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ENTERED
Office of Proceedings
March 29, 2024
Part of
Public Record

March 29, 2024

VIA-E-FILING

Ms. Cynthia T. Brown
 Section of Administration, Office of Proceedings
 Surface Transportation Board
 395 E Street, SW
 Washington, DC 20423-0001

RE: Great Lakes Terminal Railroad, LLC – Acquisition and Operation Exemption –
 Norfolk Southern Railway Company, CRRC, and the Owner Association, FD 36764

Pursuant to 49 C.F.R. 1150.41, et seq., Great Lakes Terminal Railroad, LLC (“GLTRR”) hereby provides verified notice of exemption from 49 U.S.C. § 10902 for GLTRR’s acquisition and operation of approximately 22,568 linear feet (4.27 miles) of existing railroad right-of-way, trackage, and transloading facilities in Chicago, Illinois, owned by Norfolk Southern Railway Company (“NSR”), CRRC Sifang America Incorporated (“CRRC”), and Chicago Enterprise Center Owners’ Association (“Owner Association”).

The requisite filing fee in the amount of \$2,200 pursuant to 49 C.F.R. § 1002.2(f)(11)(ii) has been paid on pay.gov. If there are any questions about this matter, please contact me directly, either by telephone: 202-663-7831 or by e-mail: czorbaugh@mullinslawgroup.com or Spencer M. Naake, who can be reached at (202) 663-7829 or by e-mail at snaake@mullinslawgroup.com.

Sincerely,

Crystal M. Zorbaugh
 Attorney for Great Lakes Terminal Railroad, LLC

Enclosure

cc: John Stocker
 Charles Marias

FILED
March 29, 2024
SURFACE
TRANSPORTATION BOARD

FEE RECEIVED
March 29, 2024
SURFACE
TRANSPORTATION BOARD

**BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, DC**

FD 36764

**GREAT LAKES TERMINAL RAILROAD, LLC
–ACQUISITION AND OPERATION EXEMPTION –
NORFOLK SOUTHERN RAILWAY COMPANY, CRRC, AND THE OWNER
ASSOCIATION**

NOTICE OF EXEMPTION

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Spencer M. Naake
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Tel: (202) 663-7831**

**Attorneys for Great Lakes Terminal
Railroad, LLC**

March 29, 2024

**BEFORE THE
SURFACE TRANSPORTATION BOARD
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FD 36764

**GREAT LAKES TERMINAL RAILROAD, LLC
–ACQUISITION AND OPERATION EXEMPTION –
NORFOLK SOUTHERN RAILWAY COMPANY, CRRC, AND THE OWNER
ASSOCIATION**

NOTICE OF EXEMPTION

Great Lakes Terminal Railroad, LLC (“GLTRR”),¹ a Class III carrier, seeks Surface Transportation Board (“STB” or “Board”) approval for an exemption pursuant to 49 C.F.R. 1150.41, et seq. and 49 U.S.C. § 10502 from the provisions of 49 U.S. § 10902, to authorize GLTRR’s acquisition and operation of approximately 22,568 linear feet (4.27 miles)² of existing railroad right-of-way, trackage, and transloading facilities in Chicago, Illinois (“Chicago Transloading Facility” or “Chicago Transload Facility Trackage”)³ from Norfolk Southern Railway

¹ The Transload Group, LLC is the parent company of both GLTRR and the Great Lakes Terminal, LLC. Great Lakes Terminal Railroad, LLC is the only railroad in The Transload Group, LLC (“TTG”) corporate family.

² GLTRR has been operating over the trackage since 2018. See Great Lakes Terminal Railroad, LLC – Lease and Operation Exemption – Rail Line of Great Lake Reloading, LLC, FD 36160 (STB served January 5, 2018) (“January 5, 2018 Decision”) (approving GLTRR’s verified notice of exemption to sublease from Great Lakes Reloading, LLC and to operate railroad right-of-way and trackage and transloading facilities located at 13535 S. Torrence Avenue, in Chicago, Ill.). At the time GLTRR originally sought regulatory authority pursuant to the Tenant Use progeny of cases in the trackage was approximately 12,500 linear feet (or 2.37 miles). Over the past six years, additional trackage was added and today the Chicago Transloading Facility is comprised of 22,568 linear feet (4.27 miles) of trackage.

