

HINSHAW

& CULBERTSON LLP

ATTORNEYS AT LAW100 Park Avenue
Rockford, IL 61101-1389815-490-4900
815-490-4901 (fax)
www.hinshawlaw.com

July 11, 2016

Mr. Dave Navecky
Surface Transportation Board
395 E. Street SW
Washington DC 20423-0001
Docket No. FD 35952**Re: Scoping Comments of the Perks Family
Docket No. FD 35952**

Dear Mr. Navecky:

I. Introduction

The Surface Transportation Board ("STB") has published a Draft Scope of Study for Environmental Impact Statement concerning the proposed Great Lakes Basin Transportation, Inc. ("GLBT") plan to either file an exemption or an application seeking authority from the STB to construct and operate an approximately 278 mile rail line. The STB has invited interested parties to "comment" on potential alternative routes for the proposed rail line and otherwise provide "input during the scoping process". The GLBT current route bisects an environmentally sensitive ranch and woodland property owned by the Perks family and would cause extreme environmental damage and destroy the ranching operations. See **Exhibit 1** attached hereto.

We urge the Surface Transportation Board to consider the Perks Ranch and woodland area in its "Final Scope of Study" and consider three alternative routes. We believe that the STB will conclude, as have so many others including the Rockford Metropolitan Agency for Planning ("RMAP") that alternative routes suggested in these comments are superior to the GLBT proposed route presently being studied by the STB which is frankly just too damaging to the Perks Ranch and the stream and woodland complex. The RMAP, in its scoping letter dated June 10, 2016 submitted to the STB, indicated a proposed alternative route to avoid the Ranch and the Severson Dells/Colman Dells Woodland Complex which would locate the railroad closer to the Rockford Airport and its Global Trade Park. That alternative route avoiding the Perks Ranch is discussed herein and should be considered by the STB. Likewise, there are two other alternative routes contained herein which are far superior from an environmental perspective and should be included in the study. If one of these alternative routes is not used then the "no action" alternative should be selected by the STB as the environmental impact of the project is far too substantial particularly as to the Perks Ranch and the surrounding woodland and stream complex.

Douglas Perks and Lachlan Perks and their families own and operate 1,300 acres of ranch, residences and forest land along the border of Ogle County and Winnebago County. GLBT and venture capitalist Frank Patton propose to bisect the Perks Ranch with a 200 foot right of way for a single track rail. The 1,300 acre ranch is located within the "Rockford Subdivision" at mile post ("MP") 14 to approximately MP 16.5. GLBT's narrative indicates that the subdivision is "designed to interchange with the Illinois Railway, provide the potential for a connection to the proposed industrial development area south/southwest of the Rockford International Airport and connect with the Canadian National Freeport Subdivision west of Rockford." (GLB Route Narrative, page 20). The Canadian National rail line presently has very little traffic and apparently GLBT recognizes that there will continue to be light traffic as it is proposing a single track for this section. Nonetheless, GLBT proposes a 200 foot wide taking which is the same taking it proposes for its triple track sections inclusive of the 50 feet for overhead transmission lines, underground cable, pipelines and a plethora of other possible uses. As such, it is incumbent on the STB to study the maximum environmental impact resulting from intense GLBT implementation of its plans for the 200 foot wide taking all of which magnifies the detrimental effect on the Perks Ranch unless alternative routing of the Rockford Subdivision is decided upon.

II. The EIS Scope Should Include a Study of the Perks Ranch

A. Description of the Perks Ranch

The Perks Ranch enjoys beautiful rolling terrain with grasslands, woodlands and streams. It consists of numerous out buildings and seven residential homes occupied by members of the Perks family and others employed in critical roles for the ranch operations. These homes are presently blessed with breathtaking views of the rolling grass and forest lands and utilize expansive windows, porches, pools and other outdoor features. These vistas and views will be materially decimated by the railway bisecting the property and the tranquil settings ruined by the loud industrial activity of the trains. Attached hereto as **Exhibit 2** are copies of photographs of various areas of the ranch and the structures thereon depicting some of the Perks homes on the ranch and the family enjoying horseback riding, ranching, and recreating at the proposed facility as well as a copy of the Perks Ranch webpage and historical summary.

The GLBT narrative associated with the route indicates that GLBT considered a route west of Rockford (which will be discussed in further detail below), which was "eventually rejected due to the railroad gradient, wetland impacts and hunting areas blocking access to WSOR." However, the route that is presently being studied by the STB adversely impacts wetlands, hunting areas, and environmentally sensitive woodlands. For example, the Perks Ranch consists of forest lands, wetlands, rolling hills, crop lands and grazing area for cattle all of which will be affected. The property was purchased by the family over 50 years ago and several generations have grown up living in the homes on the property, farming, ranching, preserving wildlife and recreating on the Ranch. The family has used the Ranch to teach their children, grandchildren and others the values of hard work, perseverance and the love of nature. Additionally, the family has opened the land up for education and recreation to groups like the Junior Hereford Association, local schools and education groups, international agricultural study missions, high school and university based student organizations as well as many other friends and neighbors.

As an example, the Perks recently hosted the Braveheart Veterans Cutting Clinic this past Memorial Day introducing a dozen wounded and recovering veterans to ranch work and cutting horses in the Braveheart recovery program. Doug Perks and family take the lead on the purebred cattle operation and Lachlan Perks and family run the nationally recognized cutting horse program. The Ranch is renowned for its top quality genetic stock.

B. Environmental Impacts of the Proposed Rail Line to the Perks Ranch

The railway would destroy the livestock and agricultural operations of the Ranch by severing it into numerous inaccessible parcels. The additional distances which will have to be traveled to the various severed parcels and the costs incurred will result in insufficient revenues to continue to operate the Ranch or maintain the forest land. Presently the cattle and horses at the Perks Ranch can graze on hundreds of acres of open range grass land, which will be destroyed and bisected by the GLBT. As a result, the Ranch would have to convey its stock by other means to the severed parcels which would dramatically increase operating costs resulting in the destruction of the financial viability of the Ranch.

Furthermore, the beautiful family homes of Doug Perks and Lach Perks will be only about 1,500 feet and 900 feet from the railway. Both estates and the five other residences on the Ranch will be subjected to extreme noise, vibration and disturbance from the excessive train use. The tranquil bucolic settings of these homes would be forever destroyed by the railroad. The Perks will sustain a multi-million dollar loss in real property value if the railway is allowed to bisect the property.

The Perks Ranch includes a large tract of hardwood forest that is part of a larger complex of forest that has been identified as a critical habitat for migratory birds and other wildlife according to the Illinois Department of Natural Resources. The larger forest complex includes two Illinois nature preserves and two forest preserves. If the route is not changed then the proposed rail line will destroy part of the forest on the Perks property, fragment the larger woodland and introduce invasive plants and predators into the interior of the forest. The woodlands in the area produce white tailed deer which have been used to repopulate herds in other areas of the State of Illinois. The operation of the rail line would introduce noise and vibration and will disrupt the wildlife breeding and feeding patterns and block wildlife movements. The scope of the EIS must include a study of the impacts on the Perks Ranch, the Perks forest and the nearby woodlands and nature preserves including analysis of the alternatives to avoid these severe environmental impacts.

The Perks Ranch has been inspected by environmental scientist Gerald Paulson, who is the past director of the Natural Land Institute of Rockford, Illinois, a well-recognized expert in botany, plant sciences, endangered, threatened and unique species and habitat. Mr. Paulson is known for his active participation in the state wide inventory of Illinois Natural Areas and supervised the work of the first listing of endangered and threatened species in Illinois. He designed and implemented the land owner contact program areas identified in the Illinois Natural Areas Inventory which served as a model for other states. Over the past four decades Mr. Paulson has administered and managed several wetland restoration projects for the Wetlands Initiative and worked for other not-for-profit groups including the Lake Michigan Federation of Chicago, the

American Farmland Trust in DeKalb, and the McHenry County Defenders, which is an environmental group from Woodstock, Illinois. He has a Master's Degree in plant pathology and a Bachelor of Science Degree in Horticulture, both from the University of Illinois. He has served as the President of Earth Share Illinois, the Illinois Environmental Counsel, Audubon Council of Illinois and the Sinnissippi Audubon Society, helped found the local Sierra Club Chapter and served in the Severson Dells Environmental Center's first Advisory Committee. Mr. Paulson has received the Seth B. Atwood Park and Conservation Service Award for Outstanding Contributions to the field of parks, forest preserves and conservation from the Rockford Park District and Winnebago County Forest Preserve District. See resume of Mr. Gerald Paulson, attached hereto as **Exhibit 3**.

Mr. Paulson has toured the Perks Ranch and surrounding properties and concluded that the proposed route would cause extreme detrimental environmental impacts to the Ranch, the wetlands and stream, and the Perks forest as well as the larger forest complex. He had preliminary inventories taken of the Perks Ranch and nearby properties and found several endangered or threatened species use the area, including the Cerulean Warbler and Loggerhead Shrike. He found the impacted area includes an active heron rookery, and a potential habitat for Indiana Bats, Northern Long-eared Bat and other species. He ultimately concludes that a complete inventory of migratory and breeding birds, bats, fish and other wildlife using the Perks Ranch, the Perks forest and the Severson Dells/Colman Nature Preserve and Forest Complex (which includes the Perks Ranch) must be included in the Scope of Work for any EIS. A copy of his report is attached hereto as **Exhibit 4**.

The route published by the STB actually follows a stream valley running through the Ranch undoubtedly to take advantage of the uniform grade created by the tributary, and goes through the middle of a spring-fed wetland along the stream. Thus, despite the assertion by GLBT that it would avoid wetland and environmentally sensitive areas in reality the Rockford Subdivision route dramatically impacts the wetlands and wooded areas which abut that stream. Specifically, Mr. Paulson has found that at MP 13.10 the railroad crosses the Rock River and enters the Byron Township in Ogle County, Illinois, and that from this point the proposed alignment crosses into a large complex of farmland, woodland, grassland and wetland along the unnamed spring-fed stream that flows into the Rock River including the Perks Ranch and other private property enrolled in the federal Conservation Reserve Program ("CRP") which are located in Sections 2, 3, 4, 10 and 11 of Byron Township, in Ogle County, and Section 34 of Winnebago Township in Winnebago County.

Exhibit 5 attached hereto outlines the Perks Ranch, and the nearby nature preserves. The proposed rail line follows the stream. The private properties located along the stream, including the Perks Ranch, are part of a much larger complex of woodlands, wetlands and grasslands including properties owned by the Winnebago County Forest Preserve, the Byron Forest Preserve District, the Natural Land Institute, a private conservation group. Further the several CRP properties in the area are enrolled in a federal program and have been planted to reclaim farm land into native warm season grasses and forbs. All of these properties and the strides they have made toward environmental protection and rehabilitation will be destroyed or degraded if the current route is allowed.

Mr. Paulson has also conducted preliminary fish sampling using dip nets and seines in the stream which traverses the Perks Ranch which will be followed by the proposed rail line. Mr. Paulson notes, "cold water, clear spring-fed streams with hard bottom substrates are rare in the region. Those that are found provide high quality habitat for many species of fish and invertebrates, including healthy populations of species like Mottled Sculpin. A preliminary survey of fish species in the un-named stream in the project area found a rich diversity of species, including Southern Red-belly Dace, Brook Stickleback, Creed Chub, Fantail Darter and Johnny Darter. A more complete survey of fish, mussels, and other invertebrates should be done of the stream as part of the EIS".

Mr. Paulson noted the Perks Ranch grasslands and woodlands are maintained and managed for pasture, fire wood, hay and upland game. There are numerous springs and seepage areas along the stream in an area of spring-fed wetland located on the Perks property that lies directly in line of the proposed rail line. The Perks woodlands are mostly white oak flatwoods on the upland and oak-hickory savanna on the slopes along the stream. There are several ephemeral ponds in the flatwoods which provide habitat for amphibians, including frogs, toads and salamanders. Mr. Paulson finds that an inventory of amphibians that breed in the flatwoods and along the stream is needed as part of any Environmental Impact Statement.

Large tracts of upland forest and grassland are important habitat for neotropical birds that migrate through northern Illinois in the spring and fall. A number of neotropical migratory birds are dependent upon large tracts of the upland forest and grasslands area for breeding habitat. These include Loggerhead Shrike, Dickcissel, Bobolink, and Eastern Meadowlark. Mr. Paulson notes that Illinois Wildlife Action Plan ("IWAP") (2015 Revision) emphasizes the importance of large tracts of woodland as stopover habitat for neotropical migratory birds as there is little left. "Large patches of natural habitat are the best resources for these migrants," according to the Illinois Department of Natural Resources.

The IWAP also recognizes the importance of oak savannas for migratory birds such as the Red-headed Woodpecker and the Brown Creeper. Mr. Paulson points out that most oak savannas have been destroyed in this area or allowed to grow into dense forests. He points out that the grazing and mowing of the oak woodland at the Perks Ranch has created the open tree structure needed by savanna species that are not found in other areas and a complete inventory of birds that use the woodland and savanna during migration and for breeding is needed as part of the EIS. A preliminary inventory of birds that use the woodland, savanna, grassland and wetlands during migration and for breeding done during late April and May 2016 found 121 species, including, Bald Eagle, Cooper's Hawk, Red-shouldered Hawk, Sandhill Crane, Barred Owl, Pileated Woodpecker, Savanna Sparrow and Bob-o-link. A breeding population of Cerulean warbler, a State threatened species, was also found in the woodland.

Most grasslands, including many acres once enrolled in CRP, have been plowed and planted to commodity crops in recent years in response to higher prices for grain. The livestock operations and CRP at or near the Perks Ranch have maintained some of the largest tracts of grassland in the region which are important for many bird species like Bob-o-links and Meadowlarks as well as suitable habitat for such endangered and threatened species as Short-Eared Owl, Upland

Sandpiper, Henslow's Sparrow, and Norther Harrier. A complete inventory of the grassland birds that use the fields and pastures in the project area is needed as part of the EIS.

In addition to providing habitat for many migratory and breeding birds, the woodland on Perks Ranch contains an active rookery for Great Blue Heron and Green Heron. The rookery is located near the edge of the woods close to the proposed rail line. Paulson says that construction and operation of the proposed rail line through the Perks' forest will disturb the herons during the nesting season and likely lead to abandonment of the rookery.

