

July 10, 2016

Surface Transportation Board
Great Lakes Basin Transportation (GLBT) Railroad Opposition
Docket No. 35952

Dave Navecky
Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington DC 20423-0001

Dear Mr. Dave Navecky:

This letter is written to address the environmental impacts of the Great Lakes Basin Transportation Railroad's plan to install a rail line between Indiana and Wisconsin (Docket No. 35952). I am opposed to this proposed rail line and would like to provide you and your distinguished board with some significant environmental, social, and economic reasons why this rail line should not be constructed. These reasons are not just related to our immediate neighborhood, but also have impact on our neighboring communities, our neighboring states, our nation and internationally.

Environmental Noise Impacts:

The first impact is noise. As reported by the rail industry, the minimum sound level for train horns is required to be 90 dBA and can be as high as 110 dBA. The decibel levels from the operation of heavy equipment, power saws, rock concerts, and jack hammers are in this noise level band. The Federal Railroad Administration regulation on train horns require horns to be blown as it approaches and clears road crossings. The regulation requires these horns to be extremely loud so motorists can hear them from a significant distance to warn them of the life threatening danger large, fast moving, extremely difficult to stop trains pose to them. Due to the seemingly meandering route of this proposed rail line, there are numerous road crossings and the train horns will be heard multiple times every hour of the day and night by those along the route. My home will be affected by the sound of these horns for at least one road crossing within approximately a half mile and potentially a total of three road crossings within approximately a mile. However, as mentioned, this will occur all along the rail line and impact others including neighbors, individuals from our neighboring communities, and individuals in neighboring states. I am anticipating the railroad will try to convince those on the Surface Transportation Board, along with others in a position to decide on this project, the noise from the extremely loud train horns will not be intrusive, since they will not be blowing them continuously. Of course, that will not be the case as can be seen through numerous studies on noise and the impact to our hearing and general health.

In addition to the train horns, the noise associated with train wheels riding on the rails will also be heard by those unfortunate enough to be near the rail line. The rumbling "clickety-clack" of the train and its wheels on the track can be heard by those along the line and lasts the duration of the train, along with the bells at crossings that are continuous from the time the train approaches until after it has departed from the crossing. With a train passing every thirteen minutes the noise will be unbearable. Noise has the ability to impact individuals mentally and physically.

The noise levels will not only impact individual residents along the rail line, but will also impact school children. The train line route is planned to be near schools. As we are aware, any interruption in trying to teach young students will impact their ability to concentrate and learn. This is unacceptable. As a parent

we would not let our children be distracted while we were trying to teach them, so why would we allow the noise from trains to distract them while they are trying to learn during school. These children will be our next generation of leaders, and we should not impede their ability to be prepared for this great challenge.

Noise is a serious environmental issue for not only humans, but all life. This is true for wild as well as domestic animals. The noise along the train route will, at a minimum, impact the lives of the wild animals, but could drive them away altogether. We enjoy seeing the wild animals such as deer and wild turkeys, as much as the domestic ones. The proposed trains will also impact farm animals that are being raised along the route. We may not be able to fully understand the total impact noise has on animals, but along with humans, the noise seems to negatively affect their lives. This can be demonstrated to humans by comparing normal behaviors to the changes in these behaviors. This would include reported impacts such as milk production from dairy cattle. The impacts would also be to the protected animals in our county parks. The train line is proposed to run near at least one of our county parks.

As mentioned, the law requires the noise levels of these horns to be extremely loud, due to the extreme danger of a train. When one investigates the comparable noise levels, the rural communities these trains will travel through are approximately 40 dBA. It is reported every 3 dBA increase is significant enough for humans to detect a change, and the noise levels from trains are a minimum of 90 dBA. This significant increase in noise pollution and the impact to quality of life should be reason to stop this train line from being built.

Environmental Air, Land, and Water Pollution Impacts:

The second impact is pollution. There are a number of means by which trains pollute. The most obvious is through the combustion of diesel fuel. These trains will send exhaust fumes from diesel combustion throughout the rural communities. These trains will run through areas that currently are not exposed to this level of pollution from trains. Additionally, these trains will likely leak lubricants and other trash may fall from the trains during their travel along the tracks.

In addition, these trains may transport various hazardous products. There are numerous chemicals that if spilled, will pollute well water. This could potentially affect the ability to live in areas impacted by spills, due to these chemicals leaching into and contaminating the aquifer. There may also be chemicals transported that are fatal if inhaled. If a train derails and these chemicals are released, there could potentially be fatalities among first responders and those who live near the spill.

