

2679 N. County Road M
Milton, WI 53563
July 11, 2016

Dave Navecky
Surface Transportation Board
Docket No. FD 35952
395 E. Street SW
Washington, D.C. 20423-0001

Dear Mr. Nevecky,

I'm writing to oppose the Great Lakes Basin Rail Line as it is proposed through Rock County, Wisconsin.

I view this project from several perspectives. My husband and I own farmland, and we actively farm on the Rock Prairie, about a mile from the proposed GLBR route. I grew up on the farm east of Milton where GLBR proposes to start its route to the south, and my brother and his son now own that farm. In addition, I have worked as an agricultural journalist for 40 years and feel I have an excellent understanding of the mindset of my neighbors, rural landowners and farmers in this area.

Throughout my career, I've attended hearings where people have raised objections to proposed projects, and frequently their biggest objections have amounted to "not in my backyard". My objections to the GLBR are based on the real, long-term and negative impacts the rail line would have on a multitude of local farming businesses, neighbors and family, the community, the environment and government precedents.

In a nutshell, here are my objections and concerns:

- * Eminent domain should not be granted to a private citizen for personal gain.
- * The proposed route goes through Wisconsin's Rock Prairie, one of the richest land basins in the world, at a time when farmers are being asked to double food production in order to feed the world. Routing the GLBR through the Rock Prairie takes highly productive farmland permanently out of the business of producing food.
- * Farmland is not "wasteland".
- * The GLBR will negatively impact farming businesses, netting a detrimental impact on water quality, groundwater safety, wildlife, the environment and animal welfare.
- * The GLBR would negatively impact the quality of life for area residents.
- * GLBR is undervaluing the value of the land along the proposed route.

resource plans for our businesses, we employ people, we pay property and income taxes, and we safeguard our resources so that our businesses will remain productive enterprises for generations to come.

* The GLBR would negatively impact farming businesses, netting a detrimental impacts on surface-water quality, groundwater safety, wildlife, the environment and animal welfare. Farmers are premier environmentalists, and we pay careful attention to surface-water and groundwater quality and the environment. I would ask the Surface Transportation Board to carefully consider that placing a rail line across Rock County will disrupt grass waterways used to keep soil, plant nutrients, herbicides and insecticides out of surface water and groundwater. The rail line will disrupt the flow of tile lines farmers use to prevent flooding. The establishment of a rail bed will alter the areas closest to the railway as well as upland from it, potentially causing flooding of farm fields. Should a derailment occur, nearby farmland and surface and groundwater could become contaminated.

Surface water in this area flows west to the Rock River, which flows to the Mississippi River, and lives along the way could be harmed by a derailment. I believe it goes without saying that a derailment and resulting spill always negatively impacts those people and the land closest to it. Placing the GLRB through the Rock Prairie runs the risk of placing residents in the City of Janesville and other nearby smaller towns in jeopardy.

Farmers work hard to achieve the size farm that is most efficient and productive. Livestock farmers, in particular, size their farms so they have enough land to spread manure in an environmentally responsible manner. Having to give up land means less land on which to spread the same amount of manure, which could result in over-application of manure, and that in turn could result in manure run-off into surface water and high levels of nitrates and phosphorus in groundwater. Alternatively, farmers would have to cut the number of livestock they raise, which would reduce their economic viability. It's a no-win situation for livestock farmers.

I would ask that the Surface Transportation Board consider the impact that the GLBR would have on wildlife and domestic animals. This area has pockets of woodlands that are home to white-tail deer, turkeys, sandhill cranes, bluebirds and other wildlife. It also is home to dairy and beef cattle, pigs and goats. We've been told that if GLBR were to achieve its full potential, a 100-car train would pass through this area once every 12 to 15 minutes. This has the potential to negatively impact livestock on farms along the proposed route. Temple Grandin, animal science professor at Colorado State University, is a leading animal-handling expert and could speak to the loss of productivity when animals are subjected to constant stress, in this case the stress of noise and vibration from a 100-car train passing by every 15 minutes day and night.

In most years, Rock County is one of the state's leading per-acre producers of corn and soybeans. Farmers use township, county and state roads to truck their products to grain elevators, and particularly for soybeans, the harvesting window is short. At the April listening session in Janesville, a consulting firm's employee told me that every road intersecting the proposed railway would have an on-grade crossing or a bridge for vehicular traffic. I believe this person was misinformed. Instead, I believe many township roads and county highways will be closed, creating a web of alternate routes trucks will have to take to get grain to market. The increased mileage and time our trucks will have to take will increase the length of harvest or we will be forced to invest in additional semi-trucks, both of which puts our profitability at risk. Alternatively, some farmers will simply haul grain to another elevator in another

direction, in Walworth County perhaps. Successful businesses like Gavilon in Avalon and The DeLong Company in Clinton could see a significant drop in grain delivered to their locations, decreasing their profitability. If on-grade crossings are placed at crossings with township and county roads, then my concern is over safety. A train traveling at 70 mph could be upon a grain semi trailer in the time it takes for the truck to go from its stopped position to across the tracks. I once witnessed, near Whitewater, Wisconsin, the aftermath of a train hitting a semi-trailer loaded with corn. The slow-moving train did not derail, but it completely cut the semi in half, and the driver narrowly escaped with his life.

