

JAMES MATTHEW RICHMOND

21 April 2016

Mr. David Navecky-Docket No. FD35952
Surface Transportation Board
395 E. Street SW
Washington, D.C. 20423-0001

Dear Mr. Navecky:

In this letter I would like to express my concerns over the proposed Great Lakes Basin Transportation rail line project contained in your docket # 35952. Before delineating these concerns I would like to first introduce myself.

I and my wife are landowners in Ogle County and have several farms located in and around the Rochelle area, in fact one of these farms is located only about 1000 yards from the proposed rail bed. Another farm lies immediately adjacent to the Union Pacific line leading west from Rochelle.

For our entire 75 years on this good earth, my wife and I have been associated with the farming industry and although we own legal title to these lands, we realize we are only stewards of the land while we are still living. We believe in conservation and we protect the environment in and around our farms with conservation practices that ensure that the land will be here for others after we are gone.

My wife and I are both college graduates, each with advanced degrees from land grant colleges. My last degree was awarded in the field of Organic Chemistry, where I hold a Ph.D. I worked in the industrial area for over twenty years where I was able to employ this knowledge.

After attending the "Scoping Meeting" at the Rochelle High School last evening and after researching the issue further, we conclude that we strongly oppose the proposed project for the following reasons:

1. The proposed location of the rail line lies between our farm and the elevator firm where we sell our grain. And unless there would continue to exist a direct route to this elevator, undue delays due to re-routing to other rail crossing, would cause disruption in the harvest. There is a balance between the time it takes to move the grain from the field to the market and the number and size of combines, wagons, and semi-trucks that are used to move the grain. Increasing this time to the market would either require buying additional or larger vehicles of

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conveyance, or it would require that the harvest be delayed. The last choice is not acceptable, as in the fall of the year the risk of snow fall is ever present in northern Illinois, which stops the harvest operation until springtime. When the crop remains in the field all winter, corn and soybeans plants drop their grain to the ground and it becomes non-retrievable by the farmer, resulting in a financial loss.

2. Unlike farm fences or buildings on farm sites, which can be removed and the land returned back to the environment when the buildings or fences are no longer needed, the major construction and development of streets, housing subdivisions, and rail road beds are never returned back to the state to which Mother Nature created them. One only has to view 'abandoned" railroad beds in and around the city of Chicago. The rails and the ties may be removed, but one always finds the bed portion, which often has been re-purposed as a "hiking or bike trail". Once the land is converted into a rail bed, it is gone forever.
3. Railroads in general are poor neighbors. When it comes time to replace the ties and rails, the old ones are discarded along the rail bed and left there on a permanent basis. Brush, noxious weeds are never cut or destroyed. Left over stone and rock from construction activities are left behind for perpetuity. We have first- hand experience with this issue, and would be happy to give you a personal tour of the railroad siding adjacent to our farms west of Rochelle.
4. Bulk quantities of crude oil and hazard chemicals are known to be routinely transferred via rail. Chemicals such as benzene, toluene, zylene, phenol are some of the better of the worst that are moved via rail. These types of chemicals are not water soluble and when they escape into the environment remain as concentrated, undispersed hazards. Many of the bulk tank cars that hold these liquids are unloaded from a valve on the bottom side of the car. Protecting this value is a device known as a belly cap. The belly cap provides physical protection for the liquid contents and also attempts to catch any seepage from valves which are known to fail as all valves do. While the belly caps do provide physical protection for the values, they do a poor job of catching any seepage, and as a consequence these dribbles and runs are scattered between the rails throughout the miles and miles of length of the rail road. I had personal experience with this issue during my previous employment. I have opened belly caps of tankers and I have seen the analysis of soil samples taken from beside rail sidings. Judging from the number of different contaminants found, the leakage is very likely quiet common. There are probably rules and regulations to prevent this, but where is the enforcement? Thus, I would recommend if this proposal be approved, that a weekly random inspection of tank cars be required and also a random soil analysis be conducted. And for violation, a financial penalty with real teeth be imposed.
5. Access to emergency and fire protection services are important to all, and especially to farmers who often are miles and miles away from such services, where in a city may only be a few blocks away. Farm operators are among the most hazardous professionals in our country. Combine and tractor fires in remote areas of fields, the fields themselves removed by miles from these

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services, are definite concerns of the farmer. Each year farmers find their neighbors smothered and killed in grain bins, caught in farm machinery where they had lost limbs, or have died. All of this when they are miles from emergency service. Putting undue barriers between the farm and these services can't be justified. Again, my wife and I had personal experience with this issue. A few years back, our farm house caught fire due to an electrical problem. Fire departments from the area responding in time to control the blaze before the other buildings on the site caught fire. Had there been barriers in place such as increased travel time, or train crossing delays, the intended fire response may have arrived too late. The proposed rail line would separate this farm site from the emergency services of Rochelle.

6. The Canadian National Railroad recently acquired the former Elgin, Joliet, and Eastern Railroad to improve its rail operations as a bypass around the congested area of Chicago by connecting its five rail lines that radiate from Chicago and pass through the metro area. This was allowed by the 2008 ruling of the Surface Transportation Board. As a consequence the number of trains was expected to increase from 15.7 to 39.7 per day in 2015. The city of Naperville opposed this acquisition prior to the approval of the environmental studies and joined with other communities that opposed the acquisition. [<http://www.naperville.il.us/CNRRailroad.aspx>] With the approval of this acquisition by the Surface Transportation Board, the additional environmental impact of the pending approval should be enough to reasonably deny the approval.

It is with the above and others too numerous to mention that I strongly oppose the project and request that the United States Surface Transportation Board deny the proposal by Great Lakes Basin Transportation, LLC.

Sincerely yours,

A handwritten signature in black ink that reads "James M. Richmond". The signature is written in a cursive style with a large, stylized initial "J".

James M. Richmond

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