

May 26, 2016

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

Mr. Navecky,

This correspondence is in regards to the Great Lakes Basin (GLB) railroad, more importantly it's affects on water.

Water becomes a very touchy subject in regards to the railroad because of pollution, the problems presented with crossing rivers and going through wildlife and conservation areas and given their due importance, as well it should, that is not what I am referring to today. I'm talking about managing water, especially in a farming community.

When I spoke in particular with a representative with Union Pacific, I learned from him that water can be very damaging to a railroad line. In fact, if not handled correctly, water problems can literally destroy the proper functionality and long term viability of line and render it useless in a very short period of time unless the railroad is totally committed to throwing out constant and maybe almost never ending funding to repair and maintain a situation that may never be right. At some point, the costs outweigh the benefits and the line is abandoned since financially it doesn't make sense to continue throwing good money after bad. I also learned that the federal government in fact has some very strict guidelines for the railroad to follow in terms of not affecting the surrounding areas through which the line would be traveling with potential flooding and affects on drainage. The message ultimately being, do not change the overall topography of the areas you are going through.

As you may be aware of, in June 2015, a large portion of our country experienced a very unusual period of rainfall that lasted well over a majority of that month. Flooding was the norm, in fields, in homes and over the roads as well. Not unusual is the concept of having some field areas where the crop would not survive because of standing water that can occur with just a couple of sizable rainstorms showing up one right after the other. Because of the lay of our land in this community, it's just part of what we have to deal with. But in June 2015, we weren't dealing with just some low pockets that routinely catch excess runoff. We instead were attempting to move water off of most if not entire fields into already overflowing creeks, waterways and roadside ditches. In many instances, the backlog of excess rainfall actually ran water out into lower lying fields from the creeks, waterways and ditches as their endpoints were getting backed up as well from the runoff of other farms that was dumping into this system.

To combat this issue under normal circumstances, we have field tile that has been placed and directed over the decades to help move water so that the soil can perform at its

optimum. As with many farmers in our area as well as the rest of the country and quite likely over many generations, large investments of time and capital are made to make these improvements in the land and make no mistake, these are improvements. In some cases, certain tile lines, referred to as district tile, are installed and maintained with tax dollars to help with the flow of water over many miles and through multiple properties with multiple owners with the overall benefit of keeping fields drained well enough to keep from excess water running off of one property with otherwise saturated soils unto the neighbors property next door. And with the exception of extreme circumstances, such as the rainfall of June 2015, these tile systems work very effectively and go almost unnoticed until a situation arises where suddenly they don't.

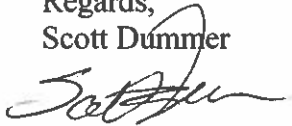
The exceptional rainfall of June 2015 proved to be one of those instances. The overflowing creeks and ditches had such high water levels from the rainfall runoff that these tile lines could not adequately move or run out all of the water they were attempting to carry away from the water-logged fields because they were under water in the ditches they were attempting to dump into. Like a bad traffic jam, it just had to sit there and wait or move at whatever the flow the ditch would allow. Notably, we had fields tied into a district line near the dump point that normally drain really well, that instead got hit really hard because there was no room to carry water away because of fields up line. There was simply nowhere for the water to go. And the effect of that extra time showed in the fields themselves as the time wore on with crops sitting in and sometimes underneath standing water, crops dying off as a result of the backed up drainage, extra weed pressure in fields later in the growing season as a result of now bare dirt being exposed for weed seed germination due to a loss of crop that was originally planted there, and ultimately damage to the crop that survived and remained after the water had finally cleared. All yields in all crops were down in the hardest hit areas, disease in the plants was prevalent and the test weight most notably in the wheat crop was so bad that after fees for drying and dockage and the cost to ship the grain to the elevator, some farmers in our area were experiencing as much as 70% to 80% loss and that was if the grain merchandiser would even accept the shipment at all.

So what does all this mean as it relates to the railroad project being proposed? Simply, from a water management standpoint, the effect a railroad would have has consequences that could extend for miles and over many acres that would not be so easy to recognize by the naked eye or in short order estimation of just where the track would run. Landowners and farmers that could be nowhere near the tracks could suddenly start incurring costs that they didn't have before because of backed up drainage, and they would have no recourse to recoup those losses since the railroad isn't "on" their property. And for those landowners who have made an investment in pattern tile and are now faced with the possibility of a railroad line now running across, over and through the field where it is, their investment would now be made just as valuable as flushing those dollars down the toilet. Breaking a tile can bring problems that simply can't be estimated accurately if the disrupted water flow contributes to not only a tile blowout further up the line but also a change in overall land value because of a drop in crop production, lower quality of soil health, crop insurance rates rising as a result of the additional risk and other higher management expenses to produce a crop in a more challenged environment

as a result of more saturated soils. And while there is a government standard for the railroad to follow in terms of how they need to maintain the land and the community as much as possible and not alter systems such as tile drainage, when push comes to shove, what assurance does any landowner have that the optimum drainage being achieved is for the benefit of all and not just the railroad? Whether his land has a rail line on it, or is a mile or two or more away from the tracks, if a landowner has a failure which has occurred in the drainage system, or more plainly put, suddenly starts dealing with water issues that he never had before, how will it be handled? And will it make a difference depending on the location? Most everything I hear about this proposal refers to what will be done for the landowner who will have a track on his property, but NOTHING for the landowner who doesn't. And regardless of that fact, when there is a problem with water say in the case of another group of large storms, what is the railroad prepared to do to timely help alleviate any drainage problems caused by the existence of the railroad disrupting drainage so that a farmer doesn't lose his crop? And if the railroad does not act in a timely fashion, again, what action can any landowner or farmer take and what is the justifiable recourse to compensate for any loss experienced as a result?

I am opposed to this GLB project as per the reasons listed above.

Regards,
Scott Dummer

A handwritten signature in black ink, appearing to read 'Scott Dummer', written over the printed name.

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