

Docket FD 35952

November 24, 2016

Dear Surface Transportation Board:

Having reviewed the 09/20/2016 Great Lakes Basin Transportation Company's (GLB) alternative route information and their 11/10/2016 estimate of train volumes, speeds and lengths, many concerns arise. Just a few of which are brought up below.

Concern #1: A direct quote from GLB: "The purpose of the GLBR is to move freight that neither originates nor terminates in the Chicago Terminal service area and its industries."

With this being GLB's main purpose, why do they need to ensure access to the Class Two railroads located along the route? As you know, Class Two railroads serve small regions of the nation, so by their very nature any connection to the GLB line contradicts their stated purpose of moving freight that does not originate or terminate in the Chicago area. An example is the Illinois Railway, LLC; which services the Ottawa, Illinois area. This line does not operate outside of suburban Chicagoland. The Illinois Railway, LLC line is primarily used to haul sand, from the U.S. Silica Company mines in the Ottawa, Illinois area. Therefore, this line's freight originates in the Chicago region and should be excluded from consideration by GLB. There should be no connections planned to this line by GLB, yet GLB plans to connect to the Illinois Railway, LLC line outside of Serena and Rochelle, Illinois. The GLB route has numerous such connections with Class Two Railroads that result in a meandering path through the affected states. As these connections are inconsistent with GLB's stated purpose all such connections to class Two Railroads need to be excluded from any STB considerations; the GLB line should be re-routed accordingly.

GLB has also stated they can not use existing Class Two rail-lines as "In general, existing rail corridors do not meet GLBT's engineering and environmental requirements...." How then can GLB divert trains off their tracks onto a Class Two track? The Class Two track, by GLB's own admission would be unable to handle trains of the size and length GLB intends to carry. Based on GLB's submitted revised route and additional information presented by GLB, any connection to a Class Two railroad must be denied. All such connections are non-compliant with their stated purpose: "move freight that neither originates nor terminates in the Chicago Terminal service area and its industries," and the Class Two lines would be unable to accommodate the trains from the GLB route, per the narrative submitted on 09/20/16. The GLB route needs to be adjusted accordingly.

Additionally, GLB's intention of allowing any land-owner located along its route to connect to its route to haul their merchandise further contradicts their stated purpose: "move freight that neither originates nor terminates in the Chicago Terminal service area and its industries." Any such connections would be hauling freight which has originated in the Chicago Terminal service area. Again the STB must deny GLB's request to allow such connections as they are inconsistent with GLB's stated purpose, and the route needs adjusted and re-routed accordingly.

Finally, the GLB route has been laid out to connect to local grain elevators. These elevators service local farmers and process the harvested grains for transport to larger markets. Once again GLB's desire to deviate from their stated purpose brings their line meandering through the affected states. An example

of this is again located in Serena, Illinois. GLB desires to connect with the local LaSalle County Farm Supply Company's grain elevator, this elevator services grain harvested locally and as such the transportation of this grain by GLB again violates their stated purpose of moving "freight that neither originates nor terminates in the Chicago Terminal service area and its industries." (The LaSalle County Farm Supply elevator in Serena, IL currently has access to the Illinois Railway, LLC line and they choose not to use that line to transport grain, further showing why allowing a connection to the Illinois Railway, LLC line is unnecessary.)

Note: Serena, Illinois is located near Sheridan, Illinois and has been left off all calculations of population, towns, and schools provided to the STB by GLB. This is a prime example of GLB not taking this process seriously and ensuring accurate information is presented to the STB.

Concern #2: Throughout the proposal there are numerous instances of GLB routing themselves to connect multiple times to the same Class One and Class Two Railroads. Many of these connections are un-needed. Some examples are:

The CP connection outside of Rockford, Illinois: CP only has access to this line from the BNSF line, which runs along the western edge of Illinois, moving freight to the north and south. These two lines connect near Savanah, Illinois. At this connection the CP line then runs east to Chicago through the greater Rockford area. The CP line does not exit Chicago. The CP line does not go any farther west than Savanah, Illinois. Logically then this line services only CP's need to haul freight into Chicago and out of Chicago. A connection to this line does not allow freight to bypass Chicago as the freight on this line is bound for or is leaving Chicago.

