

April 12, 2016
Surface Transportation Board Docket No. FD 35952

Dear Mr. Navecky,

I would like to take a moment of your time to address the proposed plan of Great Lakes Transportation Board Inc. to build a railway directly through the middle of a magnificent natural resource, the soil of Rock Prairie, located in Rock County Wisconsin. The soil is considered some of the richest soil in the country. It has a long history of being the most productive food producing land, due to its incredibly perfect mix of elements.

I have enclosed two articles from the Janesville Gazette, both speaking of the value of this land. And yes, these articles are from several years ago, but that does not discount the fact that it is still the same soil.

This proposed railway would destroy 24 acres of this soil per mile of railroad. This is land that would be lost forever. It would be total destruction of the center of Rock Prairie. Valuable soil that feeds our country in many ways just covered over.

I urge you to please deny access to this company from devastating such a natural resource. Can't there be any alternative area that they could ruin? Perhaps land that is not as valuable, near an existing railroad? I hope you have time to read these enclosed Gazette articles, and learn about what a valuable resource this area truly is.

Thankyou for your time.

Barbara M. Ford

1123 N. Emerald Grove Rd.

Janesville WI 53546-9793 608-295-3443

URL: <http://www.gazettextra.com/article/20100214/ARTICLES/302149978>

Farmland doesn't get better than on the Rock Prairie

By [Marcia Nelesen](#)

February 14, 2010



Super soil

JANESVILLE — A glacier that moved south from Canada about 13,000 years ago ground to a halt across northern Rock County.

As the mile-thick slab of ice melted, sand and gravel washed onto the southern plain known now as the Rock Prairie.

Later, windblown silt called loess settled over the sand and gravel. The sediment probably came from the Mississippi River Valley, at that time a broad floodplain.

Over the years, prairie vegetation took root and formed rich, dark topsoil, normally 4 to 5 feet deep but sometimes up to 6.

The soil's crumbly texture allowed roots to breathe and water to percolate. At the same time, a mix of clay under the soil captured moisture for plants to grow during dry periods.

Similar soils are found in only a few other places in the world, experts say.

The combination of soil and climate, however, sets the Rock Prairie apart, said Fred Madison, professor in the Department of Soil Science at UW-Madison.

He calls the prairie the "perfect storm" for crop production.

"The setting in the Rock Prairie is as good as any in the world. Everything is there," he said.

"In southern Wisconsin, we get in the summertime an inch of rainfall a week. Guess what a corn crop takes? An inch of rain a week."

Are the growing conditions on the prairie the best in the world?

"That may be a bit egocentric, but I certainly as a loyal Wisconsin native have no problem claiming it," Madison said. "It's safe to say the combination of climate and soil and vegetation and everything we have on the Rock Prairie is very, very unique."

"All the good stuff happens in Rock County."

Madison is not alone in using "perfect" to describe the prairie's growing conditions.

Jim Stute, crops and soils agent for UW Extension, calls the prairie a "perfect confluence" of soil, flat land and climate.

The Rock Prairie generally extends from County A to the state line. It is bordered on the west by Interstate 39/90 and extends east into Walworth County.

The Rock Prairie's plano silt loam—one of the best soil types in the world—covers about 8 percent of Rock County's land, said Norm Tadt, senior conservation specialist with the Rock County Land Conservation Department.

What are the prairie's virtues?

-- It's young soil, in a geological sense. It's chock-full of the fresh minerals and nutrients needed for crop growth. Africa, by contrast, has old land surfaces and worn-out soil.

-- It gets enough rain. Southern Wisconsin gets more than is needed to grow crops, so the groundwater is replenished. That is no small factor. Moving west, the ratio changes. Sections of the Great Plains are reverting to pasture because irrigation there is depleting an ancient aquifer.

-- The winter. The soil gets a break from the constant attack of bacteria and fungi. The cold breaks the pest cycles. The subsoils rebuild their moisture. The freezing and thawing restores the soil structure.

-- It's contour. The land is flat, perfect for farming.

Madison said the challenge is to recognize the prairie as a precious and irreplaceable natural resource.

"It's the same we face everywhere in that the very best soils in any location are the very best soils for everything: best for septic, best for highways, best for building houses and growing crops," Madison said.

"As you look over the prairie, it looks sort of endless," Madison said. "It's not endless. That's the key thing to remember."

Madison recalled similar soils in Oconomowoc in an area known as the Pabst Farms. The soil was a bit shallower than on the Rock Prairie, but it was beautiful prairie soil, Madison recalled.

