

April 29, 2016

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

Re: Docket No. FD 35952

Dear Mr. Navecky:

I am writing on behalf of Chicago Wilderness to express our concern regarding the proposed construction and operation of a 278-mile rail bypass of the Chicago metropolitan region.

Chicago Wilderness is a regional alliance of approximately 200 member organizations. We lead strategy to preserve, improve, and expand nature and quality of life. Over 150 rivers and creeks in our region are crossed by the proposed rail line. These include high quality systems such as the Kishwaukee, Lower Fox, and Kankakee Rivers as well as over 100 headwater streams that are critical for sustaining healthy plant and animal habitat downstream. The rail line would impact at least two of Chicago Wilderness' Priority Species, the mottled sculpin and ellipse mussel, who reside in these waters.

We have serious concerns about the how this project would degrade or destroy significant natural resources in the project area. We request that the Surface Transportation Board's Office of Environmental Analysis (OEA) evaluate other reasonable alternatives that will cause less damage to meet its purpose and need. As part of this process, we urge the OEA to consider measures to best understand and protect the natural resources that would be impacted by this project. For instance:

- 1) All of these streams need to be crossed with bridge structures, NOT CULVERTS which disconnect the continuity aquatic organisms need to access the entire perennial stream habitat. This is necessary whether T&E species or State Wildlife Action Plan species are present or not, as these headwaters are all available in their current state for habitat restoration whether as an intentional habitat restoration project, or as a related result of agricultural buffer installations which we foresee as one of the primary nutrient control management practices to be utilized by the agricultural community in upcoming years.

2) All of these stream segments need to be inventoried by the petitioner with consultants approved by the various state Department of Natural Resources, Natural History Surveys, and/or U.S. Fish & Wildlife Service in order to establish the baseline of aquatic species including fish, mussels, macroinvertebrates, herps, and mammals (eg. river otters which are seen in 1st and 2nd order streams). With 110 trains per day utilizing this proposed rail line, accidents and spills are a given, not a potential event. Baseline data is necessary before construction of such a project in order to accurately assess damages and mitigation in the future.

3) Any wetlands adjoining 1st through 5th order streams and rivers should be crossed by bridge structures, not simply filled in with berms, as these wetlands provide groundwater recharge to our creeks and rivers and are critical for sustaining the aquatic biodiversity in the river systems impacted by this project.

4) Any wetland mitigation fees which are necessary should be targeted to wetland restoration projects within the county in which the impact takes place. County forest preserve and conservation districts, land trusts, certified mitigation banks, and other wetland habitat agencies should be the primary implementers of wetland restoration within the same county sub-watershed in which a wetland impact takes place.

Thank you for your consideration of these comments. If you should have any questions, please don't hesitate to contact me at 312-224-8028 or suzanne.malec-mckenna@chicagowilderness.org.



Sincerely,

Suzanne Malec-McKenna
Executive Director
Chicago Wilderness

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