

211804



Wisconsin Department of Transportation

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Governor

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Secretary

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August 13, 2004

Office of the Secretary
Case Control Unit
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423



**RE: STB Finance Docket AB-303 (Sub-No. 27) Wisconsin Central LTD. ---
Abandonment -- In Ozaukee, Sheboygan and Manitowoc Counties, WI**

Dear Gentlepersons:

Enclosed are the Comments and the Petitions in the Alternative relating to the above mater.

Please date stamp and return a duplicate copy of this letter in the prepaid, return mail envelope for verification of receipt. Thank you.

Sincerely,

Allyn Lepeska
Attorney

Enclosures

pc: Secretary Frank Busalacchi
Ron Adams
Jim Thiel
POR

ENTERED
Office of Proceedings
AUG 16 2004
Part of
Public Record

211804

WISDOT-2

BEFORE THE
SURFACE TRANSPORTATION BOARD

DOCKET NO. AB-303 (SUB-NO. 27)

WISCONSIN CENTRAL LTD.
--ABANDONMENT--
IN OZAUKEE, SHEBOYGAN AND MANITOWOC COUNTIES, WI



COMMENTS OF
WISCONSIN DEPARTMENT OF TRANSPORTATION
AND IN THE ALTERNATIVE
PETITION FOR PUBLIC USE CONDITION
AND
PETITION FOR CERTIFICATE OF INTERIM TRAIL USE

ALLYN LEPESKA
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Wisconsin Department of Transportation
4802 Sheboygan Avenue, Room 115-B
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Madison, WI 53707-7910
(608) 266-8810

Attorney for Wisconsin Department of
Transportation

Dated: August 13, 2004

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WISDOT-2

BEFORE THE
SURFACE TRANSPORTATION BOARD

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WISCONSIN CENTRAL LTD.
--ABANDONMENT--
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COMMENTS OF
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PETITION FOR PUBLIC USE CONDITION
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PETITION FOR CERTIFICATE OF INTERIM TRAIL USE

INTRODUCTION

On June 30 2004, Wisconsin Central Ltd. ("WCL") filed an application seeking authority under 49 U.S.C. 10903 to abandon an approximately 37 mile line of railroad known as the "Plymouth line." The proposed abandonment extends from Milepost 114.8 near Saukville, to Milepost 151.8 near Kiel, in Ozaukee, Sheboygan and Manitowoc Counties, Wisconsin.

The Wisconsin Department of Transportation ("WisDOT") is the designated state agency in rail matters in Wisconsin. 49 U.S.C. § 22102, 49 C.F.R. § 266.1 and Ch. 85, Wis. Stats.

WCL did not go beyond the letter of the law in seeking this abandonment. WisDOT acknowledges that present public convenience and necessity may permit abandonment of a portion of the line that has not been used for years. However, as the Board has recognized by granting a public meeting, there has been a great deal of interest in this matter.

LEGAL AUTHORITY

49 U.S.C. § 10903(d) provides:

(d) A rail carrier providing transportation subject to the jurisdiction of the Board under this part [49 USCS §§ 10101 et seq.] may –

- (1) abandon any part of its railroad lines; or
- (2) discontinue the operation of all rail transportation over any part of its railroad lines;

only if the Board finds that the present or future public convenience and necessity require or permit the abandonment or discontinuance. In making the finding, the Board shall consider whether the abandonment or discontinuance will have serious, adverse impact on rural and community development.

EXISTING SITUATION

WCL seeks abandonment of 37 miles of lightly traveled rail line between Milepost 114.9 to Milepost 151.8. There has been no programmatic tie replacement on the Plymouth line for over 20 years. The active line has been from Milepost 114.9 to Milepost 135.0 with 195 of the 206 carloads in the base year received or shipped from Milepost 130.2 and Milepost 114.9 primarily in the spring and fall. The cost of rehabilitation provided by WCL includes the line that is out of service from Milepost 135.0 to Milepost 151.8. The abandonment will have real economic impact upon the active shippers. WCL has not operated the line efficiently. WCL is requesting that the Board create an orphan line, i.e., a line that is not accessible from another active line. There are active shippers just beyond the north and south mileposts. WCL has not indicated that it has made any efforts to work with other carriers in the area to fulfill its common carrier obligations.

