



Farmland Protection Project

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June 15, 2016

To: Mr. Dave Navecky
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW, Washington, DC 20423-0001

Re: Docket No. FD 35952 - Comments on the Environmental Impact Statement relative to the Great Lakes Basin Transportation Corporation's proposed new railroad.

The Farmland Protection Project, a volunteer organization with a mission to preserve prime farmland, would like to express their concerns in regards to the Great Lakes Basin Rail proposal.

At public listening forums, Mr. Navecky indicated there will be a separate group focusing on the economics of the proposal at a later date. Economics will negatively influence the environmental impact if the Great Lakes Rail proposal simply shifted the congestion and problems of the existing rail network to their new line, and existing rail was abandoned. The Great Lakes Rail proposal will only be a benefit to society if both new and existing rail are fully utilized for multiple generations.

Smaller scale improvements and shorter links of existing rail would be the preferred method to solve the congestion around Chicago in lieu of the cost of a brand new line far from existing rail users and infrastructure needed to support and serve a rail line.

On environmental issues, the Boone County Conservation District, has submitted documentation on environmentally sensitive areas that should be avoided in Boone County IL. The County Board of Boone County, IL has gathered, documented and submitted issues in regards to emergency response, road access, and cost to infrastructure. The City of Belvidere has noted that the route does not utilize existing or future planned industrial zones in Boone County. Winnebago Boone Farm Bureau has submitted concerns in regards to the agriculture base and the impact on the future economic well-being of the farming community. They discussed the importance of above and below ground drainage issues that will need to be addressed. We concur with the major points addressed by each group and would wish you to consider seriously their research and efforts to collect the concerns from their respective communities.

We would add the following additional items for your consideration. The combination of prime farmland with adequate water is rare in the world and is concentrated in areas that proposed rail will transit. Prime farmland is important to conserve for the long term environmental and economic benefits currently realized.

The route should avoid prime agriculture soil types with Illinois' Optimum Productivity Index of 117 or greater (Class A and B rated farm land). The route should avoid similar soils that are rated using Wisconsin and Indiana productivity index ratings.

Mr. Patton has been quoted as stating that every landowner, as part of their compensation, would be allowed a siding with access to the rail line. We would wish the STB not allow siding access to all owners. Instead, require as part of the permit, specific locations of siding sites for future logistics, warehouse, factory, and other uses requiring sidings. We feel that this would allow the STB to create a more accurate environmental assessment of the rail line, and minimize loss of prime farmland.

For those prime farm lands that cannot be avoided, financial mitigation should be made to offset the higher land prices due to speculation on future non-farm development. There are groups that hold development rights, but still allow the private ownership and use of farmland. Mitigation efforts should involve these groups so that matching funds and long term care of the land can be maintained.

Local organizations representing local farmers, environmentalists, and infrastructure planning should have a voice in determining the final route if approval for the Great Lakes Rail is granted. They should have a "seat at the table" in final approval before construction begins.

Thank you for your time and consideration of the concerns of those living and working along the proposed route.

Sincerely,
Ken Ramsay, President
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A 501 (c)3 volunteer organization
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