



Grundy County Farm Bureau

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June 8, 2016

Surface Transportation Board

ATTN: Dave Navecky

395 E. Street SW

Washington, DC 20423-0001

Docket No. FD 35952

The Grundy County Farm Bureau appreciates this opportunity to comment on Docket No. FD 35952 regarding the construction of a 278- mile line by Great Lakes Basin Transportation, Inc. (GLBT). Grundy County Farm Bureau (GCFB) is a not-for-profit membership organization serving farm and agriculturally interested families comprised of nearly 3,800 families, many of whom will be directly impacted by the proposed project.

It is widely recognized that congestion of rail traffic through Chicago is a major area of concern, but the proposed project by GLBT does not address the city's passenger nor commuter rail issues. In fact, a project like the one proposed by GLBT, has not even been suggested in the plan developed by the Chicago Region Environmental and Transportation Efficiency Program (CREATE). CREATE is a partnership between US DOT, the State of Illinois, City of Chicago, Metra, Amtrak, and freight railroads which is working to develop improvements aimed at increasing the competence of both passenger and freight rail infrastructure in the Chicago region. Therefore, The fact that CREATE did not recommend any new rail lines of this size and scope is a clear indication that this project is not necessary to address train congestion issues in this region.

The rail line proposed by GLBT will take nearly 751 acres of farmland out of production in Grundy County, which does not include acres lost to flyovers, additional crossings, and/or rail spurs. Nearly 100% of the ground in Grundy is designated by the United States Department of Agriculture as prime farmland. The proposed route will sever over 100 parcels, creating uneconomical remnants from nearly one third of those properties. These uneconomical remnants will ultimately create the potential for more acres to be lost. We believe that this project could also create additional impacts on our region's drainage infrastructure, wetlands, and water resources, and that these impacts warrant substantial investigation.

Also of concern to our county, is the impact on cultural or historic resources in our region. The proposed project is currently designed to cross the Shabbona Reservation along the Illinois River. The Shabbona Reservation is an archeological site of historical importance and the proposed rail line's impact on this historically significant area should be studied.

The GCFB Board of Directors realizes and understands this is very early in the review process for this project. However, due to the loss of prime farm ground, disruption of local transportation infrastructure, and no commitment from any Class 1 rail road to utilize the proposed GLBT rail line, the GCFB Board of Directors has taken a position to oppose the project as it is outlined today. As an organization working to protect landowners' rights, we also adamantly oppose granting authority to exercise eminent domain for this project.

GCFB respectfully requests the Surface Transportation Board Office of Environmental Analysis perform a full review of the Great Lakes Basin Transportation rail project to answer questions submitted to the STB through comments and oral testimony during the scoping process.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steve Kodat". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Steve Kodat, President
Grundy County Farm Bureau