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Springfield, IL 62704

June 15, 2016

Mr. Dave Navecky
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

Re: FD 35952
Comments on Great Lakes Basin

Dear Mr. Navecky,

I own a 40 acre farm at MP 101 on the Great Lakes Basin Transportation, Inc.'s ("GLB") proposed route. The field is used to grow corn and soybeans and is farmed by a tenant farmer, Doug Ruffatti. He has been farming the field for almost 30 years. Mr. Ruffatti has been engaged in farming for 40 years. He currently farms about 490 tillable acres. I have only the 40 acres that GLB proposes to traverse. Mr. Ruffatti and I have discussed the proposal and we both have serious concerns about the effects it would have on the farming operation. I provide these comments to present our concerns. I have several suggestions as to what should be considered in the Environmental Impact Study ("EIS").

Although my comments are directed to my farm, the same observations would be equally applicable to most, if not all, of the farms on the route. Some of my concerns are directly related to the size of my farm. These concerns would apply to all segmented farms. It is my intent that these comments will alert the team that is analyzing the GLB proposal of these concerns and that they will analyze these effects along the entire route.

I. SOCIO-ECONOMICS.

A. Costs

The project should only proceed if the benefits outweigh the costs. GLB's cost projections for land acquisition, construction, and maintenance should be thoroughly analyzed. The cost of land acquisition cannot be calculated based solely on the amount of land physically needed for the rail line. There are many stretches where the proposed route runs diagonally or

vertically through farms, rather than along the border. Segmenting the fields into parcels would make them more expensive to farm.

Farming is a gamble. It all depends on two variables: weather and prices. There are good years and there are bad years. I have only owned the property a couple years, but I have the records going back to 1989. There were years when there was close to zero profit. There were some good years. As a general matter, farming has a low or moderate profit margin and it is very dependent on the weather which, in central Illinois, is very unpredictable. In some cases, the GLB rail line would increase the cost of farming a segment to the point where it would be uneconomic to farm it.

Farmland is not undeveloped land. The productivity of farms in north central Illinois is the result of great efforts and expense over many years. Farm fields are generally square or rectangular. This is because it is more efficient to maneuver farm machinery in fields with 90 degree corners. Each field needs direct access to roads in order to plant, till, fertilize, spray, harvest, and to take the grain to market. The grid of farm fields and roads resulting in one mile square sections is by design. A railroad track passing diagonally through possibly hundreds of fields would wreak havoc on the road and farming field system.

The proposed track would cut through my 40 acre farm at about a 45 degree angle. I estimate that, if GLB was granted authority to take a 200 foot strip of my property, it would take a little over 6 acres. It would leave 2 parcels, one of about 21 acres; the other 12 acres. The 6 acres the proposed track would traverse is my most productive farm ground. Mr. Ruffatti provided me with the attached dry yield report (see Attachment A), which his combine generated during harvest last year. The dry yield report indicates that the approximate location of the proposed track coincides with the highest yielding portion of the field. The dry yield report is consistent with a soil map that indicates the portion of the field, which is the location of the proposed track, has the best soil: 293A Andres silt loam, 0 to 2%.

In addition to taking the best ground, if the field was bisected, the acreage used for end rows would increase. End rows are places at the end of each field, the tractor or combine turns around and to go back down the field in the opposite direction. After the field is planted from one end to the other, the area at each end, where the tractor turns around, is planted. For each application, the tractor must turn around over the end rows. Driving over this area repetitively compacts the earth and damages some of the crop. As a result, end rows are less productive than the center part of the field.

A track running diagonally through the field would double the number of end rows. The end rows, on the diagonal, would be longer than the current end rows, which are straight. The tractor would have to turn around at the end of each round on both the 21 acre segment and the 12 acre segment. The end rows would be at an angle paralleling the track. Being at a diagonal, the end rows would be longer than they would be for a rectangular field, whereas the center rows

would be shorter. On the east segment, the length of the field would be longer on the north side of the field and shorter on the south side. On the west segment, it would be the opposite. The longest rows on the west segment would be significantly shorter than the shortest rows on the east segment. If the track were allowed to bisect the field at an angle, as GLB proposes, it would significantly increase the proportion of end rows and decrease the proportion of the more productive, center part of the field. The angles created by the track as it enters and exits my farm would be over-planted. This happens because, when planting rows that end on an angle, the planter has to keep planting on the shorter side, until the planter reaches the end of the field for the longer row. Mr. Ruffatti estimates that the total end rows for both segments would be about 3.64 acres. He estimates production in those rows would be reduced by 30%, almost one third of production

Segmenting the field would also increase the time spent for each operation. It takes time to turn a tractor around, more time to turn a combine around. Segmenting the field would double the turnaround time. Mr. Ruffatti estimates that it now takes about one hour of turnaround time to plant my field. He notes that the angles created by a diagonal track would increase the turnaround time. He estimates that, if the field were segmented, turnaround time for planting would be about 2.5 hours. He anticipates that it would take about one additional hour to cultivate. The increased time for chisel plowing the field would be about 1.5 hours. Harvesting would take approximately one third more time; if it normally would take 4.5 hours, when segmented it would take about 6.5 hours. The increased time investment would also affect applications of anhydrous, chemicals, dry fertilizer, and mid-season fungicides and insecticides.

If a crossing is not provided for traffic on Woods Road or Filman Road, my field would have to be accessed by going down Old Mazon Road to the west or down Gorman Road to the east for a crossing. For a one way trip, using Old Mazon Road would add about 5.7 miles, or using Gorman Road would add about 7.2 miles. Attachment B presents a calculation of the increase in time and miles that would result from there being no crossing on Woods and Filman Road. Mr. Ruffatti's calculations were based on 6.5 miles (13 miles round trip), which is the average of the increase between taking Old Mazon Road and Gorman Road. His calculation includes waiting 5 to 10 minutes for one train with each pass. He anticipates that access to the east field would be from within the west field. Mr. Ruffatti estimates increased mileage of 767 miles for 59 trips. He estimates the trips would add up to 36.5 hours of additional time spent. (See Attachment B) If trains were more frequent, the time would increase proportionately. The calculation does not include the added mileage or time for inputs such as fertilizers and herbicides. In addition to time and the increased fuel costs, the wear and tear on machinery with each additional mile should be considered. Segmenting the field would increase the expense of basic inputs for the farm. All of this extra turning around would increase the wear and tear on the tractor and fuel usage by the same proportions.