While the train industry does not want to highlight the number of derailments, there are derailments across our great nation every day. Unfortunately, there are instances where train derailments have released hazardous chemicals. There are communities that have to be evacuated and tragically, there have been deaths from these accidents. I do not want to have that risk placed on our communities.

The environmental impact due to pollution from the trains traveling on this proposed rail line is undeniable. The pollution from the trains traveling on the line will come from the combustion of diesel fuel, from leaking lubricants, and potentially from a catastrophic hazardous chemical spill or toxic fumes. This significant increase to the pollution in these rural communities, and the potential for environmental catastrophe from spills will adversely impact quality of life and should also be reason alone to stop this train line from being built.

Environmental Impact of Land Use:

The next impact to be considered is land use. As reported by GLBT, the proposed rail line will be approximately 278 miles in length. The line will take a minimum of 100 feet easement on each side. The route for the proposed line is through rural communities that have some very rich farm land. If you consider only the minimum amount of land that will be taken away from generating food from the 278 mile route, the acreage would be approximately 7,000. It is estimated that each acre of land will generate approximately 150 to 180 bushels of corn each year. If these 7,000 acres of rich farm land were planted with corn, the number of bushels of corn per year it could generate is approximately 1,000,000 to 1,250,000. It is reported that an adult consumes approximately 8 bushels of corn a year. This would mean enough food production would be lost for more than 125,000 to 150,000 individuals each year.

This estimate could be considered the minimum impact that would occur each year. There will also be larger areas of land that will be consumed by this proposed rail line for other facilities (e.g. train yards). In addition, the proposed route will make it impossible for some farmers to get to some of their fields and even more land may likely be lost.

The land proposed along the route selected by GLBT is rich farm land and one of the natural resources of our country. The use of this land for other than generating food should be carefully considered, since there are numerous individuals not only in our nation, but across the world that are lacking food. The potential impacts of malnutrition, and tragically death, from lack of food is unacceptable. Therefore, the potential loss of food production should also be reason alone to stop this train line from being built.

Impact to Transportation:

The next impact to be considered is transportation. This railroad will cut through many communities and roads that service these communities. There are limited routes for vehicles to travel in these rural communities, so any impact is considerable. These routes provide us with emergency responders for fire, ambulance, and police. Trains can impede the ability of these emergency responders to reach their destinations. If a route is blocked, it could take a considerable amount of time to travel around the blocked route which may lead to additional peril for those they are seeking to assist. This peril could be loss of homes or barns with associated lives to fire, loss of life associated with ambulance runs, or potential loss of property or life for a police call. Significant resources have been used to help emergency responders arrive at emergencies as quickly as possible. Our 911 emergency response system has helped numerous individuals and have saved numerous lives. This potential obstruction from a train blocking the route for these brave emergency responders is unacceptable.

Additionally, trains can block the route for children on their way to school. As mentioned, there are very few rural routes, and a lack of practical alternatives for bus or car routes to transport our children to school that would offset the time lost waiting on trains. The busses also have to stop at all railroad crossings to verify no trains are coming, which is additional travel time for these students. These kids are competing in the world market place and need to have ample time for learning, sleeping, studying, and playing. Exposing them to significant increases to their travel time to and from school should not be considered acceptable.

Additionally, the trains blocking the route will make it difficult for some local farmers to reach their fields. This not only impacts the farmers and the limited amount of time to plant and harvest their crops, but also the community. The farmers will be on the roads more, and this will expose them and the community to an increased risk of traffic accidents and potential harm.

Finally, the trains will impact individual residents and their daily lives. With the potential for a train to block travel 4 to 5 times per hour, community members will be impacted. The trains will affect the

quality of lives in time alone. This will also impact individual economics as well. Additionally, train crossings inevitably deteriorate and can damage vehicles and farm equipment as they are traveled over.

The impacts to transportation through our communities are significant. The trains will disrupt emergency response systems, children, farmers, and community members. The impact to our local transportation system will potentially cost lives, and potentially hurt our children and our economics. This is not only a quality of life matter, but could be a life or death matter, and should be reason to not build this railroad.

Environmental Impact Due to Vibration:

The next impact to be considered is vibration. Trains traveling along rail lines cause vibrations. While there are attempts to mitigate vibrations through the design of the bedding and track, they are still present. These vibrations impact their surroundings.

