# **Environmental Impacts of the Great Lakes Basin Railroad Proposal**

The Forest Preserves of Winnebago County is requesting the Environmental Impact Statement for the proposed Great Lakes Basin Railroad address in detail the impact construction and operation of the railroad will have on water quality, ground water, wildlife, vegetation and soils in Winnebago County, Illinois.

# **Water Quality**

The proposed route is upstream of Kilbuck Creek and the south and north branch of the Kishwaukee River and their tributaries. The south branch of the Kishwaukee is a biological class A stream at the proposed crossing, while the Kilbuck and Kishwaukee Rivers are class B streams as they travel through the county to the confluence with the Rock River. The construction and operation of the railroad may cause an increase in soil erosion, flood waters, and siltation. Another threat is hazardous chemical spills.

Soil erosion is a problem in Forest Preserve property along the south branch of the Kishwaukee River. We have had to employ two major erosion control measures and several smaller erosion controls at Oak Ridge Forest Preserve. Vegetation alone has not stopped erosion. The proposed route travels thru similar soils. Erosion control measures during construction should be adequately covered in the EIS.

The Kishwaukee River is susceptible to quick fluctuations in water levels and floods frequently. Since 2010 the river has been at or past the 12ft. flood stage as monitored by USGS gauge at Perryville Road. The proposed rail line must not increase the existing rate and volume entering the river.

Increased siltation is the third concern related to surface water run-off. As previously mentioned Kilbuck Creek and Kishwaukee River are a class B streams in Winnebago County. Any increase in siltation will damage water quality and harm the aquatic life in those waterways. To view existing conditions regarding water quality, please refer to Illinois Natural History Survey (INHS) technical report titled "Freshwater mussels of the Rock River Tributaries": the Pecatonica, Kishwaukee and Green River basins in Illinois, issued March 19, 2013.

Hazardous chemical spills caused by a train derailment could result in serious long term or even permanent water quality damage. The Great Lakes Basin Railroad Plan should give an estimate of the types of cargo and the plan of action in case of an accident. A hazardous chemical spill would have impacts in other areas listed in this communication.

## **Ground Water**

According to the Kishwaukee River Corridor Green Infrastructure Plan (June 27, 2013), soils in the area are subject to NO<sup>3</sup> leaching at milepost 5 and milepost 9-12. A hazardous chemical spill is a potential source of ground water contamination. The EIS should recommend a plan to mitigate the environmental damage in the event of a hazardous chemical spill.

# <u>Wildlife</u>

Known birds of concern along the proposed route include; Bald Eagle, Cerulean Warbler, American Redstart, Redheaded Woodpecker and the state threatened Black-billed Cuckoo.

The Forest Preserve would like the EIS to answer the following questions:

- 1. How would the rail line affect wildlife movement patterns?
- 2. How would the noise and disruption of the rail traffic affect nesting birds?
- 3. What is the anticipated alteration in wildlife population due to habitat decrease?
- 4. How can the spread and introduction of invasive species be deterred? For example, Emerald Ash Borer.

## Vegetation

The impact the proposed rail line may have on vegetation in Winnebago County appears to be primarily near the waterways at the south branch of the Kishwaukee, Kilbuck Creek and along the Rock River. The route along the Rock River appears to have the greatest impact. Between mile post 12 and 13 and again at mile post 15 the route segments an upland forest. We would like an alternate route less disruptive to upland forest be proposed.

A second concern previously mentioned under wildlife, is the introduction of exotic and invasive species. A plan to reduce the chance of invasive species introduction should be documented in the proposed plan.

## Soil

Soil erosion has already been addressed. The proposed route crosses large areas of hydric soil. Hydric soil especially between milepost 8-10 will require landscape alterations to provide a stable rail bed. The quantity of earth moving necessary to build a stable subsurface may have implications to subsurface and surface drainage patterns. The plan should address drainage patterns impacts.

## **Noise**

The volume of rail traffic proposed will generate substantial noise. The noise generated by the rail traffic could reduce visits to nearby Forest Preserves, especially Severson Dells. Most certainly the noise level will impact the quality of visit to Kilbuck Bluffs, Severson Dells, Indian Hill and Oak Ridge Forest Preserves. Noise may also impact wildlife habitat. The EIS should reference any studies involving impact noise has on wildlife.

## Conclusion

The above are the environmental concerns the Forest Preserves of Winnebago County would like addressed in the EIS. We have one additional comment. The proposed route interferes with the Forest Preserve expansion plans. The route proposed could have an adverse impact on future acquisition plans. Expansion plans can be viewed in the Boone and Winnebago Greenway Plan. The three adverse impacts on future acquisitions are along the south branch of the Kishwaukee River, Kilbuck Creek and the Rock River.

# Resources

Freshwater mussels of the Rock River tributaries:
 Pecatonica, Kishwaukee, and Green River basins in Illinois
 Diane Shasteen, Sarah Bales, Alison Stodola
 INHS Technical Report 2013

WWX.inhs.illinois.edu/files/2913/7089/9842/Rock\_River\_basinreport.pdf

- 2. Kishwaukee River Corridor Green Infrastructure Plan Krep.bios.niu.edu/KREP\_PUBS/kish\_corridor\_Gl\_plan.pdf
- 3. Boone and Winnebago Greenways Plan and Map Ims.wingis.org/greenways/

A bird species and plant list of property near Severson Dells Forest Preserve is attached.