

ATTN: Docket # FD 35952

May 31, 2016

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

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."*

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 publics' 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.

Signature



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Signature



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No eminent domain for private investor(s) gain.

I/ WE respectfully request that the STB deny the above referenced project for the following reasons:

1. Transportation Systems

- Closing of township roads impacting rural school bus routes, emergency responders, commute times, businesses
- Slow moving farm equipment will have to use more well traveled roads with rural road closings

2. Safety

- Increased amount of rail road crossings
- Longer response times for police, fire and ambulance vehicles due to rail-road crossings and road closures
- Increased possibility of spills and derailments with high speed rail
- Need for fire dept. extensive training and equipment to deal with large spills and derailments
- Who will bear the cost of this training and equipment
- Disrupts fire, medical personnel, police and volunteers, this will cost much extra volunteer time

3. Impact on Current Land Use

- Permanent destruction of prime farmland (Apprx. 6,700 acres: 20 per mile for 270 miles - plus the rail yard proposed for the Manteno area of Kankakee County)
- Large fields will be divided in smaller pieces, decreasing productivity
- Increased compaction of soils due to shorter rows
- Farm implements may be too big to use on newly created smaller fields
- Large amounts of fill are needed to build 'fly-overs' and bridges
- Livestock wandering on tracks due to poor or broken fencing
- Maintenance of the unused portion of the 200 foot wide easement?

4. Recreation

- Hunting as they clear cut timber for rail

5. Impact on Agricultural Activities (Biological Resources)

- Delays at crossings for farm machinery and equipment...this affects productivity and profits
- RR will cause land locked fields and pastures
- Increased traffic of farm equipment on more traveled roads with closure of rural roads
- Farmers will not be able to evacuate valuable life stock in case of evacuation need
- Damage to existing field tile lines
- Decreased production of crops and livestock
- Increased use of herbicides to maintain unused portions of the easement

- Limits use of bordering land
- Decreased land values for surrounding properties resulting in a lower tax base and less real estate taxes
- There are risk factors associated with a privately funded company taking on this huge project
- This is not a company with a proven track record building railroads
- What happens if they run out of money
- What happens if the company is not profitable
- Future maintenance issues

13. Cultural & Historic Significance and/or Resources

14. Aesthetics

- Clear cut trees, raised rail beds, bluffs along IL river

15. Environmental Justice

16. Cumulative Impacts

- People in this township are living here because of the rural environment
- Destroy that and people might be forced to go elsewhere
- Permanent destruction of valuable soils
- Township roads will be altered or closed - a tremendous inconvenience
- It degrades the rural nature of the historic countryside

Additional Issues

- One of the main reasons that the Notice of Intent gives as the need for this is the congestion in the Chicago terminal. It says delays "can be up to 30 Hours." This line can decrease this to 8 hours.
- This new line merely allows the rail shippers to get their product to their destination quicker which results in more profit for the shipper. Since when can eminent domain (the taking of private property for public use) be used to generate more corporate profits?
- Suggest that the terminal allow Google to send in a team to determine how technology can be used to make the terminal more efficient. They are currently developing cars that drive themselves. Google is an organization that has concerns for the environment. They can help save precious needed farm land and can help preserve the peace and tranquility of the country.
- The inefficiencies of the Chicago train terminal should not be solved by creating a problem in the countryside. C.R.E.A.T.E. is already working on congestion and is a combined effort of many.
- The Notice of Intent states that "the Board must approve a construction request unless it finds that the construction is inconsistent with the public convenience and necessity." Convenience and necessity should be stressed in the issues.

Current proposed GLB tracks
are less than $\frac{1}{2}$ mi from our 138 ac farm
~~that~~ we've owned since 1975 - 41 years

Noise level here 25 dBL

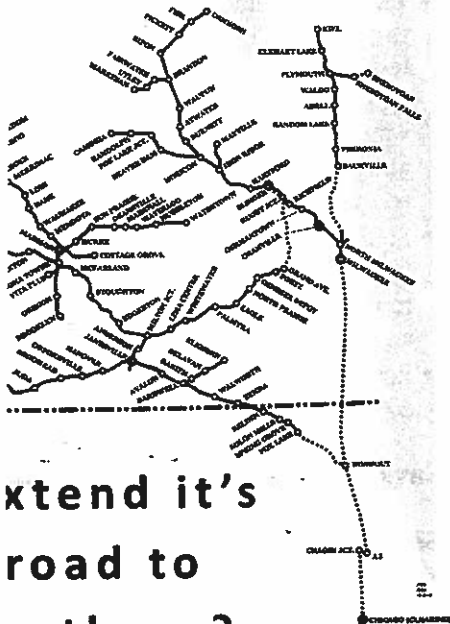
Our neighbors' fields will be dissected, even separated

No railroad needs a 15,000 acre rail yard!