Segmenting the field would affect drainage. I do not believe the field tile, i.e., water drainage system, would work below the track. Mr. Ruffatti indicates that surface water normally

drains by running across the field to the northeast, toward Gardner Road. He says that drainage would be blocked by the railroad. He thinks that the water would probably have to be drained toward the creek along Woods Road. He is concerned because the creek already tends to flood from moderate to heavy rainfall amounts. Drawing the surface water toward the creek would mean more water would back up into the field.

Mr. Ruffatti notes that there are two culverts that pass under Woods Road, one near the southwest corner of my field and one by the northwest corner of the 40 acre farm north of mine. He is concerned about the effect of the railroad running through the middle of that flood area. I think that tiling would have to be reconfigured into two separate tile systems. A drainage ditch would have to be dug along the track. I am not aware if plans for that are included within the land requested by GLB for the rail line. If there is no culvert added beneath the railroad in the road ditch, then Mr. Ruffatti suggests that an additional culvert should be placed beneath Woods Road. He says an additional culvert would allow the flood water to recede quicker. Mr. Ruffatti says that more water tends to sit on the north part of the road ditch adjacent to my field. Neither of us is familiar with the tile drainage system below ground.

As I understand it, GLB plans to build a private crossing for each segmented parcel. To be useful, the private crossing would have to be wide enough for use by all farming equipment. If the private crossing would require additional land, that would be another cost for GLB. Access to the private crossing could be an issue. If access is through another landowner's property, the cost of making that arrangement would be an integral part of the cost of constructing the private crossing. The private crossing should be located to minimize the impact on the farm. It could make an additional culvert, for entering the field, necessary.

Assuming that GLB builds the private crossing, using it to access the field will take additional time, fuel, and wear on the farming equipment. How the private crossing is accessed would affect the increase in time, fuel, and attrition. Whether the crossing provides direct access, or requires traveling additional distances, will have an effect on costs. Each trip would take more time, how much more time would depend on how direct access would be. The cost of time, fuel, and wear on farming equipment would be impacted by the number, length, and speed of the trains. The track is planned to accommodate up to 110 trains, traveling up to 70 miles per hour, a day. That could be up to one every 13 minutes. How long each would take to pass would depend on the length and the speed.

Farming is weather sensitive. There are windows of opportunity for each step. In this area of the state, corn is ideally planted in April. It can be planted later into May, depending on soil and weather conditions. Corn, from emergence to harvest, requires about 150 days. (Corn maturity days can be confusing. Growing Degree Units or GD Days are used in the seed industry to measure the time needed for corn to mature. GD Days would be different from actual calendar days.) The 150 days are actual calendar days. Soybeans are ideally planted in May,

sometimes earlier, sometimes later depending on soil and weather conditions. Soybeans, at this location, from emergence to harvest, require about 135 frost-free days to mature.

There tends to be a lot of rain in May and June. To plant, the soil must be dry enough so that the tractor will not get stuck. To plant, the soil must also be dry enough to maintain the tilth, workability, and productivity of the soil. The soil should be dry enough that working it will not make it get hard and clod up, which could prevent seedlings from sprouting. The timing and amount of rainfall cannot be predicted. There are a limited, and unknown, number of days and hours during which the fields must be planted. Harvesting presents equivalent concerns. Time is always of the essence, when farming is concerned.

The delays that would be caused by the reconfiguration of the fields, the need to cross a track to get to the field, and, possibly, the need to cross a track within the field would have a significant impact on the timing for each farming process. It would impact the number of acres that could be farmed by one farmer and one piece of equipment. The number of acres farmed has a direct impact on profitability. If there were no crossing on Woods or Filman Roads, the increased cost in time and mileage would be enormous relative to the size of my operation.

Forty acres does not generate a large profit. With prices down last year there was virtually no profit. My farm is a very large investment for me. In 2014, I was offered \$10,045 an acre. That offer was based on its value as farmland. If my farm were bisected and lost 6 of the most productive acres, had reduced productivity, and increased costs, my 40 (then 34) acres would become uneconomic to farm. I am not aware of another economic use for a small piece of property out in the middle of nowhere bisected by a railroad track. Its value would be a fraction of what I was offered in 2014. If the track made the 40 acres uneconomic to farm, the cost, to me, of the track severing my farm would be my investment in the 40 acres. The cost to society would be the loss of 40 acres of productive farmland.

Losing 40 acres of productive farmland would be a small cost to society. But, my 40 acres are only an example of the impact the track would have on many of the farms it would traverse. In its entirety, the track would cause a loss of many times my 40 acres of productivity. Lost productivity also has consequences. Less grain means less income for the farmer. The reduction in productivity would affect all the services needed to farm. Those services fuel the economies of farming communities. Any consideration of an influx of construction workers must be weighed against the local under-employment that would be caused by the loss of farm productivity.

B. Width of Track

Railroad tracks are 4 foot, 8 inches wide. GLB's proposed route is 200 feet wide for a double track. It states that 50 feet will be for utility easements. There is no need for a utility easement. The Illinois Commerce Commission ("ICC") has jurisdiction over utilities in Illinois. A utility must have a certificate, granted by the ICC to conduct business. Additionally, without a

certificate a utility cannot use the easement. The ICC Staff informs me that no utility has requested such a certificate. There is no basis for an entity to include a 50 foot strip of land for a possible utility easement as part of its request for a certificate to operate a railroad. GLB should not be granted eminent domain authority, as part of a railroad certificate, over land which it wants to procure for a possible future utility easement.

C. Mitigation Measures

The width of GLB's route should be limited to the minimum necessary to operate and maintain its proposed tracks. GLB should be required to take all possible steps to mitigate the impact of the construction and railroad traffic on farming. Impacts can be best mitigated by changes to the route to avoid and minimize severing parcels.

Regardless of whether fields are segmented, crossings, wide enough for machinery to cross should be constructed for each public road. The bean head for Mr. Ruffatti's combine is 25 feet wide. Generally, when moving the combine from field to field on public roads, the head is transported with a carrier pulled by another piece of equipment. The head is then attached to the combine before the combine enters the field. Mr. Ruffatti says he might leave the head on if the distance is very short and the traffic is blocked off. It would be helpful, but not absolutely necessary, for crossings on public roads to be wide enough for a combine to cross with the head on.

If the fields are segmented, rail crossings should also be constructed for each segmented field. In contrast to the public road crossings, the crossings within farm fields (field to field) would have to be wide enough to allow combines to cross without having to remove the head and place it on a carrier for transport. Transporting the head separately to cross to the field on the other side of the track would take a significant amount of time and space as well as an additional piece of equipment to pull the carrier. Putting the head back on in a field would require having to drive on top of the crop to find enough room for the combine and carrier to line up with each other.