POSITION OF WISDOT

I. WisDOT Requests that the Board Impose the Appropriate Conditions to Prevent Serious Adverse Impact on Rural and Community Development.

WisDOT recently issued a report on Wisconsin Rail Issues and Opportunities with input from the State Rail Advisory Committee. The report finds that:

Rail will continue to be an important mode of transportation in Wisconsin's economy for the following reasons:

- Production output levels of key Wisconsin industry that use rail are expected to grow over the next two decades.
- Rail service provides a low cost transportation alternative for the high volume, lower value commodities that are essential to many of Wisconsin's traditional manufacturing industries.
- ...
- Rail freight movement between Wisconsin, Canada and Mexico is expected to continue to grow. Containerized shipments to and from overseas are anticipated to increase significantly.

WCL has attempted to show that the Plymouth Line is a burden on interstate commerce. However, because of the strong community and political concerns about the effect that this abandonment would have on the rural and community development, WisDOT requests that the Board impose the appropriate conditions to allow current customers to be served. This Board did allow members of the community to state their positions at a public meeting in Random Lake, Wisconsin on August 13, 2004. No one testified in support of CN. Generally shippers and community leaders were very critical of the current level of service provided by CN and the lack of commitment by CN. The community strongly believes that better rail service is needed on the Plymouth Line.

WCL application fails to bifurcate the cost of providing service on the active portion of this line. The Board listed a failure to bifurcate the data between segments where there was traffic and where there was no segment as one of the reasons denying a petition for exemption to abandon. See Soo Line Railroad Company – Abandonment Exemption – In Marshall and Robert Counties, SD, STB Docket No. AB-57 (Sub-No. 48X), issued to the public on November 17, 1999 (corrected decision issued November 19, 1999) Footnote 18. Bifurcation would indicate that there may not be any operating loss on the portion of the line with active shippers.

WCL is creating an orphan line and segment that will be more difficult for another operator to service as WCL controls the exit and the entrance and historically has been very reluctant to allow trackage rights that allow for competition on its lines. Although an agreement for trackage rights is a contractual matter between private parties in situations where a number of current customers will not be served without trackage rights, the Board has the authority to strongly encourage WCL to negotiate with a willing carrier for trackage rights or other arrangements. Canadian Pacific Limited, et al. – Purchase and Trackage Rights - Delaware and Hudson Railway Company, 7 I.C.C.2d 95, 117 (1990).

In the past, WCL has not abandoned lines with active shippers without providing alternative service. WCL indicates that it is willing to pursue “all mutually beneficial options for meeting the post-abandonment transportation needs” (Kolbe V.S. 7), but this means that WCL is abandoning active shippers without providing alternative service. The present shippers have a strong economic presence in the local community. (Russell V.S.). Local politicians, including the majority leader of the Wisconsin Senate have requested an economic impact study. Exhibit 3. That study is underway. WisDOT respectfully requests that the Board keep the record open for this study. The shippers have stated that the next most likely alternative will cost them an additional \$210,000 per year based upon current shipments. (Russel V.S. 2) This abandonment will have substantial impact on these rural

communities.

This is not the typical exempt abandonment. CN has a reasonable customer base to north and south of the endpoints of this abandonment. A number of people have called this “cherry picking” which does create problems for local economic development. This is an area of the state that is between two areas that have significant economic development. This area has great potential.

Neither abandonment of continuing the status quo is not good for the communities. CN has not indicated that its corporate culture is concerned about community development. WisDOT encourages the Board to impose conditions on this abandonment that requires CN to work with local units of government, shippers, other carriers and other interested parties to find an option that will better accommodate continued and improved rail service.

II. In the Alternative, WisDOT Requests the Board Grant a Public Use Condition, Pursuant to 49 U.S.C. § 10905 in Response to WCL’s Abandonment Application for the Plymouth Line.

If the Board finds that the present or future public convenience and necessity require or permit abandonment or discontinuance on all or a portion of the Plymouth Line, WisDOT requests that Board grant a Public Use condition on the portion subject to abandonment or discontinuance. 49 C.F.R. 1152.28.

