

Docket # FD-35952

Mr. Navecky,

Kankakee's proposed rail terminal covers roughly 15000 acres. Union Pacific, the largest rail company in the world, describes their Bailey yard as massive at 2,850 acres.

The need for the immense size of the Kankakee terminal is not explained in the Notice of Intent.

Union Pacific can handle an average of 139 trains per day, comprised of raw and finished goods, such as automobiles, coal, grain, corn, sugar, chemicals, steel and consumer goods, including electronics, apparel and other retail products in their 2,850 acre Bailey Yard.

It is yet to be determined if Class I railroads will even use the Kankakee terminal since none of them have publicly stated that they will even use the proposed GLB rail.

Union Pacific has publicly stated that it is not interested in the GLB project

Furthermore, all Class I railroads have their own yards and would likely do most work on their cars and locomotives there as opposed to farming it out.

If this rail is intended for trains that do not require transport to the Chicago terminal area for sorting or delivery, I am not understanding why there would be a great need for switching just southeast of Chicago.

The public has no access to either Mr. Patton's business plan, his purported investors, or his purported clients making it impossible to determine what GLB's goals for this project are. When one compares the size of the GLB rail terminal with that of Union Pacific it is clear though that the 110 trains which Mr. Patton speaks of are easily served on a terminal 1/5th the requested size. His recent comments that the GLB track would have much less traffic, maybe 12-16 trains per day puts the 15,000 acre proposed yard in the absurd category.

§10901. Authorizing construction and operation of railroad lines

(c) The Board shall issue a certificate authorizing activities for which such authority is requested in an application filed under subsection (b) unless the Board finds that such activities are inconsistent with the public convenience and necessity.

Giving that GLB is proposing to obtain the acreage required for this project via Eminent Domain if needed, and that people in a 24 square mile area would lose their homes, farms, church and cemetery as well as livelihood, I would argue that this rail terminal is not for the public convenience.

My previous comments regarding the size make it clear it is not even remotely necessary to have a terminal the size proposed by GLBT Inc.

Another concern which I have mentioned in a previous letter is the 50 foot easement for utilities. Under primary features on the GLB website it states; "As mentioned above, 50 feet of the 200-foot GLB right of way would be reserved for possible use by utilities as a new right of way to serve potential future population growth of the region. This is another potential source of revenue for GLB."

This is curious to me since this is not a transportation need (is it even a legal request?) and furthermore there is no mention regarding "Need" in the Notice of Intent for these utilities. Since it amounts to 25% of the easement requested for the rail portion of the project it seems reasonable to expect a clearly stated need, as opposed to a highly speculative "potential future growth of the region". The statement regarding this being another potential source of revenue for GLB also indicates that this is inconsistent with the public convenience and necessity. I have yet to meet someone willing to sell their land or be forced to sell via Eminent Domain in order for GLB to have more revenue.

A 15,000 acre rail terminal without clearly stated purpose added to the above mentioned 25% (1900 acres) of the roughly 7600 acres for the rail adds up to 16,900 acres for which there is no clearly stated or demonstrated purpose. Add that to the fact that not a single Class I railroad has publicly agreed to use the proposed GLB rail 'public convenience and necessity' seem extremely farfetched.

I am wondering why this project has been allowed to get as far as it has, why was it not felled properly before fast tracking it and providing an exemption of the 6 month notification period? Mr. Navecky I am not sure if you are the person who can answer this question for me, if not please direct me to someone who can.

Sincerely,

Mirjam Melin
8608 East Rye Drive
Clinton, WI 53525