Paulson found many mature shag-bark hickory trees in the Perks' forest that provide potential nesting and roosting habitat for the federally endangered Indiana Bat and the federal threatened Northern Long-eared Bat. The scope of work of any EIS should specify that a complete survey of the bat population found in woodlands should be completed, and the survey of bats include mist netting and collection of acoustic echolocation data following the guidelines of the U. S. Fish and Wildlife Service.

Mr. Paulson has considered the several factors which are to be studied by the STB in any EIS and as to "Land Use" found that in his expert opinion "the construction of new rail lines for the project area will disrupt the farming operation, chopping the woodlands, pastures and hay fields into separate, smaller inaccessible units. It will also make it more difficult to manage woodlands for timber and wildlife production." Mr. Paulson has further noted as to "Recreation" that the woodlands and grasslands are heavily used for horseback riding, hiking, birding and other recreational activities. "The area is managed for upland game and white tailed deer". "The construction activities and the noise and vibrations associated with the rail line will disturb wildlife, disrupt game trails and wildlife movement patterns and degrade the recreational experience of people using the properties." As to "Biological Resource" "the proposed alignment of the railroad will destroy a rare spring-fed wetland lying in its path, damage the cold water stream and destroy potential habitat for rare fish, eliminate many acres of grassland and woodland and fragment habitat for neotropical migratory birds, raptors and other wildlife. It will also likely cause the herons using the rookery to abandon their nests. Fragmentation of woodland and grassland is a major threat to the value of these habitats to wildlife."

As to "Water Resources" Mr. Paulson has found the "proposed alignment of the railroad will cross the unnamed cold water stream at two locations, and follow the edge of the stream for about one and a half miles". Construction of the crossing and rail bed along the edge of the stream will completely alter the hydrology of the stream, contribute silt and sediments, pesticides, oil and lubricants, dust, smoke and other pollutants into the stream, and potentially block the movement of fish through culverts. A potential spill or leak of oil, chemicals or hazardous materials shipped on the train into the stream would kill everything living in it. All crossing of the stream should be done on bridges, not culverts and run off from rail bed should be captured and treated before being released to the stream. Use of pesticides to control weeds and other vegetation along the rail bed should be limited and carefully monitored."

As to "Geology and Soils" the project area "is underlain by fractured dolomitic bedrock that lies very close to the surface, outcropping in several locations along the stream. The shallow soils that cover the bedrock are highly erodible when vegetation is removed. Excavation of the rail

bed through the project area will require blasting through the bedrock, potentially disrupting the groundwater hydrology of the stream. The hydric soils in the spring-fed wetland south of the creek are unsuitable for construction of the roadbed and will have to be removed, destroying the wetland in the process. There is no way to mitigate for the loss of a spring-fed wetland without great expense and engineering".

Mr. Paulson has also found as to "Noise and Vibration" that "trains using the rail line will disrupt wildlife, diminish the enjoyment of people using the area for recreation and degrade the rural lifestyle of people living in the area". As to "Cultural and Historic Resources" the Rock River valley between Rockford and Byron was the home of a large intercultural population of Native Americans. Villages were found on terraces along the river, and burial, effigy and ceremonial mounds were constructed on ridges and bluff-tops all along the river. The ridge south of McGregor Road and flat areas along the stream are likely sites used by Native Americans. The Perks' property has long been rumored to have been a Native American site and thus it needs to be thoroughly studied before any artifacts are destroyed. Mr. Paulson concludes a "complete Phase One inventory of potential archeological sites must be done to determine the significance of the project area to cultural and historic resources".

The impacts to "Aesthetics" are manifest. The Ranch is beautiful with rolling streams, grasslands, meandering majestic oak woodlands and elegant homes and grounds. As Mr. Paulson notes the Ranch is "one of the most picturesque rural landscapes in northern Illinois. Travelers on Montague and Kennedy Hill roads, and State Route 2, as well as boaters on the Rock River can enjoy the beauty of this area. A rail line bridging the river and highway, and cutting through the rolling landscape of the project area will totally destroy the scenic values of the area".

Clearly the "Cumulative Impacts" of the project would be devastating to the Perks Ranch and the sensitive ecological area. "The cumulative impacts of the construction and operation of the proposed rail line through the project area will include:

- Loss of habitat for species in greatest conservation need, including disturbance of a heron rookery, and destruction of wetlands,
- Fragmentation and degradation of land and water resources, inhibiting movement of species and increasing the "edge effect",
- Loss of canopy cover and important stopover and breeding habitat for neotropical migratory birds and bats, including endangered and threatened species,
- Alteration of surface and groundwater hydrology,
- Spread of invasive species of plants and animals,
- Increased storm water runoff, erosion, and sedimentation,
- Introduction of predators, parasites and disease, and

- Loss of enjoyment of recreational and aesthetic values".

For these reasons the EIS must consider the impacts on the Perks Ranch and the surrounding woodland and wetland properties. Furthermore, the Ranch property should be avoided by any route ultimately proposed by the STB or the "no action" alternative should be selected.

III. Alternative Routes

A. RMAP Suggested Routing as Described in its Scoping Letter dated June 10, 2016.

RMAP is the Metropolitan Planning Organization ("MRO") for the Rockford region and empowered by a Cooperative Agreement adopted by the cities of Rockford, Loves Park, Belvidere, and Machesney Park, Illinois, as well as Winnebago County and Boone County, Illinois, and the State of Illinois acting through the Illinois Department of Transportation. RMAP meetings are attended by the Mayors and County Board Chairs of the principal communities as well as IDOT. RMAP also receives advice and assistance from a 22 member team and committee including several smaller cities and the Rockford Mass Transit District and the Chicago/Rockford International Airport.

RMAP, following several meetings, submitted its scoping letter dated June 10, 2016 to the STB which indicated a new route which will avoid the Perks Ranch and the Severson/Colman Dells woodlands and the spring fed stream. The RMAP proposed route is closer to the Rockford Airport and the Airport's Global Trade Park before it terminates at the Canadian National Railway. Getting closer to the Airport and the related development corridor is accomplished by following a route to the west of Rockford and east of Meridian Road and then intersecting the Canadian National Railroad. That alternative will completely avoid the Perks Ranch by several miles thereby avoiding the devastating environmental impacts to the Perks Ranch, Severson/Colman Dells woodlands, and the spring fed stream. In the deliberations in those meetings by the RMAP Policy Board leading to issuance of its letter, members inquired as to whether the GLBT had considered the RMAP Greenways Plan and the environmentally sensitive properties that the GLBT proposal would bisect. In response, a member of the Policy Board who had been in contact with Mr. Patton indicated that Mr. Patton and GLBT now understood that it was not advisable to maintain the route as proposed as it did impact environmentally sensitive properties including the Perks Ranch property and that GLBT was supportive of the alternative route ultimately described in the RMAP letter dated June 10, 2016.

On June 24, 2016 Mr. Dave Navecky of the STB informed Attorney Richard Porter that he had heard from several sources that GLBT had indeed expressed that it would file alternative routes with the STB after having reviewed the Scoping Comments. It is, therefore, apparent that GLBT has now agreed that the Perks Ranch and Severson/Colman Dells Woodland Complex area should be avoided and that RMAP's proposed alternative route is now preferred.

A depiction of this route is attached hereto as **Exhibit 6** which we strongly encourage the STB to consider in the EIS and substitute for the original GLBT proposed routing.

B. The Original Meridian Road GLBT Route West of Rockford.

The narrative provided by GLBT for the proposed Rockford Subdivision (and the Wisconsin Subdivision) acknowledges that an original route which was considered would have taken the railroad to the west of Rockford and completely avoided the Perks Ranch and the Severson Dells/Colman Dells Woodland Complex. A copy of that route is attached hereto as **Exhibit 7**. The "Rockford Subdivision" section of the original proposal followed Meridian Road in Rockford and was superior to the route being studied by the STB and should be considered as an alternative route.

In 2015 GLBT presented that original Meridian Road proposed route to RMAP. At the RMAP meeting on May 26, 2016 several members of RMAP spoke out against the current plan proposed by GLBT and the majority of members spoke in favor of the original Meridian Road route proposed in 2015 by GLBT. That 2015 plan completely avoids the Perks Ranch, the aforementioned stream, and the Severson/Colman Dells forest area. The Meridian Road alternative calls for the railroad to follow the multi-lane roadway system where most of the environmental impacts have already been endured. Therefore, the original Meridian Road route contemplated and advocated by GLBT was far superior in avoidance of wetlands and sensitive environmental areas.

On June 9, 2016 RMAP met and voted to issue a statement to the STB (dated June 10, 2016) which memorializes that RMAP "supports the view that the route in Winnebago County needs to move closer to the Chicago Rockford International Airport and offer closer proximity to the Airport's Global Trade Park before it terminates at the CN Railway." Thus RMAP has now officially proposed an alternative route which would avoid the environmentally sensitive areas of the Perks Ranch and the surrounding woodlands as moving the route closer to Rockford and the airport would avoid the ranch altogether. The officially proposed alternative route of RMAP is consistent with the highlighted section of **Exhibit 7** which follows Meridian Road as originally proposed by GLBT. Moving closer to the populated areas of Rockford and the airport and Global Trade Park would largely avoid the environmental impacts while facilitating the goals of industrial and commercial development and convenience of the local communities.

The Surface Transportation Board should consider the original Meridian Road proposed route of GLBT at the area near the Perks Ranch and Severson/Colman Dells Woodland Complex, which the majority of the RMAP members prefer. That alternative route is far superior to the route presently being considered by the STB and accomplishes all of the same goals of connecting the Rochelle area, the Rockford Airport, and avoids the Ranch, the forest land, wetlands, and the Severson/Colman Dells Woodland Complex.

C. Rerouting the Western Spur in a More Southwesterly Corridor

The Surface Transportation Board should consider an alternative route for the western spur of the Rockford Subdivision similar to the one attached hereto as **Exhibit 8**. At MP 186.35 the railroad could swing further southwest between Byron and Oregon, Illinois, in Ogle County thereby completely avoiding the Perks Ranch, the spring-fed stream and the Severson/Colman Dells woodland complex. The route could perhaps cross the Rock River south of Byron, Illinois and

north of the Exelon Nuclear Plant and then curve west of Seward, Illinois. The route could then swing back north to intersect the Canadian National Railroad. That route would virtually avoid all woodlands and wetlands as it would traverse only agricultural crop-land. Such a route would truly honor the GLBT stated goal of avoiding wetlands and environmentally sensitive areas.

IV. Conclusion

The proposed railroad would negatively impact not only the Perks Ranch property and its operations and cause extreme property value loss, but experts have confirmed that the Perks forest and the unnamed spring-fed tributary to the Rock River would be severely impacted as well as habitat for numerous endangered and threatened species including Cerulean warbler, Loggerhead shrike, Indiana bat and Northern long-eared bat. Clearly the alternative of not pursuing the project must be considered as there are numerous under-utilized railways which could simply be used to avoid the Chicago Metropolitan area. Furthermore, extensive research and finances have gone into the CLEAR project which is designed to reduce the Chicago congestion problems which GLBT proposes to avoid. The CLEAR solution is far superior and less costly and invasive from an environmental perspective than the Great Lakes Basin Railroad. Furthermore, even if the GLBT project is considered, alternative routes should be utilized which avoid the Perks Ranch and the Severson/Colman Dells Woodland Complex and the aforementioned unnamed tributary.

The STB has explicitly stated "interested parties are also encouraged to comment on potential alternative routes for the proposed rail line." (Summary of the Board's Environmental Review Process). GLBT itself has now admitted and agreed that the Perks Ranch must be avoided. According to RMAP representatives, GLBT has agreed it should not file an application which includes a route that bisects the Perks Ranch. The developer has also admitted that an alternative route must be selected and stated it will do so after having reviewed the public scoping comments. The three alternatives discussed herein are all superior to the route presently being considered by the STB. Therefore, the scope of the STB EIS needs to include the potential impacts to the Perks Ranch and study each of the three potential alternative routes discussed herein.

