



1925 S. Meridian Rd
Rockford IL 61102-2397
Phone: (815) 962-0653
Fax: (815) 962-0022

Email: wfbmanager@live.com
www.winnebago-boonefarmbureau.org

June 8, 2016

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

The Winnebago-Boone Farm Bureau appreciates the opportunity to submit this written comment to the Surface Transportation Board (STB) regarding the proposed Great Lakes Basin Rail (GLBR) project. Winnebago-Boone Farm Bureau is a non-profit voluntary membership organization representing over 9,700 member families. Many of those families may be directly or indirectly impacted by this project. On behalf of the farmers, landowners, and members of the Winnebago-Boone Farm Bureau we would like to relay the following questions and concerns we have regarding the proposed GLBR project.

We request the STB to give full review of the transportation merits to the proposed GLBR project, and deny an exemption from that review should it be requested. We understand that the STB typically grants exemptions from the full transportation review process when requested by applicants. This is not the typical applicant or project. GLB is not a railroad, in fact, it's a start-up company, with no freight rail experience. According to GLBR this is the largest railroad project in 125 years. The current proposed route is now 280 miles long and most of that cuts through highly productive farmland which cannot be replaced.

According to GLBR their railroad will provide all Class 1 Railroads that use the Chicago Rail network with a bypass around Chicago to move freight more efficiently. According to Mr. Patton, at least 2 or really 3 or 4 railroads need to use the proposed GLBR but not one railroad has publicly indicated that they will use it. In fact, Union Pacific told the press they won't use the GLB railroad. On May 23, 2016, Norfolk Southern submitted a public comment in this docket informing the STB that it has "a robust route network, with multiple routes into and out of the Chicago area and also owns its own bypass route" and that it would not use the proposed GLB rail line.

We know there is rail congestion in Chicago, but the panels created to study the problem haven't suggested that a 280 mile bypass through irreplaceable highly productive farmland is the answer. We support the idea of using or upgrading existing rail lines.

Mission Statement

*Be the voice, resource, and advocate for farm families and agriculture,
while promoting stewardship for today and future generations.*

GLBR included a 50 foot corridor for possible future use by utilities in its current plan. In GLBR's Route Narrative, under Key Design Objectives, #3 says: Provide a utility corridor for improved electricity, water, natural gas, fiber optics, and wireless coverage, both to support railroad operations and to provide new options for our neighbors. Railroads don't need a utility corridor to support their railroad operations and the STB doesn't have authority to approve electric transmission projects, natural gas pipelines, or fiber optics or anything else GLBR can come up with that has nothing to do with a freight railroad.

GLBR says that this 50 foot utility corridor would be another source of revenue for GLBR. We believe that it's Unconstitutional for a private company to take our land for a railroad and then turn around and sell it off or grant easements for uses which have nothing to do with a railroad. We request that the STB exclude any non-railroad uses from its consideration of the project. Should GLBR request authority to exercise eminent domain we will oppose any such request.

As stated in the GLBR narrative, the rail line enters Boone County at mile post 188 and exits Boone County at mile post 220. The Rockford Subdivision enters Winnebago County at the Winnebago & Boone County line and runs back and forth between Winnebago and Ogle Counties. It ends in Winnebago County just past mile post 19.

The narrative states a number of roads would be impacted with crossings, overpasses or "stubbed" in Boone and Winnebago Counties. This would alter the transportation infrastructure creating conditions of adverse travel impacting rural public health and safety by affecting the service provided by first responders; increased travel time for large farm equipment on the roadways, and an increase in congestion on a number of high traffic roads for residents and commuters. Between the two counties, the proposed route will affect 31 roads in Boone County and 23 roads in Winnebago County for a total of 54 roads.

The proposed rail line extends through Boone County for 32 miles and Winnebago County for approximately 11 miles which at 200 feet wide, would be around a total of 1,043 acres (776 acres in Boone and 267 acres in Winnebago) of land, mostly farm land, consumed. This does not take into account the sidings or the number of parcels affected by being severed, landlocked, or otherwise that become remnants unfeasible or uneconomical to be farmed.