³ The Chicago Transload Facility Trackage is used in conjunction with interchanging with the Indiana Harbor Belt Railroad (“IHB”), which owns and operates tracks GLTRR uses to connect to Norfolk Southern Railway Company (“NSR”) track. Inbound shipments of steel products primarily arrive by rail and outbound by truck. Additionally, agricultural/construction equipment is inbound by truck and outbound by rail. GLTRR has Interchange Agreements with both the IHB and NS.

Company (“NSR”), CRRC Sifang America Incorporated (“CRRC”), and Chicago Enterprise Center Owners’ Association (“Owner Association”).⁴

The Background section below sets forth various ownership and changes that have arisen concerning the Chicago Transload Facility Trackage since GLTRR became a carrier in 2018.

I. BACKGROUND

The “line of railroad” at issue (the Chicago Transload Facility Trackage) was previously owned by CenterPoint Chicago Enterprise, LLC (“CenterPoint”) and operated by GLTRR under a Board approved sublease between GLTRR and Great Lakes Reloading LLC (“GLR”) effective January 19, 2018.⁵ The Board’s January 5, 2018 Decision found that the Chicago Transload Facility Trackage was a line of railroad under 49 U.S.C. § 10901 based on tenant use progeny of cases⁶ and therefore subject to the Board’s jurisdiction. In the January 5, 2018 Decision, the Board approved operations for GLTRR to operate as sub-lessee to GLR. A few months after the January 5, 2018 Decision, on April 30, 2018, GLT, a non-carrier and a wholly owned subsidiary of TTG, acquired the Chicago Transload Facility from CenterPoint⁷ but mistakenly GLTRR, a wholly owned subsidiary of TTG, did not file a lease amendment exemption for its new lease on the belief that

⁴ GLTRR’s operations over CRRC and the Owner Association’s tracks are subject to two private agreements: (1) CRRC Property - GLTRR has recorded easement rights and (2) Owner Association - a recorded Declaration covers rail operations and gives GLTRR the right to utilize the Owner Association Rail Area. While technically these agreements could be considered private agreements outside the Board’s jurisdiction, GLTRR operates over both sets of tracks in interchanging with IHB.

⁵ See January 5, 2018 Decision (approving GLTRR’s verified notice of exemption to sublease from Great Lakes Reloading, LLC and to operate, approximately 12,500 (2.37 miles) of railroad right-of-way and trackage and transloading facilities).

⁶ Id. at 2.

⁷ When GLT acquired the property from CenterPoint on April 30, 2018, the CenterPoint Lease to Great Lakes Reloading LLC was terminated, the Sublease and Operating Agreement between Great Lakes Reloading LLC and GLTRR was likewise terminated, and GLT leased the Chicago Transload Facility Trackage to GLTRR pursuant to a new lease. This arrangement remains in place today. Only recently did GLTRR come to the realization that it should have likely filed a lease amendment when GLT acquired the Chicago Transload Facility Trackage and entered into the new lease with GLTRR (“April 2018 Transaction”).

because it had just received STB authority to operate under a sub-lease, no lease amendment was necessary. As a result of the April 2018 Transaction, there was one material change in operations that should have been submitted to the Board: after GLT acquired ownership of the Chicago Transload Facility Trackage **it entered into a new lease with GLTRR** to replace the Board approved sub-lease between GLR and GLTRR. Since the April 2018 Transaction, GLT has been the fee simple title holder and GLTRR has been the operator of the Chicago Transload Facility Trackage.

To be clear, neither GLT nor GLTRR intended to circumnavigate the Board's jurisdiction but rather both were simply mistaken in thinking a lease amendment was not necessary. In the event that the Board believes it is necessary to clean up GLTRR's April 30, 2018, oversight now, GLTRR respectfully requests that the Board grant an individual exemption for such authority on its own motion. As explained in Section II (*infra*), GLTRR has been the operator of the Chicago Transload Facility Trackage since 2018 and remains the operator today; thus, after-the-fact amended lease authority would not have an adverse impact on any affected shippers.

