



Building girls of courage, confidence and character, who make the world a better place.

Elgin Service Center
12N124 Coombs Road
Elgin, Illinois 60124

Freeport Service Center
5040 Bus. Rt. 20 West
Freeport, Illinois 61032

Rock Falls Service Center
229 First Avenue, Suite 1
Rock Falls, Illinois 61071

Rockford Service Center
2820 McFarland Road
Rockford, Illinois 61107

Sugar Grove Service Center
200 New Bond Street
Sugar Grove, Illinois 60554

ATTN: Docket # FD 35952

June 16, 2016

Mr. Navecky
Surface Transportation Board
Docket No. FD 35952
395 E Street, SW
Washington, DC 20423

Mr. Navecky,

After reviewing the available information about the proposed Great Lakes Basin (GLB) rail project, it is my opinion that the proposed GLB project has failed to sufficiently provide documentation that supports public convenience and necessity. Furthermore, I believe that fast tracking this project and waiving the six month notification period was an error on the part of the STB. For the following reasons I respectfully request that the STB cease any further action on this project.

NEED

- The Chicago Region Environmental and Transportation Efficiency (CREATE) program—a collaboration between rail companies, local, state and federal government—is in the process of implementing physical and managerial improvements to make the rail system in Chicago more efficient in order to decrease delays. Letters from the Class I rail lines in response to the July 13, 2015 letter by the Chairman of the STB Daniel R. Elliot, II, indicate the CREATE project, although not completed, is improving the delays in Chicago.
- The GLB proposed project undermines and subverts the CREATE program.
- The GLB project is neither comprehensive, visionary, nor collaborative. The proposed project is not part of any federal, state or local long-term freight plan. It is strictly a commercial venture by a for-profit company.
- There is no publicly available business plan for the proposed rail line to document public convenience, necessity or benefits.
- GLB documentation does not describe a need for the 50 foot utility easement (beyond stating that it is a potential revenue source), or the need for the proposed 15,000 acre Kankakee rail terminal, which is five times larger than the largest rail yard in the world. The Surface Transportation Board's (STB) jurisdiction to approve a utility corridor is also in question.
- Union Pacific and Norfolk-Southern have publicly stated that they are not interested in the proposed GLB project. Instead they prefer to work with the CREATE program in Chicago.
- Canadian National invested heavily in their own Chicago bypass by purchasing the Elgin, Joliet and Eastern Railway line and are therefore less likely to use the proposed GLB toll rail.
- The letter from Norfolk Southern Corporation's legal department (filed as EI-22974 under FD-35952) states that Norfolk-Southern does not have a non-disclosure agreement with GLB, nor market research that was done, or not done, for this project.

- The loss of thousands of acres of prime farmland cannot possibly be considered a public convenience. Taking highly productive land out of production for a speculative for-profit project is not in the public's best interest

The above provided information is what led me to the conclusion that the proposed GLB project is inconsistent with the public convenience and necessity. It was insufficiently vetted before starting the approval process. I respectfully request that the STB cease work on this project. Individually, or as part of a group, we will fight the GLB proposed plan using all options available.

Our organization, the Girl Scouts of Northern Illinois, has owned and operated a Girl Scout camp—Camp McCormick, less than one mile from the proposed railroad for over 75 years. We find that the proposed railroad is likely to harm the economic value of the camp, can potentially lead to significant noise pollution and environmental damage, and above all has significant potential to harm the safety of girls at camp, in the event of an accident.

Signature

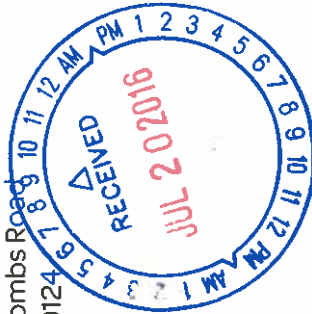


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Docket # 35957