



WINNEBAGO COUNTY SOIL AND WATER CONSERVATION DISTRICT

EI-25100

Conserving Our Land Today For Tomorrow

4833 Owen Center Road - Rockford, IL 61101-6007 ♦ Phone: (815) 965-2392, Ext. 3 ♦ www.winnebagoSWCD.org

May 24, 2016

To Whom It May Concern;

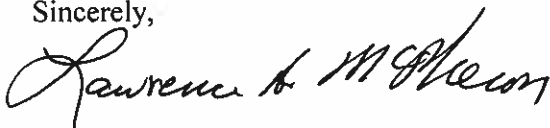
On behalf of the Winnebago County Soil and Water Conservation District Board of Directors, our Resource Conservationist, Dennis Anthony, has reviewed the proposed Great Lakes Basin Rail corridor for Agricultural and Natural Resource issues that may result from the construction of the proposed rail line. He has identified the following issues and concerns along the proposed rail corridor that will impact the Agricultural and Natural Resources in Winnebago County.

- 1.) **Farmland Protection.** Agriculture, including row crop and livestock production, is still a major land use in Winnebago County. Once farmland is lost to another land use it will never be brought back into crop production. Winnebago County, the State of Illinois and the Federal Government all have Farmland Protection Programs at work in the county. The goal of these programs is to preserve farmland. The proposed route impacts about **336 acres** in the County, with approximately **306 acres** rated "**Prime Farmland**" and **23 acres** rated "**Farmland of Statewide Importance**."
- 2.) **Farmland Fragmentation.** The dividing of crop fields into smaller fields or odd shaped fields hurts the ability of producers to crop the land. Agriculture has continued to evolve using larger more efficient equipment, if the fields get smaller the equipment and fields won't work together. The railroad corridor has sections that run at angles that don't coincide with the property lines; this will make for "odd" shaped fields that are difficult to farm. Another issue with the rail corridor is the access to be able to access crop fields on both sides of the railroad corridor. Many times access roads are required to be constructed to access a field that is now on the backside of the corridor.
- 3.) **Subsurface Drainage.** The proposed rail line goes across many large blocks of land that have soils requiring subsurface drainage. Most agricultural field tile lines are unmapped in Winnebago County. Many of these systems are 60+ years old. Laterals and mains, intersecting the proposed line will need to be rerouted as to allow for maintenance of said in the future. I am assuming that all field drainage lines will not be allowed to remain under the proposed railroad right of way. Many acres of cropland would be impacted if the subsurface drainage is not adequately addressed.
- 4.) **Agricultural Program Impacts:** There are fields in many different USDA programs that will be affected by the rail corridor. Some of these programs are: the **Conservation Reserve Program**. This program retires cropland that is environmentally sensitive for periods of 10 to 15 years. These areas are seeded to native cover to provide wildlife habitat, reduce erosion, filter nutrients from runoff water and attenuate pollutants from ground water. The **Conservation Stewardship Program (CSP)** is a voluntary conservation program that encourages producers to continue to improve and maintain existing conservation activities as well as undertake additional conservation activities this is completed through contracts based on the producer's cropland.
- 5.) **Floodplain Corridors.** While the planners have also done a good job to avoid crossing wide floodplain areas, the proposed rail line will still cross several major river floodplains. These include the previously mentioned Rock River, Kilbuck Creek and the South Branch of the Kishwaukee River; as well as smaller corridors of Canal Creek and Mill Creek.

- 6.) **Wetlands.** While the planners have done a good job avoiding many of the US Fish and Wildlife mapped wetlands, numerous wetlands will be impacted along the proposed line. These include mapped and unmapped wetlands in the Rock River corridor, Kilbuck Creek corridor and the corridor of the South Branch of the Kishwaukee River. There are also the potential to encounter un-mapped wetlands or farm wetlands along the segment running along the south side of the County, which contains many hydric soils. Professional wetland determinations should be done along the entire proposed route. IDNR permits and possible mitigation will be needed for any wetland disturbance. The Army Corps of Engineers would also review any wetland disturbance.
- 7.) **Kishwaukee River Corridor.** The Kishwaukee River system is recognized as one of the few remaining high quality resource rich areas in northern Illinois. It is recognized statewide for its diversity of fish and mussel species, migratory bird habitats, river otters, and high quality natural woodlands and wetlands. It's one of the highest quality river systems in the State of Illinois. The Kishwaukee River and its tributaries are also an important recreational resource, providing quality fishing, hiking, canoeing, tubing, camping, picnicking, bird watching and other healthy outdoor activities. The high quality habitat and local participation in the river for recreational activities is a "brand" that many communities may wish they could use as they compete for economic development, long-term jobs, and economic sustainability. (Taken from Kishwaukee River Corridor Green Infrastructure plan – April 2013)
- 8.) **Woodlands and Wildlife Habitat.** The construction of this rail line, as proposed, will cut through woodland and wildlife areas, in particularly where it crosses the South Branch of the Kishwaukee River; and where it runs adjacent to the Rock River before crossing it just west of the Winnebago/Ogle County line. This will further fragment the blocks of wildlife habitat in the immediate area of the line. Studies have shown that as land is divided by manmade structures, various terrestrial wildlife populations shrink and populations become separated. A railroad corridor will limit the movement of wildlife and the interaction of population.
- 9.) **Stormwater Runoff.** Numerous agencies have ordinances and/or statutes to address this issue. If jurisdiction falls to a local unit of government, Winnebago County and the City of Rockford, have ordinances to address this issue. This rail corridor will be a graveled surface that will have the potential to increase the stormwater runoff rates of flow. This could include the need for stormwater detention ponds. The water from the rail corridor will need to be controlled as not to cause any off-site impacts. Surface drainage patterns will need to be improved and maintained.
- 10.) **Erosion Control.** Numerous State, County and Municipal Agencies have ordinances and/or statutes to address this issue, including the Illinois EPA, Winnebago County, City of Rockford, and Cherry Valley Township. This would be a construction time issue. Erosion control measures will be required during the construction phase of the project and last until all areas are stabilized. No off-site impacts are allowed.

Due to the adverse and negative impacts to the Agricultural Areas and Natural Resources in Winnebago County, the Winnebago County Soil and Water Conservation District Board of Directors, at our monthly Board Meeting held on April 27th, unanimously opposed the Great Lakes Basin Rail project.

Sincerely,



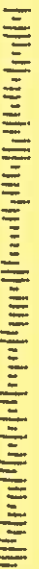
Larry McPherson
Chairman
Winnebago County SWCD

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