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I am also asking that the names of the GLBT investors be released to the public, the public has a right to know who they are dealing with.

The GLBT proposed route is not a rail bypass as they claim, they are simply moving trains from one congested area to another in the same area. Please consider the information below as it clearly shows there are better alternatives to this route that would disrupt fewer lives. There is no transportation need for this line in the area it is proposed to run and no public necessity, as the area is already over served by freight lines.

The Canadian National Railroad purchased the Elgin, Joliet and Eastern line for 300 million dollars. Warren Buffet purchased BNSF for 44 billion dollars. Given the size of BNSF, that comes to Warren Buffet paying approximately \$1,260,000 per mile of track, including trains and cars. In Southern Illinois we have two small railways, the Toledo, Peoria, and Western Railway (TPW) and the Keokuk Junction Railway (KJR).

The Keokuk Junction Railway (KJR) runs from Keokuk Iowa, across the Mississippi River to Peoria, Illinois. Their line is 126 miles long. Their line runs through very rural Southern Illinois. The largest town they go through is Macomb, population 19,265, and of course near Peoria, population 115,828. This line has connection agreements with BNSF, Union Pacific, Canadian National, Norfolk Southern and the Toledo, Peoria and Western Railway. Given the price paid for BNSF, this line would be valued at 158.8 million dollars.

The Toledo, Peoria and Western Railway (TPW) runs from Peoria, Illinois to Logansport, Indiana, crossing the Illinois River. Their line is 247 miles long and also runs through very rural Southern Illinois. The largest town besides Peoria it travels through is Watseka, IL with a population of 5,100 people. This line has

connection agreements with BNSF, Canadian National, CSX, Norfolk Southern, and the Keokuk Junction Railway. Given the price paid for BNSF, this line would be valued at 311.2 million dollars.

Great Lakes Basin Transportation Company (GLB) claims they have 8 billion dollars to construct a rail bypass of Chicago. GLB plans to run their line through the populated far suburbs of Chicago. The GLB proposal fails to account for the fact the Chicagoland Region has expanded to include the entire Northern area of Illinois East of Route 39 and extends as far North as Rockford, IL. The areas they want to build in are rapidly growing as Chicagoland continues to expand. Placing a line in this area only temporarily moves the congestion to a new area of Chicagoland. Some examples of cities affected by the GLB line and their population are: Rockford, IL population of 149,123, Kankakee, IL population of 26,860, Rochelle Illinois population of 9,424, Sheridan, IL population 2411 (and an additional 2,000 residents of the Sheridan Correctional Facility) and Seneca, IL population 2,371. These are not insignificant populations and are substantially larger than those in rural Southern Illinois where the KJR and TPW lines operate.

GLB needs to explore purchasing the KJR and TPW lines, these lines run in an almost straight line east to west across truly rural Southern Illinois, and not the far suburban Chicagoland areas. These lines also currently connect to and have usage agreements with 5 of the 6 class one railroads, which are the intended clients of GLB. GLB, based on the selling price of BNSF, could purchase these lines for under 500 million dollars. This leaves GLB 7.5 billion dollars to upgrade these lines to be the premier rail lines in the nation. It is important to note GLB estimates they need to purchase 21,500 acres of land at \$20,000 per acre. The land acquisition costs would be 450 million dollars. For 50 million more they could purchase two existing in service rail lines with existing non- court challengeable easements in place.

Fifty million dollars is a small additional price to pay, given the destruction the proposed GLB line would create on the environment. This line would upgrade existing tracks and expand rail capacity in areas that have already been harmed by having a rail line built on them. The KJR and TPW lines also have existing bridges over rivers and streams. No new bridge locations across the Illinois River, or any river, would be needed, GLB simply needs to improve the existing bridges.

This applies to the rest of the water crossing along this route; the infrastructure is already in place. Field tile drainage lines, phone lines, electric lines and pipelines have already been re-routed along this line. The environmental impacts of GLB purchasing and expanding the KJR and TPW lines are meniscal compared to the environmental destruction of fields, forests, wetlands and waterways that a new rail line would cause. GLB needs to utilize and purchase existing rail lines to accomplish their only stated goal of providing a bypass for Chicago freight traffic.