A. WisDOT seeks an order prohibiting WCL from disposing of the corridor or rails from Milepost 114.9 to Milepost 151.8 or the portion not subject to discontinuance or abandonment whichever is greater.

B. There has been strong interest expressed in acquiring the line intact for future rail purposes. This area is located between two areas of rapid growth and will be requiring additional transportation facilities rather than less transportation options. WisDOT has

programs to provide loans and grants for assistance or restoration of freight rail service.

Section 85.08, Wis. Stats.

C. The time sought in the full 180 days from the effective date of the abandonment authorization. The time is needed for the interested parties to become organized, to conduct negotiations with WCL and to reach an agreement with a short-line operator.

D. The order should include a prohibition against disposal of rail assets for 180 days from the effective date of the decision authorizing the abandonment or discontinuance, unless the properties have first been offered on reasonable terms, for sale for public purposes.

III. In the Alternative, WisDOT Respectfully Requests that the Board Grant a Certificate of Interim Trail Use to WisDNR if the Board Decides to Authorize Abandonment of the Plymouth Line.

A. On June 30, 2004, WCL filed with the Board an application for permission to abandon its line of railroad known as the Plymouth Line, extending from Milepost 114.8 near Saukville to Milepost 151.8 near Kiel, a distance of approximately 37 miles in Ozaukee, Sheboygan and Manitowoc Counties, WI. On October 30, 2003, the Wisconsin Department of Natural Resources (WisDNR) signed a Statement of Willingness to Accept Financial Responsibility pursuant to 49 C.F.R. § 1152.29. This statement is for the segment of WCL railroad from Saukville Milepost 114.8 to Kiel Milepost 151.8, a distance of 37 miles.

B. Wisconsin Department of Transportation petitions to obtain a certificate of interim trail use for interim highway, bicycle, pedestrian and other trail purposes and rail banking pursuant to 16 U.S.C. § 1247(d) and 49 C.F.R. § 1152.29 for WisDNR for specified segments of the right of way involved in this proceeding. WisDNR will use or preserve the land corridor and related real property for interim public transportational and recreational purposes (including highway, pedestrian and other trail), subject to restoration for railroad purposes. WisDOT and WisDNR

have agreed to work cooperatively to acquire and WisDNR is the lead state agency for designating, acquiring, developing for public use and maintaining a system of state trails as part of the state park system for use by equestrians, bicyclists, cross county skiers or hikers. Secs. 23.09(2)(d)12, 23.175(2)(a) and 23.30(1), Wis. Stats. It is required to encourage other state agencies to participate in the planning, establishing, developing and maintaining of state trails. Sec. 23.175(2)(b), Wis. Stats. WisDNR is authorized to spend funds with the approval of the Governor for the acquisition of lands. Secs. 20.914 and 23.14, Wis. Stats.

C. WisDOT is the designated state agency in rail matters in the State of Wisconsin. 49 U.S.C. Appx. § 1654(a) (formerly § 1654(j)), 49 C.F.R. § 266.1 and Ch. 85, Wis. Stats. WisDOT is responsible for all state and federally-aided highway construction and all state and federally-aided airport construction in Wisconsin. Secs. 84.01(2) and 114.32(1) and (5), Wis. Stats. WisDOT has the statutory first right to acquire for present or future transportation, recreational or scenic purposes any property used in operating a railroad that is abandoned in Wisconsin. Sec. 85.09(2), Wis. Stats.

WisDOT has state statutory authority to incorporate trails into the highway right-of-way in sec. 84.06(11), Wis. Stats.:

(11) State Trails. As a part of any highway improvement or as a separate project under this section, a portion of a hiking trail, cross-country ski trail, bridle trail or bicycle trail under the management of a state agency, municipality or nonprofit may be incorporated into the highway right-of-way, and facilities for safe crossing of the highway may be provided.

WisDNR and WisDOT need the interim trail use designation to fulfill federal and state transportation and environmental responsibilities.

D. WisDOT respectfully requests that the Board provide WisDOT a certificate of interim bicycle, pedestrian and other trail use and rail banking condition to accomplish the above public

purposes. WisDOT is interested in having WisDNR acquire and use the right of way of the rail line being abandoned for interim bicycle, pedestrian or other trail use and rail banking.