In order to minimize the impact on land productivity, GLB (including its contractors) should be required to take steps to avoid or minimize soil compaction. Construction vehicles should be required to use public roads and prohibited from entering or using land outside of the designated route. To the extent it traverses land outside the designated route, GLB should be required to identify and use construction methods to prevent, where possible, and otherwise mitigate and remediate soil compaction. GLB should be required to identify the location of drainage tiles. GLB should also avoid traversing the drainage systems where possible. To the extent the rail related construction damages or renders the water drainage systems ineffective, GLB should be required to repair or replace the system. GLB should be required to speak with landowners regarding the placement of the crossing on their farms.

II. PUBLIC HEALTH AND SAFETY

The failure of the proposed route to parallel roads or other property dividers, results in the need for an extravagant number of rail crossings with associated safety hazards. Each rail crossing is eminently dangerous and there are many. My farm is at MP 101 on the GLB route map. In the approximately 3 miles between MP 99 and 102, in addition to the road crossings, 10 private crossings are needed for bisected farm fields. Both the public and private crossings would create delays for emergency vehicles, farm equipment and grain trucks. The potential for such delays, in itself, creates a hazard, as drivers may try to beat the train to avoid a delay.

The safety of the crossings themselves is an issue. Inspecting the large number of additional crossings would be a significant burden. Only the public crossings would be subject to inspection by ICC inspectors, as the ICC has jurisdiction over the safety of public railroad crossings. The private crossings must be monitored and maintained. The size of the farm machinery using the crossings would be hard on the crossings, as the machinery is very heavy. At the same time, because of the size of the machinery, defects in the crossings could damage the machinery or cause it to get stuck on the track, which, in itself, presents a potentially dangerous condition. This is because large machinery cannot start or stop quickly.

Looking at the map of the route, the 3 miles near my farm, are not unique. The proposed route may result in the need for hundreds of private crossings. Considering the number of trains projected, up to 110, the speed (up to 70 miles per hour), and the number of private crossings, accidents would be likely.

Each instance where the track is raised or lowered at crossings would mitigate the risk at that crossing. Lights and gates should be required to mitigate the risk. In order to minimize the potential for collisions between farm equipment and high-speed trains, a schedule for regular monitoring and maintenance of private crossings must be put in place and enforced.

III. FINANCES

A. Financing Track Construction

The goal of enabling trains to link to existing tracks in order to avoid the Chicago terminal is reasonable. Building an entirely new track is not a logical or efficient method of linking the existing tracks. Building an entirely new track would be exorbitantly expensive and is not necessary. There are many tracks in northern and central Illinois which could be used to achieve this purpose. While a new, state of the art track, that avoids population centers sounds inviting, there is no indication that its benefit would be greater than its cost. Building upon the existing railroad network could satisfy the goal of avoiding the Chicago terminal much more efficiently.

The first step in determining whether GLB has the financial capability to finance building a 278 mile railroad track is to calculate how much the construction would cost. Running a track through prime farmland would be expensive. Choosing a route that ignores local transportation grids and current property use would be expensive both for GLB and for the local communities. Bisecting farm fields and creating large numbers of uneconomic parcels of farmland would increase the expense significantly. Mitigating the safety risk with bridges, tunnels, lights, arms, and careful maintenance would increase the cost but would decrease the safety risk. GLB would be exposed to significant liability in the case of accidents. GLB should be required to maintain adequate insurance to cover that risk. All of these costs should be included in the calculation of the costs for the project.

If congestion of railroads going through Chicago is a problem that must be addressed, it should be addressed in the most efficient manner possible. Ultimately, the track must generate sufficient revenues to pay for itself. The more expensive the track is to construct, the higher the rates that must be charged in order to pay for it. At the same time, rates must be such that railroads find the tracks economically efficient to use, or they will not use them. The projected rates should be compared to the expense of the project. As railroads will not be required to use the track, the projected rates should also be compared to the cost to use alternative tracks.

A determination of who would finance the track and how it is financed is essential. There have been assertions that the entire track will be privately financed with no governmental subsidies. If that is so, then there must be a plan for privately financing it and the plan should be closely scrutinized. If GLB will receive federal loans or other subsidies, the cost to the public for those loans or subsidies should be considered as part of the costs of the project.

The financing issue is important because the benefits can only outweigh the costs if the project is completed. Costs are incurred up front; benefits only come after completion. It should be considered whether at some point during construction, this project would become too big to fail.

The plan for the South Suburban Airport (also called the third airport) in Will County, Illinois used the same rationale as GLB. The State of Illinois determined that the airports in Chicago were too congested and there was a need for a third airport to relieve the congestion. The airport has not been constructed but \$100 million dollars was spent over 15 years to acquire (sometimes using eminent domain) hundreds of acres of prime farmland near Peotone, Illinois for the airport. No major commercial or freight airline has ever agreed to use the new airport. The Governor placed a hold on the project in March 2015. Eminent domain cases are still pending in court. Some landowners have been in limbo for years and many have suffered tremendous emotional and financial hardship as a result of the loss of their property.

GLB is a new, single purpose entity. Any claim that it could singlehandedly finance, construct, and operate a project of this scope has to be put to the test.

B. Mitigation Measures

GLB should not be granted a certificate to construct the track unless it demonstrates that railroads would be willing to pay rates that are sufficient to cover the cost and provide a return on the investment. GLB should not be granted a certificate unless it demonstrates that it will have the finances to complete it. Alternatively, certificates should only be granted for one section of the track at a time. That could be accomplished by dividing the project into sections, with each section having a starting and ending point, where it connects to an existing rail. A certificate would be granted for one section at a time, as GLB completes sections. Building the rail line section by section would allow railroads to begin using the track. GLB could demonstrate that the rail line is economically feasible and begin earning a return on its investment. If GLB were to fail to demonstrate the feasibility of building a section of the track, then it calls into question whether the next section should be certificated.

The alternative of reconfiguring existing tracks to address congestion through Chicago would also be expensive. But, it would not be as expensive or as disruptive as constructing a 278 mile long, entirely new track. GLB should be required to maintain adequate liability insurance. To the extent landowners could be liable for injuries caused by the track or passing trains, landowners should be compensated for those expenses, which could be very costly.