The vibrations impact the structures along the track. It is my understanding that these vibrations can be detected at relatively long distances from rail lines. Individuals in homes along the lines will be exposed to the vibrations and this can be as little as a nuisance due to rattling of objects in their homes to severe enough to potentially cause structural damage. This is especially true since a number of structures, including homes and barns in the rural community were built long ago and could be very susceptible to the new vibrations.

Vibrations can also impact farm animals and wildlife. Similar to noise, the vibrations may cause the animals to be unsettled. This impact could potentially cause farm animals to decrease their production or stop producing their normal products and potentially could drive wildlife away from the area.

Additionally, as heard at a local meeting held by the Surface Transportation Board in Lowell, IN, the Buckley Homestead is home to a Purdue astronomic research center. This research center is very beneficial to Purdue, the local community, nationally, and potentially the world. The research center's telescopes are extremely sensitive, and it was reported any vibration will cause the equipment to be in error.

The vibration from the trains traveling along the rail lines will have a negative impact. This impact could be to structures along the route, as well as individuals in the community and potentially animals both farm and wild. The vibration from the trains could potentially affect the quality of life, and this is just another reason the railroad should not be built.

Accidents:

The next impact to be considered is accidents along the train route. There are many accidents that occur each year involving trains. These accidents include other trains, vehicles, and pedestrians. It has been reported there are more than 2,000 car/train collisions alone each year. There will be numerous road crossings with the route proposed. Each of these road crossings alone is a potential for an accident to occur. The trains will also have the potential for accidents involving other trains along the route. The trains will pose a risk for anyone working or walking near the rail line. This could be at a crossing or could potentially be anywhere along the line.

Most of us have heard of countless incidents of deadly accidents with trains. Unfortunately, some of these incidents include children who were distracted and did not realize they were in danger. Students are among those who have been injured and some tragically killed from train accidents. I have heard of a young person from a nearby community who died because of an accident involving a train. This is unacceptable.

There are numerous train accidents every year. These accidents take neighbors, friends, and children. This is just another reason this train line should not be allowed to be built.

Impact to Environment - Trees:

The next impact to consider is trees. While there may be harm to trees from pollutants, the reason I mention trees is the number needed to build and maintain the rail line. It is estimated that more than 2,500 railroad ties are required per mile of rail. It is also estimated that more than 30 trees are required to supply the railroad ties for one mile of track. For the approximate 278 miles of track, that would be more than 8,000 trees. Each mature tree is reported to provide enough oxygen for two adults, so the trees being consumed for just the initial construction of the rail line could reduce the amount of oxygen for more than 15,000 individuals. Additionally, railroad ties are a maintenance item and need to be replaced on a regular basis. Therefore, the consumption of trees is endless.

Trees are an integral part of our lives. Without them, the oxygen required in our environment will be reduced. While trees are a renewable resource, any negative impact to the quality of our air should be taken into consideration.

Impact to Drainage:

The next impact to consider is storm drainage. There are areas on the south side of Porter County, IN which are prone to flooding. I live on a road that floods multiple times a year. Farmers have tried to address the problem, and have had some success. However, the heavy rains cause “rivers” to flow through the fields and across the roads. This usually takes hours, if not longer, to recede. Placing rails within these fields and across the roads that already have flooding/drainage issues will likely cause the problem to get even worse. These areas are not equipped for the “dams” formed by the rail line. In addition, our county is taxing land owners to generate funds to correct the flooding problem. Taxpayers should not potentially have to pay to fix additional problems that may arise as a result of a privately owned rail line.

Fire Department Impacts:

The next impact to consider is to rural fire departments. The rural fire departments are well equipped and manned for the types of fires experienced in rural communities. Unfortunately, these fires include brush, cars, barns, and houses. However, they are not adequately equipped to address a fire related to train derailments. These fires can be chemical based from different kinds of chemicals being transported by the rail line. These fires pose all new risks to our brave rural fire fighters. These fire departments and fire fighters are not equipped to handle these fires without significant enhancements to their equipment and training. The industrial areas where the existing railroads are currently operating have the equipment and are trained for these types of emergencies. They not only deal with them for train fires, but also for industrial fires. The small rural communities do not have the resources to equip their fire departments or train their fire fighters for these types of fire hazards.