Exhibit 1 consists of a map showing the location of all the needed property in Ozaukee, Sheboygan and Manitowoc Counties, Wisconsin.

Exhibit 2 is the required Statement of Willingness by the WisDNR to assume full responsibility for management of the property.

WisDNR's acquisition of the corridor for present and future transportation purposes as stated above is consistent with all Congressional purposes and neither abandonment nor discontinuance permitted by the STB conditioned as requested by WisDNR would be inconsistent with or disruptive of potential future rail use.

CONCLUSION

For the above reasons, WisDOT requests that the Board fully review WCL's request to authorize abandonment on the Plymouth Line, grant the appropriate conditions, including in the alternative a Public Use Condition and in the alternative a Certificate of Interim Trail Use.

Respectfully submitted,



ALLYN LEMESKA
Office of General Counsel
Wisconsin Department of Transportation
4802 Sheboygan Avenue, Room 115-B
P. O. Box 7910
Madison, WI 53707-7910
(608)266-8810
Attorney for Wisconsin Department of
Transportation

pc: Secretary Frank Busalacchi

Indirect Effects (as a result of sales and activity at supplier businesses)

109 year-round jobs

\$3,552,870 in aggregate personal income

Induced Effects (as a result of employees spending their wages)

63 year-round jobs

\$1,895,379 in aggregate personal income

TOTALS

254 year-round jobs

\$9,737,450 in aggregate personal income

The businesses using the rail line enjoy a significant cost benefit over the next most likely alternative. Based upon tonnages shipped from 2002 to mid-2004, an estimated total of \$210,690 is saved annually by using this rail line. Over a ten year period, the present value of these annual savings is estimated to be \$1,750,090, using a 5% annual discount rate.

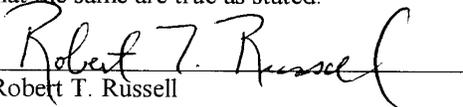
Several shippers stated that they would be able and willing to send and receive even more goods if the line itself were improved to allow larger rail cars and higher speeds.

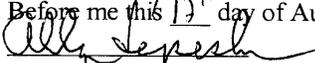
I am in the process of determining the economic impact of the loss of Plymouth line to the communities in the area.