Recently GLT reached an agreement with NSR (pursuant to a purchase and sale agreement) to sell NSR the entirety of its 14,215 linear feet of 10906 industry track (2.69 miles). GLTRR will remain the operator of the track and is seeking acquisition and operation authority for its continued operations over the NSR track under a new lease, as well as its continued operations over the trackage owned by CRRC (850 linear feet/ 0.16 miles), and the Owner Association (7,503 linear feet/ 1.42 miles). Based on the Tenant Use Test, GLTRR's operations, which are limited solely to operating over the Chicago Transload Facility Trackage, constitute a line of railroad subject to the Board's jurisdiction.⁸

⁸ NSR's acquisition of the GLT-owned industry tracks, which partially comprise the Chicago Transload Facility Trackage, does not require Board approval because per 49 U.S.C § 10906 "[t]he STB does not have

In support of its acquisition and operation notice of exemption (“Notice”) GLTRR represents as follows:

II. SUPPORT FOR BOARD GRANTING GLTRR AN INDIVIDUAL EXEMPTION FOR GLTRR’S APRIL 2018 LEASE AND OPERATION EXEMPTION OVERSIGHT ON ITS OWN MOTION (IF NECESSARY).

Under 49 U.S.C. 10502(a), the Board is required to exempt a transaction from regulatory requirements under Subtitle IV of Title 49 of the United States Code (49 U.S.C. 10101-16102) if it finds that the application of those requirements (1) is not necessary to carry out the transportation policy of 49 U.S.C. 10101, and (2) either (a) the transaction or service is of limited scope or (b) the application of the requirement is not needed to protect shippers from the abuse of market power.

Here, detailed scrutiny of the April 2018 Transaction is not warranted because it is consistent with the rail transportation policy (“RTP”) of 49 U.S.C. § 10101. Specifically, an exemption from the 49 U.S.C. § 10901 regulatory requirements would promote the RTP by minimizing the need for federal regulatory control over the transaction (49 U.S.C. § 10101(2)); ensuring the development and continuation of a sound rail transportation system able to compete with other modes of transportation and meet the needs of the public and national defense (49 U.S.C. § 10101(4)); reducing regulatory barriers to entry into the rail industry (49 U.S.C. § 10101(7)); encouraging efficient management of railroads (49 U.S.C. § 10101(9)); and providing for the expeditious handling and resolution of proceedings (49 U.S.C. § 10101(15)). Other aspects of the RTP will also not be adversely affected. The Board has previously cited the same provisions of 49

authority . . . over the construction, acquisition, operation, abandonment, or discontinuance of spur, industrial, team, switching, or side tracks.” Such track is often referred to as excepted track or ancillary track. Although these tracks are not subject to the STB’s licensing authority, until abandoned by the carrier, they are subject to the STB’s exclusive jurisdiction for preemption purposes. See Tri-City R.R. – Petition for Declaratory Order, FD 36037, slip op. at 4 (S.T.B. served June 1, 2017) (explaining the “construction, acquisition, operation, abandonment, or discontinuance of spur, industrial, team, switching or side tracks” is statutorily excepted from the entry and exit licensing requirements of 49 U.S.C. §§ 10901-10905, as well as the sales and acquisition licensing requirements of 49 U.S.C. §§ 11321-11326).

U.S.C. § 10101 in support of granting retroactive exemptions that are very limited in scope.⁹

Likewise, this transaction is of a very limited scope. GLTRR's exemption in the April 2018 Transaction was for the acquisition of only 12,500 linear feet (or 2.37 miles) of trackage. GLT intended for the existing carrier GLTRR to continue to provide transloading services to shippers seeking to ship steel rebar and steel piping as well as agriculture and construction equipment by rail after arrival at the Chicago Transload Facility by truck, and that has happened as envisioned. As a result of this transaction, there was no loss of rail competition and no change in the level of rail service to the shippers utilizing the Chicago Transload Facility.

While GLTRR failed to timely file a notice of exemption pursuant to 49 C.F.R. § 1150.41, et. seq. for the lease amendment, there was no bad faith on the part of GLTRR, and this unintentional delay did not prejudice any shipper or other party. The Board has previously granted exemptions under similar circumstances when parties are not prejudiced and the failure to seek approval was unintentional or inadvertent, or the result of a mistaken belief that approval of the transaction was not required.¹⁰ GLTRR respectfully requests that the Board grant the same relief here if such relief is determined necessary, in connection with the April 2018 Transaction.

