

STEELFAB, INC.

STRUCTURAL STEEL FABRICATORS

2045 S. KENSINGTON AVE. • KANKAKEE, IL 60901

June 5, 2016

Mr. Dave Navecky
Surface Transportation Board
ATTN: Docket No. FD 35952
395 E Street, SW
Washington, DC 20423-0001

Dear Mr. Navecky:

After reviewing the available information about the proposed Great Lakes Basin (GLB) rail project, it is my opinion that the proposed GLB project has failed to sufficiently provide documentation that supports public convenience and necessity. Further more I believe that fast tracking this project and waiving the six month notification period was an error on the part of the STB. For the following reasons I respectfully request that the STB cease any further action on this project.

NEED

- The Chicago Region Environmental and Transportation Efficiency (CREATE) program - a collaboration between rail companies, local, state and federal government - is in the process of implementing physical and managerial improvements to make the rail system in Chicago more efficient in order to decrease delays. Letters from the Class I rail lines in response to the July 13, 2015 letter by the Chairman of the STB Daniel R. Elliot, II, indicate the CREATE project, although not completed, is improving the delays in Chicago.
- The GLB proposed project undermines and subverts the CREATE program.
- The GLB project is neither comprehensive, visionary, or collaborative. The proposed project is not part of any federal, state or local long-term freight plan. It is strictly a commercial venture by a for-profit company.
- There is no publicly available business plan for the proposed rail line to document public convenience, necessity or benefits.
- GLB documentation does not describe a need for the 50 foot utility easement (beyond stating that it is a potential revenue source), or the need for the proposed 15,000 acre Kankakee rail terminal, which is five times larger than the largest rail yard in the world. The Surface Transportation Board's (STB) jurisdiction to approve a utility corridor is also in question.
- Union Pacific and Norfolk-Southern have publicly stated that they are not interested in the proposed GLB project. Instead they prefer to work with the CREATE program in Chicago.
- Canadian National invested heavily in their own Chicago bypass by purchasing the Elgin, Joliet and Eastern Railway line and are therefore less likely to use the proposed GLB toll rail.
- The letter from Norfolk Southern Corporation's legal department (filed as EI-22974 under FD-35952) states that Norfolk-Southern does not have a non-disclosure agreement with GLB, nor is it interested in using the proposed rail. It also states that no information about current rail movements or traffic volumes was provided for the GLB project. This raises the question whether there are any "non-disclosure agreements" at all. It also makes one wonder about the market research that was done, or not done, for this project.
- Mr. John Yonan, P. E., Superintendent of the Cook County Department of Transportation and Highways writes the following in his letter to the STB; *"The proposed Great Lakes Basin Rail Line will, at best, only address a very small part of the region's freight congestion. Cook County's Department of Transportation and Highways is proceeding with a long range transportation plan and an analysis to identify and prioritize freight pinch points and possible solutions. Those studies will yield a more comprehensive range of projects to address freight congestion and promote development."*

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PUBLIC CONVENIENCE

- I find no evidence that the proposed GLB Chicago bypass has been identified as a solution to the Chicago bottleneck, a public convenience, or a national transportation priority (as Mr. Patton asserts). It is a business proposal by a for-profit company.
- Due to the fact that the route of the proposed rail will likely change (Mr. Patton's words) people in an area of over 32,220 square miles have lived in uncertainty about the future of their homes, farms and livelihood.
- The potential for unwanted rail - and the use of eminent domain - has increased stress for land and property owners.
- Farm fields divided by the proposed rail will be more difficult and dangerous (due to farm field crossings) to manage. Productivity of the land will decrease due to construction of the rail, odd shaped parcels and increased compaction. Costly irrigation and tiling infrastructure will be damaged and rendered useless.
- Government has spend millions of tax dollars preserving farmland, woodlands and promoting good agricultural practices. Farmers spend thousands of dollars on soil conservation practices. The proposed rail line is counter-productive to these efforts.
- Home and land owners near the proposed rail will see their home and land values reduced.
- GLB intends to be a toll railroad. Investors in this proposed project will have only their own financial interest in mind, not the public convenience.
- Opposition to the proposed project has been overwhelming, seven of eleven counties involved have passed resolutions opposing the GLB rail. Mr. Patton has stated that he will take land by eminent domain if the proposed project is approved.
- The loss of thousands of acres of prime farmland cannot possibly be considered a public convenience. Taking highly productive land out of production for a speculative for-profit project is not in the public's best interest.

The above provided information is what led me to the conclusion that the proposed GLB project is inconsistent with the public convenience and necessity. It was insufficiently vetted before starting the approval process. I respectfully request that the STB cease work on this project.

Individually, or as part of a group, I will fight the GLB proposed plan using all options available, including Congress, my vote at the ballot box and the judicial system.



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