

ATTN: Docket # FD 35952

May 31, 2016

Mr. Navecky
Surface Transportation Board
Docket No. FD 35952
395 E Street, SW
Washington, DC 20423-0001

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. Further more 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

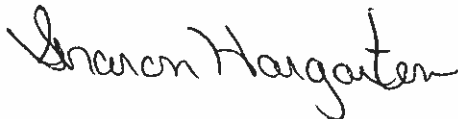
- The Chicago Region Environmental and Transportation Efficiency (CREATE) program - a collaboration between rail companies, local, state and federal government - is in the process of implementing physical and managerial improvements to make the rail system in Chicago more efficient in order to decrease 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, or 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 is it interested in using the proposed rail. It also states that no information about current rail movements or traffic volumes was provided for the GLB project. This raises the question whether there are any "non-disclosure agreements" at all. It also makes one wonder about the market research that was done, or not done, for this project.
- Mr. John Yonan, P. E., Superintendent of the Cook County Department of Transportation and Highways writes the following in his letter to the STB; *"The proposed Great Lakes Basin Rail Line will, at best, only address a very small part of the region's freight congestion. Cook County's Department of Transportation and Highways is proceeding with a long range transportation plan and an analysis to identify and prioritize freight pinch points and possible solutions. Those studies will yield a more comprehensive range of projects to address freight congestion and promote development."*

PUBLIC CONVENIENCE

- I find no evidence that the proposed GLB Chicago bypass has been identified as a solution to the Chicago bottleneck, a public convenience, or a national transportation priority (as Mr. Patton asserts). It is a business proposal by a for-profit company.
- Due to the fact that the route of the proposed rail will likely change (Mr. Patton's words) people in an area of over 32,220 square miles have lived in uncertainty about the future of their homes, farms and livelihood.
- The potential for unwanted rail - and the use of eminent domain - has increased stress for land and property owners.
- Farm fields divided by the proposed rail will be more difficult and dangerous (due to farm field crossings) to manage. Productivity of the land will decrease due to construction of the rail, odd shaped parcels and increased compaction. Costly irrigation and tiling infrastructure will be damaged and rendered useless.
- Government has spend millions of tax dollars preserving farmland, woodlands and promoting good agricultural practices. Farmers spend thousands of dollars on soil conservation practices. The proposed rail line is counter-productive to these efforts.
- Home and land owners near the proposed rail will see their home and land values reduced.
- GLB intends to be a toll railroad. Investors in this proposed project will have only their own financial interest in mind, not the public convenience.
- Opposition to the proposed project has been overwhelming, seven of eleven counties involved have passed resolutions opposing the GLB rail. Mr. Patton has stated that he will take land by eminent domain if the proposed project is approved.
- 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 publics' 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, I will fight the GLB proposed plan using all options available, including Congress, my vote at the ballot box and the judicial system.

Signature



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Oregon derailment is latest in string of US oil train crashes



A train carrying 3 million gallons of North Dakota crude derailed during a snowstorm Feb. 16, 2015, sparking a massive fireball near Mount Carbon, West Virginia. Firefighters had little choice but to let the tanks burn themselves out, which took nearly a week. *(The Associated Press)*

AP By The Associated Press
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on June 03, 2016 at 3:14 PM, updated June 03, 2016 at 6:20 PM

The derailment of an oil train in Oregon's Columbia River Gorge follows a string of fiery accidents in the U.S. and Canada as shipments of crude by rail have increased with more domestic oil production:

OIL TRAINS

2013

July 5: A runaway Montreal, Maine & Atlantic Railway train that had been left unattended derailed, spilling oil and catching fire inside the town of **Lac-Mégantic in Quebec**. Forty-seven people were killed and 30 buildings burned in the town's center. About 1.6 million gallons of oil was spilled. The oil was being transported from the Bakken region of North Dakota, the heart of an oil fracking boom, to a refinery in Canada.

Nov. 8: An oil train from North Dakota derailed and exploded near **Aliceville, Alabama**. There

were no deaths, but an estimated 749,000 gallons of oil spilled from 26 tanker cars.

Dec. 30: A fire engulfed tank cars loaded with oil on a Burlington Northern Santa Fe train after a collision about a mile from **Casselton, North Dakota**. No one was injured, but more than 2,000 residents were evacuated as emergency responders struggled with the intense fire.

2014

Jan. 7: A 122-car Canadian National Railway train derailed in New Brunswick, Canada. Three cars containing propane and one car transporting crude oil from western Canada exploded after the derailment, creating intense fires that burned for days. About 150 residents were evacuated.

Jan. 20: Seven CSX train cars, six of them containing oil from the Bakken region, derailed on a bridge over the Schuylkill River in Philadelphia. The bridge is near the University of Pennsylvania, a highway and three hospitals. No oil was spilled and no one was injured. The train from Chicago was more than 100 cars long.

April 30: Fifteen cars of a crude oil train derailed in **Lynchburg, Virginia**, near a roadside eatery and a pedestrian waterfront, sending flames and black smoke into the air. Nearly 30,000 gallons of oil were spilled into the James River.

2015

Feb. 14: A 100-car Canadian National Railway train hauling crude oil and petroleum distillates derailed in a remote part of Ontario, Canada. The blaze it ignited burned for days.

Feb. 16: A 109-car CSX oil train derailed and caught fire near **Mount Carbon, West Virginia**, leaking oil into a Kanawha River tributary and burning a house to its foundation. The blaze burned for most of week.

March 10: Twenty-one cars of a 105-car Burlington Northern Santa Fe train hauling oil from the Bakken region of North Dakota derailed about 3 miles outside **Galena, Illinois**, a town of about 3,000 in the state's northwest corner.

March 7: A 94-car Canadian National Railway crude oil train derailed about 3 miles outside the northern Ontario town of Gogama. The resulting fire destroyed a bridge. The accident was 23 miles from the Feb. 14 derailment.

May 6: A 109-car Burlington Northern Santa Fe crude oil train derails near **Heimdal, North Dakota**. Six cars exploded into flames and an estimated 60,000 gallons of oil spilled.

July 16: More than 20 cars from a 108-car Burlington Northern Santa Fe oil train derailed east of **Culbertson, Montana**, spilling an estimated 35,000 gallons of oil.

Nov. 7: More than a dozen cars loaded with crude oil derail from a Canadian Pacific Railway train prompting the evacuation of dozens of homes near **Watertown, Wisconsin**.

2016

June 3: A Union Pacific train hauling crude oil derails in **Oregon's Columbia River Gorge** near Mosier, sparking a large fire.

-- The Associated Press

[Oregon calls for indefinite moratorium on oil trains through the state](#)

[Make railroad, fossil fuel industries pay for emergencies: Letters to the Editor](#)

[Portland mayor to Gov. Kate Brown: Say no to more oil trains](#)

[5 ways to make oil trains less risky than they are today](#)

[Day before Mosier, inspection found 'very serious' problems with Union Pacific](#)

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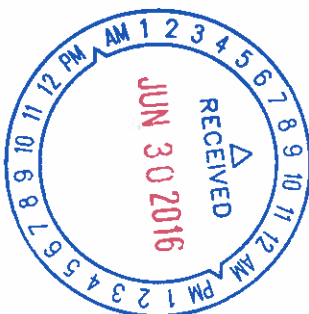
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