

WINNEBAGO COUNTY SOIL AND WATER CONSERVATION DISTRICT

EI-25516

Conserving Our Land Today For Tomorrow

4833 Owen Center Road - Rockford, IL 61101-6007 ♦ Phone: (815) 965-2392, Ext. 3 ♦ www.winnebagoowcd.org

October 21, 2016

Mr. David Navecky
Surface Transportation Board
395 E Street SW
Washington DC 20423-001

Re: Great Lakes Basin Railroad – revised route – STB Docket No. FS 35952

Dear Mr. Navecky,

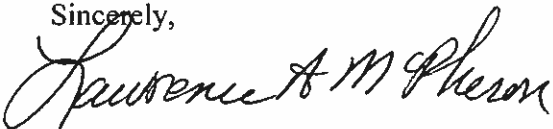
On behalf of the Winnebago County Soil and Water Conservation District Board of Directors, our Resource Conservationist, Dennis Anthony, has reviewed the revised route for the proposed Great Lakes Basin Rail corridor, for Agricultural and Natural Resource issues that may result from the construction of the proposed rail line. He has identified the following issues and concerns along the proposed rail corridor that will impact the Agricultural and Natural Resources in Winnebago County.

- 1.) **Farmland Protection.** Agriculture, including row crop and livestock production, is still a major land use in Winnebago County. Once farmland is lost to another land use it will never be brought back into crop production. Winnebago County, the State of Illinois and the Federal Government all have Farmland Protection Programs at work in the county. The goal of these programs is to preserve farmland. The proposed route impacts about **721 acres** in the County, with approximately **592 acres** rated “**Prime Farmland**” and **81 acres** rated “**Farmland of Statewide Importance.**” There are also several dairy and other livestock operations in the vicinity of the proposed route which will be negatively impacted.
- 2.) **Farmland Fragmentation.** The dividing of crop fields into smaller fields or odd shaped fields affects the ability of producers to crop the land. Agriculture has continued to evolve using larger more efficient equipment, if the fields get smaller the equipment and fields won’t work together. The railroad corridor has sections that run at angles that don’t coincide with the property lines; this will make for “odd” shaped fields that are difficult to farm. Another issue with the rail corridor is the access to be able to access crop fields on both sides of the railroad corridor. Many times access roads are required to be constructed to access a field that is now on the backside of the corridor.
- 3.) **Subsurface Drainage.** The proposed rail line goes through many large blocks of land that have soils requiring subsurface drainage. Many of these systems are 60+ years old. I am assuming that all field drainage lines will not be allowed to remain under the proposed railroad right of way. Laterals and mains intersecting the proposed line will need to be rerouted so that the drainage system can properly function. Many acres of cropland would be impacted if the subsurface drainage is not adequately addressed.
- 4.) **Agricultural Program Impacts:** There are fields in many different USDA programs that will be affected by the rail corridor. One of these programs is the **Conservation Reserve Program (CRP)**. This program retires cropland that is environmentally sensitive for periods of 10 to 15 years. These areas are seeded to native cover to provide wildlife habitat, reduce erosion, filter nutrients from runoff water and attenuate pollutants from ground water. The **Wetland Reserve Easement (WRE)** program, which is a section of the **Agricultural Conservation Easement Program (ACEP)**, is a longer term or permanent easement on land which restores soils that had been drained or converted back to wetland conditions. The **Conservation Stewardship Program (CSP)** is a voluntary conservation program that encourages producers to continue to improve and maintain existing conservation activities as well as undertake additional conservation activities this is completed through contracts based on the producer’s cropland.

- 5.) **Floodplain Corridors.** While the planners have also done a good job to avoid crossing wide floodplain areas, the proposed rail line will still cross several major river floodplains. This includes the confluence of the South Branch of the Kishwaukee River and Kilbuck Creek into the Rock River, the Pecatonica River east of Shirland; and smaller stream corridors of Raccoon Creek near the Stateline, and the two branches of Kent Creek west of the City of Rockford.
- 6.) **Wetlands.** Numerous wetlands will be impacted along the proposed line. These include mapped and un-mapped wetlands in the Kishwaukee River/Kilbuck Creek, the Pecatonica river corridor, and the Raccoon Creek corridor, which has some land enrolled in the USDA-NRCS Wetland Reserve Easement Program. There are also the potential to encounter un-mapped wetlands or farm wetlands along the segment running along the south side of the County; and where it runs adjacent to the Pecatonica River in Harrison Township, which contains many hydric soils. Professional wetland determinations should be done along the entire proposed route. IDNR permits and possible mitigation will be needed for any wetland disturbance. The Army Corps of Engineers would also review any wetland disturbance.
- 7.) **Woodlands and Wildlife Habitat.** The construction of this rail line, as proposed, will cut through woodland and wildlife areas. One particular area is the segment from the Pecatonica River crossing to the Wisconsin State line, which includes many woodlands and wildlife plantings. Another area is the confluence of the South Branch of the Kishwaukee River and Kilbuck Creek into the Rock River. This will further fragment the blocks of wildlife habitat in the immediate area of the line. Studies have shown that as land is divided by manmade structures, various terrestrial wildlife populations shrink and populations become separated. A railroad corridor will limit the movement of wildlife and the interaction of population.
- 8.) **Stormwater Runoff.** Numerous agencies have ordinances and/or statutes to address this issue. If jurisdiction falls to a local unit of government, Winnebago County and the City of Rockford, have ordinances to address this issue. This rail corridor will be a graveled surface that will have the potential to increase the stormwater runoff rates of flow. This could include the need for stormwater detention ponds. The water from the rail corridor will need to be controlled as not to cause any off-site impacts. Surface drainage patterns will need to be improved and maintained.
- 9.) **Erosion Control.** Numerous State, County and Municipal Agencies have ordinances and/or statutes to address this issue, including the Illinois EPA, Winnebago County, City of Rockford, and Cherry Valley Township. This would be a construction time issue. Erosion control measures will be required during the construction phase of the project and last until all areas are stabilized. No off-site impacts are allowed.

Due to the adverse and negative impacts to the Agricultural Areas and Natural Resources in Winnebago County, the Winnebago County Soil and Water Conservation District Board of Directors, at our monthly Board Meeting held on October 21st, unanimously opposed the Great Lakes Basin Rail project.

Sincerely,



Larry McPheron
Chairman
Winnebago County SWCD



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