The UP connection at Earlville, Illinois: this UP line runs from near Troy Grove, Illinois to DeKalb, Illinois, it does not go further north or south than these towns, it is a relatively short segment of track servicing a very limited area of Illinois. Outside of DeKalb, Illinois the UP line connects to a UP main line which runs East and West. So, again the Earlville, Illinois connection does not serve to bypass freight out of the Chicago market, the UP line through Earlville services only local freight. Any freight headed west once this line connects to the UP line going east/west near DeKalb would already be bypassing Chicago. Any freight going east from this line is specifically headed to Chicago. The planned UP connection to the GLB line at Rochelle, Illinois would completely service UP needs for any freight coming from the west and headed east, as that is the same UP main line that the Earlville line connects to outside of DeKalb, Illinois. The Earlville Illinois connection to the GLB route is redundant.

The BNSF connection at Earlville, Illinois: this BNSF track starts in Galesburg, Illinois. Outside of Galesburg, Illinois the BNSF line (which originates in the west) splits into a "Y". One line goes northeast from Galesburg, Illinois into Chicago and the other line goes southeast from Galesburg, Illinois towards Joliet, Illinois and beyond. Any freight currently on the BNSF line through Earlville, Illinois, (the northeast line) is specifically headed to Chicago; otherwise BNSF would have already switched the freight in Galesburg, Illinois to their southeast line headed for Joliet and beyond. Therefore, BNSF does not need an Earlville, Illinois connection to the GLB line as any freight traveling through Earlville, Illinois is headed to or from Chicago.

We have already established that any Class Two Railroad connections are un-needed; now upon closer examination the majority of Class One connections appear to be unneeded. GLB needs to explain why these proposed connections are needed as it appears they are redundant connections or are connections built to specifically serve the Chicago market and not bypass Chicago, as such these connections do not serve GLB's stated purpose of moving "freight that neither originates nor terminates in the Chicago Terminal service area and its industries." Accordingly, the GLB line needs re-worked to eliminate connections that do not serve to bypass freight from Chicago.

Concern #3: GLB dismisses all routes further out from their preferred route; they cite vague references to increased travel times and costs. GLB has not provided any information to support the belief the longer route would increase travel times. The trains in the area of the current "preferred" route are traveling at less than 70 mph. The further out they can connect to the GLB line the sooner they can travel at 70 mph. There is significant time savings connecting sooner rather than later to the GLB line. Just as it is faster to drive an Interstate than it is to take back roads, it would be faster overall for the trains to connect sooner and farther out to the GLB line. GLB needs to provide detailed travel times from each entry and exit point on its route and how these time compare to current travel times. Without this information their vague reference to longer routes take longer is not valid.

A farther out route also ensures GLB will capture freight before it enters the Chicago Terminal area, fulfilling their stated purpose of being a bypass. As planned their preferred route simply moves existing freight in the Chicago Terminal area to a new location. A bypass prevents traffic from entering an area. The "preferred" route does not keep freight from entering the Chicago Terminal area, only a line further out creates such a bypass.

The closer in and further out alternative have no route narratives or other detailed information provided, it appears they took and drew two lines at random on the map. Where exactly are these routes? Why are there only vague and limited generalities? How were these routes chosen, what was their criteria? Why do they not consider routes much further south, that would serve as true by-passes?

Concern #4: There are numerous errors in the statistics provided to the STB by GLB. For example:

Population estimates, GLB accounts only for the populations in the "major" towns along its route. GLB fails to account for the significant rural populations located outside the urban centers. In at least one case GLB leaves out the entire town of Serena, Illinois. GLB also leaves out former "towns" that are no longer recognized as towns, but which contain significant populations. An example would be Catherine, this was a "town" located between Sheridan and Serena, Illinois. Today this former "town" is a subdivision whose population is neither accounted for in the Serena, Illinois nor Sheridan, Illinois Census numbers, but is reflected in LaSalle County, Illinois census numbers. These residents are affected by the GLB line and deserve to be counted.