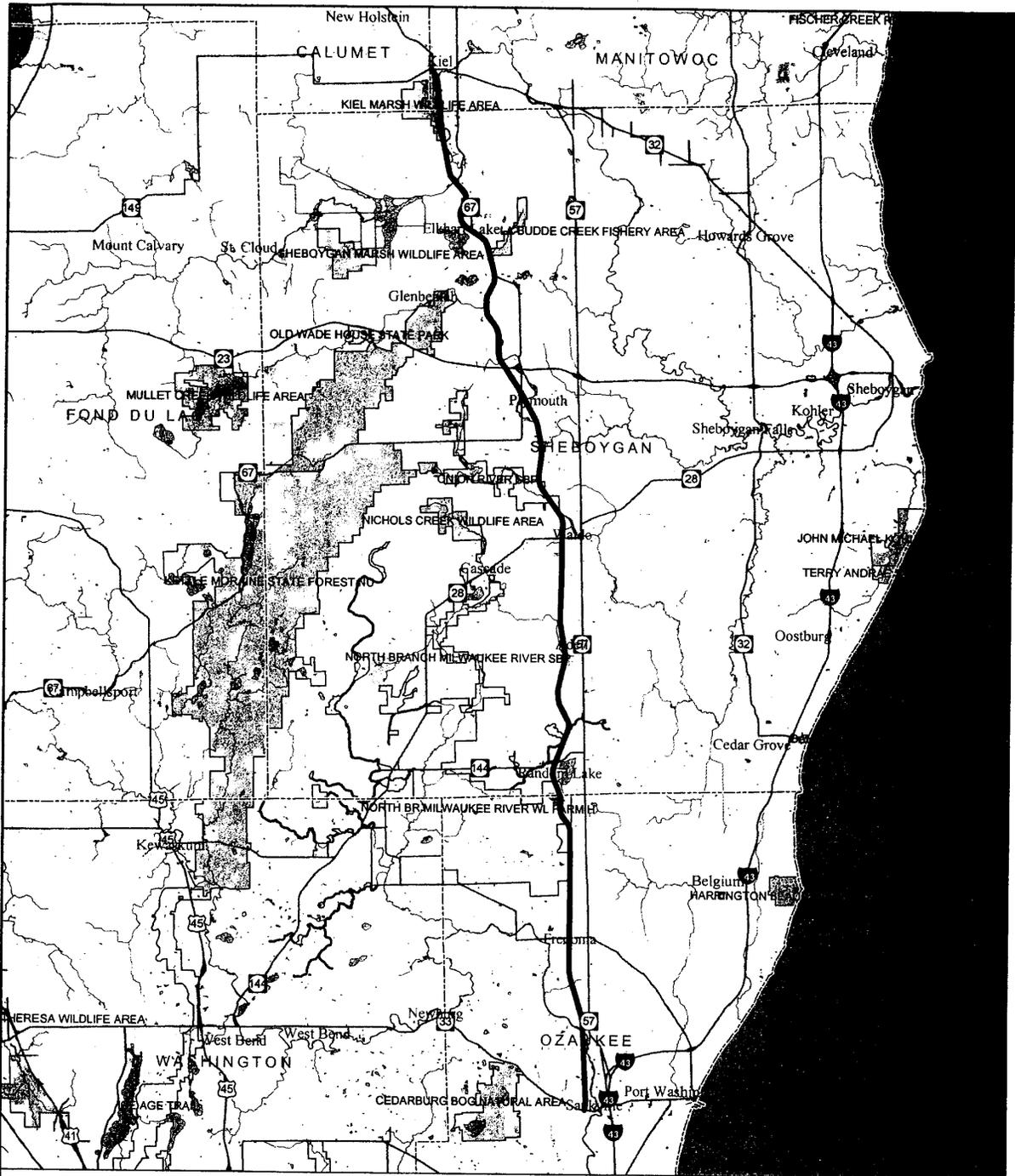
State of Wisconsin)

)
County of Dane)

Robert T. Russell, being duly sworn, deposes and says that he is an economist with the Wisconsin Department of Transportation, that he has read the foregoing statement and knows the facts asserted therein, and that the same are true as stated.


Robert T. Russell

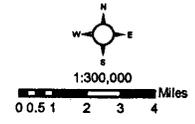
SUBSCRIBED AND SWORN TO
Before me this 17th day of August, 2004

Notary Public
My commission is permanent.



**Saukville to Kiel
Canadian National/
Wisconsin Central LTD.
Track Abandonment**

Legend

-  Saukville To Kiel Track DNR Managed Land
-  City/Village
-  Fee
-  Easement
-  DNR Project Boundary



Created by WIDNR
Bureau of Facilities and Lands
October 27, 2003

EXHIBIT

BEFORE THE
SURFACE TRANSPORTATION BOARD

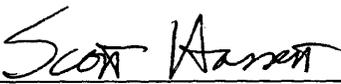
CANADIAN NATIONAL/WISCONSIN CENTRAL LTD.
ABANDONMENT EXEMPTION IN OZAUKEE, SHEBOYGAN & MANITOWOC COUNTIES

STATEMENT OF WILLINGNESS TO ACCEPT RESPONSIBILITY
STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES
PURSUANT TO 49 CFR 1152.29

In order to establish interim trail use and rail banking under 16 USC 1247(d) and 49 CFR 1152.29, the State of Wisconsin, Department of Natural Resources (WDNR) is willing to assume full responsibility for management of the property it acquires from the present owner and operator, Canadian National/Wisconsin Central Ltd. Upon acquisition, the WDNR is willing to assume full responsibility for its operations on the property and for the payment of any taxes or assessments that thereafter may be lawfully levied against it. The segments for which WDNR is making this Statement of Willingness are the following portions of the Saukville to Kiel corridor:

Saukville Milepost 114.8 to Kiel Milepost 151.8, a distance of 37 miles.

WDNR acknowledges that use of the property is subject to the WDNR continuing to meeting its responsibilities described above and subject to possible future reconstruction and reactivation of the property for rail service. A copy of this statement is being served on the railroad Canadian National/Wisconsin Central Ltd., on the same date it is being served on the Surface Transportation Board.