IV. EFFICIENCY.

The State of Illinois started the Chicago Region Environmental and Transportation Efficiency ("CREATE") program about 12 years ago. CREATE is a first-of-its-kind partnership between U.S. DOT, the State of Illinois, the City of Chicago, Metra, Amtrak, and the nation's freight railroads. CREATE is described as a project of national significance. According to its website, it will invest billions in critically needed improvements to increase the efficiency of the region's passenger and freight rail infrastructure and enhance the quality of life for Chicago-area residents. The CREATE project is already addressing a number of the issues raised by the GLB to alleviate rail congestion in the Chicago area.

The GLB costs and rates should be compared to the costs and rates expected to result from the CREATE program. GLB states that it is having discussions with the Class 1 railroads, but has no commitments. If the track was too expensive, no railroads would use it. The GLB's project may be a duplication of the CREATE program's efforts, but at even greater expense. Redundancy is not efficient and not in the public interest. It should be determined whether the GLB's program duplicates governmental efforts on the part of CREATE before GLB is given a certificate.

V. ALTERNATIVES.

Based upon a map of railroads in Illinois that I received from the Illinois Department of Transportation, I suggest a number of alternatives. Although some of the alternatives suggest areas of new track, I believe the most efficient alternatives would use tracks currently in place or abandoned track right-of-ways. Those are my preferred alternates. I am not a railroad expert. I anticipate that the analysts reviewing the GLB proposal would use my suggestions in conjunction with their familiarity with the rail lines making practical adjustments in order that the current lines and/or rights-of-way could be used.

I include exhibits to illustrate the maps. (The wiggles in the highlighted routes are a result of a shaky hand, not variations in the route). I propose the following alternate routes:

A. Alternate Routes Using Existing Tracks

1). (See Ex. 1, Yellow Line) Norfolk Southern ("NS") leaves Lake County, Indiana entering Illinois in Kankakee County. Take it west to south of Streator. Then take Illinois Railroad ("IR") through LaSalle County, into Kendall County. From this point, there are two options:

- a. (Yellow) Get on the BNSF track at Aurora in Kane County. Take it through Sugar Grove, through DeKalb County to Steward, where it goes north to the IR. Take the IR tracks through Ogle County to Winnebago County and through Rockford, on the Canadian Pacific ("CP") tracks; or
- b. (Red) Go north on what appears a Joppa and Eastern ("EJE") track through Batavia, where it jogs east on the EJE to UP tracks, which go northwest. Then take the UP tracks heading northwest to the CN tracks. Take CN tracks northwest to Rockford and then take CP north.

2). (See Ex. 2) Take the NS track. From this point, there are two options:

- a. (Purple) to Route 39 ("39"), build new track roughly paralleling 39 (on one side or the other of 39) north to BNSF tracks at Steward. Then take BNSF northwest to IR north through Rockford; or
- b. (Pink) to IR, then to the Sheridan area. Build new track going northwest to BNSF. (Identify the least disruptive, efficient route.) Take BNSF to IR through Rockford.

3). (See Ex. 3) (Green) Take NS to the UP track in Kankakee County. Go north to what appears to be an NS or EJE track near Richton, then go west through Joliet. Go north on EJE through Plainfield to UP and then CN near Wayne. From this point, there are two options:

- a. (Green) Go northwest on UP to CN. Take CN to CP in Rockford and go north; or
 - b. (Peach) Take UP to CN to CP in Rockford.
- 4. (See Ex. 4) (Hot Pink) Enter Illinois on EJE, rather than on NS. Take EJE from Indiana west to Joliet. Continue north on EJE through Plainfield to near Wayne. From this point, there are two options:
 - a. (Hot Pink) Continue north on EJE to UP, just south of Deer Park. Take UP northwest to Wisconsin; or
 - b. (Green) At Wayne split off on UP west to CN, then to CP in Rockford and go north.
- 5. (See Ex. 5) (Blue) Go west from Indiana on EJE to CSXT. Take CSXT to Peru.
 - a. (Blue) Construct a new track either to the UP line at Troy Grove. Go north to BNSF tracks at Steward. Then take BNSF northwest to IR north through Rockford; or
 - b. (Rust) Construct a track paralleling 39 (on one side or the other of 39) north to BNSF tracks at Steward. Then take BNSF northwest to IR north through Rockford.
- 6. (See Ex. 6) (Green) Taking NS west from Indiana, go to Streator. Go north on IR to Sheridan. Construct a track from Sheridan to Leland. From this point, there are two options:
 - a. (Green) Take BNSF west to UP. Go northeast on UP to DeKalb then west on UP to BNSF then northwest to IR. Take the IR tracks through Ogle County to Winnebago County and through Rockford, on the CP; or
 - b. (Green) Continue track construction to somewhere between Shabbona and Waterman to intersect BNSF. Then, take BNSF west to IR.

If the goal is to avoid Rockford, for the routes entering Rockford from the east on UP, construct a track somewhere west of Marengo, going northwest to meet CP north of Rockford, or north to meet UP or IMRL in Wisconsin. For the routes entering Rockford from the south on IR or CP, construct a track from CP, near Byron, north and east around Rockford to CP.

B. Revising the Proposed Route

At a minimum, a routing alternative that would follow field or property lines would be more efficient. The rail line does not have to bisect farms. It could be revised to maximize the

extent to which it runs along roads or property lines. It cannot be emphasized too strongly that the GLB project need not bisect farms.

C. Mitigation Measures

To the extent the alternate routes cross farm land, the mitigation proposals discussed above for farmland are equally applicable for the alternates.

GLB indicates a goal for the proposed route to avoid population centers. This goal is somewhat impractical and inconsistent with the argument that the track will produce jobs. In fact, populations locate where there is efficient transportation. Many towns are the result of the railroad track that runs through them. They were intentionally located along railroad tracks to take advantage of them. To the extent the proposal results in large train yards, it will draw population. Safety concerns can be addressed, to some extent, by constructing bridges or tunnels at crossings at regular intervals.

VI. THE PROCESS

I learned about the GLB proposal from Mr. Ruffatti on April 7, 2016. He shared the news as soon as he heard it. We both attended the public meeting on April 21, 2016 in Seneca, Illinois. Since then, Mr. Ruffatti and I have spent many hours considering the implications of a track across my 40 acre field. Although I have quite a bit of experience with issues similar to this, concerning electricity and gas transmission, before April 7, 2016, I had no awareness of the process for getting a railroad certificate. I have spent untold hours in the last 9 weeks, looking at the United States Code and the Federal Register, trying to figure out the requirements and considerations for a railroad certificate. I am lucky to have been able to consult with Mr. Ruffatti, who is very knowledgeable about farming.