III. REQUIRED INFORMATION (10902 TRANSACTIONS - 49 C.F.R. 1150.41)

In this Notice, GLTRR is filing under the Board's exemption procedures, 49 C.F.R. 1150.41, et seq., for its acquisition and operation exemption of the Chicago Transload Facility

⁹ See Independence Rail Works, Ltd. – Acquisition and Operation Exemption – Byesville Scenic Trails, LLC, FD 36432, slip op. at 5 (STB served April 13, 2021); see also Colorado Pacific Rio Grande Railroad, LLC – Petition for Exemption – Acquisition and Operation of Line of Railroad in Costilla County, Colorado, FD 36694, slip op. at 3 (STB served September 18, 2023).

¹⁰ See Colorado Pacific Rio Grande Railroad, LLC, FD 36694 (Board granted authority for an after-the-fact acquisition of 1.53 miles of track (the “Blanca Spur”) by CP Rio Grande as its petition and supporting documents trace the ownership history of the Blanca Spur and do not reveal any extant dispute over CP Rio Grande's ownership of the Blanca Spur.); see also City of Oakland Cal. – Acquisition Exemption – Former Oakland Army Base, Alameda County, Cal., FD 36303 (STB served October 28, 2019) (Board granted authority for an after-the-fact acquisition of 15,000 feet track as the City of Oakland, Cal. was not aware, at the time of the acquisition, that the trackage was subject to the Board's jurisdiction).

Trackage from Norfolk Southern Railway Company (“NSR”) pursuant to a new lease, CRRC, and the Owner Association upon NSR acquiring ownership of the trackage. In accordance with the requirements of 49 C.F.R. 1150.43, GLTRR submits the following information that the regulations require in a notice of exemption acquisition:

(a) Full Name and Address of the Class III Applicant

The full name and address of the applicant is:

Great Lakes Terminal Railroad, LLC
13535 South Torrence Avenue
Chicago, Illinois 60633

(b) Name, Address, and Telephone Number of Representatives to Receive Correspondence:

GLTRR’s representatives are:
Spencer M. Naake
Crystal M. Zorbaugh
MULLINS LAW GROUP PLLC
2401 Pennsylvania Ave., NW
Suite 300
Washington, DC 20037
Tel: (202) 663-7831

(c) Statement Regarding Agreement

GLT has reached an agreement in principle with NSR to sell NSR the entirety of its 14,215 linear feet of 10906 industry track (2.69 miles), which comprises part of the Chicago Transloading Facility Trackage. GLTRR will continue to operate the tracks after NSR’s acquisition.

(d) The Operator of the Property

GLTRR, a Class III rail carrier, has been the operator of the Chicago Transloading Facility Trackage since 2017 and will remain the operator.

(e) Brief Summary of the Transaction

a. Name and Address of the Railroad Transferring the Subject Property:¹¹

For the NSR portion of the Chicago Transloading Facility Trackage the entity transferring the subject property is:

Norfolk Southern Railway Company
650 West Peachtree St NW
Atlanta, GA 30308

b. Proposed Schedule for Consummation

The lease amendment between GLTRR and NSR is anticipated to be effective 30 days after the filing of this Notice of Exemption or upon exemption by the Board.

c. Mileposts of the Property

The Chicago Transloading Facility Trackage does not have mileposts.

d. Total Route Miles

At the time of the April 2018 Transaction, there were 12,500 feet (2.37 miles) of trackage, as noted in the Board's January 19, 2018, Decision. Since that time, additional trackage was added, today GLTRR is leasing 14,215 linear feet (2.69 miles) of trackage from NSR and will continue to operate over as well as its continued operations over the trackage owned by CRRC (850 linear feet/ 0.16 miles), and the Owner Association (7,503 linear feet/ 1.42 miles). Thus, the total route mileage from all three entities is 22,568 linear feet (4.27 miles)

(f) Map

Maps depicting the Chicago Transloading Facility Trackage are attached as Exhibit 1.

¹¹ Since 2017, GLTRR has held recorded easement rights over the CRRC Property to use the property for rail purposes. Since 2018, GLTRR has an recorded declaration to utilize the Owner Association rail area for rail purposes.

(g) Certificate of Projected Revenues & Advance Notice Requirements (49 C.F.R. 1150.42)

The required certificate is attached, along with the verification for this notice of exemption. See Verification and Certification, attached as Exhibit 2. The projected annual rail revenue of GLTRR will not exceed \$5 million. Accordingly, the advance notice requirements of 49 C.F.R.1150.42(e) do not apply to the transaction.