It has been lost to development, and that is a huge, tragic loss, he said.

"Those are decisions we made. Once they're gone, you don't bring them back. It's irreplaceable. With all my years of being in soil science, I can't tell you how to re-create them.

"When you have agricultural land the quality of ... the Rock Prairie, even though it may not be something that looks like the biggest dollar winner, you have to look at it long term and the potential that those soils have."

If properly managed, the production quality of the land on the Rock Prairie is among the world's best.

"That's very important," he said. "We don't have a lot of soils that perform that well."

Madison predicts that Janesville's proximity to metropolitan areas will become increasingly important as more people buy locally because they want to know where their food is grown.

"The fresh food market is just huge," Madison said. "To have diversified agriculture in the southern part makes a boatload of sense."

"We have tough times now, but we should continue to be level headed as we think about planning."

 URL: <http://www.gazettextra.com/article/20100214/ARTICLES/302149977>

'We need to do a better job' or Wisconsin will keep losing valuable farmland

By [Marcia Nelesen](#)
February 14, 2010



Super soil

JANESVILLE — It was the first big sale of land on the Rock Prairie east of Highway 14, where most people didn't think development would occur.

"I think people were shocked," recalled Norm Tadt, senior conservation specialist at the Rock County Land Conservation Department.

In 2007, at the request of the owner, Janesville annexed and rezoned from agriculture to residential 365 acres at Highway 14 and County A.

Developer Bill Bohn planned to build a 900-home subdivision on the land. The development eventually failed, and the land is still being farmed. But the annexation and rezoning stand, and the land will likely be developed when the housing market rebounds.

"That was the first chunk to fall. What was going to happen after that?" Tadt said.

It is ironic that Janesville could leach the life from the agricultural community, which long ago nurtured the city into being.

Parts of Janesville are built on the Rock Prairie, which holds some of the world's richest soil. The city continues to advance onto the land, where the soil and contours are perfect not only for farming but for development, as well.

Even Tadt's land conservation department rents office space in a building on the prairie.

Farmland preservation advocates recognize that growth will continue in high-pressure areas.

"We can't save every piece of good farmland," said Ron Nilsestuen, the state's secretary of agriculture.

"On the other hand, God isn't making any more farmland."

Perhaps Midwesterners are numbed by the vista of farmland that still surrounds them. People driving east from Janesville toward Delavan take for granted the crops that stretch to the horizon in all directions.

But in the eastern United States, development pressure as long as 30 years ago prompted states to create effective methods to protect farmland. Nilsestuen is pushing Wisconsin to consider some of those methods today.

National Geographic magazine recently estimated that 3 percent of the Earth's surface offers inherently fertile soil. More than 6 billion people rely on food grown on just 11 percent of the global land surface.

Wisconsin ranks No. 14 among states in percentage of land termed "prime" or "unique," with 27 percent of its land in the two categories.

The state, though, is losing farmland every year.

In the late 1980s, Wisconsin lost about 15,000 acres of farmland a year. That grew to 24,000 in the '90s. Today, the state loses about 30,000 acres a year.

That gives Wisconsin the dubious distinction of being No. 1 among states in rapidity of farmland loss, Nilsestuen said.

In Rock County, 7,000 acres were diverted from agricultural to other uses in the last seven years, said Randy Thompson, UW Extension dairy and livestock agent.

The most important environmental advance of the next decade will be to protect Wisconsin's farmland, Nilsestuen predicted.

He worries that farmland will go the way of the pine forests of the north. They no longer support Wisconsin's paper industry because of development and fragmentation.

"We need to do a better job," Nilsestuen said. "You can see it with your very own eyes every day that the land is being chewed up.

"When you put a McMansion—one of those 'look at me houses'—in the middle of 40 acres, you've really reduced the ability of that land to be productive," he said. "It's too little to farm and too big to mow.

"You have to have land to produce food or fiber or energy," Nilsestuen said, noting the promising future for biofuels and other renewable energy.

"Yet, we haven't assigned the same kind of priority to our most productive food-producing land and working lands—whether forest or farms—that we have other things," he said.

On some maps, he noted, agricultural land is still designated as "vacant land."

Words mean something, he said.

A new initiative included in the last state budget provides guidelines and money for governments and land trusts to help protect what advocates call working lands.

A workshop last year in Rock County was one of the best attended in the state. Advocates are traveling the state to teach about the tools, including tax credits, that are available to protect land.

