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Docket #: FD -35952 - -

Subject: * Great Lakes Rail Project

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Message: Re Docket No. FD 35952 - please see attached letter. PS - Did the planners of this project look up "GLBT" before they decided to use it for this project?



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I am writing I regard to the Great Lakes project.

In general, I support the goal of the project, and I am intrigued by the reward that the project could bring to those who are privileged to be part of it. This project could bring extraordinary benefits to the communities along its route as well as to the nation as a whole.

With that in mind, I have been struck by what appears to be the almost perverse idea that the route of this project would soone be best to be built through some of the very few parts of Illinois, Wisconsin and Indiana that are least able to benefit from it. These rail lines could be a form of economic salvation for rust weary communities in southern Wisconsin, northern Illinois , the ear southern suburbs of Chicago and northwest Indiana. The GBT site referred to the thousands of jobs that regional freight brings to the larger area, and any form of new intermodal facilities along this route could ring a level of growth to cities and towns that have desperately looking for some form of economic "Shot in the arm" ever since the 1970's.

But instead of routing the new lines through the areas that would support them with enthusiasm, the backers of this project appear bound ad determined to try and push them onto those in rural communities or "exurban" subdivision dwellers whose economic fortunes are either already resolved or simply not dependent on efficient rail access for ay persona prosperity.

The strategy being pursued is bound to fail.

And this is directly related to the issues involved in an environmental impact study. I am not a scientist, and I do not know how to study groundwater, topsoil, or anything else needed in an environmental impact study. BUT li DO have a basic understanding of common sense, logic and reason. Al of these things suggest that the economic impact of a project like would be the least in either of these two situations.

- 1) The environmental impact would be lessened in an area that already had a rai line or two or three, or
- 2) The environmental impact of the project would be no worse and possibly a small improvement over what currently exists on a site.

Years ago, I interned for the City of Rockford in their Economic Planning Department. We were studying a parcel on the West Side to determine its placement in a package for future development. We discovered metals in the sol that was eventually determined to be there as a contaminated remnant from days past.

A study of the metals found in the soil suggested that this was what remained of a particular type of plant that was o that piece of land almost 100 years earlier. And this older piece of industrial land was naturally located along one of the rail lines that bisected the city.

I can understand to a degree the preferences some may have to use land not use before for anything other than agriculture, but this preference simply doesn't make sense when analyzed rationally. The

idea of using eminent domain is bound to fall on ears that will either not pay heed to it or will respond with derision, as some have done already.

On the other hand, the land I described as already being used for rail or land that is either a candidate for a "brownfield" or something perhaps slightly less disadvantaged; a "beige field", perhaps, but still land that is in an older industrial Rust Belt town that no one is seeking for investment. This land would be available for a project that would bring with it quality blue collar jobs.

As far as the land needed in between these communities, there is a simple solution, a solution that turns the project sideways and would stimulate even more interest and support.

The railroads should be covered, and a "greenway" of sorts constructed on top of the rails. The covering would include any existing rail that be alongside any newly installed rails. I propose building a continual berm on both sides of the rails for the entire length of the project, with the top of the berms to be covered, probably with a form of recyclable plastic structural sheeting or panels, the kind that are currently being used as pedestrian bridges in Rotterdam and other cities.

The use of recyclable materials, as well as using road waste or building waste inside the constructed berms, will both reduce the cost and improve the environmental overall "score" regarding environmental impact.

What we would have then is 1-3 railroad lines with a clearance of 25 to 75 feet, with a berm on either side of up to 25 feet in width on both sides and about 20 feet high. Proper venting and lighting can be included as needed.

Estimated cost for berm construction can be as low as one dollar per cubic yard, based on estimate I found through a California highway construction site. The plastic used in pedestrian bridges is affordable as well. Further information on the use of recyclable plastics is available through numerous private companies who sell plastic construction timbers, as well as pedestrian bridges. Rutgers University also has a major program dealing with plastics, resins and construction.

Construction of the berms and plastic top can be done in the chosen communities as a "public works" project, hiring labor in these areas that still have a higher than average unemployment rate.

A critical issue is whether or not the public in Rockford, Janesville, Beloit, the near southern Chicago suburbs or the towns in northwest Indiana would be content with this new man made ridge going through their cities.

I believe the clear answer would be "Yes", under the right circumstances.

Since the new project would be covered, any current noise from current train traffic would be muffled or eliminated altogether. That makes the project a winner in towns like Genoa IL even if it does nothing else. The ridge, properly landscaped and shaped, would not have to result in rain pouring down its sides and flooding neighboring land, and it could be set up to be an attractive pedestrian path.

More of a "sell" could be its use of recyclable materials, which would not only reduce local and regional landfill costs, but this project might actually be able to significantly reduce the amount of waste put into regional landfills altogether. It may be a stretch, but it is not inconceivable that various localities may pay the project to take some of their trash to be used in the berms; having people pay you or give you

building material is proving to be an ongoing benefit for all kinds of construction projects using recycled plastics.

The major selling point can be that the project can be set up so the communities involved get to benefit directly in the profits and rewards, and both can be done without costing the leaders of this project any money, and it may even increase their profits.

Consider what could happen, for example, if this project included several thousand jobs in a new intermodal facility at the old GM plant in Janesville, Wisconsin and a new facility by the growing Greater Rockford Airport, or new jobs and growth in southern Chicago suburbs.

Having one or more all-weather covered rails means freight can pass through at incredible speeds. It opens up potential for all kinds of new business for the airports and trucking facilities along its route. If the current rail freight stakeholders in Chicago are not moving forward fast enough on these kinds of projects, other communities can and will.

The other direct way communities could benefit is if they were given a real opportunity to invest in it themselves. My knowledge in how this would be set up is less than ideal, but some form of REIT (real estate investment trust) could be set up so people and companies along the new, more direct route could benefit financially for years to come. People in this part of the country see money and jobs and their kids go to the coasts. This kind of project is something that people could invest in personally, if done right.

I can produce citations if needed, and I would be delighted to work on this in more detail.

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