The proposed one to two rail tracks with in Boone and Winnebago Counties require merely a 100 feet right of way, but GLBR seeks to take 200 feet for future unknown development plans. If the project is approved, we request that the STB reduce with right of way to 100 feet where there are proposed one or two rail tracks.

According to the most recent USDA Ag Census data available, there were 134,759 acres of land in farms in Boone County and 182,905 acres of land in farms in Winnebago County. If the rail project were to be constructed as outlined in the narrative, it would consume 776 acres of land which is 1% of Boone County's farmland acreage and it would consume 267 acres of land which is .15% of Winnebago County's farmland acreage.

Agriculture is an important part of the economy for Illinois. Based on the *2012 Census of Agriculture* data, the annual market value of agricultural products sold in Illinois was over \$17 billion. This is in addition to the multibillion dollar agribusiness supported industries. Illinois ranks among the top states in market of agricultural products sold.

Agriculture and agriculture-related industries contributed \$361.4 million or 4.1% to Boone County's total economic output in 2012. Regarding Winnebago County's total economic output, agriculture and agriculture-related industries contributed \$2.26 billion or 9% of Winnebago County's economy in 2012. Agriculture added \$123 million (of the nearly \$361 million above) from "value-added" and "beyond the farm gate" economic activity, to the wider economy of Boone County. The market value of all agricultural products sold in Boone County in 2012 was just under \$100 million (22% increase from 2007) and over \$106 million in Winnebago County in 2012 (18% increase from 2007). 1,319 jobs (6% of all jobs) in Boone County and 7,667 jobs (4.8% of all jobs) in Winnebago County are derived from the ag-related economy.

Boone County farmers spent \$86 million and Winnebago County farmers spent just under \$92 million on farm production expenses (i.e. fertilizer, lime, chemicals, seeds, plants, vines, and trees purchased). \$17 million was returned to Boone County landlords and \$18 million was returned to Winnebago County Landlords in the year 2012 as cash rent for land and buildings to non-farmers and also farmer-investors.

Within GLB's proposed Rail and Utility Corridor Area, agriculture is the predominant land use in Boone County, which is comprised of approximately 74 percent farmland and Winnebago County is comprised of approximately 55 percent farmland. This compares to 73 percent statewide, for Illinois. Farmland production in the Study Area includes both crop production and livestock.

Over 1,000 acres of highly productive farmland in Boone County will be lost if this project is constructed. In fact, over 1% of the tillable Boone County farmland will be used by the railroad and 3-4% more will be affected by landlocked or severed parcels. Agriculture in Boone County contributes \$361.4 million annually and if you remove 1% of farmland from production, that equates to an estimated loss of \$3.6 million to Boone County on an annual basis.

267 acres of highly productive farmland will be lost in Winnebago County if the proposed route is approved and constructed. Agriculture in Winnebago County contributes \$2.26 Billion annually and if you remove this farmland from production that is an estimated loss of \$3.4 million to Winnebago County on an annual basis.

In addition to removing a valuable natural resource which cannot be replaced, this project will cause both surface and tile line drainage issues. As elevations are changed and the creeks are bridged, storm water movement will change, resulting in new flooding patterns. The proposed route crosses the Piscasaw Creek, Kishwaukee River, Kilbuck Creek, Rock River and a number of

other creeks in Boone and Winnebago County. Drainage tile systems are a common practice due to the shallow water tables and hydric soils in Boone and Southern Winnebago Counties.

Again, the proposed GLBR project is a high priority for the Winnebago-Boone Farm Bureau. With the information available at this point, the Winnebago-Boone Farm Bureau is opposed to the Great Lakes Basin Rail project at this time, but our organization will continue to evaluate the project and have the right to change our position if the economic interests and benefits outweigh the costs.

Sincerely,

A handwritten signature in cursive script that reads "Richard Beuth".

Richard Beuth, President
Winnebago-Boone Farm Bureau
ac