GLB also has faulty information regarding the distance towns are from the line. An example would be Sheridan, Illinois. GLB indicates the route would be 1.17 miles from Sheridan, Illinois. GLB has failed to recognize the Village of Sheridan's extraterritorial zoning authority, which effectively extends the village limits. The Village of Sheridan has zoning rights covering the "preferred" line, as this line technically falls

within the Extraterritorial Village Limits. GLB railroad is failing to recognize the extraterritorial zoning authority of many of the towns it runs near. These extraterritorial zoning authorities are granted to the towns by section 11-13-1 of the Illinois Municipal Code. This authority allows the town to enact a zoning ordinance governing the land within 1½ miles from the village's borders. GLB needs to re-evaluate their entire route to account for the extraterritorial zoning authorities, as their route currently falls within several village limits.

Concern #5: GLB has selectively altered their route based on a few specific instances in a few impacted counties; they did not address the significant issues that exist in each county.

An example is the Sheridan Correctional Facility, a facility that houses over 1,700 inmates, these inmates almost double the town's population. The GLB line runs within 1/3 mile of the Correctional Facility, this is completely unacceptable. A derailment or chemical spill in the vicinity of the Sheridan Correctional Center places over 1,800, including staff, lives in danger, as there is no way to quickly and safely evacuate the inmates. GLB has completely disregarded this concern addressed numerous times by community members and government officials. The Sheridan Correctional Facility is also located within the Village of Sheridan, further demonstrating that the GLB information is inaccurate, as their route is not 1.17 miles from the Village, the route is less than 1/3 of a mile from the Village of Sheridan. The track needs moved out 1.5 miles from the Sheridan Correctional Center to exit the Village of Sheridan limits.

Another example is the Community Unit School District Number 2 main campus, GLB touts how they moved their route to accommodate a Middle School in Lowell, Indiana, but they remain committed to building the route less than 1/2 mile from the main campus of Community Unit School District Number 2, housing the High School, Grade School, and Administrative Offices for the district. This district serves 124 square miles in the greater Serena, Illinois area. The GLB line would require the majority of student in the district to cross the line daily and the noise from the trains would severely impact the tranquil learning environment the district currently enjoys.

GLB is also touting how they moved their line to accommodate future development of Westville, Indiana, but they fail to adjust the route to accommodate future development of the rest of the towns impacted by the line. Why was preferential treatment given to one town, over the rest, especially when they are running through the Village of Sheridan, Illinois?

The new GLB proposal is wrought with many such inconsistencies and inequities, GLB needs to explain why some issues were addressed and others were ignored, they need to address the impacts of the track town by town so that the STB can better gauge the true impact of their route. GLB revised the beginning and the end of their route and left the rest as is, this is unacceptable given the many serious issues, only a few of which were mentioned above. Others would include the Chief Shabbona Indian Reservation, the crossing of the Enbridge oil pipeline, the crossing of farm tiles, emergency response times, and numerous more site specific concerns that have not been addressed by GLB.

Concern #6: GLB has failed to again adequately explain why the alternatives have been dismissed.

An example would be the Fox River Crossing GLB states the alternative route was rejected because “the bridge would be extraordinarily high and long to cross the river and the alignment was too close to a small airport for clearance issues. The preferred route (red) is a much shorter bridge in length and height, avoids the airport clearance issue, and results in a shorter route overall.” How much shorter in length and height? Exactly how high would the bridge be if they are worried about planes hitting it? Exactly how much shorter would the route be in miles using the preferred route? The routes look similar in length on their provided map. Why does the route not run straight from the Fox River to the Illinois River? The lands are very similar, again we meander all over the countryside to create a bypass.