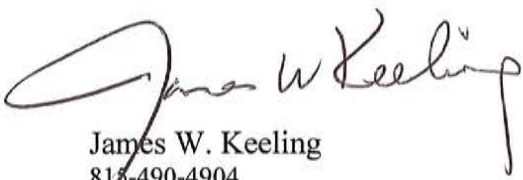
Sincerely,

HINSHAW & CULBERTSON LLP



Richard S. Porter
815-490-4920
rporter@hinshawlaw.com

RSP:JWK:dmh



James W. Keeling
815-490-4904
jkeeling@hinshawlaw.com

EXHIBIT 1

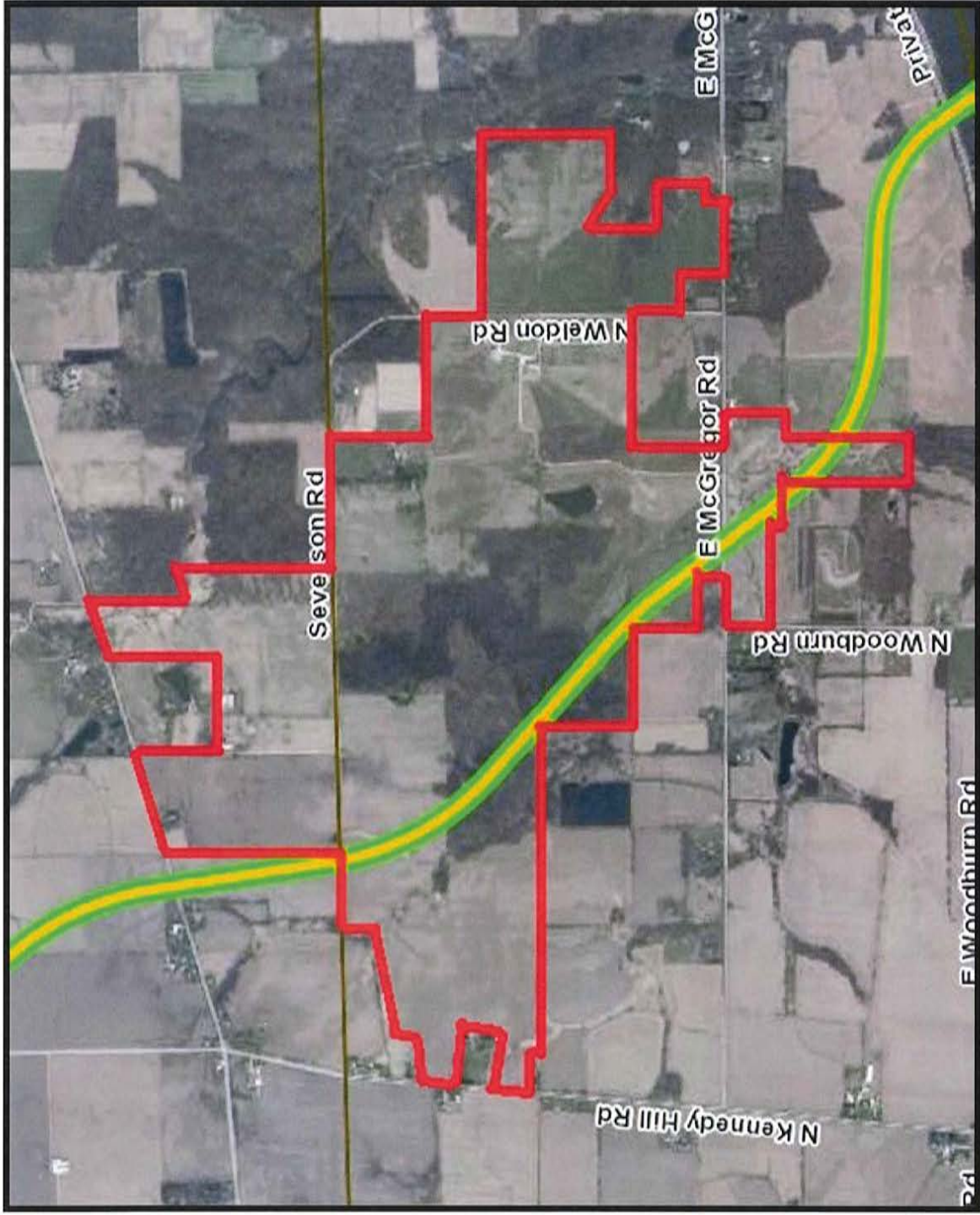
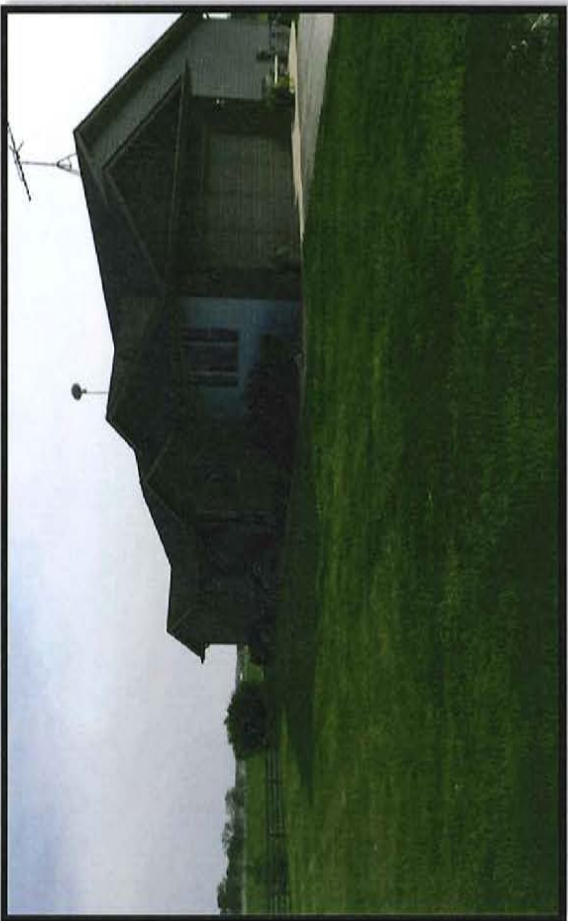


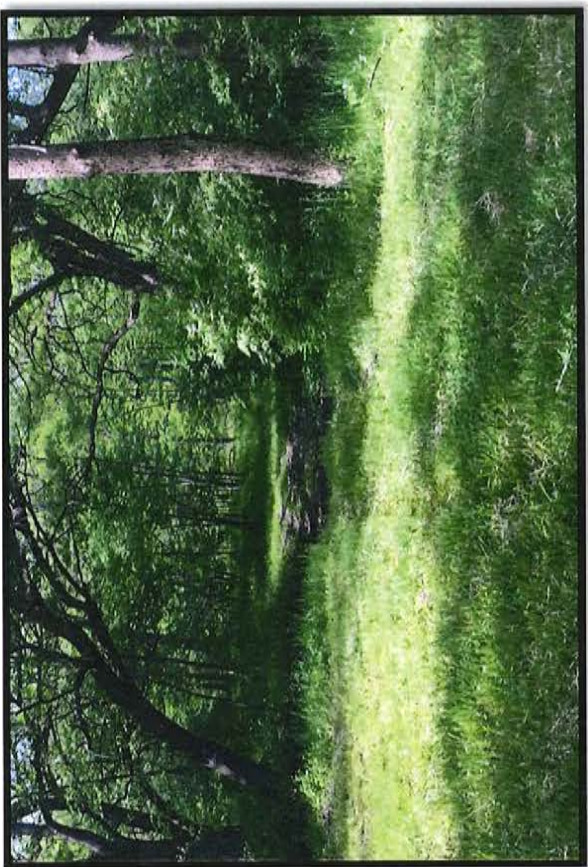
EXHIBIT 2: PHOTOGRAPHS OF PERKS RANCH

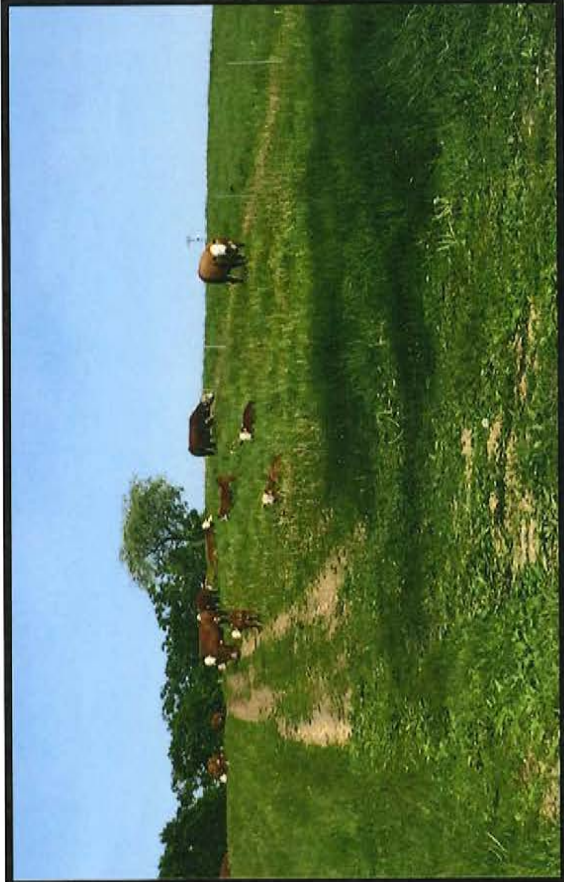
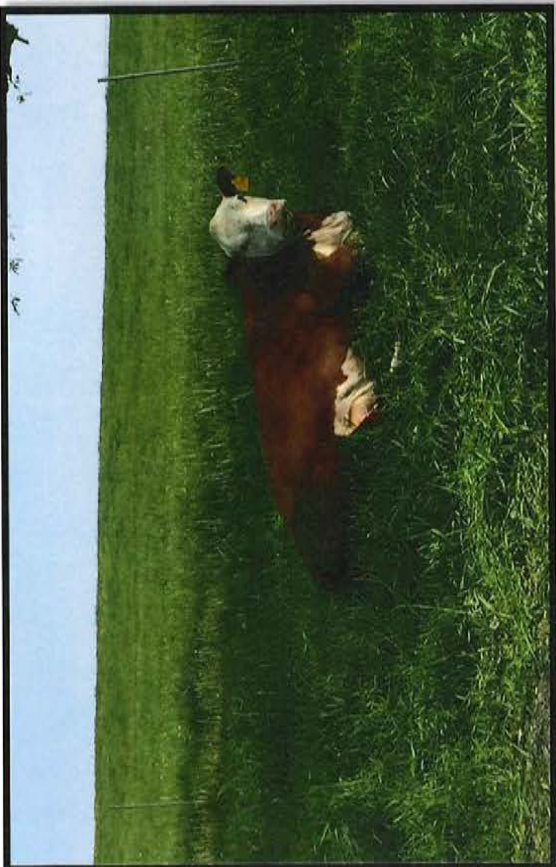
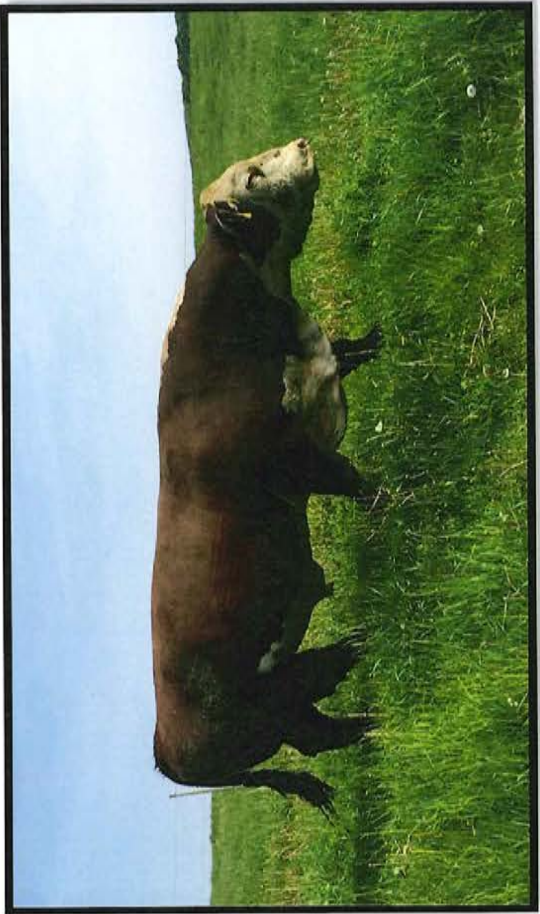


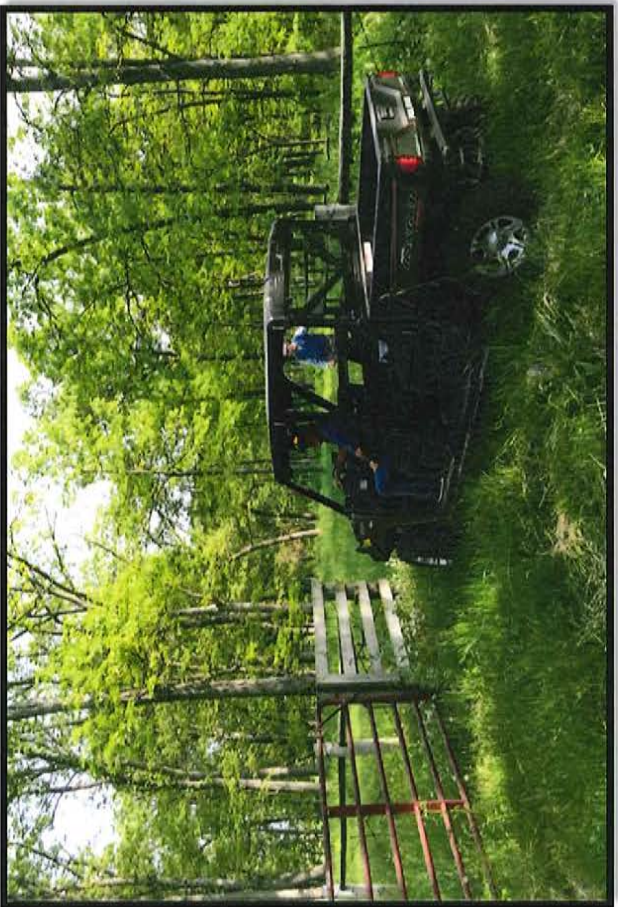






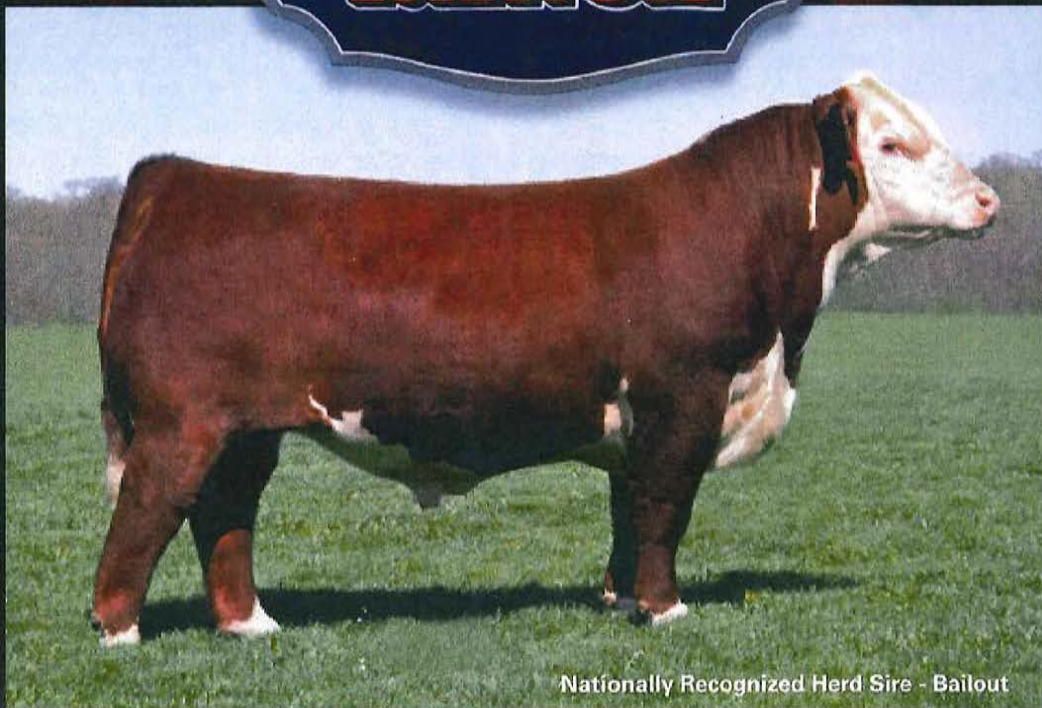








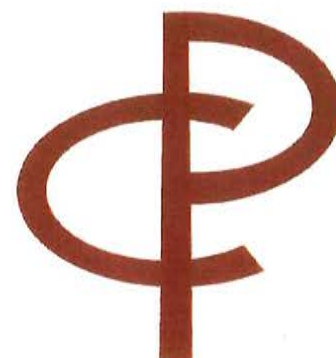




Nationally Recognized Herd Sire - Bailout

PERKS RANCH HISTORY

Perks Ranch was founded as a working horse and cattle ranch in 1961 by Cam Perks and his family, -thus the start of the well known CP brand. Over the years, the ranch has expanded to approximately 1,500 acres of rolling grass pastures, cropland, and protected forests. After 50 years of continuous livestock operations the ranch remains in the Perks family. Doug Perks and his family take the lead on the purebred cattle operation, while Lachlan Perks and his family run a nationally recognized cutting horse program.



