



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 attend to the city's passenger nor commuter rail issues. In fact, a project like the proposed by GLBT has not even been suggested in a 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, where is the need for this project?

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, ultimately created the potential for more acres to be lost. Is a project of this magnitude the best use of highly productive farm land? What additional impacts will this project create for wetlands, drainage, and water resources?

Also of concern to our county, is the impact on cultural or historic resources in our region. The proposed project is currently design to cross the Shabbona Reservation along the Illinois River. The Shabbona Reservation is an archeological site of historical importance and should be further studies before granting GLBT approval. How will this historically significant area be affected by the proposed rail line?

Grundy Co. Farm Bureau Continued, **Docket No. FD 35952**

The GCFB Board of Directors realizes and understands this is very early in the approval 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 Grundy County Farm Bureau 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 performs 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,

Steve Kodat, President
Grundy County Farm Bureau