



May 16, 2016

Mr. Dave Navecky  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423-0001

ATTN: Docket Number FD 35952

Dear Mr. Navecky:

As the oldest and largest national trade association for America's cattle producers, the National Cattlemen's Beef Association (NCBA) urges the Surface Transportation Board to cease any additional work on docket number FD 35952 given the extensive damage the proposed Great Lakes Basin Rail (GLBR) project will cause farmers and ranchers across the states of Wisconsin, Illinois, and Indiana.

In conversations with members of our association who have been engaged in public meetings held by the Surface Transportation Board and GLBR, it is obvious that this project has not been well vetted or thought out. Our primary concern has to do with the assertion by the GLBR that Eminent Domain will be used to condemn thousands of acres of some of our country's most productive agricultural lands.

To date, no Class 1 railroad has shown interest in utilizing the GLBR. In fact, passenger and freight rail congestion in Chicago has been studied for years, resulting in the formulation of the Chicago Region Environmental and Transportation Efficiency Program (CREATE) to address those congestion concerns. The CREATE proposal does not include the GLBR. Without support of the major railroads or the government bodies involved in the CREATE proposal, we find it concerning that the GLBR believes that Eminent Domain works in their favor.

Our concerns about the abuse of Eminent Domain by GLBR is furthered by our understanding that GLBR intends to take land for their right-of-way in addition to a 50-foot utility corridor for future utility placement. The Surface Transportation Board does not have the jurisdiction to authorize construction of a utility corridor. This must be a major factor as you look at this proposal.

We also understand that it has been stated in public meetings that the GLBR is intended to be a railroad which charges tolls to use. Tolls are a telling sign that the investors have their own financial interest in mind rather than the public good. Again, this flies in the face of Eminent Domain. The land taking for the railroad, the land taking for income from utilities, and the

use of tolls on this railroad should be enough to convince the Surface Transportation Board to cease action and deny any request from the GLBR to begin development.

More concerning than anything else is the loss of thousands of acres of prime farm ground. This land is important in producing crops and livestock. The population of this country continues to grow, and for the sake of national security, it is important that we have the ability to feed ourselves. The confiscation of the land needed to construct the GLBR will be detrimental to our food security because it will take land out of production, or put land in a position where it cannot be accessed or utilized.

When reviewing proposed maps of the GLBR, it is obvious that several different scenarios will play out with the farmers along the line. For many, they will lose enough acres to make their operation no longer viable and will have to sell their farms. This drives producers out of their family livelihoods and history. For others, their farms will be severed into multiple fields or parcels. This will increase the amount of management that goes into farming or grazing this land. Increased management comes with costs such as increased inputs, time, and movement of equipment or livestock. All of these increased costs will come at a time where we continue to see a decline in prices for agricultural products.

Furthermore, some producers will see portions of their farms landlocked and inaccessible. Without adequate access roads, this land become useless to the owner and will more than likely need to be sold off. Again, with less acreage, most all farms become less viable. The lack of access roads, or the closing/elimination of existing roads, will keep farmers off of the land they have worked hard to buy and maintain. No scenario exists for the GLBR which will have a minimal impact on agriculture. In fact, farmers and ranchers will be the ultimate losers if the GLBR goes forward.

NCBA is opposed to this project and urges the Surface Transportation Board to cease any additional work on this project. NCBA is prepared to fight this proposal using all avenues available including Congress and the judicial system. The livelihoods of the farmers and ranchers in the path of this project are too important to ignore. Again, we cannot jeopardize our food security for a project that is only intended to line the pockets of its investors at the expense of the ones who feed them.

Sincerely,

A handwritten signature in black ink, appearing to read "W. A. Woodall", with a long horizontal flourish extending to the right.

Colin Woodall  
Senior Vice President, Government Affairs