



OGLE COUNTY BOARD

KIM P. GOUKER, CHAIRMAN • ogle@gouker.net

June 21, 2016

Mr. Dave Navecky
Office of Environmental Analysis
Surface Transportation Board
Docket No. FD 35952
395 E Street SW
Washington, DC 20423-0001

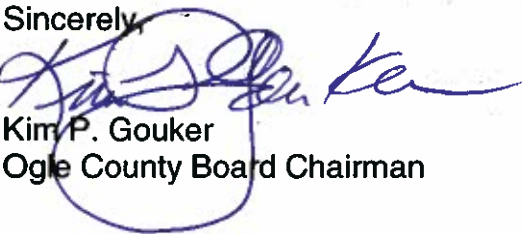
Dear Mr. Navecky,

Enclosed you will find a statement of concerns collectively written, and approved by a majority vote, at the regularly scheduled June, 2016 meeting of the Ogle County Board.

It is important to note that this statement of concerns, while it is a consensus statement, does not represent an opinion of this Board, either in favor or opposition, to this proposed rail project (see last paragraph at the bottom of page 5). The Ogle County Board recognizes your request is for concerns regarding the possible Environmental Impact of this project, and we have confined our comments to your categories of impact to be analyzed. The Ogle County Board also recognizes that the STB may conduct a merit review of this proposed project, at a later date, and that such a merit review may be the time that our Board would have more information presented, at which time our Board may decide to take a position, in favor of, or opposition to, the project.

Finally, the Ogle County Board is strongly in favor of projects that would generate positive economic benefits, without serious environmental impact, and we would be please to participate in the process of determining an alternate route that may accomplish that goal. I have personally spoke to several other County Board Chairmen, who serve in counties that share the proposed route, who have the same desire to assist in determination of any alternate route. We stand ready to assist in any manner possible, and look forward to your decision with the Environmental Impact Statement.

Sincerely,



Kim P. Gouker
Ogle County Board Chairman



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Mr. Dave Navecky
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Dear Mr. Navecky,

This letter serves as an official communication, in regard to the Docket identified above, for the Great Lakes Basin Rail Transportation Corporation's (GLBT) proposed rail, passing through the northeastern part of our county, and then bisecting much of the eastern portion of our county, and specifically with respect to your office's request for comments for your Environmental Impact Statement.

At our regular County Board meeting, held on Tuesday, June 21, 2016, this consensus statement was written, containing the collective comments of concern for this project, by a majority vote of a quorum of our Board. Please consider these comments in your review for your Environmental Impact Statement. For your convenience, our comments are listed here under your listing of Impact Categories to be Analyzed.

TRANSPORTATION SYSTEMS:

The Ogle County Board is concerned this project has not identified precise road closure crossings information that will occur, how our transportation needs will be affected, and potentially the project, as currently proposed, would close several township roads.

The Ogle County Board believes other transportation systems are better suited to address the freight rail concerns in Illinois, and we are concerned the GLBT project may be redundant, with little positive impact, and serious negative agricultural and environmental impact, as we will outline later. Specifically:

- 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 GLBT proposed project undermines and subverts the CREATE program.
- The GLBT project is neither comprehensive, visionary, nor 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.
- GLBT 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 GLBT 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 GLBT, 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 GLBT 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.

As a County, we have serious concerns as to the effect of this rail system, and its ability to meet its goal of relieving freight rail congestion. Recently, Mr. John Yonan, P. E., Superintendent of the Cook County Department of Transportation and Highways, addressed the STB; saying that "the proposed Great Lakes Basin Rail Line will, at best, only address a very small part of the region's freight congestion", and that his department "is proceeding with a long range transportation plan and an analysis to identify and prioritize freight pinch points and possible solutions", studies which "will yield a more comprehensive range of projects to address freight congestion and promote development."

SAFETY:

Ogle County is concerned about the safety issues that accompany this project. Public safety professionals have expressed great concern with diminished response times and corresponding reduced access, due to the proposed route. Grade crossings are a prime safety concern: our public safety professionals find it problematic to determine the additional resources they would need to manage a derailment accident. If such an incident were to occur in our County, our Emergency Management personnel would be able to address the threat that would occur, but to do so, our County would need greater reliance on neighboring mutual aid arrangements, while their resources are

already strained due to their own local needs.

