

COUNTY - PORTER

Board of Commissioners

Administration Center
155 Indiana Ave. • Ste. 205
Valparaiso, Indiana 46383

North District
John A. Evans
(219) 465-3361

Center District
Jeff Good
(219) 465-3354

South District
Laura M. Blaney
(219) 465-3349



(219) 465-3440
Fax: (219) 465-3362

July 13, 2016

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

Re: Proposed Great Lakes Basin Rail Line
EIS Scoping Comments
Docket No. FD 35952

Dear Mr. Navecky:

The Porter County Board of Commissioners respectfully submits this letter in response to the Draft Scope of Study for the proposed Great Lakes Basin Rail Line (GLBRL). We thank you in advance for consideration of our comments and the information provided.

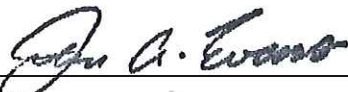
It is our belief that the establishment of a new railroad alignment would be detrimental to the social, economic and environmental resources of Porter County residents and businesses. While we would prefer that the GLBRL not be located in Porter County, should consideration be given for further advancement, it is our request that a detailed examination of these resources be made including the calculation and evaluation of measurable impacts. There are many stakeholders that would be impacted and we also request that in addition to the prescribed public involvement process that these stakeholders be consulted throughout the study process to provide input. These stakeholders would not only include those that represent regulatory agencies (e.g., US Fish and Wildlife, Indiana Department of Natural Resources) but those that locally represent the area being impacted (e.g., various Porter County agencies, volunteer fire departments, Farm Bureau).

We understand that the GLBRL has proposed a single route through Porter County, Indiana. We have many concerns of what impacts would be created. First, we believe that the route shown at the recent public meetings has not been subject to the examination of other alternatives. Furthermore, all routes that may be considered should include a "do nothing" alternative in comparison of impacts. In evaluation of the current GLBRL alignment no consideration was given to making use of established rail corridors, both active and inactive. We find it disheartening that this new proposed alignment will effectively destroy countless acres of prime farmland, segregate properties and services, and, disrupt our infrastructure when there are numerous rail corridors already in existence.

From an elevation of 10,000 feet, maps can only show a glimpse of the story. Upon further detailed examination what you will find is an area sensitive to development. As examples, over the last century public and private entities have invested heavily in stormwater improvements to facilitate the agricultural community and, being rural in nature, roadways are widely spaced and the closure and/or restriction of our transportation system would add countless hours of travel delay as well as create an impediment in providing emergency services.

We have attached a list of items that we strongly believe should be considered as further study of the GLBRL continues. This list is not exhaustive and undoubtedly there are additional factors that should be considered and will certainly be discovered as the process continues. We also would expect that Porter County and the numerous stakeholders in the county will be actively engaged in providing valuable input throughout the process. We would also strongly recommend that a Community Advisory Committee (CAC) be utilized during the EIS process to facilitate this request.

In closing, we are passionate about the wellbeing of our community. A project such as the GLBRL would have overwhelming significant impacts to our community. We would expect that this proposed rail line would seriously take into account our concerns and be a factor in the decision making process.



John A. Evans



Laura M. Blaney



Jeffrey J. Good

**GREAT LAKES BASIN RAIL LINE
EIS SCOPING COMMENTS
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Resources and Issues within Porter County, Indiana that at a minimum must be addressed in the Environmental Impact Statement

The Great Lakes Basin Rail Line project would involve construction of approximately 280 miles of new railroad corridor, with approximately 25 miles of this distance being located in the central-eastern and southern portions of Porter County.

The National Environmental Policy Act of 1966 requires that an Environmental Impact Statement (EIS) is prepared for federally funded projects which result in significant impacts upon the human environment. The Office of Environmental Analysis of the United States Government's Surface Transportation Board has determined that an EIS is appropriate for this project. The EIS will document consideration of a reasonable range of build alternatives, all of which would result in significant impacts upon the human environment in Porter County.