ABOUT THE PROGRAM

Calving season is February 1 through April 30. The 90-day calving season is in line with the market, targeting fall production sales and a yearling bull market. Heifers and early-calving cows are bred through artificial insemination; however, pride is taken in the fact that most of the AI sires are bulls that Perks Ranch owns. Following a short AI season, a combination of ranch-raised and purchased bulls are turned out. A majority of the purchased bulls are nationally recognized AI sires. Emphasis is placed on the selection of AI and herd sires by finding bulls that have muscle and growth in a moderate package. These sires are backed by strong mothers with sound udders and a productive history. Each group of cows is specially selected and put together to best utilize the strengths of the herd sire.

The ranch's strict 90-day calving window, -means only females with the highest fertility remain in the herd. In the fall, cows are pregnancy checked using an ultrasound machine. Not only are open cows identified, but the next year's calf crop is sexed. Sexing each calf crop gives a glimpse into the future and aids in the next year's marketing.



Complete performance information is collected through the birth, weaning, and yearling phases of production. All yearlings are scanned for carcass data and bulls have a breeding soundness exam. In addition, cows are scored for udder soundness and body condition is scored at weaning.

Ultrasound data is one of the tools used to make genetic improvements within the herd. By consistently collecting data for more than 18 years, Perks Ranch has been able to measure progress and increase muscle put into the cow herd and offspring. Utilizing scales to collect weaning and yearling weights has helped to mark progress made by annual calf crops and to help identify the parents of higher performing offspring.

The Genetic and Economic Management (GEMS) computer program is utilized to measure herd performance, records, and analysis. The GEMS program allows total breeding, health, embryo transfer, and marketing information and can interact with the American Hereford Association for registration and transfer. GEMS gives a centralized database being able to measure and manage the productiveness of the cowherd. Having complete data history on the cow herd allows for the consistently top producing cows to be identified and for non-producing females to be culled.

To promote Perks Ranch genetics, cattle are exhibited locally and nationally. After several years of hosting a spring bull sale, Perks Ranch switched over to selling bulls private treaty, allowing for more personal contact with the customer and a chance to help match a bull that best fits their program. More recently a majority of the bulls have been developed and marketed in a cooperative arrangement with Langford Herefords in Oklahoma. Perks Ranch also sells females private treaty and welcome visitors to come by anytime to view the operation.



COW HERD

The foundation of the Hereford cowherd at Perks Ranch traces back to the great Northern Pump Cattle Co. dispersion sale at McHenry, Ill. in 1978. Doug purchased 20 females in this landmark sale, which led to the formation of the Perks Ranch registered cow herd. From that point forward, the complexion of the cattle division at Perks Ranch has made rapid changes and improvements. Major purchases were also added from the Imig Herefords herd, Lakeside, Neb.. These cows were greatly influenced by the genetics of RB L1 Domino 970. Perks and Imig owned several partnership bulls during the early development of the Perks program; the most noteworthy was SH Advancer 409, a legendary sire of wonderful females. The blood of 409 runs deep in the Perks Ranch herd today, with the majority of the cows tracing back to this great sire.

Several bulls have been used in the Perks Ranch program from the great Cooper Hereford Ranch herd, Willow Creek, Mont. They include CL 1 Domino 905, CL 1 Domino 349, and the most famous would have to be CL 1 Domino 373. This collective group of herd bulls went on to sire many regional and national champions for Perks Ranch. Some highlights include several carload bull and commercial female champions at the Fort Worth Stock Show and Rodeo, as well as reserve champion bull at the American Royal in 1997.

In 1997, the nucleus of the Perks Ranch Red Angus program emerged through select purchases of females from Von Forell's foundation cow herd. The strong maternal genetic base of these cows combined with the power of RBJR Advance A709 has proven to be a successful combination in the Red Angus industry and was followed with several years of success within the business. These years were highlighted by being named premier exhibitor at various shows as well as winning several grand and reserve grand champions.

Perks Ranch has always taken pride in selecting top quality bulls. In 1998, Polled influence was added to the herd with the purchase of S&S Kodiak 6G from Schutte and Sons, Guide Rock, NE. In 2005, GH Rambo 279R was purchased from Hirsche Herefords, Alberta, Canada, who was then named Canadian National Champion at Farm Fair in 2006. Then in 2006, LaGrand Reload 80P was purchased from LaGrand Herefords, Freeman, S.D., who was then named national champion at the 2007 National Western Stock Show.



In December 2009, Perks Ranch was looking to expand their genetic pool by finding a good-sized group of females from one program with consistently proven backgrounds and quality. A select group of weaned heifers was then purchased from Topp Herefords, Grace City, N.D. These heifers are now in production and have proven to be a great addition to the herd.

With a serious analysis of the cattle industry and a continued commitment to raising the best beef possible, the ranch made a strategic decision to consolidate operations

to one beef breed. Therefore, in June 2010 the ranch dispersed their Red Angus herd and is now focusing all their resources on producing top Hereford cattle.

PERSONNEL

Members of Perks Ranch are involved in many cattle and civic organizations. Doug Perks served on the American Hereford Association board of directors and is active with the Hereford Youth Foundation of America board. He also serves on the newly formed board for GiGi's Play House in Rockford, which is a Down Syndrome awareness center. He and his wife Mary have four children; Wade, Anna, TJ and Shannon.



Doug's son, Wade, has an animal science degree from Oklahoma State University and a certificate in ranch management from Texas Christian University. He works with Dan Cox & Associates in Lewisville, Texas. Wade has served on the National Junior Hereford Association board of directors and served as their president. He is active with the Texas and Southwestern Cattle Raisers Association and Texas Hereford Association. In addition, Wade serves on the auction and international committees for the Fort Worth Stock Show and Rodeo. On Sept. 4, 2010, Wade married Brie Whitehead of San Angelo, Texas and they reside in Fort Worth.

Tom and Tammy Boatman joined Perks Ranch as managers in June 2011. Tom is originally from Alabama and Tammy from Kansas. Tammy holds a bachelor's degree in animal science for Kansas State University. They were managers at JWR Land & Cattle Company in Georgia for 8 years prior to joining Perks Ranch, and have been very

active in the Hereford breed. Tom and Tammy have twins, Kade and Kendall.

Steve Koelm, a former rough stock rider, and a Southern Illinois University ag. business graduate, joined Perks Ranch as herdsman in 2009. In his spare time he does leather work and announces at several rodeos.

PERKS RANCH CATTLE DIVISION MISSION STATEMENT

- To be recognized as a leading source of genetics for the beef cattle industry, by utilizing all available practical, scientific and genetic knowledge.
- To foster a progressive environment of education and knowledge in a family environment.
- To operate the ranch with quality personnel in a practical manner with all equipment and facilities in good order.
- Customer acceptance, personal satisfaction and PROFIT are measures of success for Perks Ranch.



PERKS RANCH

12526 N. Weldon Road
Rockford, Illinois 61102
Phone/Fax (815) 335-2824
<http://www.perksranch.com/>

EXHIBIT 3: RESUME OF GERALD PAULSON

RESUME

Gerald A. Paulson
4601 Paulson Road
Caledonia, Illinois 61011
815-222-4414; paulsonjerry@aol.com

Current Employment

Consultant to private conservation groups, foundations and restoration ecologists

Previous Employment

Executive Director, Natural Land Institute, Rockford, IL 2000-2013
Project Manager, The Wetlands Initiative, Chicago, IL 1995-2000
Hey and Associates, Inc., Chicago, IL 1993-1995
Executive Director, McHenry County Defenders, 1985-1993
Coordinator, Operation Topsoil Project, McHenry County Defenders 1984-1985
Coordinator, Wetlands Protection Project, Lake Michigan Federation 1982-1984
Land Preservation Coordinator, Natural Land Institute 1976-1981
Field Representative, Illinois Nature Preserves Commission 1971-1976

Education

Masters of Science, Plant Pathology, University of Illinois 1970
Bachelors of Science, Ornamental Horticulture, University of Illinois 1969

Major Projects

Acquired 155-acres in Apple River Canyon, near Stockton, Illinois
Acquired 142-acre woodland and marsh on Pecatonica River, near Pecatonica
Acquired conservation easement on 68 acres of woodland and marsh on Pecatonica River
Acquired 39-acre Nieman Marsh, near Pecatonica, Illinois
Acquired and restored 720-acre Nygren Wetland Preserve near Rockton, Illinois
Acquired 233-acre Kyte River Bottoms, south of Oregon, Illinois
Acquired 80-acre Pecatonica Ridge Prairie and wetlands near Pecatonica, Illinois
Acquired conservation easements on 310 acres of land along Kishwaukee River
Developed plan to acquire and restore 2,500-acre Hennepin Drainage District
Managed large-scale wetland restoration project at Midewin National Tallgrass Prairie
Developed master plan for restoration of Spunky Bottoms, near Beardstown, Illinois
Developed planning framework to implement wetland restoration projects on a watershed basis in the Great Lakes basin.

Advisory Boards, Boards and Committees

Land Advisory Council, Forest Preserves of Winnebago County, Present Chairman
Boone County Fair Board, Current Board Member
Prairie State Conservation Coalition, Founder and Past President of Board

Kishwaukee River Ecosystem Partnership, Past Council President, Treasurer
Farmland Protection Project (Boone County, Illinois), Past Chairman
Governor's Groundwater Advisory Council, Past Member
Wetland Advisory Council, Illinois Department of Natural Resources, Past Member
Earth Share of Illinois, Past Chairman, Board Member
McHenry County Defenders, Past Board Member
Friends of the Fox River, Past Board Member
Greenwood Township Planning Commission, Past Commission Member
Sierra Club's National Wetlands Committee, Past Chairman
Illinois Environmental Council, Past President, Board Member
Audubon Council of Illinois, Past President, Board Member
Sinnissippi Audubon Society, Past President, Board Member
Severson Dells Advisory Committee, Past Member

Invited Testimony

Before the White House Domestic Policy Council on Achieving a "No Net Loss of Wetlands Policy," August 1990, Peoria, Illinois

Before the U.S. House Committee on Government Operation, Environment, Energy and Natural Resources Subcommittee, Rep. Dennis Hasterd, Chairman, on the need to incorporate wetlands into water quality programs, September 1991, Freeport, Illinois

Publication and Papers Authored or Co-authored

Wetlands and Water Quality: A Citizens Handbook for Protecting Wetlands. 1990. Lake Michigan Federation, Chicago, IL

The Potential to Integrate Wetland Restoration and Water Quality Management Plans to Reduce Nonpoint Source Pollution Problems of the Nearshore Waters of the Great Lakes: A Report to the Great Lakes Protection Fund. August 12, 1993

Great Lakes Wetlands Restoration: Linking wetlands restoration and watershed planning. Great Lakes Wetlands, Vol. 5, No. 1, Spring 1994

Farmland Protection in DeKalb County, Illinois. American Farmland Trust, Center for Agriculture in the Environment, DeKalb, Illinois. www.farmland.org

Farmland Protection in McHenry County, Illinois. American Farmland Trust, Center for Agriculture in the Environment, DeKalb, Illinois. www.farmland.org

Personal

Single. Live on family farm near Rockford.

EXHIBIT 4: PAULSON REPORT OF PERKS RANCH AND SURROUNDING PROPERTIES

**Report on the potential environmental impacts of the
proposed Great Lakes Basin Transportation, Inc. rail line spur
through Perks Ranch and surrounding property in
Byron Township, Ogle Co., and Winnebago Township,
Winnebago Co., Illinois .**

By Gerald A. Paulson
June 3, 2016

Introduction

The Surface Transportation Board has issued a Notice of Intent to Prepare an Environmental Impact Statement and Request for Comments on the Draft Scope of Study for the EIS for construction and operation of a rail line through northern Illinois and southern Wisconsin by the Great Lakes Basin Transportation, Inc. (GLBR). The proposed rail line includes the single track Rockford Subdivision, starting from a wye junction off the GLBR Wisconsin Subdivision at MP 186.35, curving west to MP 7.30, then northwest from MP 7.30 to MP 11.00, then north to MP 12.00, then west to MP 13.00, then northwest and north to MP 14, then north to MP 17.00 and northwest to MP 19.61 ending at an interchange connection with the CN Freeport Subdivision.

At MP 13.10 the railroad would cross the Rock River and enter Byron Township in Ogle County, Illinois. From this point the proposed alignment crosses into a complex of farmland, woodland, grassland and wetland along an un-named spring-fed stream that flows into the Rock River known as Perks Ranch (study area). The properties along the stream in the study area are located in Sections 2, 3, 4, 10 and 11 of Byron Township, T. 25 N., R. 11 E, 4th PM in Ogle County and Section 34 of Winnebago Township, T. 26 N., R. 11 E. 4th P.M. in Winnebago County. (Figure 1)

Perks Ranch is part of a much larger complex of woodland, wetland and grassland owned by the Winnebago County Forest Preserve District, Byron Forest Preserve District and Natural Land Institute, a private conservation group. About one hundred acres of other the land within the study area has been enrolled in the Federal Conservation Reserve Program (CRP) and planted to native warm season grasses and forbs. (Figure 2)

The author was engaged by the Perks family to conduct a preliminary assessment of the potential environmental impacts of the proposed GLBR going through Perks Ranch and the surrounding area, and prepared comments on the Draft Scope of Work for the EIS. The assessment included a review of maps of the proposed GLBR right-of-way through Byron and Winnebago townships, inspection of soils and topographic maps and aerial photographs, visual inspection of the woodlands, wetlands, farm and stream, review of CRP planting plans, and a preliminary survey of the plants, fish and birds found in the study area during late April and May, 2016. The inventory was carried out by local naturalists under the direction of the author

and included sampling of the fish in the spring-fed stream that runs through the property using dip nets and siens, and observation of plants and animals during three visits to the area. Lists of species observed during the surveys are attached.