Concerns over public health and safety as well as transportation also exist. The proposed project, just in Ogle County, will intersect nine township roads, two county highways, three state highways and two interstates. These roadways are utilized by over 800 rural residents daily, as well as five school districts and four fire protection districts. The potential for delays in travel on these roads whether by residents, school buses or first responders gives us concern.

With the potential for township roads to be closed, and over 100 trains going through the roads that are still open, emergency response for our residents will be delayed. The Ogle County Sheriff's Office and local fire departments will have to make a decision, as to either an alternate route, or wait for the train to pass, while an emergency situation deteriorates. Every school day, School buses full of kids, will have to take longer routes to get students to and from school.

In addition to safety concerns already listed here, our County would need to address the increased possibility of spills and derailments with high speed trains, the need for extensive training and equipment (and the increased cost to our taxpayers for such training) to deal with possible spills and derailments. There is also the safety concern at private rail crossings in fields, with farm equipment and high speed trains.

LAND USE:

Land use is of primary concern for the Ogle County Board, as the primary body politic charged with the maintenance and enforcement of a Comprehensive Land Use Plan, as well as the Zoning of tracts throughout our County. From the Ogle County Comprehensive Plan's goals, objective and policies:

"Ogle County should pursue policies that preserve and enhance its current living environment. It is the goal of the County to maintain and enhance the overall aesthetic quality of its residential, recreational, commercial and industrial areas; and, to maintain a rate of growth and development that is manageable in light of the public resources.

"Among the Comprehensive Plan's objectives, Ogle County strives to promote the maintenance and improvement of existing development within Ogle County, and to ensure that newly developed or redeveloped areas are compatible with existing uses of land, and to manage balanced growth to maintain the small-town, rural character of Ogle County and promote rural community values."

Nearly all of this route, in our County, passes through areas designated by our Comprehensive Plan as primarily agricultural use. It is the opinion of this County Board, that the Great Lakes Basin Transportation Rail Line, in its current, proposed state, runs contrary to our Comprehensive plan.

As currently proposed, the GLBT rail line will bisect many family farms, causing great difficulty to continue farming their remaining property. To alleviate this problem, the rail

line should follow either section or half section lines to alleviate farms being cut into pie sections. The land owners should be in stronger control of their own land, without threatened eminent domain action, that leaves them with carved up farm properties.

Ogle County is a predominantly rural county, as more than 77% of our land base rests in agricultural production. Over one-quarter of the economic output of Ogle County comes from the agricultural sector. Of our County's 1,148 farms, per the USDA Census of Agriculture, 153 are Centennial Farms designated by the Illinois Department of Agriculture. This designation indicates these farms have been held in the same family for three or more generations. Eighteen of those Centennial Farms lie in eastern Ogle County, where the GLBT rail is proposed. As you can see agriculture is not only a way of life, but it's our heritage. As currently proposed, the GLBT project lends a serious concern to this heritage.

Our County Board's other concerns regarding Land Use, include:

- 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 spent 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.
- Large fields will be divided into smaller tracts and will decrease productivity
- Increased compaction of soils due to shorter rows
- Farm implements may be too big to farm smaller tracts of land
- Alteration of stream banks, drainage ditches affecting drainage and runoff during large rain and melt events
- Large amounts of fill will be needed to build "fly-overs" and bridges.
- Land locked fields
- Damage to field tiles

BIOLOGICAL RESOURCES:

The Ogle County Board has concerns about the negative impact of our natural biological resources. In Ogle County, water aquifer protection is of prime importance. The danger to these aquifers, from derailments and other spill scenarios cannot be overstated. Geologic formations, such as the glacial till in the Troy Bedrock Valley and other pathways of environmental contamination, are of great concern. Geologic fault lines must also be examined. Ogle County is blessed with rich soils and highly productive farmland - the fifteenth highest County, of the 102 counties in the State of Illinois, for total agricultural cash receipts. The GLBT project needs to more clearly address the threats and concerns we have for these biological resources.

GEOLOGY AND SOILS:

As stated above, Ogle County has some of the best soil for crop growing in the entire world. Because of this, Ogle County farms feed tens of thousands of people a year. Much of this production will be impacted by the GLBT project, and needs to have proper attention given to these concerns. With this proposed railroad, Ogle County would lose as much 500 acres of pristine farm land.

