



Boone County Government

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May 18, 2016

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

Dear Mr. Navecky,

This document represents comments submitted by the Boone County Government, on behalf of its citizens, regarding the proposed Great Lakes Basin Transportation (GLBT) Corporation's proposed new railroad. The Boone County Board and our community are opposed to the proposed Wisconsin Subdivision route due to its impact on our citizens and the environment.

Boone County engaged in a thoughtful and open process whereby standing committees of the County Board each took time, in open session, to entertain comments about the proposed route. Concerns were stated which ran the spectrum and included: Violation of the Comprehensive Plan, negative impact on agricultural and conservation land, risk to aquifers and underground pipelines, loss of transportation routes, decline in property values, noise, and impact upon first responders. Additionally, issues of great concern, but not necessarily environmental, include no disclosure of ownership, insurance costs to residents, and loss of farm productivity due to loss of livelihood. The Boone County community's livability, because we are the environment, will suffer if the GLBT route is approved. Our comments generally follow the scoping meeting categories:

Land Use:

The following policy statement leads off the Boone County Comprehensive Plan:

"Boone County now stands alone. In each direction, a combination of urban, suburban, exurban, and resort development has altered the once unequalled agricultural richness and rural integrity of the State Line area. Although large remnants of this natural and human heritage exist in parts of DeKalb, Winnebago, Rock, Walworth (sic) counties, they remain shrinking fragments-anchored most firmly on their Boone County borders. These changes have been strongly resisted in each of these counties, with comprehensive plans calling for agricultural preservation, environmental protection, and the enhancement of small community character since the 1950's."

Indeed, the pattern of development in Boone County since the adoption of the 1999 plan has encouraged development in targeted areas and *specifically kept the rural areas, of which the GLBT is proposed, as agricultural purposes*. There is nothing about the proposed route that is compatible with the 1999 Boone County Comprehensive Plan. The GLBT compensation package offers access to every property owner, and in theory, development in multiple agricultural areas-a clear violation of the plan.

Transportation Systems

We have not been given precise road closure crossings information that will occur, and how our transportation needs will be affected.

Safety

Public safety professionals expressed great concern with diminished response times and corresponding less access due to the proposed route. Grade crossings are a prime safety concern. Our public safety professionals simply cannot determine the additional resources they would need to manage a derailment accident. We would need greater reliance on neighboring mutual aid arrangements and their resources are also strained due to their own local needs. There are numerous underground pipelines, most recently the Enbridge oil pipeline, and agricultural drain tile networks, which could be potentially affected.

Biological, Water, Geology and Soils

The biological resources will be negatively affected. Water aquifer protection is of prime importance. The danger from derailments and other spill scenarios cannot be overstated. Geologic formations such as the glacial till in the Troy Bedrock Valley and other pathways of environmental contamination are of great concern. Geologic fault lines must also be examined. Boone County is blessed with rich soils (soil type) and highly productive farmland. In addition, the proposed route cuts through two properties owned by the Boone County Conservation District. The Kishwaukee Valley Conservation area was purchased with private and state of Illinois grant funds. The purpose of these programs is to preserve land in its present state.

Noise and Vibration

Noise and vibration are of great concern to the residents.

Socioeconomics

Of little consideration, but great concern is the corresponding impact of insurance rates on residents and businesses. There has not been disclosure regarding the ownership of the GLBT and whether this is foreign or domestic. The ability of the Great Lakes Basin Corporation to absorb liability and remain a true viable business has not been disclosed. There is always the potential of business interruption and bankruptcy during the project implementation and no information has been presented to alleviate concerns. Farming activity is the primary economic driver in Boone County. Loss of this land due to the railroad will significantly reduce productivity, diminish income to county farmers, and affect the economic viability of the county. No presentation has been made to the community regarding the potential economic benefits of the proposed route. It is questionable as to whether the overall economic infrastructure of Boone County can accommodate a project of this size and scope.

Cumulative Impacts and Conclusion

When the Surface Transportation Board examines alternate routes or proposals, it is recommended that substantial analysis be devoted to existing rail infrastructure in the Northern Illinois region, and corresponding rail capacity that can provide access to current industry. Boone County intends to pursue a partnership with Rock County Wisconsin to further develop alternate rail location scenarios. In summary, it is the Boone County community that is opposed to the proposed route due to its adverse impact on our environment, and strongly urges the Surface Transportation Board to fully investigate the proposed route, and all alternate ideas that would exclude the Boone County location.

Respectfully submitted,



Bob Walberg, Chairman
Boone County Board