Social Impacts – Rural Residents Compared to City Residents:

I have discussed a number of significant impacts to the rural residents along the proposed rail line. There are some that would say the rail line should be routed away from the larger cities. This may imply those of us who live in the rural communities may not be as significant. While to some, it may be logical to think that way; however, I would propose the trains running through the more congested areas are likely safer than a train traveling in the country. The trains running through the higher populated areas travel slower which could be considered safer. If they were to derail in the populated areas, the derailments at slower speeds could potentially be less severe, and these areas have the appropriate equipment and

knowledgeable first responders to resolve the situation more quickly compared to what may take much longer in the country and could cause an even greater environmental problem. I am not suggesting anyone should be exposed to the dangers associated with trains, but it is not a given that trains running in the country are inherently less dangerous to all of us and our environment, since they are in less populated country settings. Please note, just because the trains run slower in the urban areas does not mean they are not making it through the Chicago corridor slower. They are much closer to their destination when they are closer to the cities they serve, and therefore, do not need to run as fast to make it in a comparable time frame.

Economic Impacts:

While it is my understanding the Surface Transportation Board's decision is not influenced by the economics of the project, I implore you to at least consider the economic impacts on those along or near this proposed rail line. It will economically impact farmers and individual home and property owners along the entire route. Some farmers will be impacted through the inability or reduced ability to earn a living from their crops and animal farms. This is not just a one-time impact, but will impact their income on their property every year. In addition, individuals near the rail line will be impacted economically. During a recent public meeting on this proposed rail line, a real estate broker reported this is already being seen in the housing market as a result of the proposed railroad. The impacts will likely only get worse.

GLBT has been direct in their communication to the public in regard to eminent domain. They have not minced words in that they are planning on using eminent domain to take the property they want for their proposed railroad. This appears to only benefit them, since there does not seem to be documentation supporting the public need for this rail line. This has been confirmed by some of the existing railroads indicating they will not use the proposed rail line. These railroads have indicated they already have routes around any of the past congested areas.

Additionally, GLBT has been claiming those along the train route will have a benefit from the rail line. There are articles on eminent domain and the railroad barons of yesteryear claiming the farmers had a benefit from the rail line when they took their property. During the eminent domain legal battles of yesteryear, this "benefit" claim allowed the railroad barons to pay less for the property. GLBT has indicated if farmers build their own rail spur and switch they can connect to their proposed rail line. GLBT claims this to be a "benefit". The small family owned farms along the route will likely not have the means to install their own rail spur and switch to connect to the rail line. However, just having the "ability", even though it will probably never be installed, is likely to be considered a "benefit". This will likely work to the advantage of GLBT and negatively impact the value of the farmer's property.

In my opinion there seems to be very little, if any, evidence this proposed train line will have any benefit except potentially to private parties that make up the GLBT. It is unconscionable to let a private entity use an outdated process, eminent domain, to take anyone's private property let alone the productive farm land that impacts not only local communities, but the world.

Alternatives:

What are the potential alternatives? I would propose, since there seems to be little, if any, evidence of public need, the best alternative is the "do nothing" alternative. From information conveyed by some railroads, there are rail lines already in place to minimize any current congestion, and a new rail line is not needed. There are other alternatives besides the use of existing rail lines including use of abandoned rail lines, but again, there does not appear to be a public need. The best alternative is to cancel this proposed rail project.

I have presented a number of arguments addressing why this proposed rail line by GLBT should be stopped. The rail line has significant negative environmental impacts from noise, pollution, tree use, and land use. It also has negative impacts due to the threat of accidents with potential loss of life, first responders with road blockages and potential loss of property or life, need for specialized equipment and training for rural fire departments to fight chemical fires, visually the rail line and the trains are not appealing in the country settings, and additional flooding due to compounding already existing drainage problems. This train will have negative social impacts due to rural residents seemingly not regarded the same as city or urban citizens, since the rail line has proposed the less populated route thinking they will impact fewer people. Additionally, it will have negative economic impacts to those along the rail line due to decreased/loss of farm income and impacts to the value of homes and properties. I believe this rail line will have a negative impact on our neighborhoods, our neighboring communities, our neighboring states, our nation, and to a degree our world. There seems to be little evidence, if any, that this proposed train line has been determined to be a public need, and it appears those who potentially benefit from it are the private parties that make up the GLBT. For these reasons, I urge you to stop the proposed rail line.

Sincerely,
Steven Warren

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