(h) Interchange Commitments

The transaction that is the subject of this verified notice of exemption does not involve any provision or agreement that may limit future interchange with a third-party connecting carrier, nor is the Chicago Transloading Facility Trackage currently subject to any agreement that imposes such an interchange commitment. The transaction will not result in any adverse change in competition or service levels or any significant operational changes.

Labor Protection

Because the proposed transaction involves a Class III carrier lease, employee protective conditions may not be imposed as a condition of this exemption. See 49 U.S.C. § 11326(c).

Environmental and Historical Reports

Under 49 C.F.R. § 1105.6(c)(1), the proposed transaction is exempt from environmental reporting requirements because it will not result in a “significant change in carrier operations” and does not exceed the thresholds in 49 C.F.R. § 1105.7(e)(4) or (5).

Specifically, the transaction that is the subject of this Notice of Exemption will not cause a diversion of (1) more than 1,000 rail carloads a year to motor carriage; or (2) an average of 50 carloads per mile per year for any part of these lines to motor carriage. Nor will the transaction result in (1) an increase in rail traffic of at least 100 percent or an increase of at least eight trains a day on any segment of the subject rail line; (2) an increase of rail yard activities of at least 100 percent; or (3) an average increase in truck traffic of more than 10 percent of the average daily

traffic or 50 vehicles a day. This transaction will not exceed the thresholds of 49 C.F.R. § 1105.7(e)(5)(ii). The transaction will not result in the transportation of any ozone-depleting materials. Therefore, pursuant to the Board's regulations at 49 C.F.R. § 1105.6(c), no environmental documentation is required.

Similarly, under 49 C.F.R. 1105.8(b)(1), the acquisition and operation of the Chicago Transloading Facility Trackage is exempt from historic preservation reporting requirements. The proposed acquisition will continue the status quo concerning freight rail operations and NSR does not intend to dispose of or alter properties subject to the STB's jurisdiction that are 50 years or older. Accordingly, no environmental or historical documentation is required.

Caption Summary (49 C.F.R. § 1150.44)

A caption summary in appropriate form is attached as Exhibit C to this notice.

Conclusion

Pursuant to 49 C.F.R. 1150.41, et seq. and 49 U.S.C 10502(a), GLTRR respectfully requests that the Board exempt its continued acquisition and operation of the Chicago Transloading Facility Trackage from regulation under 49 U.S.C. 10902.

Respectfully submitted,

Crystal M. Zorbaugh

**Crystal M. Zorbaugh
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Railroad, LLC**

March 29, 2024

**BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, DC**

FD 36764

**GREAT LAKES TERMINAL RAILROAD, LLC
–ACQUISITION AND OPERATION EXEMPTION –
NORFOLK SOUTHERN RAILWAY COMPANY, CRRC, AND THE OWNER
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NOTICE OF EXEMPTION

EXHIBIT 1

MAPS



**BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, DC**

FD 36764

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–ACQUISITION AND OPERATION EXEMPTION –
NORFOLK SOUTHERN RAILWAY COMPANY, CRRC, AND THE OWNER
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EXHIBIT 2

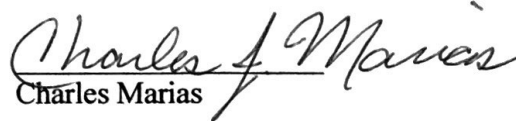
CERTIFICATION & VERIFICATION

CERTIFICATION AND VERIFICATION

I, Charles Marias, hereby certify that and verify under penalty of perjury the following:

1. I am the President of The Transload Group, the parent company of Great Lakes Terminal Railroad, LLC ("GLTRR"), and am therefore qualified to make the subject "Certification and Verification" on behalf of GLTRR.
2. GLTRR's actual and projected annual operating revenues are less than \$5 million, and its projected annual operating revenues are not expected to exceed those that would qualify it as a Class III carrier.
3. I have read the foregoing document and verify that the facts stated therein are true and correct.

Executed on March 28 2024.