Some people might not care about the aesthetic value of a red barn on a hill or the loss of wildlife habitat, for instance, said Bob Wagner of the American Farmland Trust. But they pay attention when he talks money — the economic impact of agriculture and the cost of development. Others tune in when the talk turns to food security in these days of global uncertainty.

Economics

Agriculture generates \$51.5 billion a year for Wisconsin. Nilsestuen has the statement on his official stationary as a reminder.

"Ag is our industry," he said. "Manufacturing is an important part of the overall economy, but for many areas of the state, ag and food are either the largest industry or a big part of it."

About 12 percent of the state's jobs are related to agriculture and food.

"People really don't have a good perspective on the importance of agriculture right here in Rock County," Thompson said.

People who consider Rock an urban county should think again.

Agriculture contributes \$1.2 billion annually to the local economy and 8,500 related jobs.

Rock County is No. 1 in the state in corn and soybean production. It is third in tobacco, sixth in wheat, seventh in sweet corn and eighth in peas and hog production. It is home to 135 dairy farms and boasts the largest pheasant farm in Wisconsin.

Wisconsin's dairy industry alone has almost 14,000 farms and generates \$22 billion a year, Nilsestuen said.

"There's no other business sector that we could either grow or attract that would have 14,000 units in the state," he said.

But that industry lives or dies with the land base.

Treating farmland as limitless and without priority is shortsighted. It's a precious natural resource, much like water, Nilsestuen said.

As the land is chipped away, the entire industry is threatened, Wagner said.

"You need the human infrastructure, and you need the whole marketing infrastructure," he said.

In Vermont, as dairy farmers went out of business, milk truckers decided it wasn't worth driving to those that remained, for example. Some farmers turn to the Internet for equipment as dealerships close. Costs increase as the supplier industries move away.

Food security

More and more, people want to know where their food comes from.

A diversified agriculture industry is best for the country, said Vicki Elkin, campaign and policy associate for

the American Farmland Trust.

"Diversification is frankly a security issue in terms of where we get our foods."

For example, it is not in the country's long-term interest to depend on California for certain products. Concentration makes the food supply vulnerable to terrorist attacks, Elkin said.

"Do we really want to get more of our products from overseas?" Wagner asked.

Pesticides that were banned long ago in the United States are still sold in other countries and are making their way back into the food chain.

As the world population grows, the amount of food produced is an issue, and so are distribution and affordability.

Farming marginal land

As fertile land is lost, farming is pushed onto marginal lands. With that come additional costs, both in production and environmental impact.

The migration increases the potential for soil erosion and the need for more fertilizer and pesticides, for example. In the western United States, farmers tap water from aquifers that are not being replenished or from rivers that are running dry from development upstream.

It is cheaper and better for the environment to use good land rather than try to make poor land better, said Jim Stute, UW Extension crops and soils agent.

"Marginal land tends to have more negative environmental consequences, such as nutrient losses ... and water quality," Stute said.

Improving soil means adding fertilizer, and fertilizer contains nitrogen, which is made from natural gas, and phosphorus and potassium, which are mined.

"We're basing food production on fossil fuels, which is not sustainable," Stute said. "We need to use the native soil fertility to help us with that."

"I think we're coming to the realization that we can't (meet the needs of a growing population) solely with technology."

"We need to use the native soil fertility."

Tadt of the land conservation department said production by corn growers on the prairie routinely beats corn yields elsewhere.

The farmers do nothing out of the ordinary and use a normal fertilization regime.

Cost of Growth

For years, some municipalities have claimed that extra money generated by residential development justifies

new subdivisions on the edge of town.

Studies of the costs of community services undercut some of those claims.

Providing services to residential areas actually costs more than the residences pay, Wagner said.

"Chickens don't call 911," Nilsestuen said.

Studies show it costs municipalities an average of \$1.19 for every dollar that residences pay for services, such as police and fire.

Farmland/open space costs 37 cents per dollar paid, while commercial and industrial land costs 29 cents.

Scattered development costs even more.

Allan Arndt, a farmer and town of La Prairie supervisor, said farmland preservation advocates understand that people need houses and jobs.

"But growth is expensive," he said. "Do we need to provide houses for people who work in Madison? If we didn't have those people, we don't need their garbage picked up."

Patrick Stevens of the Wisconsin Builders Association, however, cited studies that show the millions of dollars generated for every 100 single-family homes built.