It is recommended that the EIS include comprehensive reviews and analyses of potential impacts upon the social, economic and environmental resources and issues listed in the paragraphs below. Information and discussion has been added to those resources and issues to describe unique or special aspects of importance within Porter County.

1. SOCIAL RESOURCES AND ISSUES

Land Use and Community Impacts

The project will predominantly impact land in agricultural use. This farmland was created over the years by hard work and is a way of life for many of our residents. Prime farmland is of a premium, new farmland cannot be created. The segregation of farmland is an important consideration. Any proposed rail line should be sensitive to this point.

Impacts to the local roadway network should be seriously considered. The rural nature of our county is that roadways are spaced widely apart. Closure and/or restrictions of our roadways would add countless hours of vehicle delay as well as impede emergency responders. Special attention should be paid to maintaining roadways that provide links between the small rural communities in the project area.

The railroad will undoubtedly transport hazardous materials and there is the potential for derailments and other events that would lead to spills/releases of hazardous materials. Consideration should be given toward the proximity of the project alternatives to the local communities, homes and schools, including consideration of prevailing wind directions.

A possible mitigation measure is providing funds to improve the response capabilities of local emergency responders and clean-up teams.

Native American / Archaeological Resources

Throughout its history of human occupation, this area of the state has formed an important corridor around the southern tip of Lake Michigan and between distinct resource zones. Porter County is especially rich in Middle Woodland sites, including mounds and earthworks of the Goodall tradition, a regional variant of the Illinois Hopewell/Havanna culture. During the Late Prehistoric period, Oneota groups, perhaps ancestral to the historic Miami, utilized the area, and it remained home to the Potawatomi people until removal.

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Historic Resource Impacts

While the involved portion of Porter County contains very few properties listed in the National Register of Historic Places, potentially historic properties are present. The historicity of all properties in proximity to the project must be determined, as required by Section 106 of the National Historic Preservation Act as well as Section 4(f) of the USDOT Act.

Section 4(f) of the USDOT Act requires selection of the feasible and prudent alternative which results in the least overall harm to Section 4(f) resources, which include historic properties (including archaeological sites), wildlife and waterfowl refuges and public parks and recreation areas.

Rail Noise/Vibration Impacts

The introduction of a railroad into the involved portion of Porter County, which is currently rural in nature, is a major change with the potential to significantly affect the quality of life of nearby residents. The current route has an alignment that is in close proximity to existing residences as well as agricultural operations consisting of livestock.

Consideration should be given to the establishment of Quiet Zones as part of any plan.

Transportation Network Connectivity

The involved portion of Porter County is rural in nature. The majority of roadways to be crossed by the project are County Roads. As mentioned previously, detailed examination should be made with regard to transportation impacts.

Impacts to the existing transportation network affect the following:

- Overall vehicle delay resulting from closures and/or restrictions.
- Response times of emergency responders (Ambulance, Fire, EMA/Hazardous Materials Spills from derailments, etc.)
- School bus routing
- Roadway maintenance including snow plowing

Hazardous Waste Sites

While recorded locations of hazardous waste sites appear to be few within the involved portion of Porter County, it is not uncommon to find private dumps and other potential hazardous materials associated with past and current agricultural operations.

Visual and Aesthetic Impacts

The introduction of a railroad into the involved portion of Porter County, which is currently rural in nature, represents a significant visual change. This may be mitigated somewhat by the development of a green buffer within the right of way. Such a green buffer would also provide benefits to wildlife and may serve as forest mitigation, as described below.

2. ECONOMIC RESOURCES AND ISSUES

Property Values (Assessments)

The project will affect the assessed values of properties in close proximity to the selected corridor. Resulting impacts to the tax base should be considered. Being that the rail line does not serve a terminal or any other development within the county that would increase net property value, the impacts to property values would appear to be negative. The splitting of properties, proximity to existing and future land improvement are all considerations in evaluating the true impact to property values.