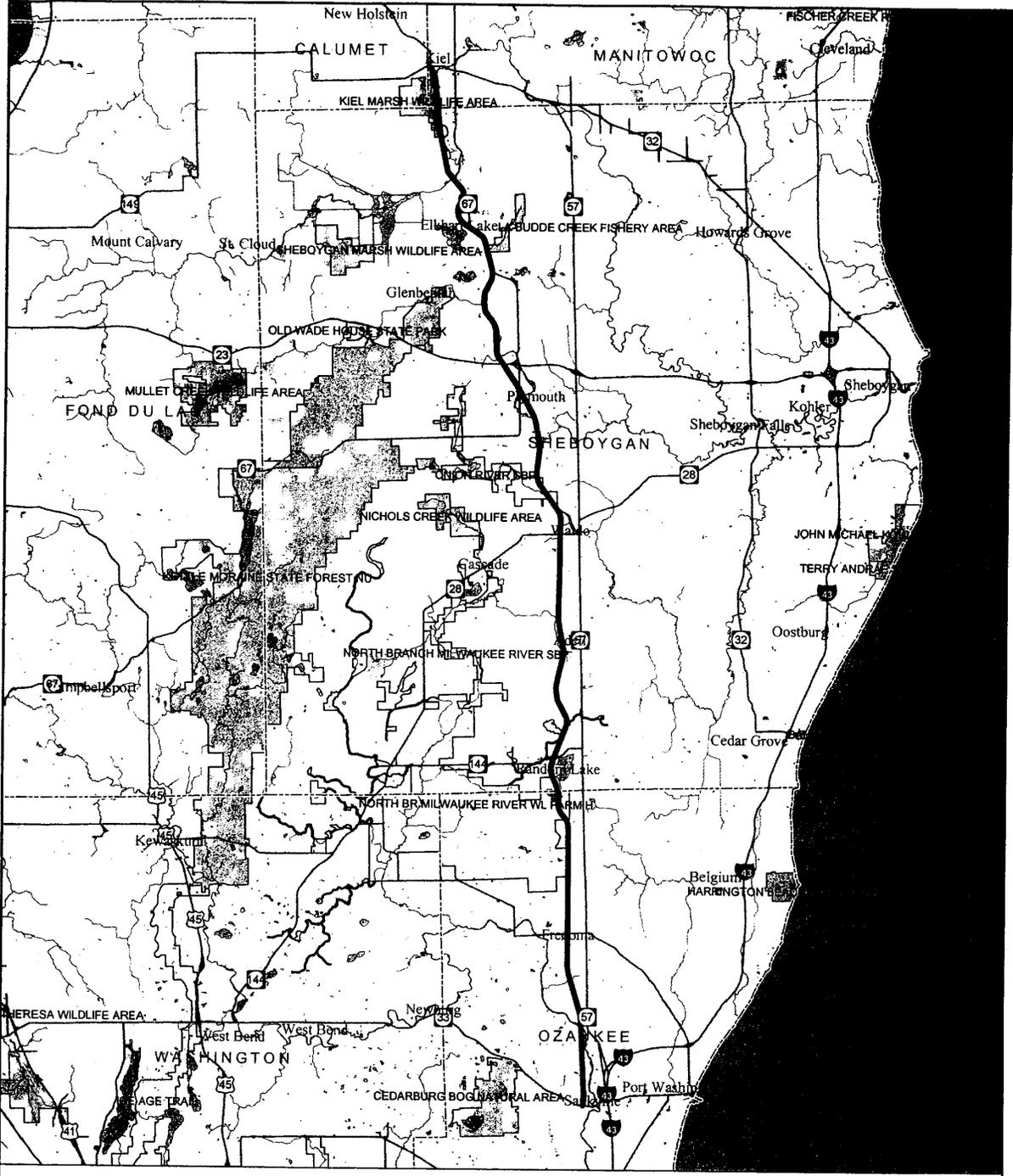


State of Wisconsin, Department of Natural Resources
By P. Scott Hassett, Secretary