Charles Marias

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WASHINGTON, DC**

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–ACQUISITION AND OPERATION EXEMPTION –
NORFOLK SOUTHERN RAILWAY COMPANY, CRRC, AND THE OWNER
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NOTICE OF EXEMPTION

EXHIBIT 3

CAPTION SUMMARY

SURFACE TRANSPORTATION BOARD

[FD 36764]

Great Lakes Terminal Railroad, LLC –Acquisition and Operation Exemption – Norfolk Southern Railway Company, CRRC, and The Owner Association

Great Lakes Terminal Railroad, LLC (“GLTRR”),¹ a Class III carrier, has filed a verified notice of exemption under 49 C.F.R. § 1150 to acquire and operate approximately 22,568 linear feet (4.27 miles)² of existing railroad right-of-way, trackage, and transloading facilities in Chicago, Illinois (“Chicago Transloading Facility” or “Chicago Transload Facility Trackage”) from Norfolk Southern Railway Company (“NSR”), CRRC Sifang America Incorporated (“CRRC”), and Chicago Enterprise Center Owners’ Association (“Owner Association”).³ GLTRR states that the Chicago Transload Facility does not have milepost numbers.

According to GLTRR, the Chicago Transload Facility was previously owned by CenterPoint Chicago Enterprise, LLC (“CenterPoint”) and operated by GLTRR under a Board approved sublease between GLTRR and Great Lakes Reloading LLC (“GLR”) effective January 19, 2018. GLTRR states that a few months after the Board’s approval of the sublease, on April 30, 2018,

¹ The Transload Group, LLC is the parent company of both GLTRR and the Great Lakes Terminal, LLC. Great Lakes Terminal Railroad, LLC is the only railroad in The Transload Group, LLC (“TTG”) corporate family.

² GLTRR has been operating over the trackage since 2018. See Great Lakes Terminal Railroad, LLC – Lease and Operation Exemption – Rail Line of Great Lake Reloading, LLC, FD 36160 (STB served January 5, 2018) (“January 5, 2018 Decision”) (approving GLTRR’s verified notice of exemption to sublease from Great Lakes Reloading, LLC and to operate railroad right-of-way and trackage and transloading facilities located at 13535 S. Torrence Avenue, in Chicago, Ill.). At the time GLTRR originally sought regulatory authority pursuant to the Tenant Use progeny of cases in the trackage was approximately 12,500 linear feet (or 2.37 miles). Over the past six years, additional trackage was added and today the Chicago Transloading Facility is comprised of 22,568 linear feet (4.27 miles) of trackage.

³ GLTRR’s operations over CRRC and the Owner Association’s tracks are subject to two private agreements: (1) CRRC Property - GLTRR has recorded easement rights and (2) Owner Association - a recorded Declaration covers rail operations and gives GLTRR the right to utilize the Owner Association Rail Area. While technically these agreements could be considered private agreements outside the Board’s jurisdiction, GLTRR operates over both sets of tracks in interchanging with IHB.

GLT, a non-carrier and a wholly owned subsidiary of TTG acquired the Chicago Transload Facility from CenterPoint but mistakenly GLTRR, a wholly owned subsidiary of TTG, did not file a lease amendment exemption for its new lease on the belief that because it had just received STB authority to operate under a sub-lease, no lease amendment was necessary. According to GLTRR, as a result of the April 2018 Transaction, there was only one material change in operations that should have been submitted to the Board: after GLT acquired ownership of the Chicago Transload Facility Trackage it entered into a new lease with GLTRR to replace the Board approved sub-lease between GLR and GLTRR. Since the April 2018 Transaction, GLT has been the fee simple title holder and GLTRR has been the operator of the Chicago Transload Facility Trackage. In its Notice of Exemption, GLTRR also seeks to clean up its prior regulatory omission.

GLTRR certifies that its revenues from freight operations will not result in the creation of a Class I or Class II carrier. GLTRR also states that no interchange agreements are involved in the subject transaction.

The exemption will become effective on April ____, 2024. If the verified notice contains false or misleading information, the exemption is void ab initio. Petitions to revoke the exemption under 49 U.S.C. 10502(d) may be filed at any time. The filing of a petition to revoke will not automatically stay the transaction. Petitions to stay must be filed no later than April ____, 2024 (at least seven days before the exemption becomes effective.

All pleadings, referring to FD 36764, must be filed with the Surface Transportation Board either via e-filing or in writing addressed to 395 E Street, S.W., Washington DC 20423-0001. In addition, a copy of each pleading must be served on GLTRR's representative, Crystal M. Zorbaugh, Mullins Law Group PLLC, 2401 Pennsylvania Ave., N.W., Suite 300, Washington, DC 20037.

According to GLTRR, this action is categorically excluded from environmental review under 49 C.F.R. § 1105.6(c) and from historic reporting requirements under 49 C.F.R. § 1105.8(b).

Decided: April _____, 2024.