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Drainage / Drainage Tiles

The involved portion of Porter County was historically part of the Grand Kankakee Marsh. Over the last 150 years or more, a network of drainage features consisting of ditches and drainage tiles has been established to allow for agricultural development of most of southern Porter County. As time has progressed, these drainage features also support the residential developments that have been constructed. The existing drainage network supports agricultural land use which is the main factor driving the area's economy as well as the quality of life for the residential community.

This drainage system is complex and consists of drainage ditches and subsurface tiles that criss-cross the county. Substantial amounts of public and private funding have been invested over the years to develop the current system. When it comes to our drainage system, impacts are generally not localized in nature. Impacts are measured from a system-wide perspective. The project should consider system-wide impacts.

3. ENVIRONMENTAL RESOURCES AND ISSUES

Suitability of Soils for Railroad Development

The involved portion of Porter County was historically part of the Grand Kankakee Marsh. The suitability of the soils to support Railroad development may be a significant project cost factor.

Farmland and Prime Farmland Soils

The involved portion of Porter County contains between 80% and 100% prime farmland soils. Impacts should be minimized.

To the extent possible, rights of way should be planned to avoid severance of farmed parcels, land locking of farmed parcels and creation of uneconomic remnants.

Wildlife Considerations

Within the involved portion of Porter County, wildlife habitats are substantially fragmented, primarily by agricultural land uses. Further fragmentation caused by the project should be mitigated to the degree possible by implementing such measures as providing adequate space/appropriate geometry at water feature crossings, so that wildlife may cross under the railroad. Providing space within the right of way to function as a green buffer that would allow wildlife to travel along the corridor would also be desirable.

Forests

While it is recognized that forested areas are particularly limited within the involved portion of Porter County it is important to note that what limited forested areas that remain should be protected. Impacted forested areas should be mitigated by implementing such measures as purchasing lands for preservation and reforestation, and acquisition of a wide enough right of way to allow for planting of native trees and shrubs (green buffer).

Greenways and Blueways

Consideration should be given to the existing and emerging greenways and blueways that are scattered throughout the county. These features provide important environmental as well as recreational opportunities to Porter County.

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Air Quality – Non-Attainment Area

Porter County is currently designated by the USEPA as a non-attainment area for air quality. The project's effects upon air quality must be carefully evaluated.

MS4 – Storm Water and Sanitary Sewer

Porter County is very proactive in its implementation of storm water management practices, both from volume and quality perspectives. This is embodied in both County ordinances and procedure manuals. The existing stormwater management system is predicated upon years of development starting with the draining of land to develop the County's agricultural base in the 1800's. Terrain in the area of the proposed rail line is generally flat in nature. Interruption of stormwater drainage and the potential for run-off potentially created by the construction of the rail line must be considered and consistent with the policies of the County.

4. OTHER CONSIDERATIONS

- Water Resources
- Federal and State Threatened and Endangered Species
- Mineral Resources
- Managed Lands and Natural Areas
- Title VI / Environmental Justice
- Business / Residential Relocations
- Tourism (bikeways, recreation)

5. STAKEHOLDER INVOLVEMENT

It is recommended that, at a minimum, the following stakeholders are included in the project's public involvement activities:

- Porter County agencies, including but not limited to; Board of Commissioners, Planning Department, Stormwater Board, Board of Health, etc.
- Indiana Association of Counties
- Purdue Extension, Ag, livestock, Purdue Pinney Farms
- Affected Utilities - NIPSCO, REMC - Wheatfield
- Emergency response agencies (e.g., fire, police, ambulance, emergency management)
- Northwestern Indiana Regional Planning Commission
- Affected School Corporations
- Indiana Farm Bureau
- Property owner associations

It is strongly encouraged that a Community Advisory Committee (CAC) be established and consulted throughout the EIS process.