

To: Surface Transportation Board
RE: Great Lakes Basin Transportation FD -35952
Date: June 16, 2017

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As a reasonable man, I have great concern for the validity of the process regarding the GLB application. While it appears that the applicant and STB have followed procedures, there seems to me to be a large disconnect with how the STB chooses to allocate resources to projects of this nature, and specifically the legitimacy of the GLB proposal. There is simply no evidence that this is anything more than a speculative application, and plenty of evidence GLB has neither the capacity nor expertise to build or operate a railroad. The application is little more than a route plan, with little detail on customers, freight, railport usage, value added services, or costs for other rail companies to use GLB. The financial estimates are based entirely on capacity projections, which is a function of design and location, rather business planning based on customer usage. The application fails to address the complexity that no railroad company travels both east and west out of Chicago, and how a new line would add value to this dynamic situation. Lack of financial information and business usage is very concerning, as is the limited diversity in stock holdings. Without a balance sheet, we can't know this for sure, but with the principle shareholder owning 87% of the stock, it is unlikely that there is any substantial paid in capital from any other investor. This, along with the fact that GLB did not want to reveal financials due to not having revenue, is of substantial concern to the public. There is little evidence that GLB is a going concern that it can weather the storm of constructing and operating, what the applicant states in the application, "an audacious" project.

The STB has a role to protect the public by collecting information about projects that may be detrimental to the public. While continuing to vet proposals and collect multiple viewpoints is typically in the best interest of the public, in this case has become an undue burden. The amount of people and communities impacted by this proposal are significant. This burden is being magnified by GLB's inexperience, and by the STB continuation of the vetting process. When considered on its own merits, this application falls woefully short of any business, public, or governmental standard. The fact that an EIS was commenced, prior to the facts of an application, or application fees paid, has harmed taxpayers. People were forced to make comments on conjecture and media coverage of the proposal, not the facts of the proposal. Now that an application is filed, there is not additional documentation that supports viability.

There comes a point where the actions taken by the STB warrant a review and oversight. Using taxpayer resources to spend years vetting a proposal that since the beginning the EIS process in March 2016, has not produced a single document of evidence that any business interest will use the railroad, or fund construction, is fleecing the American public. The fact that anyone can contact the STB and put a project on the docket that leads to an EIS, scoping, application, and thousands of opposing comments, scores of legislative comments, and even legislation is a clear illustration that the process has fundamental flaws, and is wrought with inefficiency. Any further continuation of this application by the taxpayer funded STB should be considered excessive government waste. It is time to admit that the public and government have paid a

high enough price dealing with an idea that somehow became an application, but does not meet the standards of one.

I am not a landowner effected by this proposal, I am a taxpayer who believes this project is not in the best interest of the Midwest, has a tremendous amount of risk as it is being proposed alongside three other multi-billion dollar ideas by the same inexperienced developer, is opposed by every County Government it traverses, is in direct conflict with the STB supported Create project, should not be allowed to take land, or bisect State Parks or Cemeteries, should not be able to build the world's largest railyard without explanation of land use, and should not divide nearly every parcel of land it touches. I believe this project should not be allowed to cause any further harm to the thousands of people directly impacted by this.

I am a taxpayer, and I am a reasonable man.

As a reasonable man and a business person, I can state that this application does not meet the standard to continue using taxpayer dollars to evaluate. I think most reasonable men and women would agree that the mountain of evidence against this project far outweighs the intentions of the developer, which in spite of many requests show no evidence that this could ever be built or sustained.

As a reasonable man, I ask you to deny this application, and spare the taxpayers any further burden.

Sincerely,

Andrew Corbus
5 Bristol Grn
Bourbonnais, IL 60914
acorbus@gmail.com