New homes mean new jobs, more people pumping money into the local economy and more money in taxes and other revenue, such as permit fees, for local government.

Rick Stadelman, executive director for the Wisconsin Towns Association, said new housing starts and other construction always benefit the economy.

"I'm not opposed to construction and growth and development," he said.

Communities should just plan better where that will be, he added.

They should first encourage building on smaller parcels. And they should make sure development occurs first on marginal land rather than the most productive farmland, Stadelman said.

Flooding

Widespread flooding in the past two years "spoke pretty loudly" to the fact that development made the damage worse in some areas, Nilsestuen said.

Concrete and other impermeable surfaces don't allow water to percolate and recharge the groundwater.

Wagner remembers flying into Madison at the height of the flooding in 2008, looking down and seeing all the flooded farm fields.

"To many people—and accurately so—it was a real catastrophe for those farmers. They couldn't put in crops, and, if they were already in, they were drowning in water. But by the same token, those were flooded farm

fields and not flooded subdivisions."

Aesthetics

"Wisconsin's working lands are incredibly important to the quality of life," Nilsestuen said. "We want this to be the Wisconsin we love and look like the Wisconsin we love. We've got to do a better job."

"The alternative is, one day, we're going to wake up, and we're going to think we're in New Jersey."

Talking about saving farmland

"Every year, there is less land farmed because of development, so you have a shrinking land base for food. On the other hand, every year the world has more people so more food is needed."

"We're not anywhere near a crisis point to not being able to provide. But if we don't make corrections somewhere along the line, we'll get to that point. If you want to see rioting and anarchy, when people can't put food on the table, you'll have it." — *John Lader, LaPrairie Township*

"Agriculture is such a huge economic generator in the state. Frankly, the most important (part of that) is the land. We can't take it for granted. We need to take a longer-term view (and protect) places best suited for agriculture. We can't assume that those places are going to be around forever unless we put in place good programs and plans now." — *Vicki Elkin, campaign and policy associate for the American Farmland Trust*

"Certainly, the world population continues to explode, and it's not only an issue of the aggregate production of food but the distribution and affordability. We're not making any more farmland, so treating it as limitless — that it can be, without priorities, developed willy-nilly — is very short sighted. It's a precious natural resource."

"Land doesn't get picked up and moved somewhere else in the world." — *Rod Nilsestuen, secretary of the Wisconsin Department of Agriculture, Trade and Consumer Protection*

"The thing that's really interesting and challenging about the Janesville area is that (the) soils are really so very, very good for agriculture and, as such, really are irreplaceable." — *Fred Madison, soil science professor at UW-Madison*

"Farmland protection is not a no-growth strategy. This is about incorporating farming and agriculture into the economy." — *Bob Wagner, senior director of the Farmland Protection Programs for the American Farmland Trust*

"It's the best soil in the world. (When it's developed), you're digging up 3 to 4 feet of good, black top soil that phases into clay that helps hold the moisture. At about 5 to 6 feet, sand and gravel provide drainage so you don't have ponding. It's a perfect agricultural profile of soil.

It's perfect." — *Kurt Leach, Rock County farmer*

"In La Prairie, we do not see 'agriculturally developed' as 'undeveloped.' Those are two very different terms for us, whereas the majority of people—the Department of Transportation or the city of Janesville—see it as 'undeveloped.' You don't put a highway through a major urban area. You shouldn't put a highway through a major rural area. You put a highway around it because it's open space. Their claim is that this is the only site that fits. Why does it fit? Because we're agriculturally developed, which they claim is undeveloped." — *Allan Arndt, La Prairie Township farmer*

"It's not just about farm fields where crops grow. It's about open space, as well. One of the important things they look at in the areas that I visited (out east) was the impact on the water quantity and water quality. There's other things besides having access to food for consumption and fuel. There's recharging the water table." — *Al Sweeney, Rock County farmer and county board supervisor*

ROCK COUNTY

----- Rock Prairie

The spotted line shows the approximate location of the Rock Prairie. The Metcalf land shown at the bend in Highway 14 was rezoned residential in 2007 and was the first chunk of the prairie east of Highway 14 to fall to planned development. The subdivision has since failed, but the zoning stands.



Tony DiNicola/tdinicola@gazettextra.com

Ford
1123 N. Emerald Grove Rd.
Janesville, WI 53546-9793



Dave Navecky
Surface Transportation Board Docket # FD3595a
395 E. Street SW
Washington DC 20423-0061

204230001