Importance of Area to Fish and Wildlife

Large tracts of upland forest and grassland are important habitat for neotropical migratory birds that migrate through northern Illinois in the spring and fall. Many neotropical migratory birds are dependent upon large tracts of upland forest, and grasslands such as are found in the project area for breeding habitat. These include Loggerhead shrike, Dickcissel, Bobolink, and Eastern meadowlark. The Illinois Wildlife Action Plan (2015 Revision) emphasizes the importance of large tracts of woodland as stopover habitat for Neotropical Migratory Birds as there is little left that migrants can use. "Large patches of natural habitat are the best resources for these migrants," according to the Illinois Department of Natural Resources ([http://www.dnr.illinois.gov/con...5 FINAL Revision%204-18-16.pdf](http://www.dnr.illinois.gov/con...5_FINAL_Revision%204-18-16.pdf)).

The Illinois Wildlife Action Plan also recognizes the importance of oak savannas for migratory birds, such as Red-headed woodpecker and Brown creeper. Most oak savannas were cleared for agriculture, developed for building sites or allowed to grow into dense forests after fires and grazing were discontinued. The grazing and mowing of the oak woodland in the project area has maintained the open tree structure needed by savanna species that are not found in other areas. A preliminary inventory of birds that use the woodland, savanna, grassland and wetland during migration and for breeding done during April and May 2016 found 121 species, including Bald eagle, Cooper's hawk, Red-shouldered hawk, Sandhill crane, Barred owl, Pileated woodpecker, Savanna sparrow and Bobolink. A breeding population of Cerulean warbler, a State threatened species, was found in the woodland. A complete inventory of the breeding birds in the area is needed as part of the EIS to determine what other endangered and threatened species are present.

The woodlands are managed for fire wood, pasture and upland game. There are numerous springs and seepage areas along the stream, and an area of spring-fed wetland located in the NE ¼ of the SW ¼ of Section 3 lies directly in the alignment of the proposed rail line at MP15. These wetlands provide habitat for Sedge wren, Sora rail and other birds, and could shelter a population of American bittern, a State endangered species. The woodlands are mostly white oak flatwoods on the uplands, maple-basswood forest on slopes, and oak-hickory savanna along the stream. Several ephemeral ponds in the flatwoods and wetlands along the stream provide habitat for frogs, toads, salamanders and other amphibians. A complete inventory of amphibians that breed in the ephemeral ponds in the flatwoods, and along the stream is needed as part of the EIS.

In addition to providing habitat for many migratory and breeding birds, the woodland contains a rookery for breeding Great blue and Green herons. The rookery is located near the edge of the woods, in close proximity to the proposed

rail line. Yellow-crowned night-heron and Black-crowned night-heron, both State endangered species could also nest in brushy thickets on the study area. An inventory of herons and egrets breeding on Perks Ranch should be done as part of the EIS.

There are many mature shag-bark hickory trees in the woodlands and savanna in the study area. These provide potential nesting and roosting habitat for the Federally endangered Indiana bat and the Federally threatened Northern Long-eared bat. Other species of bats are undoubtedly found in the woodlands, but none were observed during late April and May. A complete survey of the bat population found in the woodland is needed as part of the EIS. The Scope of Work should specify that the survey of bats include mist netting, and collection of acoustic echolocation data following guidelines of the U.S. Fish and Wildlife Service in areas where suitable habitat is found.

The grasslands are maintained and managed for pasture, hay, and upland game. The livestock operations and CRP on the land on Perks Ranch and the adjoining private property have maintained some of the largest tracts of grassland in the region. Large tracts of grassland are important for such birds as Bobolinks, Dickcissel, and Eastern meadowlarks, and such State endangered and threatened species as Short-eared owl, Upland sandpiper, Henslow's sparrow, and Northern harrier. Suitable habitat for all these species is found in the study area. Loggerhead shrike, a State endangered bird was found in the grasslands on the Perks ranch in early May. It is not known if this was a migrant or resident. A complete inventory of the grassland birds that use the fields and pastures in the project area during the breeding season is needed as part of the EIS.

Cold water, clear spring-fed streams with hard bottom substrates are rare in the region. Those that are found provide high quality habitat for many species of fish and invertebrates, including healthy populations of fish like Mottled Sculpin. A preliminary survey of fish species in the un-named stream in the project area found a rich diversity of species, including Southern red-belly dace, Brook stickleback, Creek chub, Fantail darter and Johnny darter. A more complete survey of fish, and macro-invertebrates found in the stream should be done as part of the EIS.

Several exposures of dolomitic bedrock are found along the stream, forming low cliffs or "dells" at some locations. The shallow soils on top of the bedrock exposures provide a unique environment for several species of plants that are rare in the region. Those found growing on the cliffs in the study area include leatherwood (*Dirca palustris*), pagoda dogwood (*Cornus alternifolia*), bladdernut (*Staphylea trifolia*), bulblet fern (*Cystopteris bulbifera*), and purple cliff brake (*Pellaea glabella*). The proposed rail line will destroy or disturb many of these cliffs. It is not possible to mitigate for the loss of these special habitats.

Environmental Impact Analysis

The Perks Ranch, and the surrounding area contains important woodlands, grasslands and wetlands, as well as a cold-water spring-fed stream with exposures of bedrock along it that provide habitat for many plants and animals, including suitable habitat for several endangered and threatened species, and species of greatest conservation need identified in the Illinois Wildlife Action Plan (Revised).

The construction and operation of the proposed rail line through the project area will have the potential for the following environmental impacts:

1. Land Use – The construction of a new rail line through Perks Ranch will disrupt the farming operation, chopping the woodlands, pastures and hay fields into separate, smaller, inaccessible units. It will also make it more difficult to manage the woodlands for timber and wildlife production.
2. Recreation – The woodlands and grasslands are heavily used for hunting, horse-back riding, hiking, birding and other recreational activities. The area is managed for upland game and whitetail deer. The construction activities, and the noise and vibrations associated with the rail line will disturb wildlife, disrupt game trails and wildlife movement patterns, and degrade the recreational experience of people using the properties.
3. Biological Resources – The proposed alignment of the railroad will destroy a rare spring-fed wetland lying in its path, damage the cold water stream and destroy potential habitat for rare fish and mussels, eliminate many acres of grassland and woodland, and fragment habitat for Neotropical migratory birds, raptors and other wildlife. Fragmentation of woodland and grassland is a major threat to the value of these habitats to wildlife. In addition, the construction and operation of the rail line along the edge of the woodlands will disturb the herons using the trees for a rookery, probably causing them to abandon the nests and move to another location.
4. Water Resources – The proposed alignment of the railroad will cross the unnamed cold-water stream at two locations, and follow the edge of the stream for about 1 ½ miles. Construction of the crossing and rail bed along the edge of the stream will completely alter the hydrology of the stream, contribute silt and sediments, pesticides, oil and lubricants, dust, smoke and other pollutants into the stream, and potentially block the movement of fish through culverts. A potential spill or leak of oil, chemicals or hazardous materials shipped on the train into the stream would kill everything living in it. All crossing of the stream should be done on bridges, not culverts, and runoff from the rail bed should be captured and treated before being released to the stream. The use of pesticides to control weeds and other vegetation along the rail bed should be limited and carefully monitored.
5. Geology and Soils – The project area is underlain by fractured, dolomitic bedrock that lies very close to the surface, outcropping in several locations along the stream. The shallow soils that cover the bedrock are highly

erodible when vegetation is removed. Excavation of the rail bed through Perks Ranch will require blasting through the bedrock, potentially disrupting the groundwater hydrology of the stream. The hydric soils in the spring-fed wetland south of the creek are unsuitable for construction of the rail bed and will have to be removed, destroying the wetland in the process. There is no way to mitigate for the loss of a spring-fed wetland.

6. Noise and Vibration – The noise and vibration of trains using the rail line will disrupt wildlife, diminish the enjoyment of people using the area for recreation, and degrade the rural lifestyle of people living in the area.
7. Cultural and Historic Resources – The Rock River valley between Rockford and Byron was the home of a large intercultural population of native Americans. Villages were found on river terraces, and burial, effigy and ceremonial mounds were constructed on the ridges and bluff-tops all along the river. The ridge south of McGregor Road and flat areas along the stream are likely sites used by native Americans. A complete Phase One inventory of potential archeological sites must be done to determine the significance of the area to cultural and historic resources.
8. Aesthetics – The Rock River valley between Rockford and Dixon is one of the most scenic areas in northern Illinois. It has been called the “Hudson River of the Midwest” and has been considered for designation as a State scenic river for many years. Illinois State Route 2 runs along the river and is one of the States most well traveled scenic highways. The heavily wooded, rolling hills, and streams found in the project area are one of the most picturesque rural landscapes in northern Illinois. Travelers on Montague and Kennedy Hill roads, and Illinois State Route 2, as well as boaters on the Rock River can enjoy the beauty of this area. A rail line bridging the river and highway, and cutting through the rolling landscape of the project area will totally destroy the scenic values of the area.
9. Cumulative Impacts – The cumulative impacts of the construction and operation of the proposed rail line through the project area will include:
 - Loss of habitat for species in greatest conservation need, including disturbance of a heron rookery, and destruction of wetlands,
 - Fragmentation and degradation of land and water resources, inhibiting movement of species and increasing the “edge effect”,
 - Loss of canopy cover and important stopover and breeding habitat for neotropical migratory birds and bats, including endangered and threatened species,
 - Alteration of surface and groundwater hydrology,
 - Spread of invasive species of plants and animals,
 - Increased stormwater runoff, erosion, and sedimentation,
 - Introduction of predators, parasites and disease, and
 - Loss of enjoyment of recreational and aesthetic values.

The cumulative impacts of the proposed rail line on Perks Ranch and the surrounding landscape are significant and would severely degrade the environmental quality and habitat for fish and wildlife in the area.

Attachments

1. Fish observed in un-named stream on Perks Ranch
2. Birds recorded on Perks Ranch, April & May 2016
3. Perks Ranch plants of known occurrence

Attachment 1 – Fish observed in un-named stream on Perks Ranch

Sampled by Greg Keilback and Matt Vincent
May 2016

1. Creek chub – *Semotilus atromaculatus*
2. Southern redbelly dace – *Phoxinus erythrogaster*
3. Bluntnose minnow – *Pimephales notatus*
4. White sucker – *Castostomus commersoni*
5. Brook stickleback – *Culaea inconstans*
6. Green sunfish – *Lepomis cyanellus*
7. Fantail darter – *Etheostoma flabellare*
8. Johnny darter – *Etheostoma nigrum*

Observer(s) Greg Keilback & Matt Vincent # of observers 2
 Location Perks Ranch, Ogle & Winn Cos
 Earliest birding time _____; Latest birding time _____; Owling hours _____ hrs _____ mins _____
 Daylight party hours walked: _____ hrs _____ mins _____; Daylight party hours driven: _____ hrs _____ mins _____
 Daylight party miles: _____ walked _____ driven; Other party hours: _____; Other party miles: _____ (Explain: _____)
 Record number of bird species in front of bird name Late April + May 2016