I find the railroad certificate process to be very troubling. When a railroad (which may require taking real estate through eminent domain) is proposed, the railroad developer should be required to provide written notice to each affected landowner. I am fortunate that Mr. Ruffatti is on the ball and became aware that GLB proposes to traverse my farm. If he had not alerted me, I would not be aware of the project. I suggest that rules be adopted requiring notice to landowners. I also find it inexplicable that the law requires the opponents of a rail line to demonstrate that the rail line is not in the public interest, rather than requiring that GLB demonstrate that the rail line is in the public interest. I recognize that the United States Congress, not the STB, wrote the law. I certainly will contact my Senators and Representative.

That some landowners are likely not aware of the GLB proposal adds further importance to the thoroughness of the EIS. The concerns Mr. Ruffatti and I have described for my 40 acre field would apply to each farmer or landowner along the proposed route. I am sure that we have not thought of all the problems that would result from the track. The track would affect other landowners in other ways. It is essential that the team reviewing the proposal for the EIS

familiarize themselves with farming in north central Illinois. The EIS will only be accurate as the details it considers.

I strongly urge the STB to direct the consultants who are performing the study to take the time to identify and quantify similar concerns for each parcel the track would cross.

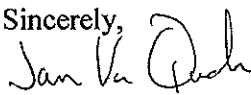
VII. CONCLUSION

The scope and magnitude of this proposed rail line requires a thorough and in depth study of the impact this project may have on the individuals, businesses, communities and railroads directly affected by the tracks. The concerns I raise would affect any farm that is bisected along the route. The EIS should consider the added time and costs for each segmented farm when considering the proposed track's socio-economic impact. The EIS should consider the economic impact on each of the communities and counties affected by the track. GLB's anticipated benefits must be weighed against the decrease in the current productivity of the farms it would be crossing.

The length of my discussion of safety concerns should not be interpreted as a sign that I do not find them significant. I shudder each time I think of a hundred trains per day, traveling up to 70 miles per hour going over hundreds of private crossings. It would be a disaster, or, I should say one disaster after another. The safety risks are beyond what I am willing to imagine.

GLB would affect the wealth not only of individuals and corporations. Whether it is a good or a poor use of assets will affect the wealth of the community, the state, and the country. Its success or failure will be as huge as the project itself. Further, there are several alternatives available to the GLB that do not disrupt the landowners involved, or, which have a minimal impact upon those landowners. I hope the Surface Transportation Board will very closely review the project costs, and analyze the claimed benefits. The true costs must be weighed against the likelihood of success and achieved benefits.

Thank you for your time and attention.

Sincerely,

 Jan Von Qualen

CC:

U.S. Senator Dick Durbin
 U.S. Senator Mark Kirk
 Candidate Tammy Duckworth
 Representative Rodney Davis
 Candidate Mark Wicklund
 Candidate David Gill

Representative Adam Kinzinger
 State Senator Wm. Sam McCann
 State Representative Sara Wojcicki
 Jimenez
 Candidate Tony DelGiorno

Dry Yield

Doug Ruffatti - Jan Von Qualen - South 40 Acres



Client Information:

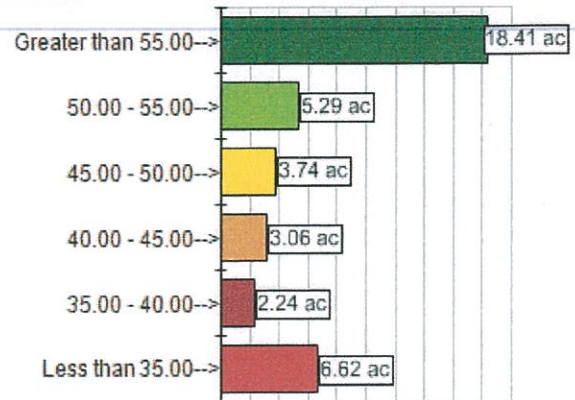
Client: Doug Ruffatti
 Farm: Jan Von Qualen
 Field: South 40 Acres

Field Information:

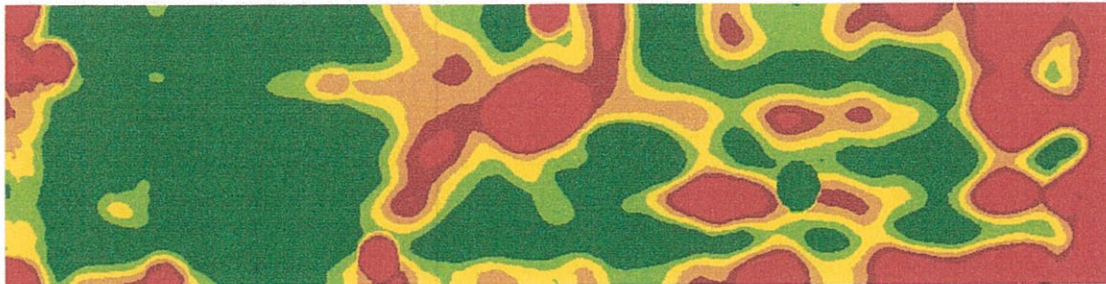
Crop: Soybeans
 Start Date: 10/2/2015
 Product: Soybeans
 Elapsed Time: 2.906 h
 Area: 39.36 ac
 Average Yield: 49.7 bu/ac
 Average Dry Weight: 2,983.7 lb/ac
 Total Yield: 1,957.0 bu
 Total Dry Weight: 117,439 lb
 Average Moisture: 10.04 %
 Productivity(area/hour): 13.55 ac/h

Legend Information:

Units = bu/ac



Field information and legend apply to active map layer only.