10/30/03

Date

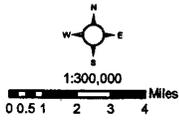
EXHIBIT 2



**Saukville to Kiel
Canadian National/
Wisconsin Central LTD.
Track Abandonment**

Legend

-  Saukville To Kiel Track DNR Managed Land
-  City/Village
-  Fee
-  DNR Project Boundary
-  Easement



Created by WIDNR
Bureau of Facilities and Lands
October 27, 2003



DTB 2004-0377



WISCONSIN LEGISLATURE

P. O. Box 7882 Madison, WI 53707-7882

June 28, 2004

Dear Secretary Busalacchi:

On June 30, 2004, Canadian National Railroad (CN) intends to file a motion for abandonment of the 37-mile stretch of rail line between Saukville and Kiel. This abandonment, if approved by the Federal Surface Transportation Board (STB), would likely spell the end of rail service for businesses in Plymouth, Adell, Random Lake, and Fredonia. These vital parts of our local communities do not need to lose their competitive edge just as our economy starts to pick up steam.

The abandonment of the corridor would adversely affect not only the shipping businesses located directly on the line, but also all those secondary businesses, farms and families that depend on their services. Abandonment would also jeopardize future rail opportunities in our communities, especially in the short-term.

We strongly request that the Department of Transportation conducts an economic impact study of the effects of abandonment on the communities surrounding the Kiel-Saukville Corridor as soon as possible.

Again, we believe it is important that we know exactly what is at stake before we begin a dialogue with the STB on the abandonment.

Thank you in advance for your cooperation in this matter of great importance to Eastern Wisconsin. An economic impact study on the ramifications of a rail abandonment will help us make the right decisions to create and retain jobs in Ozaukee, Sheboygan, and Manitowoc Counties.

Sincerely,

Mary Panzer
State Senator

Joe Leibham
State Senator

Dan LeMahieu
State Representative

Steve Kestell
State Representative

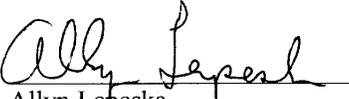
Mark Gottlieb
State Representative

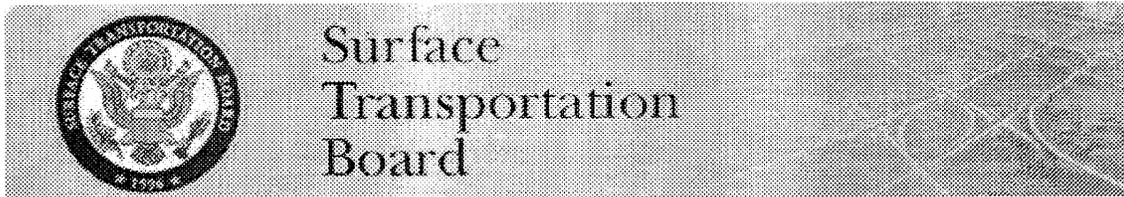
Al Ott
State Representative

**CERTIFICATE OF SERVICE
PURSUANT TO 49 C.F.R. § 1152.24(C)**

I hereby certify that on August 13, 2004, a copy of the foregoing application was served by first-class mail, postage prepaid, upon each of the following names on the attached service list.

Dated this 13th day of August at Madison, Wisconsin.


Allyn Lepeska



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Docket #: **AB_303_27**

Case Title: **WISCONSIN CENTRAL LTD.--ABANDONMENT--IN OZAUKEE, SHEBOYGAN AND MANITOWOC COUNTIES, WI**

Code Desc	Filed By	Address	Email	Filed I
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Party of Record	BARRON, JR., of MICHAEL J.	CN RAILROAD 17641 S. ASHLAND AVENUE HOMWOOD, IL 60430 Tel: (708) 332-3954 Fax: (708) 332-4361	MICHAEL.BARRON@CN.CA	
Party of Record	BENSON, JAMES	RANDOM LAKE AREA CHAMBER OF COMMERCE P. O. BOX 125 RANDOM LAKE, WI 53075 Tel: (920) 838-1726 Fax:	WWW.RANDOMLAKE.ORG	RANDOM L AREA CHAI OF COMME
Party of Record	LEPESKA, ALLYN	WISCONSIN DEPARTMENT OF TRANSPORTATION - OFFICE OF GENERAL COUNSEL P O BOX 7910 MADISON, WI 53707-7910 Tel: (608) 266-0253	OGC.EXEC@DOT.STATE.WI.US	WISCONSIN DEPARTME TRANSPOR