NOISE AND VIBRATION:

There is significant concern of noise and vibration that will come from as many as one hundred trains per day, traveling at speeds up to seventy miles per hour. The concern from noise and vibration cannot be dismissed simply because it is impacting a smaller population given the rural routes, because these noise concerns will be constant problems to be addressed by our residents. Of significant concern is the rail line's nearly traverses the Severson Dells Nature Center, on our border in Winnebago County; the noise and vibration from the constant train traffic would greatly deprive the visitors to this Nature Center the benefit of visiting in the first place.

SOCIOECONOMICS:

The addition of the rail line in eastern Ogle County will have a negative impact on the value of surrounding properties. The simple truth is people would pay less for property next to a very busy rail line. When property becomes less desired, its assessed value is less. The tax burden will be go up for all other citizens in Ogle County.

Besides the loss of prime Ogle County farmland due to this project, there are sixty-four farm parcels that will be severed, six uneconomical remnant parcels, with little to no value, will be created and there will be at least one landlocked farmstead, all of which raises concerns over the impact to our economy, our way of life and our heritage.

ENVIRONMENTAL JUSTICE:

Environmentally this project appears to have the potential to have damaging effects on the land and water in Ogle County, which raises a significant concern to this Board. The Rock River, Kyte Creek and Spring Run Creek will all be intersected by the project. Both the Rock River and Kyte Creek watersheds have been designated targeted watersheds by the Illinois EPA for environmental impact. Over sixty privately installed conservation waterways will be compromised. Current drainage tile will be impacted resulting in potential flooding and change of watercourse. Finally, the spraying of chemicals along the track to kill vegetation, could adversely affect ground water and drift in our County.

CUMULATIVE IMPACTS AND CONCLUSION:

Please be advised, the Ogle County Board, is submitting these comments, as part of your process, and with these comments, is neither taking an opinion in favor, or opposed to this project, and the County Board reserves the right to take such a position at a later stage of this project. Also, it is the request of this Board, that the STB take a FULL review of this project, rather than an expedited review.

Ogle County is very much interested in economic development, but any project should complement, and not negatively impact, the primary economic driver of our county - agriculture. This Board has been strongly concerned about the lack of in-depth information about this project, that should have been presented directly by the project developer. Economic Development needs to be a cooperative effort, and Ogle County is ready to work with any project that could be a win-win, for the developer, as well as the residents of this County.

In summary, the Ogle County community, and the Ogle County Board, is seriously concerned as to the presently proposed GLBT route, due to its adverse impact on our environment, and strongly urges the Surface Transportation Board to fully investigate the proposed route, and all alternate routes, and to address the concerns outlined here.

Respectfully submitted,


Ogle County (IL) Board

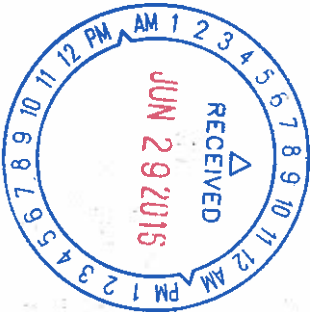
This letter has been written, and approved, by consensus vote of a majority of the Ogle County Board, State of Illinois, on this 21st day of June, 2016, with this recorded vote:

County Board Members voting: AYE: 19 NAY: 2 ABSTAIN: 0 ABSENT: 3

COUNTY BOARD MEMBER	YEA	NAY	ABST	ABS.	COUNTY BOARD MEMBER	YEA	NAY	ABST	ABS.
Nic Bolin				X	Dan Janes	X			
Dorothy Bowers				X	John R. "Skip" Kenney	X			
Jerry Brooks	X				Bruce McKinney	X			
Bobbie Colbert		X			Lee Meyers	X			
Ron Colson	X				Patricia Nordman	X			
John Finrock, Vice-Chair	X				John O'Brien		X		
Rickey E. Fritz	X				Zachary S. Oltmanns	X			
Kim P. Gouker, Chairman	X				Patricia E. Saunders	X			
Don Griffin, Jr.	X				Ashley Simms	X			
Richard Gronewold	X				Gregory Sparrow	X			
Marcia E. Heuer	X				Marty Typer	X			
Lyle Hopkins	X				William Welty				X



OGLE COUNTY BOARD
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OREGON, ILLINOIS 61061



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