Snow Goose	☒ Killdeer	☒ Loggerhead Shrike	Hooded Warbler
☒ Canada Goose	☒ Black-necked Stilt	☒ White-eyed Vireo	☒ American Redstart
Mute Swan	Spotted Sandpiper	Bell's Vireo	☒ Cape May Warbler
Trumpeter Swan**	Solitary Sandpiper	☒ Yellow-throated Vireo	☒ Cerulean Warbler
☒ Wood Duck	Greater Yellowlegs	Blue-headed Vireo	Northern Parula
Gadwall	Lesser Yellowlegs	☒ Warbling Vireo	☒ Magnolia Warbler
American Wigeon	Upland Sandpiper	☒ Philadelphia Vireo	☒ Bay-breasted Warbler
☒ Mallard	Semipalmated Sandpiper	☒ Red-eyed Vireo	☒ Blackburnian Warbler
☒ Blue-winged Teal	Western Sandpiper	☒ Blue Jay	☒ Yellow Warbler
Northern Shoveler	Least Sandpiper	☒ American Crow	☒ Chestnut-sided Warbler
Northern Pintail	White-rumped Sandpiper	Fish Crow	Blackpoll Warbler
Green-winged Teal	Pectoral Sandpiper	☒ Horned Lark	Black-throated Blue Warbler
Canvasback	Dunlin	☒ Purple Martin	☒ Palm Warbler
Redhead	Short-billed Dowitcher	☒ Tree Swallow	☒ Pine Warbler
Ring-necked Duck	Wilson's Snipe	☒ N. Rough-winged Swallow	☒ Yellow-rumped Warbler
Lesser Scaup	☒ American Woodcock	Bank Swallow	☒ Yellow-throated Warbler
Hooded Merganser	Wilson's Phalarope	Cliff Swallow	Prairie Warbler
Common Merganser	Bonaparte's Gull	☒ Barn Swallow	☒ Black-throated Green Warbler
Red-breasted Merganser	Ring-billed Gull	Carolina Chickadee	Canada Warbler
Ruddy Duck	Herring Gull	☒ Black-capped Chickadee	☒ Wilson's Warbler
Northern Bobwhite	Caspian Tern	☒ Tufted Titmouse	Yellow-breasted Chat
☒ Ring-necked Pheasant	Black Tern	☒ Red-breasted Nuthatch	☒ Eastern Towhee
☒ Wild Turkey	Common Tern	☒ White-breasted Nuthatch	☒ Chipping Sparrow
Common Loon	Forster's Tern	Brown Creeper	Clay-colored Sparrow
Pied-billed Grebe	☒ Rock Pigeon	☒ House Wren	☒ Field Sparrow
Double-crstd Cormorant	Eurasian Collared-Dove	☒ Sedge Wren	Vesper Sparrow
American White Pelican	☒ Mourning Dove	Marsh Wren	☒ Lark Sparrow
American Bittern	☒ Yellow-billed Cuckoo	☒ Carolina Wren	☒ Savannah Sparrow
Least Bittern	Black-billed Cuckoo	☒ Blue-gray Gnatcatcher	☒ Grasshopper Sparrow
☒ Great Blue Heron	Barn Owl**	☒ Ruby-crowned Kinglet	Henslow's Sparrow
☒ Great Egret	☒ Eastern Screech-Owl	☒ Eastern Bluebird	☒ Song Sparrow
Snowy Egret	☒ Great Horned Owl	Veery	☒ Lincoln's Sparrow
Little Blue Heron	☒ Barred Owl	Gray-cheeked Thrush	☒ Swamp Sparrow
Cattle Egret	☒ Common Nighthawk	☒ Swainson's Thrush	☒ White-throated Sparrow
☒ Green Heron	Chuck-will's-widow	☒ Hermit Thrush	☒ White-crowned Sparrow
Black-crwn'd Nt-Heron	Eastern Whip-poor-will	☒ Wood Thrush	Summer Tanager
Yellow-crwn'd Nt-Heron	☒ Chimney Swift	☒ American Robin	☒ Scarlet Tanager
Black Vulture*	☒ Ruby-thrt'd Hmmbird	☒ Gray Catbird	☒ Northern Cardinal
☒ Turkey Vulture	☒ Belted Kingfisher	Northern Mockingbird	☒ Rose-breasted Grosbeak
Osprey	☒ Red-headed Woodpecker	☒ Brown Thrasher	Blue Grosbeak
Mississippi Kite**	☒ Red-bellied Woodpecker	European Starling	☒ Indigo Bunting
☒ Bald Eagle	☒ Yellow-bellied Sapsucker	American Pipit	☒ Dickcissel
☒ Northern Harrier	☒ Downy Woodpecker	☒ Cedar Waxwing	☒ Bobolink
Sharp-shinned Hawk	☒ Hairy Woodpecker	☒ Ovenbird	☒ Red-winged Blackbird
☒ Cooper's Hawk	☒ Northern Flicker	Worm-eating Warbler	☒ Eastern Meadowlark
☒ Red-shouldered Hawk	☒ Pileated Woodpecker	☒ Louisiana Waterthrush	Western Meadowlark
Broad-winged Hawk	☒ American Kestrel	☒ Northern Waterthrush	Yellow-headed Blackbird
☒ Red-tailed Hawk	Peregrine Falcon	☒ Golden-winged Warbler	Brewer's Blackbird*
King Rail**	Olive-sided Flycatcher	☒ Blue-winged Warbler	☒ Common Grackle
Virginia Rail	☒ Eastern Wood-Pewee	☒ Black-and-white Warbler	☒ Brown-headed Cowbird
☒ Sora	☒ Acadian Flycatcher	Prothonotary Warbler	☒ Orchard Oriole
Common Gallinule	Willow Flycatcher	☒ Tennessee Warbler	☒ Baltimore Oriole
American Coot	Least Flycatcher	☒ Orange-crowned Warbler	☒ Purple Finch
☒ Sandhill Crane	☒ Eastern Phoebe	☒ Nashville Warbler	☒ House Finch
Black-bellied Plover	☒ Great Crested Flycatcher	Mourning Warbler	☒ American Goldfinch
American Golden-Plover	Western Kingbird	Kentucky Warbler	☒ House Sparrow
Semipalmated Plover	☒ Eastern Kingbird	☒ Common Yellowthroat	☒ Eurasian Tree Sparrow

*Documentation Required **Documentation required only if found outside normal range

RECORD ADDITIONAL SPECIES ON BACK

Perks Ranch Plants of known occurrence

Latin Name	Common Name	Perks Ranch
<i>Abutilon theophrasti</i>	Velvet leaf	X
<i>Acalypha rhomboidea</i>	Three-seeded Mercury	X
<i>Acer ginnala</i>	Amur Maple	X
<i>Acer negundo</i>	Boxelder	X
<i>Acer saccharinum</i>	Silver Maple	X
<i>Acer saccharum</i>	Sugar Maple	X
<i>Achillea millefolium</i>	Yarrow	X
<i>Acorus calamus</i>	Sweet Flag	X
<i>Actaea pachypoda</i>	White Baneberry	X
<i>Adiantum pedatum</i>	Maidenhair	X
<i>Agalinis tenuifolia</i>	Slender False Foxglove	X
<i>Agastache nepetoides</i>	Yellow Giant Hyssop	X
<i>Agrimonia gryposepala</i>	Tall Agrimony	X
<i>Agrimonia parviflora</i>	Swamp Agrimony	X
<i>Agropyron repens</i>	Quackgrass	X
<i>Agrostis alba (palustris)</i>	Redtop	X
<i>Alisma subcordatum</i>	Water Plantain	X
<i>Alliaria petiolata</i>	Garlic Mustard	X
<i>Allium canadense</i>	Wild Onion	X
<i>Allium tricoccum</i>	Wild Leek	X
<i>Alopecurus carolinianus</i>	Annual Foxtail	X
<i>Amaranthus graezicans</i>	Prostrate Pigweed	X
<i>Ambrosia artemisiifolia</i>	Ragweed	X
<i>Ambrosia trifida</i>	Giant Ragweed	X
<i>Amelanchier laevis</i>	Allegheny Serviceberry	X
<i>Amorpha canescens</i>	Leadplant	X
<i>Amorpha fruticosa</i>	Indigo Bush	X
<i>Amphicarpaea bracteata</i>	Upland Hog Peanut	X
<i>Andropogon gerardii</i>	Big Bluestem	X
<i>Anemone canadensis</i>	Meadow Anemone	X
<i>Anemone cylindrica</i>	Thimbleweed	X
<i>Anemone quinquefolia</i>	Wood Anemone	X
<i>Anemone virginiana</i>	Tall Anemone	X
<i>Angelica atropurpurea</i>	Great Angelica	X
<i>Antennaria neglecta</i>	Cat's Foot	X
<i>Antennaria plantaginifolia</i>	Field Pussy Toes	X
<i>Apios americana</i>	Ground Nut	X
<i>Apocynum cannabinum</i>	Indian Hemp, Dogbane	X
<i>Aquilegia canadensis</i>	Wild Columbine	X
<i>Arabis canadensis</i>	Sickle Pod	X
<i>Arabis glabra</i>	Tower Mustard	X
<i>Arabis laevigata</i>	Smooth Bank Cress	X

<i>Aralia nudicaulis</i>	Wild Sarsaparilla	X
<i>Aralia racemosa</i>	Spikenard	X
<i>Arctium minus</i>	Burdock	X
<i>Arenaria lateriflora</i>	Wood Sandwort	X
<i>Arenaria stricta</i>	Stiff Sandwort	X
<i>Arisaema dracontium</i>	Green Dragon	X
<i>Arisaema triphyllum</i>	Jack-in-the-Pulpit	X
<i>Artemisia campestris (caudata)</i>	Beach Wormwood	X
<i>Asarum canadense</i>	Woodland Wild Ginger	X
<i>Asclepias exaltata</i>	Poke Milkweed	X
<i>Asclepias incarnata</i>	Swamp Milkweed	X
<i>Asclepias purpurascens</i>	Purple Milkweed	X
<i>Asclepias syriaca</i>	Milkweed	X
<i>Asclepias tuberosa</i>	Butterfly Milkweed	X
<i>Asclepias verticillata</i>	Whorled Milkweed	X
<i>Asparagus officinalis</i>	Wild Asparagus	X
<i>Asplenium platyneuron</i>	Ebony Spleenwort	X
<i>Aster azureus</i>	Sky Blue Aster	X
<i>Aster furcatus</i>	Forked Aster	X
<i>Aster lateriflorus</i>	Side-flowered Aster	X
<i>Aster novae-angliae</i>	New England Aster	X
<i>Aster pilosus</i>	Hairy Aster	X
<i>Aster sagittifolius</i>	Arrow-leaved Aster	X
<i>Athyrium filix-femina (michauxii)</i>	Lady Fern	X
<i>Baptisia leucantha</i>	White Wild Indigo	X
<i>Baptisia leucophaea</i>	Cream Wild Indigo	X
<i>Barbarea vulgaris</i>	Wintercress	X
<i>Berberis thunbergii</i>	Japanese Barberry	X
<i>Bidens aristosa</i>	Swamp Marigold	X
<i>Bidens cernua</i>	Nodding Bur Marigold	X
<i>Bidens discoidea</i>	Swamp Beggar's Ticks	X
<i>Bidens frondosa</i>	Beggar's Ticks	X
<i>Bidens polylepis</i>	Bur Marigold	X
<i>Bidens vulgata</i>	Tall Beggar's Ticks	X
<i>Botrychium multifidum (intermedium)</i>	Leathery Grape-Fern	X
<i>Botrychium virginianum</i>	Rattlesnake-Fern	X
<i>Bouteloua curtipendula</i>	Side-oats Grama	X
<i>Bromus inermis</i>	Smooth Brome	X
<i>Bromus pubescens</i>	Woodland Brome	X
<i>Bromus tectorum</i>	Cheat Grass	X
<i>Cacalia atriplicifolia</i>	Pale Indian Plantain	X
<i>Calamagrostis canadensis</i>	Blue Joint Grass	X
<i>Caltha palustris</i>	Marsh Marigold	X
<i>Campanula americana</i>	Tall Bellflower	X
<i>Campanula rotundifolia</i>	Harebell	X
<i>Cannabis sativa</i>	Hemp	X
<i>Capsella bursa-pastoris</i>	Shepherd's Purse	X

<i>Carex blanda</i>	Wood Sedge	X
<i>Carex normalis</i>	Greater Straw Sedge	X
<i>Carex pensylvanica</i>	Pennsylvania Sedge	X
<i>Carex stricta</i>	Tussock Sedge	X
<i>Carex vulpinoidea</i>	Fox Sedge	X
<i>Carpinus caroliniana</i>	Ironwood	X
<i>Carya cordiformis</i>	Bitternut Hickory	X
<i>Carya ovata</i>	Shagbark Hickory	X
<i>Cassia hebecarpa</i>	Wild Senna	X
<i>Catalpa bignonioides</i>	Common Catalpa	X
<i>Caulophyllum thalictroides</i>	Blue Cohosh	X
<i>Ceanothus americanus</i>	New Jersey Tea	X
<i>Celastrus scandens</i>	Climbing Bittersweet	X
<i>Celtis occidentalis</i>	Hackberry	X
<i>Centaurea maculosa</i>	Spotted Knapweed	X
<i>Cephalanthus occidentalis</i>	Buttonbush	X
<i>Cerastium nutans</i>	Nodding Chickweed	X
<i>Cerastium vulgatum</i>	Mouse-ear Chickweed	X
<i>Cercis canadensis</i>	Redbud	X
<i>Chelone glabra</i>	Turtlehead	X
<i>Chenopodium album</i>	Lamb's Quarter	X
<i>Chrysanthemum leucanthemum</i>	Oxeye Daisy	X
<i>Cichorium intybus</i>	Chicory	X
<i>Cicuta maculata</i>	Water Hemlock	X
<i>Cimicifuga racemosa</i>	Black Cohosh	X
<i>Cinna arundinacea</i>	Wood Reed	X
<i>Circaea lutetiana (canadensis)</i>	Enchanter's Nightshade	X
<i>Cirsium arvense</i>	Canada Thistle	X
<i>Cirsium discolor</i>	Field Thistle	X
<i>Cirsium vulgare</i>	Bull Thistle	X
<i>Claytonia virginica</i>	Spring Beauty	X
<i>Clematis virginiana</i>	Virgin's Bower	X
<i>Comandra umbellata</i>	Bastard Toadflax	X
<i>Convolvulus sepium</i>	Hedge Bindweed	X
<i>Coreopsis lanceolata</i>	Sand Coreopsis	X
<i>Cornus alternifolia</i>	Alternate-leaved Dogwood	X
<i>Cornus amomum</i>	Silky Dogwood	X
<i>Cornus obliqua</i>	Blue-fruited Dogwood	X
<i>Cornus racemosa</i>	Gray Dogwood	X
<i>Cornus rugosa</i>	Round-leaved Dogwood	X
<i>Corylus americana</i>	American Hazelnut	X
<i>Crataegus mollis</i>	Downy Hawthorn	X
<i>Cryptotaenia canadensis</i>	Honewort	X
<i>Cynoglossum officinale</i>	Hound's Tongue	X
<i>Cystopteris bulbifera</i>	Bulblet Fern	X
<i>Cystopteris fragilis (protrusa)</i>	Fragile Fern	X
<i>Dactylis glomeratus</i>	Orchard grass	X

<i>Dalea purpurea</i>	Purple Prairie Clover	X
<i>Datura stramonium</i>	Jimson Weed	X
<i>Daucus carota</i>	Queen Anne's Lace	X
<i>Dentaria diphylla</i>	Crinkleroot	X
<i>Dentaria laciniata</i>	Toothwort	X
<i>Desmodium canadense</i>	Showy Tick-Trefoil	X
<i>Desmodium cuspidatum</i>	Bracted Tick-Trefoil	X
<i>Desmodium dilleni</i>	Dillen's Tick-trefoil	X
<i>Desmodium glutinosum</i>	Pointed Tick-Trefoil	X
<i>Desmodium illinoense</i>	Illinois Tick-Trefoil	X
<i>Dianthus deltoides</i>	Deptford Pink	X
<i>Dicentra cucullaria</i>	Dutchman's Breeches	X
<i>Dichanthelium laninosum</i>	Wooly Panic-grass	X
<i>Digitaria ischaemum</i>	Smooth Crabgrass	X
<i>Dioscorea villosa</i>	Wild Yam	X
<i>Dirca palustris</i>	Leatherwood	X
<i>Dodecatheon media</i>	Shooting Star	X
<i>Dryopteris disjuncta</i>	Oak Fern	X
<i>Dryopteris intermedia</i>	Florist's Wood Fern	X
<i>Dulichium arundinaceum</i>	Three-way Sedge	X
<i>Echinacea pallida</i>	Pale Purple Coneflower	X
<i>Echinocystis lobata</i>	Wild Cucumber	X
<i>Elymus villosus</i>	Silky Wild Rye	X
<i>Epilobium coloratum</i>	Cinnamon Willow Herb	X
<i>Equisetum arvense</i>	Horsetail	X
<i>Erigeron annuus</i>	Annual Fleabane	X
<i>Erigeron philadelphicus</i>	Marsh Fleabane	X
<i>Erigeron pulchellus</i>	Robin's Plantain	X
<i>Erigeron strigosus</i>	Daisy Fleabane	X
<i>Eryngium yuccifolium</i>	Rattlesnake Master	X
<i>Erythronium albidum</i>	White Trout Lily	X
<i>Eupatorium perfoliatum</i>	Boneset	X
<i>Eupatorium purpureum</i>	Purple Joe Pye Weed	X
<i>Eupatorium rugosum</i>	White Snakeroot	X
<i>Fragaria vesca (americana)</i>	Hillside Strawberry	X
<i>Fragaria virginiana</i>	Wild Strawberry	X
<i>Fraxinus americana</i>	White Ash	X
<i>Galium aparine</i>	Annual Bedstraw	X
<i>Galium boreale</i>	Northern Bedstraw	X
<i>Galium concinnum</i>	Shining Bedstraw	X
<i>Galium triflorum</i>	Sweet-scented Bedstraw	X
<i>Gaura biennis (pitcheri)</i>	Gaura	X
<i>Gentiana quinquefolia (occidentalis)</i>	Stiff Gentian	X
<i>Geranium maculatum</i>	Wild Geranium	X
<i>Geum aleppicum (strictum)</i>	Yellow Avens	X
<i>Geum canadense</i>	White Avens	X
<i>Glechoma hederacea</i>	Creeping Charlie	X