For the Illinois River GLB indicates they reviewed “Additional alignments within 100 feet or less were considered....” This is again unacceptable they reviewed crossings within a distance smaller than the width of a football field in either direction of the “preferred” and alternative routes and determined their original route is best? They have miles of river near their “preferred” route area, yet examined only 4 possible crossing and only 100 feet on either side of the crossing? So at most they examined 800 feet if the river and determined their original location is where the bridge must go? This is not a detailed and complete review.

Concern #7: The GLB response for train lengths, speed, and volume is extremely questionable. The GLB response indicates the train volume will increase by up to 30 trains per day between Seneca and Earlville, Illinois. MP 102-141. Where are the 30 trains coming from or exiting the line? There are no planned rail interchanges between Seneca and Earlville, Illinois, other than the Serena, Illinois interchange with the Illinois Railway, LLC line. GLB cites the CMAP traffic volume map, and this map indicates the train volume on the Illinois Railway, LLC line is 1 to 3 trains per day through Serena, IL. The Illinois Railway, LLC line transports only from Ottawa, IL to Rochelle, IL, so it handles only local freight originating and destined for the Chicago market. Where are the GLB numbers coming from? Serena is not a rail hub, at most they would add 3 trains per day to the GLB line. How does GLB figure a train volume increase of 30 trains per day, between MP 102 and 141, when the only rail connection is with the Illinois Railway, LLC Class 2 rail line that currently services 1-3 trains per day? This is yet another example of GLB providing the Surface Transportation Board with inaccurate guesses and not verifiable facts.

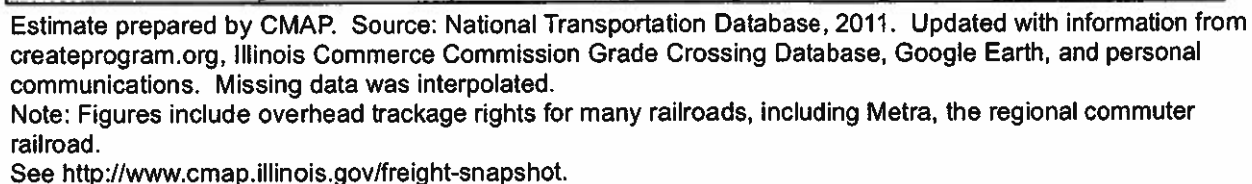
In conclusion, the new preferred route and accompanying information provided by GLB is slighting in its brevity and lack of specific details, as is the response for train lengths, volumes and speeds. GLB has not provided accurate population counts, number of towns impacted or true town boundaries. They have not provided details on how high or long the fly-overs and bridges will need to be to cross rivers, streams, roads and existing rail lines and how the locations of these crossings were determined. They ignored the majority of the counties impacted and did no revisions to the route through those counties, despite specific deficiencies and concerns being pointed out to them. GLB has not adequately provided alternatives and rejections of those alternatives. GLB has submitted inaccurate and extremely questionable estimates of train volume, lengths and speeds. The GLB management appears to be conducting this review through the use of Google and not sound investigative principals. Their route also does not serve their stated purpose of serving as a bypass to the Chicago Terminal market. I am asking the Surface Transportation Board to reject Great Lakes Basin Transportation’s request to construct a new rail line, on the grounds that Great Lakes Basin Transportation does not seem to be taking this

matter seriously and is unwilling to provide basic accurate statistic, rationalizations, and information to the Surface Transportation Board and the public. If this is the manner in which Great Lakes Basin Transportation conducts its review, how will they conduct their daily business operations?

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis G. Schepppler". The signature is written in a cursive style with a large, stylized 'D' and 'S'.

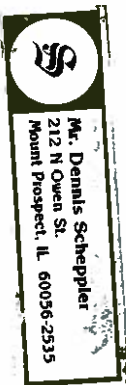
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Estimate prepared by CMAP. Source: National Transportation Database, 2011. Updated with information from createprogram.org, Illinois Commerce Commission Grade Crossing Database, Google Earth, and personal communications. Missing data was interpolated.

Note: Figures include overhead trackage rights for many railroads, including Metra, the regional commuter railroad.

See <http://www.cmap.illinois.gov/freight-snapshot>.



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