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September 16, 2014

Kathryn K. Floyd

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VIA EMAIL

Vicki Rutson
Director
Office of Environmental Analysis
Surface Transportation Board
325 E Street, SW
Washington, DC 20423

Re: Finance Docket No. 35952, Great Lakes Basin Railroad Project

Dear Vicki:

As you are aware, Great Lakes Basin, LLC is proposing to construct and operate a new rail line that would create a freight rail bypass around Chicago. This project is known as the Great Lakes Basin Railroad Project (GLBRP).

The basic purpose of the GLBRP is to provide a safe, reliable freight rail bypass around Chicago that has multiple interchanges with Class I railroads and avoids major population centers. The line—consisting of approximately 275 miles of new freight railroad—would travel from southern Wisconsin to eastern Indiana, looping around the Chicago rail hub. Great Lakes Basin intends to seek the Surface Transportation Board's authority to construct and operate the GLBRP.

On September 14, 2015, Great Lakes Basin representatives met with you and Dave Navecky at the Board's offices. We discussed information compiled during the GLBRP's development phase, as well as various environmental and planning considerations relevant to the project.

Great Lakes Basin hereby requests a waiver of the 49 C.F.R. §1105.10(a) requirement that an applicant consult with OEA at least 6 months prior to seeking the Board's authority to construct and operate a rail line, if the proposed construction would require preparation of an Environmental Impact Statement. We believe that the six-month pre-notification is not needed with respect to this project for several reasons. First, as you are aware, Great Lakes Basin is continuing to prepare substantial engineering and environmental data, and plans to submit further information to OEA in the future. Second, pursuant to the Board's procedures, Great Lakes Basin intends to utilize an independent third-party consultant, to be

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selected by OEA, to prepare the necessary agency environmental documentation for the project. Third, in light of the overall GLBRP schedule, a six-month delay would needlessly impede the progress of this important project.

Please let me know if you have any questions. We greatly appreciate your assistance and look forward to working with you on this project.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kathryn Kusske Floyd". The signature is fluid and cursive, with the first name "Kathryn" being more prominent.

Kathryn Kusske Floyd

cc: Phillis Johnson-Ball
Dave Navecky
Frank Patton