250 ft

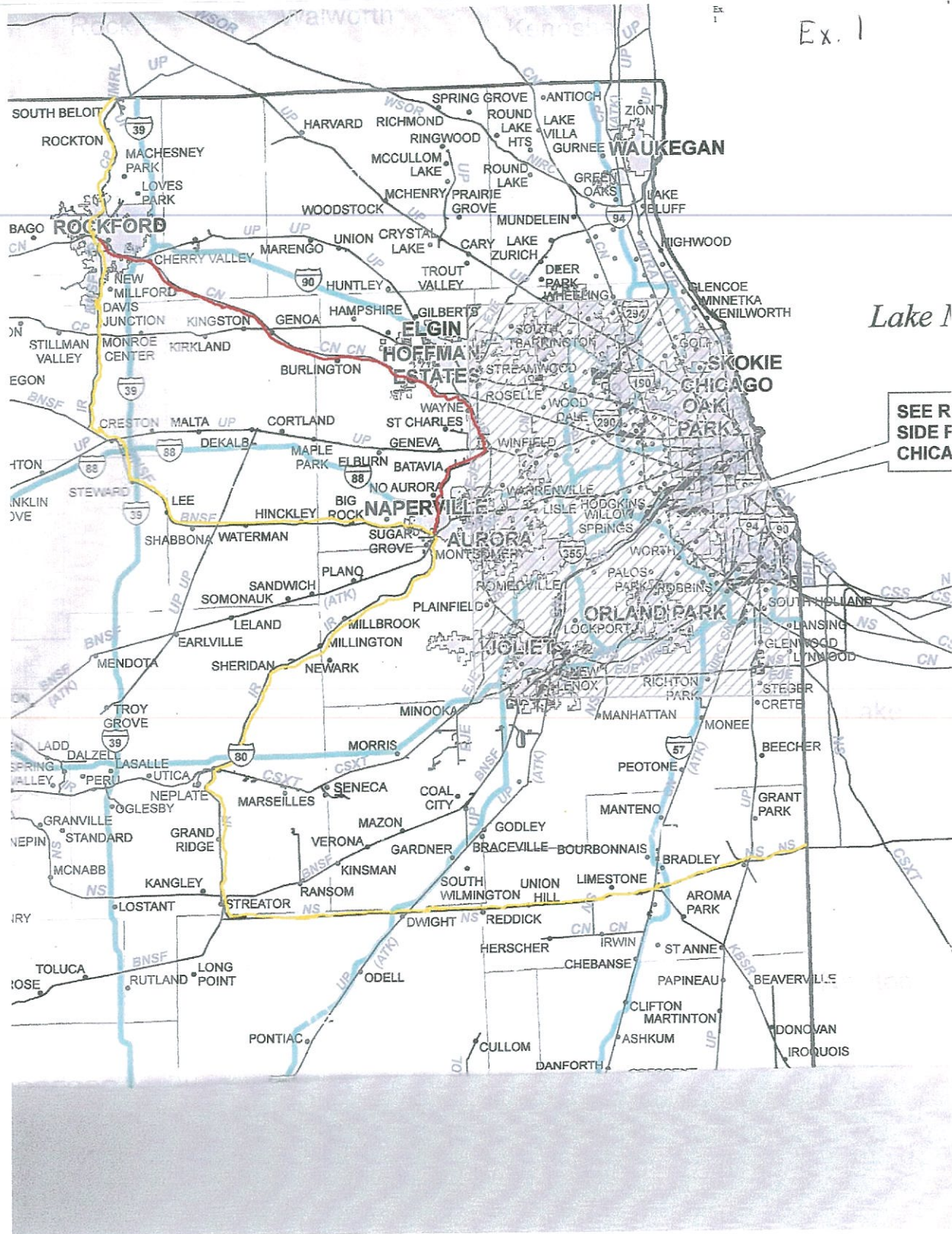


Attachment B

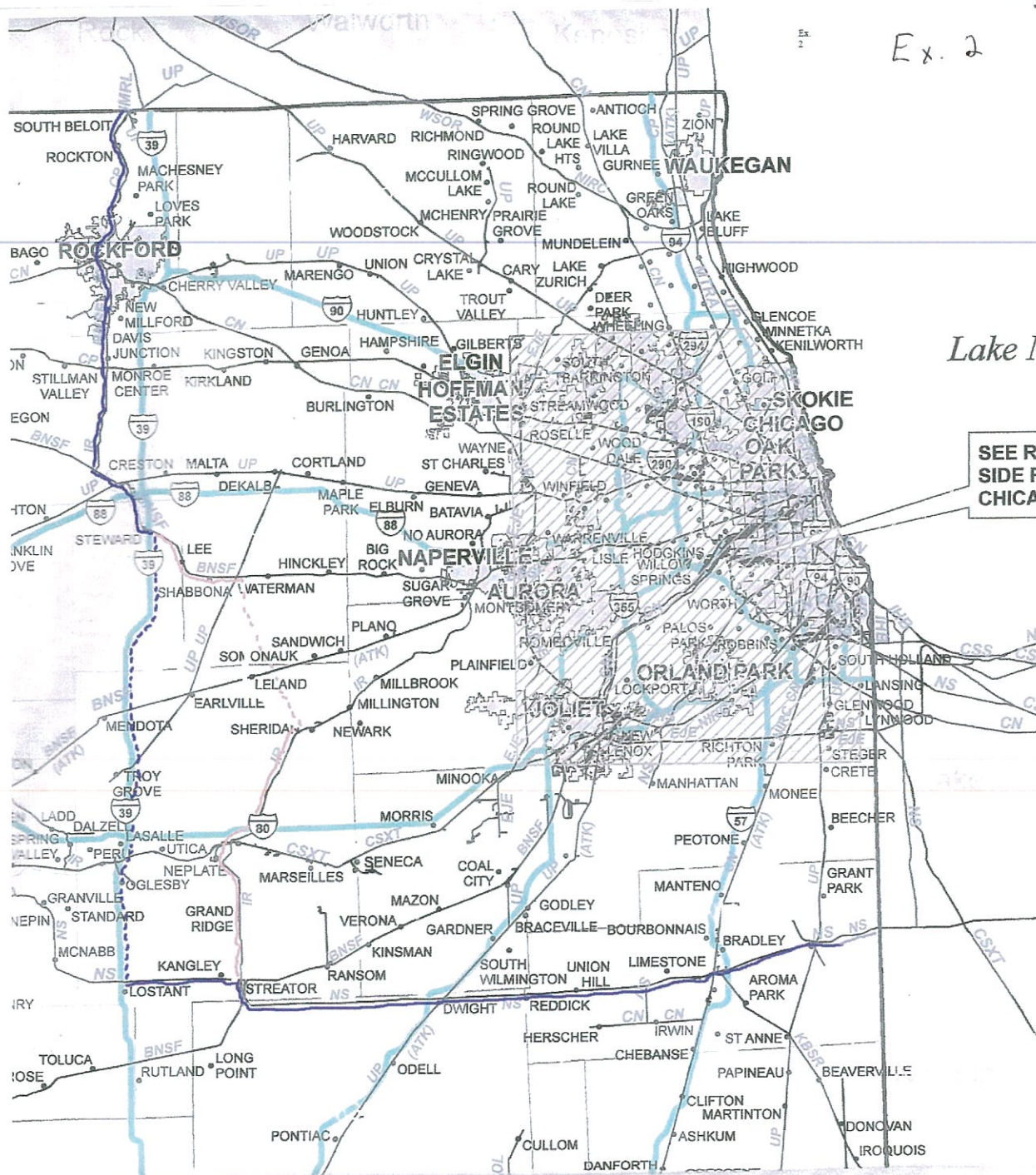
Delays Caused by Indirect Access

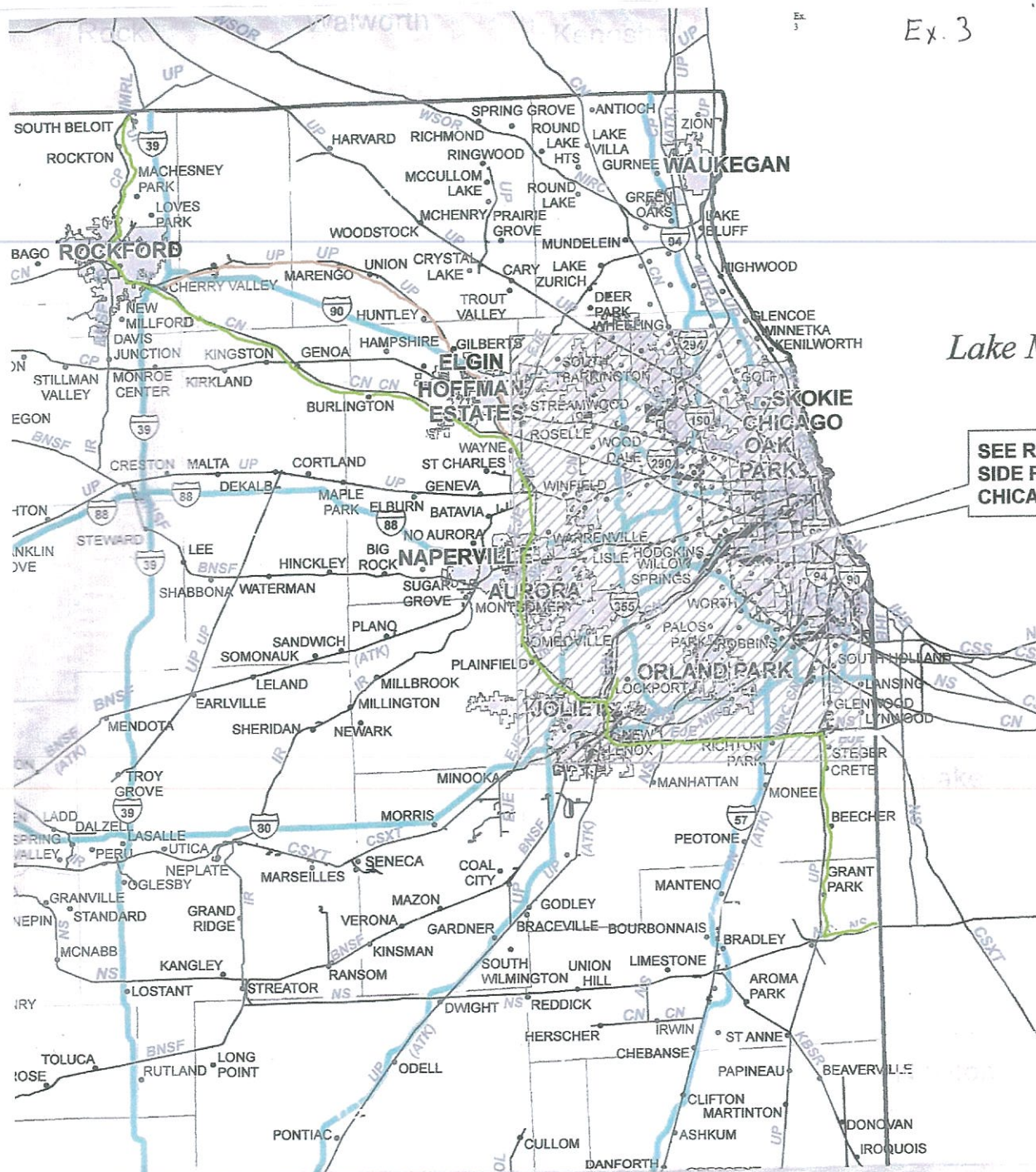
<u>ACTIVITY/VEHICLE</u>	<u>TRIPS</u>	<u>MILES</u>	<u>TRAVEL TIME</u>
CULTIVATING			
Cultivator	1 Trip	13 Miles	1 Hour
PLANTING			
Planter	1 Trip	13 Miles	1 Hour
Truck	2 Trips	26 miles	1 Hour
Seed wagon	1 Trip	13 miles	1 Hour
COMBINING			
Combine	1 Trip	13 Miles	1 Hour
Head Carrier	1 Trip	13 miles	1 Hour
Truck	3 Trips	39 Miles	1.5 Hour
Tractor and 3 wagons	14 Trips	182 Miles	14 Hours
CHISEL PLOWING			
Chisel Plow	1 Trip	13 Miles	1 Hour
CHECKING, SCOUTING FIELDS			
Truck	30 Trips	390 Miles	10 Hours
MOWING			
Tractor and mower	4 Trips	52 miles	4 hours
TOTAL:	59 Trips	767 Miles	36.5

