



Bruce Rauner, Governor
Raymond Poe, Director

Office of the Director

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July 13, 2016

Mr. Dave Navecky
Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

Re: Draft Scope of Study/Draft Environmental Impact Statement
STB Docket No. FD 35952

Dear Mr. Navecky:

Regarding the Great Lakes Basin Transportation, Inc.'s (GLBT) proposal to construct and operate a 278-mile rail line that would commence in La Port, Indiana, extend through a large portion of northern Illinois and terminate near Milton, Wisconsin, the Illinois Department of Agriculture is hereby submitting comments and recommendations for the issues that should be addressed in the upcoming Draft Environmental Impact Statement (DEIS) for the project pursuant to the National Environmental Policy Act of 1969 (NEPA).

Agriculture is Illinois' largest industry and the State contains some of the most sensitive and irreplaceable soils on a global basis that are used for agricultural purposes. As a matter of fact, Illinois ranks only behind Texas and Kansas in the nation in the amount of Prime farmland in each state, as determined by the USDA Natural Resources Conservation Service. With that said, if this project comes to fruition, every strategy possible must be employed to mitigate farmland conversion and secondary impacts to agricultural operations. The agricultural community and this Department stands ready to work with STB, GLBT and others to help formulate those crucial mitigative strategies.

The below identifies the topics/issues that should be included in the DEIS:

- The amount (in acres) of agricultural land that would be converted to rail line use and its appurtenances
- The amount (in acres) of soils classified as Prime farmland that would be converted to rail line use and its appurtenances
- The number of landlocked parcels, severed parcels and uneconomical remnants that would be created by the project, including the number of acres associated with these parcels.
- The number of miles of adverse travel for farmers to gain access to their fields post-project
- Assurance that all needed field entrances will be retained or constructed
- Impacts to surface or subsurface drainage systems and methods to restore them if damaged
- Impacts to irrigation systems and methods to restore if damaged
- Impacts to farm water wells used for human and animal consumption
- Impacts to soil conservation structures, such as grassed waterways or terraces and repairs to be carried out by qualified land improvement contractors
- Inventory of agricultural land enrolled in USDA Farm Bill Programs, such as the Conservation Reserve Program
- Inventory of affected agricultural land designated as "Agricultural Areas" under the Agricultural Conservation Areas and Protection Act (505 ILCS 5)
- The number, type and size of livestock operations that would be impacted.

The above list of topics or issues should be addressed for each of the alternative routes for the rail line project.

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Undoubtedly, the highly productive soils devoted to agricultural use would incur a far greater impact than other natural resources such as wetlands, natural areas, etc. with the construction of the project. With that being the case, the DEIS should contain a standalone section for an in-depth discussion of impacts to agriculture and methods to mitigate those impacts to the maximum extent possible. This separate section should be apart from a section entitled, "Land Use", which typically does not provide the degree of consideration that must be afforded to agriculture with this type of project.

It is also our recommendation that the DEIS address the feasibility of using a combination of existing, underutilized or abandoned rail lines as an alternative to building the new rail line.

The Illinois Department of Agriculture appreciates the opportunity to bring forward the critical agriculture related issues that are associated with a project of this magnitude. Once the DEIS is released, the IDOA will conduct a Study of Agricultural Impacts on the project and will share its results with the Surface Transportation Board, Great Lakes Basin Transportation, Inc. and other interested parties. We look forward to working with you on this important project.

If there are any questions concerning the above, please feel free to contact Acting Bureau Chief Steve Chard of my staff at 217-782-6297.

Sincerely,

A handwritten signature in blue ink, appearing to read "Raymond Poe", is written over the word "Sincerely,".

Raymond Poe, Director
Illinois Department of Agriculture

Copy: Warren Goetsch, IDOA
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