<i>Gnaphalium obtusifolium</i>	Old Field Balsam	X
<i>Habenaria viridis (bracteata)</i>	Bracted Orchid	X
<i>Hackelia virginiana</i>	Stickseed	X
<i>Helianthus decapetalus</i>	Pale Sunflower	X
<i>Helianthus grosseserratus</i>	Sawtooth Sunflower	X
<i>Helianthus hirsutus</i>	Hispid Sunflower	X
<i>Helianthus mollis</i>	Downy Sunflower	X
<i>Helianthus strumosus</i>	Paleleaf Woodland Sunflower	X
<i>Hemerocallis fulva</i>	Day Lily	X
<i>Hepatica acutiloba</i>	Sharp-lobed Hepatica	X
<i>Heracleum maximum</i>	Cow Parsnip	X
<i>Hesperis matronalis</i>	Dame's Rocket	X
<i>Hibiscus trionum</i>	Flower-of-an-hour	X
<i>Hieracium aurantiacum</i>	Orange Hawkweed	X
<i>Hieracium longipilum</i>	Long-beaked Hawkweed	X
<i>Hordeum jubatum</i>	Squirrel-tail Grass	X
<i>Hydrophyllum virginianum</i>	Virginia Waterleaf	X
<i>Hypericum perforatum</i>	Common St. John's Wort	X
<i>Hypericum punctatum</i>	Spotted St. John's Wort	X
<i>Hypoxis hirsuta</i>	Yellow Star-grass	X
<i>Hystrix patula</i>	Bottlebrush Grass	X
<i>Impatiens capensis</i>	Orange Jewelweed	X
<i>Iris virginica</i>	Blue Flag	X
<i>Juglans cinerea</i>	Butternut	X
<i>Juglans nigra</i>	Black Walnut	X
<i>Juniperus virginiana (crebra)</i>	Eastern Red Cedar	X
<i>Lactuca canadensis</i>	Wild Lettuce	X
<i>Lactuca floridana</i>	Blue Lettuce	X
<i>Lactuca serriola</i>	Prickly Lettuce	X
<i>Laportea canadensis</i>	Wood Nettle	X
<i>Lechea stricta</i>	Bushy Pinweed	X
<i>Lemna minor</i>	Small Duckweed	X
<i>Leonurus cardiaca</i>	Motherwort	X
<i>Lepidium virginicum</i>	Peppergrass	X
<i>Lespedeza capitata</i>	Round-headed Bush Clover	X
<i>Lilium michiganense</i>	Michigan Lily	X
<i>Linaria vulgaris</i>	Butter-and-eggs	X
<i>Lindera benzoin</i>	Spicebush	X
<i>Lithospermum canescens</i>	Hoary Puccoon	X
<i>Lobelia inflata</i>	Indian Tobacco	X
<i>Lobelia siphilitica</i>	Great Blue Lobelia	X
<i>Lobelia spicata</i>	Pale Spiked Lobelia	X
<i>Lonicera dioica</i>	Red Honeysuckle	X
<i>Lonicera maackii</i>	Amur Honeysuckle	X
<i>Lonicera morrowii</i>	Morrow Honeysuckle	X
<i>Lonicera prolifera</i>	Rock Honeysuckle	X

<i>Lonicera tatarica</i>	Tatarian Honeysuckle	X
<i>Lychnis alba</i>	White Campion	X
<i>Lycopus uniflorus</i>	Northern Bugle Weed	X
<i>Lycopus virginicus</i>	Bugle Weed	X
<i>Lysimachia quadrifolia</i>	Whorled Loosestrife	X
<i>Lythrum alatum</i>	Winged Loosestrife	X
<i>Maianthemum canadense</i>	Canada Mayflower	X
<i>Malus ioensis</i>	Iowa Crabapple	X
<i>Matricaria matricarioides</i>	Pineappleweed	X
<i>Medicago lupulina</i>	Black Medic	X
<i>Medicago sativa</i>	Alfalfa	X
<i>Melilotus alba</i>	White Sweet Clover	X
<i>Melilotus officinalis</i>	Yellow Sweet-Clover	X
<i>Menispermum canadense</i>	Moonseed	X
<i>Mentha arvensis (villosa)</i>	Wild Mint	X
<i>Mertensia virginica</i>	Virginia Bluebells	X
<i>Mimulus ringens</i>	Monkey Flower	X
<i>Mitella diphylla</i>	Mitrewort	X
<i>Monarda fistulosa</i>	Wild Bergamot	X
<i>Morus alba tatarica</i>	Tatarian Mulberry	X
<i>Myosotis scorpioides</i>	X Forget-me-not	X
<i>Nasturtium officinale</i>	Water-Cress	X
<i>Nepeta cataria</i>	Catnip	X
<i>Nuphar advena</i>	Yellow Pond Lily	X
<i>Oenothera biennis</i>	Evening Primrose	X
<i>Onoclea sensibilis</i>	Sensitive Fern	X
<i>Orchis spectabilis</i>	Showy Orchis	X
<i>Osmorhiza claytonii</i>	Hairy Sweet Cicely	X
<i>Osmorhiza longistylis</i>	Smooth Sweet Cicely	X
<i>Ostrya virginiana</i>	Hop Hornbeam	X
<i>Oxalis europaea</i>	Tall Wood Sorrel	X
<i>Oxalis stricta</i>	Wood Sorrel	X
<i>Oxalis violacea</i>	Violet Wood Sorrel	X
<i>Panicum virgatum</i>	Switch Grass	X
<i>Parietaria pensylvanica</i>	Pellitory	X
<i>Parthenium integrifolium</i>	Wild Quinine	X
<i>Parthenocissus quinquefolia</i>	Virginia Creeper	X
<i>Parthenocissus vitacea</i>	Grape Creeper	X
<i>Pastinaca sativa</i>	Wild Parsnip	X
<i>Pellaea glabella</i>	Purple Cliff Brake	X
<i>Penstemon digitalis</i>	Foxglove Beard Tongue	X
<i>Penstemon pallidus</i>	Pale Beard Tongue	X
<i>Phalaris arundinacea</i>	Reed Canary Grass	X
<i>Phleum pratense</i>	Timothy	X
<i>Phlox divaricata</i>	Woodland Phlox	X
<i>Phryma leptostachya</i>	Lopseed	X

<i>Physalis virginiana</i>	Lance-leaved Ground Cherry	X
<i>Phytolacca americana</i>	Pokeweed	X
<i>Pilea pumila</i>	Clearweed	X
<i>Pinus strobus</i>	White Pine	X
<i>Plantago lanceolata</i>	English Plantain	X
<i>Plantago major</i>	Common Plantain	X
<i>Plantago rugelii</i>	Red-stalked Plantain	X
<i>Platanus occidentalis</i>	Sycamore	X
<i>Poa compressa</i>	Canada Bluegrass	X
<i>Poa palustris</i>	Marsh Blue Grass	X
<i>Poa pratensis</i>	Kentucky Blue Grass	X
<i>Podophyllum peltatum</i>	May Apple	X
<i>Polemonium reptans</i>	Jacob's Ladder	X
<i>Polygala senega</i>	Seneca Snakeroot	X
<i>Polygala verticillata</i>	Tall Whorled Milkweed	X
<i>Polygonatum biflorum</i>	Smooth Solomon's Seal	X
<i>Polygonatum canaliculatum</i>	Great Solomon's Seal	X
<i>Polygonum pensylvanicum</i>	Pinkweed	X
<i>Polygonum punctatum</i>	Smartweed	X
<i>Polygonum scandens</i>	Climbing -- Buckwheat	X
<i>Polygonum virginianum</i>	Woodland Knotweed	X
<i>Populus deltoides</i>	Eastern Cottonwood	X
<i>Populus grandidentata</i>	Big-toothed Aspen	X
<i>Populus tremuloides</i>	Quaking Aspen	X
<i>Potamogeton foliosus</i>	Leafy Pondweed	X
<i>Potentilla norvegica</i>	Rough Cinquefoil	X
<i>Potentilla recta</i>	Rough-fruited Cinquefoil	X
<i>Potentilla simplex</i>	Common Cinquefoil	X
<i>Prenanthes alba</i>	White Lettuce	X
<i>Prunella vulgaris (lanceolata)</i>	Self Heal	X
<i>Prunus americana</i>	American Wild Plum	X
<i>Prunus serotina</i>	Black Cherry	X
<i>Prunus virginiana</i>	Choke Cherry	X
<i>Ptelea trifoliata</i>	Wafer Ash	X
<i>Pycnanthemum virginianum</i>	Mountain Mint	X
<i>Quercus alba</i>	White Oak	X
<i>Quercus macrocarpa</i>	Bur Oak	X
<i>Quercus muehlenbergii</i>	Chinquapin Oak	X
<i>Quercus palustris</i>	Pinn Oak	X
<i>Quercus rubra</i>	Red Oak	X
<i>Quercus velutina</i>	Black Oak	X
<i>Ranunculus abortivus</i>	Small-flowered Buttercup	X
<i>Ranunculus fascicularis</i>	Early Buttercup	X
<i>Ranunculus recurvatus</i>	Hooked Buttercup	X
<i>Ranunculus septentrionalis</i>	Swamp Buttercup	X
<i>Rhamnus cathartica</i>	Common Buckthorn	X

<i>Rhamnus frangula</i>	Glossy Buckthorn	X
<i>Rhus glabra</i>	Smooth Sumac	X
<i>Rhus radicans</i>	Poison Ivy	X
<i>Rhus radicans (radicans)</i>	Climbing Poison Ivy	X
<i>Ribes americanum</i>	American Black Currant	X
<i>Ribes cynosbati</i>	Pasture Gooseberry	X
<i>Ribes missouriense</i>	Missouri Gooseberry	X
<i>Rorippa palustris (fernaldiana)</i>	Marsh Cress	X
<i>Rosa carolina</i>	Pasture Rose	X
<i>Rosa multiflora</i>	Multiflora Rose	X
<i>Rubus allegheniensis</i>	Blackberry	X
<i>Rubus occidentalis</i>	Black Raspberry	X
<i>Rudbeckia hirta</i>	Black-eyed Susan	X
<i>Rudbeckia triloba</i>	Brown-eyed Susan	X
<i>Rumex acetosella</i>	Sheep-sorrel	X
<i>Rumex crispus</i>	Curly Dock	X
<i>Sagittaria latifolia</i>	Arrowhead	X
<i>Salix amygdaloides</i>	Peach-leaved Willow	X
<i>Salix crysocoma</i>	Golden weeping willow	X
<i>Salix interior</i>	Sandbar Willow	X
<i>Salix nigra</i>	Black Willow	X
<i>Sambucus canadensis</i>	Elderberry	X
<i>Sanguinaria canadensis</i>	Bloodroot	X
<i>Sanicula gregaria</i>	Clustered Black Snakeroot	X
<i>Saponaria officinalis</i>	Bouncing Bet	X
<i>Schizachyrium scoparium</i>	Little Bluestem	X
<i>Scirpus atrovirens</i>	Dark Green Rush	X
<i>Scrophularia marilandica</i>	Late Figwort	X
<i>Senecio pauperculus</i>	Balsam Ragwort	X
<i>Setaria glauca</i>	Yellow Foxtail	X
<i>Silene nivea</i>	Snowy Campion	X
<i>Silphium integrifolium</i>	Rosin Weed	X
<i>Silphium laciniatum</i>	Compass Plant	X
<i>Silphium perfoliatum</i>	Cup Plant	X
<i>Silphium terebinthinaceum</i>	Prairie Dock	X
<i>Sisyrinchium albidum</i>	Blue-eyed Grass	X
<i>Smilacina racemosa</i>	Feathery False Solomon's Seal	X
<i>Smilacina stellata</i>	Starry False Solomon's Seal	X
<i>Smilax lasioneura</i>	Carrion Flower	X
<i>Smilax rotundifolia</i>	Green Brier	X
<i>Solanum carolinense</i>	Horse Nettle	X
<i>Solanum dulcamara</i>	Bittersweet Nightshade	X
<i>Solanum nigrum</i>	Black Nightshade	X
<i>Solidago altissima</i>	Tall Goldenrod	X
<i>Solidago canadensis</i>	Canada Goldenrod	X
<i>Solidago flexicaulis</i>	Zig-zag Goldenrod	X