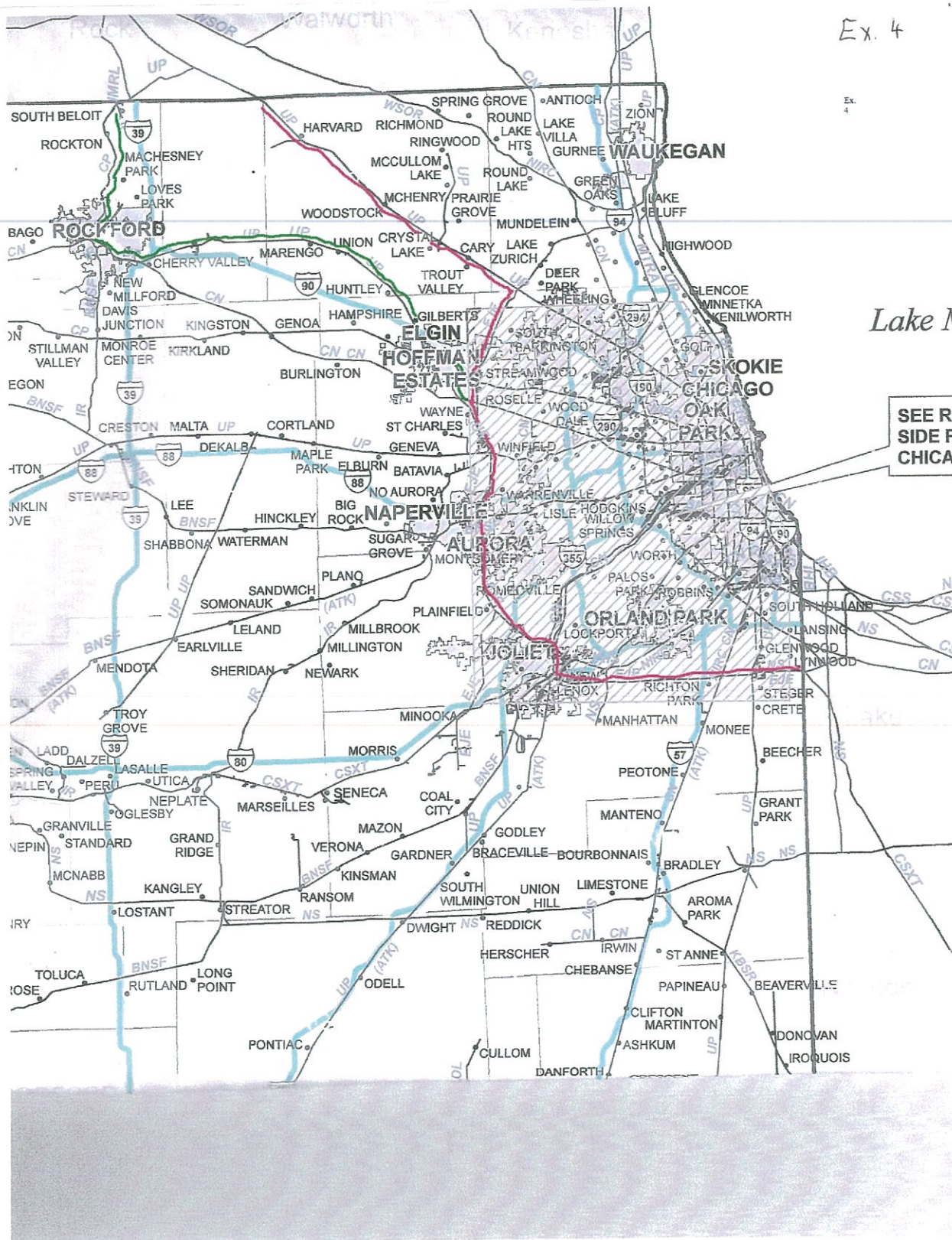
Ex. 1



Ex. 2



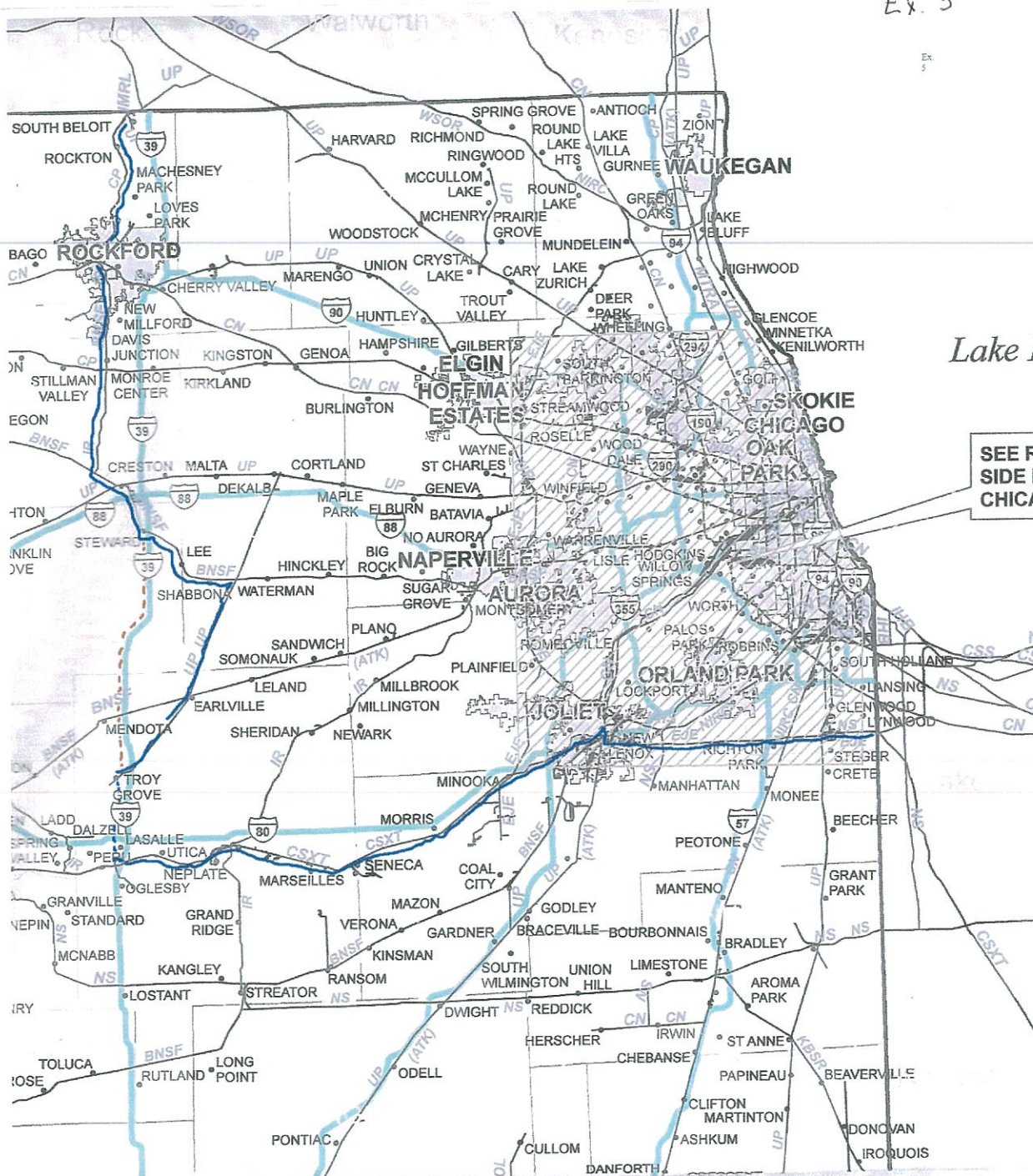




Ex
5

Lake M

SEE R
SIDE F
CHICA



FD 35952