At the April listening session in Janesville, Wisconsin, I stood next to a man who pointed to several locations on a map showing the proposed location of the GLBR in relation to the farm he recently had bought from his widowed mother. He noted that his land would be landlocked with no way to reach two of his fields. If adjoining landowners would not grant him access across their land and through their crops, he would be forced to sell virtually his entire property, he said.

*Although I believe my brother has written to the Surface Transportation Board about his concerns about the GLBR passing through his farm, I also would like to express my concerns specific to his farm. The GLBR is proposed to start at the edge of the Lima Marsh, and since the railway leading to the head of the GLBR will no doubt have to be upgraded, I believe the Surface Transportation Board needs to consider the impact GLBR would have on areas leading to and from it. In the Lima Marsh, the soil underpinnings are often saturated, and we have seen at least one train derailment caused by a train simply having slowed down. Multiple GLBR rail lines will likely call for an expansion of rail lines through the Lima Marsh, an expense Wisconsin taxpayers can ill afford. Those rail lines also would encroach on the Lima Marsh, impacting wildlife and the hydrology of the area. My family has observed water levels on the large pond on the Paul farm rise and fall in tandem with the water levels of the Lima Marsh, even though that pond is about a mile away from the Lima Marsh. Having grown up with land bordering the marsh, I'm well acquainted with the abundant wildlife in the area. It is home to deer, sandhill cranes and other birds, turtles and other wildlife. Currently, there is at least one pair of bald eagles nesting and raising young within half a mile of the proposed rail route. The Lima Marsh is a public hunting ground, and I can only surmise that the noise, vibration and traffic on the rail line would negatively impact the community's enjoyment of this public area.

As the location of the rail head, GLBR would take a significant amount of land from my brother's and nephew's farm, likely land-locking some portions of his field(s) and certainly reducing the total amount of crops available to feed their livestock. The farm is one of those where the acreage is carefully matched to the amount of manure produced by livestock on the farm, so losing land to the railroad could mean having to rent high-priced neighboring land. (Manure cannot be easily or economically transported down the highway to distant fields.) In addition, the proposed route would travel about 200 feet away from the farm's new dairy barn and existing housing for dairy beef steers. The livestock in both facilities will be subjected to the constant, around-the-clock stress of noise and vibrations of the trains. (The current cost of rebuilding his barn in another location currently would run approximately \$2.3 million, not including any of the accompanying out buildings or feed-storage facilities that would go along with it.) My brother and his son invested in their new dairy facility to ensure the profitability of their farm for coming generations, but the placement of the rail line at their doorstep could put their plans and current operation in serious jeopardy. In addition, they are planning to install a manure pit so that they can make the most environmentally responsible manure applications possible, and with the railway proposed just a

neighbors, selling land at any price when the next generation is planning on careers in agriculture would knock the foundation out from underneath our businesses. Most farmers know that they are lucky if they have the opportunity to buy neighboring land once in their lifetimes; doing so allows them to grow their business and remain economically viable. But selling land for a railway ends any opportunity--ever--for local farming businesses to grow and expand.

Solutions

We have been told that GLBR is being proposed to alleviate long transport times through the Chicago area. I understand the desire to be as efficient as possible, however, I believe that, if the problem is in the Chicago area, then the solution lies in the Chicago area. I'm sure the Surface Transportation Board is already familiar with the CREATE program, and I would urge you to consider solutions proposed through this program.

If the Surface Transportation Board deems it necessary to allow GLBR to build a new rail line, then I would urge you to place the following restrictions on the project:

- * All land must be purchased by GLBR without the use of eminent domain. Let the free market system prevail.

- * The rail line must go through the poorest farmland and marginal non-farmed land, not the richest.

- * The rail line must make use of existing rail beds or other rail lines, not slash through existing cropland. Rock County Board Member Al Sweeney has proposed three alternate routes using existing right-of-ways, including using the Canadian National line that runs from Waukesha County through Racine and Kenosha Counties to Illinois. Please consider the viability of his proposals.

- * The project should not be granted an electrical easement/right-of-way.

Thank you for taking the time to consider the points I have made. Our family asks that you turn down the GLBR proposal.

Sincerely,



Jane Metcalf

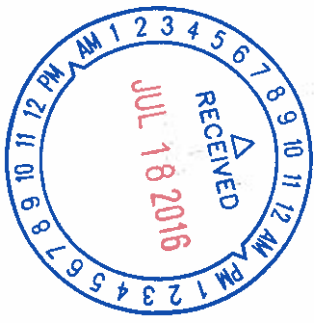
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