<i>Solidago gigantea</i>	Late Goldenrod	X
<i>Solidago graminifolia</i>	Grass-leaved Goldenrod	X
<i>Solidago ulmifolia</i>	Elm-leaved Goldenrod	X
<i>Sonchus arvensis</i>	Sow-thistle	X
<i>Sonchus oleraceus</i>	Annual sow-thistle	X
<i>Sorghastrum nutans</i>	Indian Grass	X
<i>Spartina pectinata</i>	Prairie Cord Grass	X
<i>Sporobolus asper</i>	Rough Dropseed	X
<i>Staphylea trifolia</i>	Bladdernut	X
<i>Symphoricarpos orbiculatus</i>	Coralberry	X
<i>Symplocarpus foetidus</i>	Skunk Cabbage	X
<i>Taenidia integerrima</i>	Yellow Pimpernel	X
<i>Taraxacum officinale</i>	Common Dandelion	X
<i>Taxus canadensis</i>	Canadian Yew	X
<i>Teucrium canadense</i>	American Germander	X
<i>Thalictrum dasycarpum</i>	Purple Meadow Rue	X
<i>Tilia americana</i>	Basswood	X
<i>Tradescantia ohioensis</i>	Ohio Spiderwort	X
<i>Trifolium arvense</i>	Alsike Clover	X
<i>Trifolium pratense</i>	Red Clover	X
<i>Trifolium repens</i>	White Clover	X
<i>Trillium recurvatum</i>	Prairie Trillium	X
<i>Triosteum aurantiacum</i>	Early Horse-Gentian	X
<i>Triosteum illinoense</i>	Illinois Horse-Gentian	X
<i>Typha latifolia</i>	Common Cattail	X
<i>Ulmus americana</i>	American Elm	X
<i>Ulmus rubra</i>	Red Elm	X
<i>Urtica procera</i>	Tall Nettle	X
<i>Uvularia grandiflora</i>	Large-flowered Bellwort	X
<i>Verbena bracteata</i>	Vervain	X
<i>Verbena hastata</i>	Blue Vervain	X
<i>Verbena urticifolia</i>	White Vervain	X
<i>Verbesina alternifolia</i>	Wingstem	X
<i>Veronica peregrina</i>	Purslane Speedwell	X
<i>Veronicastrum virginicum</i>	Culver's Root	X
<i>Viburnum acerifolium</i>	Maple-leaved Viburnum	X
<i>Viburnum lentago</i>	Nannyberry	X
<i>Viburnum prunifolium</i>	Smooth Blackhaw	X
<i>Viburnum rafinesquianum</i>	Downy Arrow Wood	X
<i>Viburnum trilobum</i>	Cranberry Viburnum	X
<i>Vicia villosa</i>	Hairy Vetch	X
<i>Viola palmata</i>	Lobed Violet	X
<i>Viola papilionacea</i>	Common Blue Violet	X
<i>Viola pedata</i>	Bird's Foot Violet	X
<i>Viola pedatifida</i>	Prairie Violet	X
<i>Viola pubescens</i>	Downy Yellow Violet	X
<i>Vitis riparia</i>	River Bank Grape	X

<i>Vitis vulpina</i>	Frost Grape	X
<i>Xanthium commune</i>	Cocklebur	X
<i>Zanthoxylum americanum</i>	Prickly Ash	X

EXHIBIT 5

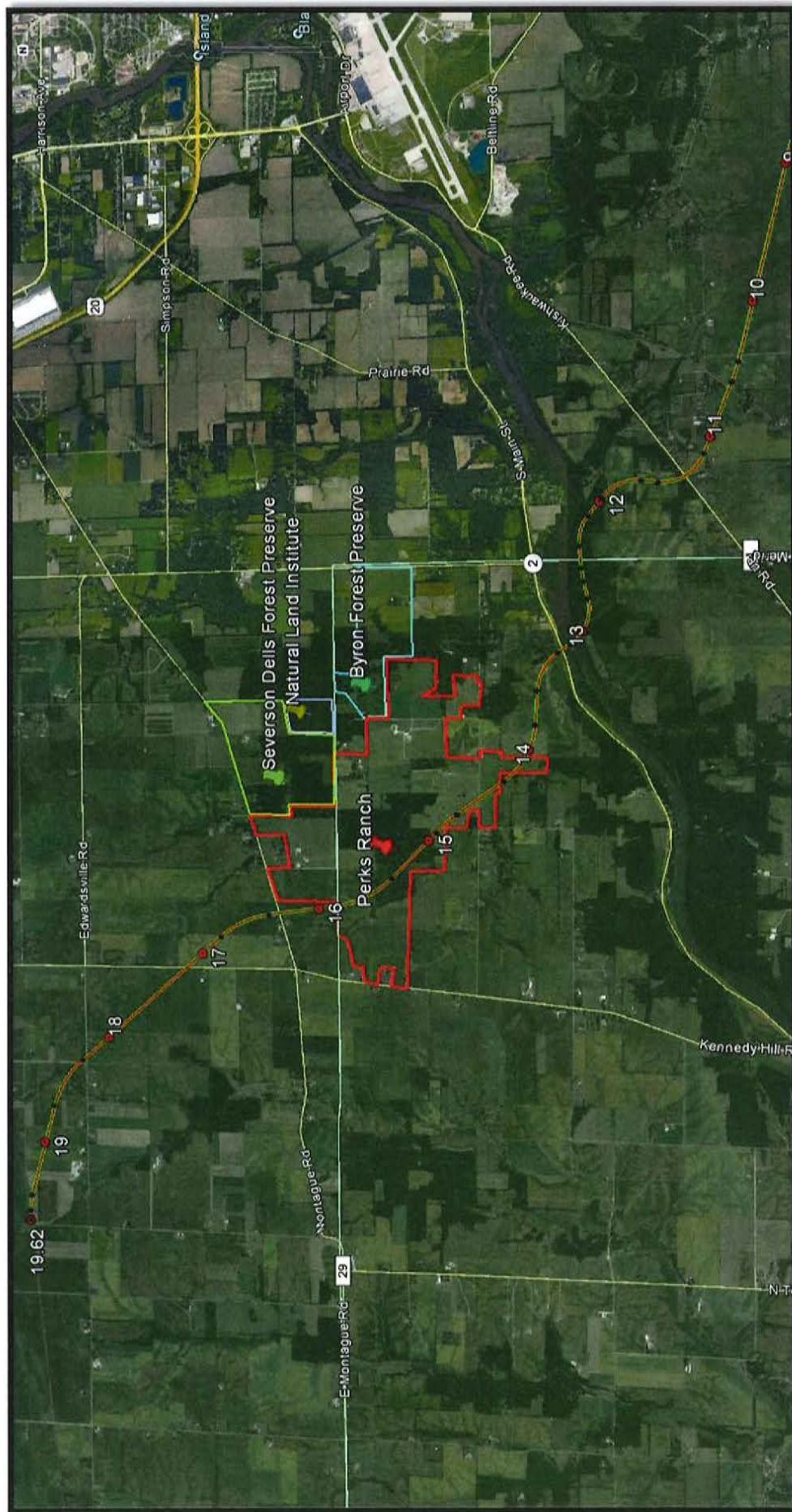


EXHIBIT 6

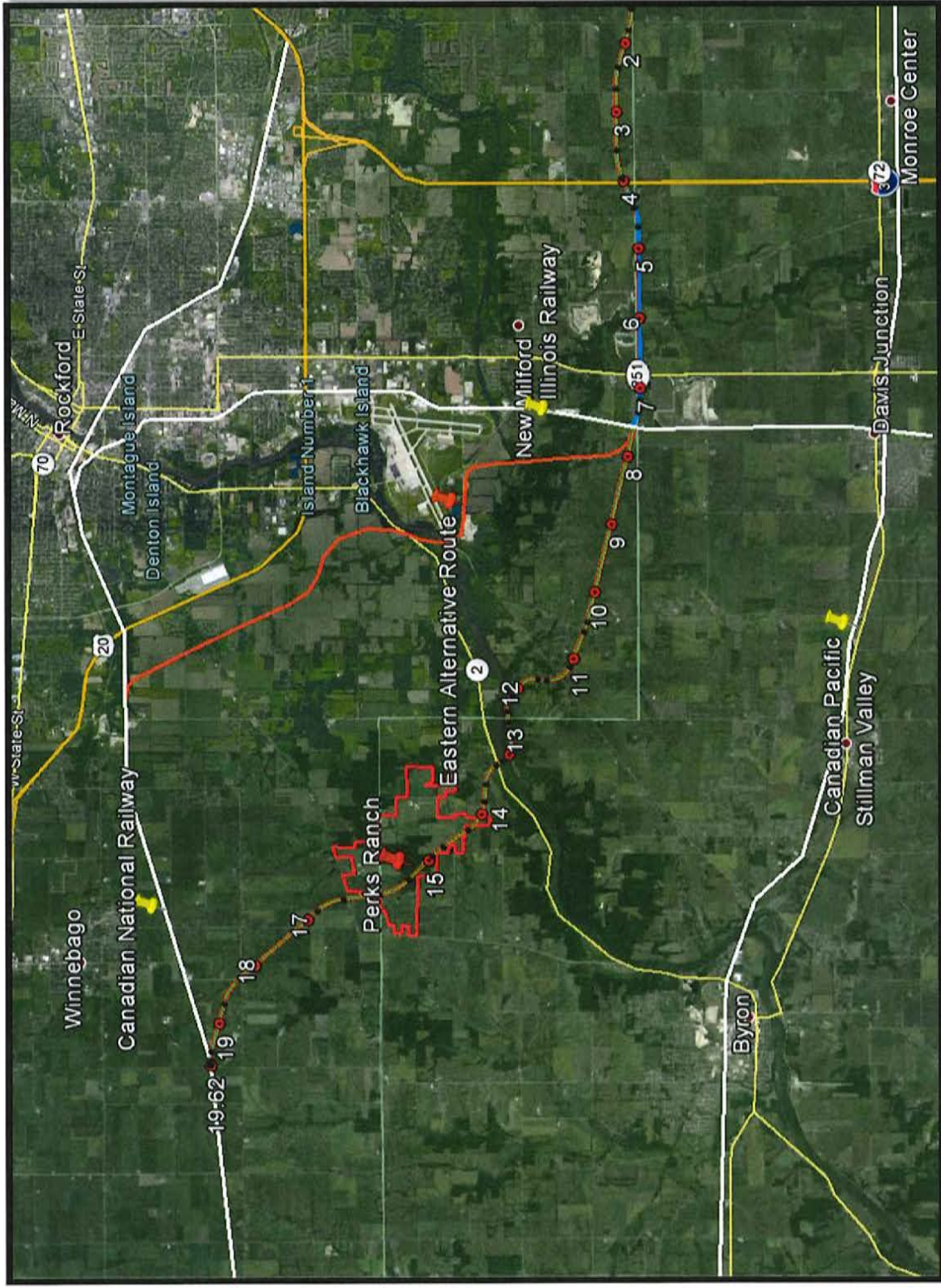


EXHIBIT 7

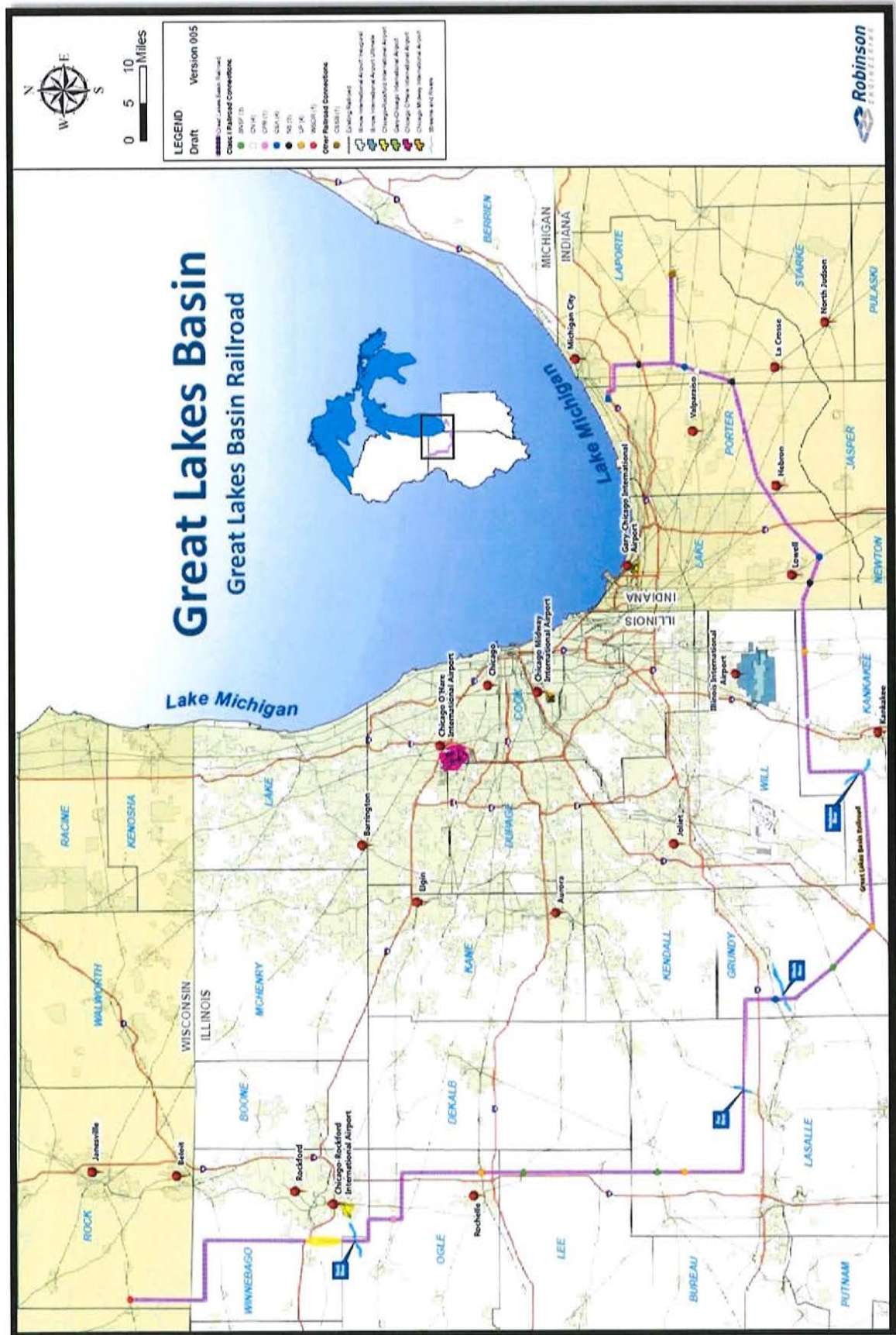


EXHIBIT 8