GLB is also lost on the concept of what a bypass is. A bypass takes an item, in this case trains, and prevents them from reaching another place, in this case Chicagoland. GLB is using Chicagoland Statistics to justify their proposal and is failing to acknowledge the huge size of the Chicago Megatropolis Area. Their plan also simply moves existing trains from one part of Chicagoland into another; there is no bypass of Chicagoland. The KJR and TPW lines can be a true bypass; they are uniquely positioned to allow all trains coming from Southern Illinois to be moved into Iowa or Indiana. Thus this route accomplishes the task of preventing trains from reaching Chicagoland, the function of a bypass. These lines are also near enough to Chicagoland; the trains coming from the north can also be funneled south to the Peoria area, using existing class one tracks, and then moved east and west using existing class one tracks. Peoria is only 167 miles from Chicago. This route would add only 4 hours onto a train's travel time (assuming a 40 mph speed which is significantly lower than the proposed 70mph GLB route). GLB currently claims it takes 30 hours to get through Chicago. This is a saving of 26 hours for traffic from the north and it also accomplishes the goal of bypassing Chicagoland. The KJR and TPW lines can and should be made into a true Chicago rail bypass. The proposed GLB line does not bypass Chicagoland, it simply moves trains from one location to another.

The next advantage of using the KJR and TPW lines is GLB can build their proposed 15,000 acre rail yard in truly unpopulated areas. This rail yard would also have the potential to actually be successful in this area, as it would be located away from the existing railyards in Chicago. The problem with the GLB plan is why would a railroad choose to use the new GLB yard when they can move just a few more miles north into Chicago and use their own yard? Located in Southern Illinois this yard could service an entirely new customer base and some existing railroads might be enticed to move operations to this area of the country. As it

stands the GLB rail yard is too close to existing established yards. Railroads have no incentive to move operations there. Another advantage, that GLB claims to have with their railyard is better climate, GLB claims that their line would not be as affected by weather in Kankakee as the railyards are in Chicago. Kankakee is only 60 miles from Chicago; it has the same or worse weather than Chicago. Chicago has on average 28.5 snowy days per year and 37.1 inches of snow on average yearly. By contrast Peoria, 167 miles from Chicago, averages 19.9 snowy days and 24.6 inches of snow per year (CurrentResults.com). Based on these statistics, a railroad could consider Peoria to have a more attractive climate and as a result may wish to move operations to a new rail yard with a more preferred climate. Yet another rail yard advantage is that there are some non-prime farmland areas along the Mississippi River and along the KJR line that the proposed rail yard could be built on and not harm Prime Farmland.

Finally, these lines have existing rail crossing in place and any roads that needed to be closed where closed years ago when these lines were first constructed. There would be little need for towns and counties to revise emergency response plans and routes. There would be little impact on current roadways as they were built or revised with the existing rail line in place. The new GLB line requires hundreds of new rail crossings, revisions to and the closings of many roads and a whole new population based to adjust their ways to accommodate the new line. These lines also have already established how farmers operate around them. GLB expects a whole new farm base to have private rail crossings and split fields. These lines have already solved these issues.

The plan to revamp and expand the existing KJR and TPW lines, rather than build a new rail line from scratch has many advantages:

1. Significantly less environmental destruction.
2. Significant cost savings due to existing infrastructure and easements being in place.
3. Filed drainage, utility and pipelines have already be re-routed.
4. The climate is better.
5. Little to no loss of Prime Farmland.
6. A rail yard can be built on non-Prime Farmland.

7. Existing rivers and waterways, including the Illinois River, have crossings already in place.
8. The STB can conduct a more accurate environmental review as these areas already have trains running through them. Drainage and other issues have already been addressed and problems are already known. For a new line this would all be conjecture. .
9. The population in this area is less populated than the GLB proposal.
10. First responders and residents already have plans in place to cross these lines.
11. There will be no need for road closures.
12. There will be no need for thousands of private rail crossings to be built for farms along the route. Crossings that are hazardous.
13. These lines are already serviced by 5 of the 6 class one railroads operating in Illinois, these railroads do not need to alter anything to use these lines. Connections are already in place.
14. Easements and right-of-ways have already been established.
15. Rail crossing of roads are already in place.
16. Fewer major roadways are affected.
17. GLB only needs to upgrade these lines to handle a larger freight volume.
18. Being more centrally located in Illinois this line may attract new customers.
19. There is room for expansion as the area is much more rural, with significantly few towns being affected.
20. This is a true by-pass preventing trains from needing to travel into Chicagoland. The current GLB line is not a bypass all it does is move existing trains to a new location in the same area. A bypass takes trains away from an area.

Please deny the current GLB proposal, as there are hundreds of existing tracks that they could purchase and upgrade to accomplish their only stated goal of providing a bypass for Chicago freight traffic.

A map of Illinois railroads can be found at

<http://www.idot.illinois.gov/assets/uploads/files/transportation-system/maps-&-charts/railroad-maps/il%20railroad%20map%202012.pdf>

Sincerely,

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