

RE: FD-35952

Mr. Navecky,

One of the things I would like the Environmental Impact Study to research is whether or not they are indeed able to do a comprehensive and valid study on the proposed GLB project.

This is important because I believe it will be difficult if not impossible to determine what and how the Kankakee area will be impacted by the proposed 15,000 plus acre proposed rail terminal. There is no public information regarding the need for such an enormous area and no information regarding what actually will be constructed there.

How will the EIS address: Transportation Systems, Safety, Water Resources, Geology and Soils, Air Quality and Climate, Energy Resources, Aesthetics and Cumulative Impacts to name just a few of the areas of study for the EIS, if there is no information for the proposed rail yard in Kankakee County (or the 50 foot wide utility easement, or the excessive 150 feet for rail) available?

It is impossible for the public to provide the STB with meaningful concerns and/or alternatives if the public is left in the dark as to why a company that, does not own a single railcar, has no public list of clients, or a publicly available business plan needs a rail terminal five times the size of the largest rail yard in the world, a 150 foot wide easement for rail and a 50 feet wide utility easement.

NEPA encourages public input, early on in the process yet we are not given information to do just that (the lack of notification issue is worthy of a letter of its own). So is the NEPA just giving lip service to the importance of public input?

The last paragraph in 'A Citizens Guide to the NEPA', page 13 reads as follows:

The scoping process is the best time to identify issues, determine points of contact, establish project schedules, and provide recommendations to the agency. **The overall goal is to define the scope of issues to be addressed in depth in the analyses that will be included in the EIS.** (Emphasis added)

Page 14 of the above mentioned publication has the following information

As part of the process, agencies are required to identify and invite the participation of interested persons. The agency should choose whatever communications methods are best for **effective involvement of communities, whether local, regional, or national**, that are interested in the proposed action. Video conferencing, public meetings, conference calls, formal hearings, or informal workshops are among the legitimate ways to conduct scoping. **It is in your interest to become involved as soon as the EIS process begins** and to use the scoping opportunity to make thoughtful, rational presentations on impacts and alternatives. **Some of the most constructive and beneficial interaction between the public and an agency occurs when citizens identify or develop reasonable alternatives that the agency can evaluate in the EIS.** (Emphasis added)

Page 27 of the above mentioned publication states;

How to Comment

Comments may be the most important contribution from citizens. Accordingly, comments should be clear, concise, and relevant to the analysis of the proposed action. Take the time to organize thoughts and edit the document submitted. As a general rule, the tone of the comments should be polite and respectful. Those reviewing comments are public servants tasked with a job, and they deserve the same respect and professional treatment that you and other citizens expect in return. **Comments that are solution oriented and provide specific examples will be more effective than those that simply oppose the proposed project. Comments that contribute to developing alternatives that address the purpose and need for the action are also effective. They are particularly helpful early in the NEPA process and should be made, if at all possible, during scoping, to ensure that reasonable alternatives can be analyzed and considered early in the process.** (Emphasis added)

If the public is not allowed meaningful participation due to lack of notification and information, and the STB does not have that information either (I am making the assumption that the STB and the public have the same playbook here) how on earth can a meaningful and comprehensive Environmental Impact Study be done?

The process that the STB has used thus far is flawed and has not allowed the public to do what the NEPA asks and encourages the public to do. An EIS based on currently available information will not be complete, comprehensive or valid due to lack of notification and lack of meaningful information. It will be challenged by the public.

I respectfully request that before the approval process goes any further, the STB examines the validity of an EIS written under above circumstances and stops the current approval process of the GLB project.

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P.S. Not notifying people about scoping 30 miles on either side of the track also was a critical mistake. It left thousands and thousands of people without the opportunity to comment.