

ATTN: Docket # FD 35952

May 31, 2016

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

Mr. Navecky,

After reviewing the available information about the proposed Great Lakes Basin (GLB) rail project, it is my opinion that the proposed GLB project has failed to sufficiently provide documentation that supports public convenience and necessity. Further more I believe that fast tracking this project and waiving the six month notification period was an error on the part of the STB. For the following reasons I respectfully request that the STB cease any further action on this project.

NEED

- The Chicago Region Environmental and Transportation Efficiency (CREATE) program - a collaboration between rail companies, local, state and federal government - is in the process of implementing physical and managerial improvements to make the rail system in Chicago more efficient in order to decrease delays. Letters from the Class I rail lines in response to the July 13, 2015 letter by the Chairman of the STB Daniel R. Elliot, II, indicate the CREATE project, although not completed, is improving the delays in Chicago.
- The GLB proposed project undermines and subverts the CREATE program.
- The GLB project is neither comprehensive, visionary, or collaborative. The proposed project is not part of any federal, state or local long-term freight plan. It is strictly a commercial venture by a for-profit company.
- There is no publicly available business plan for the proposed rail line to document public convenience, necessity or benefits.
- GLB documentation does not describe a need for the 50 foot utility easement (beyond stating that it is a potential revenue source), or the need for the proposed 15,000 acre Kankakee rail terminal, which is five times larger than the largest rail yard in the world. The Surface Transportation Board's (STB) jurisdiction to approve a utility corridor is also in question.
- Union Pacific and Norfolk-Southern have publicly stated that they are not interested in the proposed GLB project. Instead they prefer to work with the CREATE program in Chicago.
- Canadian National invested heavily in their own Chicago bypass by purchasing the Elgin, Joliet and Eastern Railway line and are therefore less likely to use the proposed GLB toll rail.
- The letter from Norfolk Southern Corporation's legal department (filed as EI-22974 under FD-35952) states that Norfolk-Southern does not have a non-disclosure agreement with GLB, nor is it interested in using the proposed rail. It also states that no information about current rail movements or traffic volumes was provided for the GLB project. This raises the question whether there are any "non-disclosure agreements" at all. It also makes one wonder about the market research that was done, or not done, for this project.
- Mr. John Yonan, P. E., Superintendent of the Cook County Department of Transportation and Highways writes the following in his letter to the STB; *"The proposed Great Lakes Basin Rail Line will, at best, only address a very small part of the region's freight congestion. Cook County's Department of Transportation and Highways is proceeding with a long range transportation plan and an analysis to identify and prioritize freight pinch points and possible solutions. Those studies will yield a more comprehensive range of projects to address freight congestion and promote development."*

PUBLIC CONVENIENCE

- I find no evidence that the proposed GLB Chicago bypass has been identified as a solution to the Chicago bottleneck, a public convenience, or a national transportation priority (as Mr. Patton asserts). It is a business proposal by a for-profit company.
- Due to the fact that the route of the proposed rail will likely change (Mr. Patton's words) people in an area of over 32,220 square miles have lived in uncertainty about the future of their homes, farms and livelihood.
- The potential for unwanted rail - and the use of eminent domain - has increased stress for land and property owners.
- Farm fields divided by the proposed rail will be more difficult and dangerous (due to farm field crossings) to manage. Productivity of the land will decrease due to construction of the rail, odd shaped parcels and increased compaction. Costly irrigation and tiling infrastructure will be damaged and rendered useless.
- Government has spend millions of tax dollars preserving farmland, woodlands and promoting good agricultural practices. Farmers spend thousands of dollars on soil conservation practices. The proposed rail line is counter-productive to these efforts.
- Home and land owners near the proposed rail will see their home and land values reduced.
- GLB intends to be a toll railroad. Investors in this proposed project will have only their own financial interest in mind, not the public convenience.
- Opposition to the proposed project has been overwhelming, seven of eleven counties involved have passed resolutions opposing the GLB rail. Mr. Patton has stated that he will take land by eminent domain if the proposed project is approved.
- The loss of thousands of acres of prime farmland cannot possibly be considered a public convenience. Taking highly productive land out of production for a speculative for-profit project is not in the publics' best interest

The above provided information is what led me to the conclusion that the proposed GLB project is inconsistent with the public convenience and necessity. It was insufficiently vetted before starting the approval process. I respectfully request that the STB cease work on this project. Individually, or as part of a group, I will fight the GLB proposed plan using all options available, including Congress, my vote at the ballot box and the judicial system.

Signature

Robert T. Bates

Name *ROBERT T. BATES*

Address *PO BOX 302*

City *MAZON*

State and Zip *ILLINOIS 60444*

Phone *815-448-2292*

Email *NONE*

ATTN: Dave Navecky -Docket No. FD35952
Surface Transportation Board
Office of Environmental Analysis
395 E. Street SW
Washington, DC 20423-0001

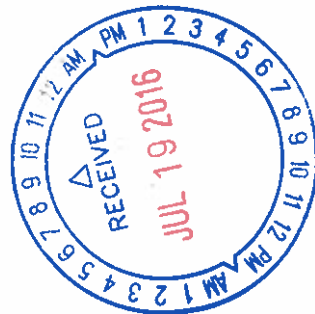
Dear Mr. Navecky:

I would like to express my concerns over the proposed Great Lakes Basin Transportation, LLC rail line project. Docket # 35952. I oppose the project and ask the Surface Transportation Board to deny the proposal. My concerns are:

There are mine shafts in the area around Verona and
South Wilmington in Grundy County in Illinois that create
sink holes from time to time and a railroad with the vibration
will cause a hazard with these aging properties. Here is a
copy of the Gantzer farm that are relatives of mine that have had
ownership of this property for over 100 years. The three parcels
of land will be ruined by this Proposal!!
Frank Patton has yet to give any Company Railroad that is in
Favor of this project to be of any use to them!!

Respectfully Submitted by (signature) Robert T. Bates (ph#) 815-448-2292
(address) 603 Main St. Po Box 302 — MAZON, ILLINOIS 60444

PO Box 302
Mayon, IL 60444



S. SUBURBAN IL 604
13 JUL 2016 PM 6 L



DAVE NAVECKY
SURFACE TRANSPORTATION BOARD
395 E STREET SW
WASHINGTON DC 20423-0001
DOCKET NO FD 35952

20423-0012