There are too many farms, cities, people in
these already developed areas.

No Eminent domain for private investor gain!

What till this CREATE
is completed. C.O.P.



Extend it's road to Southern?

talked to *Crain's Chicago Business* in 2003, was reportedly planning a six-track, Illinois and Wellsboro Indiana on a portals hope to acquire for the proposed Illinois

to cost \$3 billion dollars. Later, Patton invest. Patton said he formed the company that he was working with *Occam Consultant*, for the technical details of the

media that the rail line for his *Great* of at least 2 initial tracks and run from route of about 150 miles, but now it was Jim Pehta, marketing adviser for GLBT, project's now \$3.5 billion price tag would

project was reported as extending up through Winnebago County, and end now expanded to a five track wide a cost of \$6 billion dollars.

on Page 1, now curiously minimally as a "T" just south of Rockford. It *Illinois National's Freeport Division*. But "belt"; the *Elgin, Joliet and Eastern Railway* Indiana in 2009. CN has no need to it earns much more money keeping

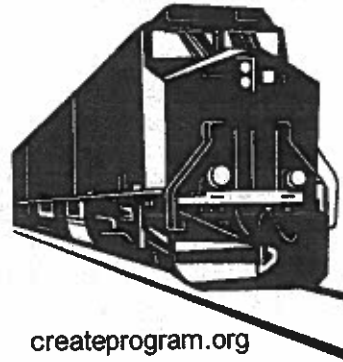
eastern edge of Boone County, the line ct with *Union Pacific Railroad*. UP di- port GLB's plan and would not use its rail's opposition to GLB in an article pub- north from Clinton, GLB hooks up with



A project of national and regional significance, CREATE will invest billions in critically needed capital improvements to increase the efficiency of the region's rail infrastructure. CREATE will reduce train and auto delays throughout the Chicago area by focusing rail traffic on four rail corridors that will be improved to handle passenger and freight traffic more efficiently. The work includes 70 projects:

- 25 new roadway overpasses or underpasses at locations where traffic (auto, pedestrian, bicycle, bus) currently crosses railroad tracks at grade level
- 6 new rail overpasses or underpasses to separate passenger and freight train tracks
- 36 freight rail projects including extensive upgrades of tracks, switches and signal systems
- Viaduct improvement projects – improvements to existing viaducts in Chicago
- Grade crossing safety enhancements – improvements to existing railroad grade crossings throughout the region
- Common Operational Picture (COP) – integration of information from dispatch systems of all major railroads in the region into a single display

For area residents, CREATE means reduced traffic delays, shorter commute times, better air quality and increased public safety. For workers and businesses, it means more jobs



createprogram.org

and economic opportunity.

CREATE will keep the GO in Chicago – now and for years to come. Chicago today remains the busiest rail hub in the United States. Each day, nearly 1,300 trains pass through the region (500 freight and 760

passenger). Chicago handles one-fourth of the nation's freight rail traffic, each day handling 37,500 railcars.

For almost 150 years, Chicago has been the nation's rail hub due to its critical location at the nexus of the North American railroad network. Six of the seven largest rail carriers access the region: the eastern railroads, Norfolk Southern (NS) and CSX; the western railroads, BNSF Railway (BNSF) and Union Pacific (UP); and the two Canadian railroads, Canadian Pacific (CPR) and Canadian National (CN).

Recognizing the growing urgency of the region's rail capacity needs, Mayor Richard M. Daley called on the federal Surface Transportation Board to convene a task force to tackle the problem. The resulting task force – made up of representatives from the railroad industry, State of Illinois and City of Chicago – announced the CREATE Program on June 16, 2003.

The total cost of the CREATE Program is estimated at \$4.4 billion in 2015 dollars. \$1.3 billion has been received so far. \$3.1 billion in additional funding is needed. The benefits of the full CREATE Program are estimated at \$28.3 billion over 30 years after full project completion.

**NO KID
HUNGRY**
SHARE OUR STRENGTH

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2016

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CAROL STREAM, IL 60131

JUN 27 2016 PM 11



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