trains must be addressed, and the public must be assured GLBT, a company with no rail experience and no balance sheet, can afford to reimburse the public for damaged caused by their line.

Federal Transit Administration and Federal Railroad Administration guidelines require a complete noise and vibration assessment be done before rail lines are approved, when is this review going to be completed? How is this review going to be completed? This line is going to substantially alter the noise pollution levels in the affected areas. The FTA Noise Impact Criteria for this project would score in the severe impact range. It is unreasonable to place a noisy train in a serene quiet area and come to any other conclusion than the impact is severe. Currently these areas are extremely quiet. Based on FTA guidance a single freight railcar traveling at 50 mph

generates a Sound Exposure Level of 82dBA at 50 feet from the track, this line is calling for 110 freight trains carrying untold numbers of railcars at 70 mph, the noise will carry for miles at unacceptable levels, given the tranquility of the current environment. In addition the vibration impact would be severe, current guidelines indicate that a rail line with more than 12 trains per day is a “high use” line. GLBT intends to run 110 trains per day, this is beyond high use and the vibration impacts will be severe. Given that this line is going to severely impact the area in both noise and vibration the line needs denied. It is unreasonable to place a rail line in an area not currently serviced by such a large freight volume line is unreasonable and irresponsible as it will forever alter the environment of the area and will harm the public. This line also runs near livestock productions and any noise and vibration study must take into account the unique needs of livestock in terms of environment. Vibrations have been shown to reduce livestock production productivity. Any noise and vibration mitigation measures proposed by GLBT must be based on a 110 freight trains per day traveling at 70mph, few if any mitigation measures have been tested for this unprecedented rail volume. The STB needs to demand evidence that any mitigation proposals GLBT submits have been proven to work with a train volume of 110 per day. The constant noise and vibrations from trains and the noise and lights from crossing gates going off every 15 minutes are not in the public interest.

Where is storm water runoff going to be collected and contained? Will retention basins be built; taking more Prime Farmland out of production? Where will the water go that comes off the tracks? Where is GLBTs Storm Water Pollution Prevention Plan? This project needs to have a system in place to handle storm water runoffs. Where too will the snow go? GLBT can not be permitted to dump their snow on area fields without just compensation. GLBT has failed to address the serious issue of water control.

How is the STB going to ensure GLBT does not harm the existing water flows and tiling systems in area fields? Many areas have 10 to 100 year flood streams that appear only when the rains need them to. How are these rarely used streams going to be located and accounted for? How are the tile lines going to be preserved? GLBT can not block tile lines or fields and neighborhoods will flood. GLBT must also account for the formation of wetlands as they will block many streams, how will these artificial wetlands be eliminated? Will each stream or river have a bridge? A culvert? What is the plan to eliminate flooding due to the blockage of field

drainage? This line runs in flood plains, how is this to be addressed? The water issues alone show this line is not in the public's interest.

This plan proposes building massive flyover eyesore bridges throughout the rural countryside, but more disturbing is their plan to build bridges over major rivers, like the Fox and Illinois Rivers. These bridges will create substantial harm to the river beds, will add to river pollution, and will be visual eyesores in pristine areas. The Fox River is home to many recreational activities, such as canoeing and water tubing. The people doing these activities enjoy the peace and quiet of the river, this train will shatter this peace with 110 trains per day and a large bridge destroying the scenic river views. This is not to mention the huge impact on the Illinois River, a vital river feeding the Mississippi River. This line would forever harm the river environments in the affected communities and would affect river based tourism business in the area, such as the canoe rental business on the Fox River; this is not in the public interest.

How are utilities going to be addressed? Who is going to relocate power and phone lines? These lines have specific right of ways and specific requirements on each line. How will these be addressed? These utilities are not on public right of ways, they are on limited easements over private lands, and they in many cases can not be moved off their existing right of way location. Does the STB and GLBT plan on negotiating new right of ways for all existing utilities? Will powerlines be raised to accommodate the trains? What about buried lines, how will they be maintained and how will they be affected by having trains rumble over them constantly. This line also crosses oil pipelines, how will the safety of the pipelines be maintained? What assurance do we have that 110 trains a day traveling over an oil pipeline will not harm the pipeline, have these lines been tested for this unprecedented volume of freight traffic and associated freight weight?

The Sheridan Correctional Center, in Sheridan, IL, is located within feet from the proposed line, this is not acceptable, and moving the line south more will bring it too close to Serena Illinois. Mile 130-134 needs addressed due to their close proximity to the Correctional Center, with 2,000 prisoners who have no way to escape the noise and vibration, and worse no way to be safely evacuated in the event of a derailment. This line is not in the public interest as it will disrupt the lives of the prisoners and their safety. This line needs to be moved north of Sheridan Village limits or south of the town of Serena, home to the area's only high school and the largest public venue in the immediate area. The line's current location slices the sister towns

of Serena and Sheridan in half. These towns share the same schools, churches and businesses. This line will prevent people from easily accessing the other town and will impact the shared emergency response teams. The STB can not allow the culture and social fabric of these towns to be ripped apart by this line. Social ties are vital to a health community and this line will harm these ties. Serena and Sheridan are essentially the same town separated by the Fox River. This line cuts the heart of these sister towns and will severely and permanently affect the cultural and social environment of the area. All Sheridan High School students attend Serena High School and all Ambulance calls from Serena are handled by the Sheridan Ambulance. The towns need to remain unimpeded by a train. The public would be harmed by this line.

The proposed line also needs to address what happens when Great Lakes Basin Transportation goes bankrupt or closes. This is extremely unlikely given their complete lack of history and the fact they have no current revenues. What happens to the line then? What plans are in place? More importantly the STB needs to deny the illegal utility corridor attached to the rail line. A transportation company is not a utility and can not be granted the right to act as a utility. The STB can only approve a transportation project; it can not approve a utility project. This proposed utility corridor needs to be immediately denied and removed from consideration. This entire project needs to be denied as GLBT has failed to show a need, failed to show that they have financing available and have failed to address the critical environmental issue of the area. They have failed to show public necessity.

As a board the STB must consider the fact many of the affected farms are generational farms. These farms are special, they represent lifetimes of work and individual family history. A train should not be allowed to cross where the original homestead once stood, the location where Grandpa had his heart attack working in the field and died, the place where the geese land each spring, or simply the tree your family picnics under, these places are special and go beyond dirt and plants. This line is set to go through people's backyards and back 40's. A farm is a cohesive unit of people, animals and plants working together. If you disturb one you affect them all. This GLBT line would forever change the way thousands of people along the route live and view the world around them. More disturbing is the way this line is dividing the communities and destroying many people's faith in our government. It is completely wrong that a private firm can propose an unneeded private project, force it onto the communities and then have the Federal

Government review this project, and if they approve the project, grant eminent domain for a private enterprise with no clearly stated public need, no clearly stated ability to fund the project, no clearly stated railroads committed to using the line, and two railroads publically opposed to the line, an inaccurate view of how the affected farmers and communities use their existing railroads, and a poorly stated and far from comprehensive business plan. This project tears at the very fabric our nation was built on. It goes against everything America believes in and needs to be denied. This is NO public necessity for this project and the feeble attempts by GLBT to prove there is can easily be proven to be inaccurate and that other issues caused by the line far outweigh any alleged benefits.

Sincerely,

Dennis Scheppler
212 North Owen
Mount Prospect, IL 60056