Party of Record LITWILER, THOMAS J	Fax: (608) 267-6734 FLETCHER & SIPPEL LLC 29 NORTH WACKER DRIVE, SUITE 920 CHICAGO, IL 60606- 2832 Tel: (312) 252-1500 Fax: (312) 252-2400	WWW.LITWILER@FLETCHER-SIPPEL.COM	WISCONSIN CENTRAL I
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Party of Record PETRI, HONORABLE THOMAS E.	HOUSE OF REPRESENTATIVES U S HOUSE OF REPRESENTATIVES WASHINGTON, DC 20515 Tel: Fax:		U S HOUSE REPRESENT
Party of Record SCHLEICHER, NORBERT	KETTLE-LAKES COOPERATIVE P.O. BOX 285 CEDAR GROVE, WI 53013-0285 Tel: (920) 668-8561 Fax: (920) 668-6154		KETTLE-LA COOPERAT
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Non-Party VIS HUIRAS, LARRY	AGRICULTURAL MGR., LAKESIDE FOODS, INC. P.O. BOX 483 RANDOM LAKE, WI 53075-0483 Tel:		

		Fax:
Non-Party VIS	ICE AGE PARK & TRAIL FOUNDATION	207 EAST BUFFALO STREET, SUITE 515 MILWAUKEE, WI 53202-5712
		Tel:
		Fax:
Non-Party VIS	IWASKIEWICZ, TIM	6255 S. ILLINOIS AVENUE CUDAHY, WI 53110
		Tel: (414) 762-7640
		Fax:
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		Fax:
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		Fax:
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		Fax:
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		Tel:
		Fax:
Non-Party VIS	PANZER, HONORABLE MARY	SENATE MAJORITY LEADER, WISCONSIN

	LEGISLATURE P.O. BOX 7882 MADISON, WI 53707-7882 Tel: Fax:
Non- Party VIS	SHEBOYGAN COUNTY PLANNING & RESOURCES DEPARTMENT - SHANNON K. HAYDIN, PLANNING DIRECTOR 508 NEW YORK AVENUE - ADMINISTRATION BUILDING SHEBOYGAN, WI 53081-4126 Tel: Fax:
Non- Party VIS	SNAY, RICHARD NATIONAL GEODETTIC SURVEY - NOAA, SSMC3, DEPT. OF COMMERCE, RM 8736 1315 EAST-WEST HIGHWAY SILVER SPRING, MD 20910-3282 Tel: Fax:
Non- Party VIS	U. S. ENVIRONMENTAL PROTECTION AGENCY-REGION 5 ENVIRONMENTAL PLANNING AND EVALUATION BRANCH - KENNETH A. WESTLAKE 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604- 3590 Tel: Fax:
Non- Party VIS	U.S. ARMY CORPS OF ENGINEERS DETROIT DISTRICT 477 MICHIGAN AVENUE DETROIT, MI 48226

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		Fax:
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VIS SERVICE	8030 EXCELSIOR	
	DRIVE	
	MADISON, WI	
	53717-2906	
	Tel:	
	Fax:	
Non- U.S. FISH &	GREEN BAY ES	
Party WILDLIFE	FIELD OFFICE	
VIS SERVICE	2661 SCOTT TOWER	
	DRIVE	
	NEW FRANKEN, WI	
	54229-9565	
	Tel:	
	Fax:	
Non- U.S. NATIONAL	MIDWEST REGION	
Party PARK SERVICE	1709 JACKSON	
VIS	STREET	
	OMAHA, NE 68102	
	Tel:	
	Fax:	
Non- WISCONSIN	COASTAL	
Party DEPARTMENT OF	MANAGEMENT	
VIS ADMINISTRATION	PROGRAM	
	101 EAST WILSON	
	STREET	
	MADISON, WI 53702	
	Tel:	
	Fax:	
Non- WISCONSIN	HISTORIC	
Party HISTORICAL	PRESERVATION	
VIS SOCIETY	816 STATE STREET	
	MADISON, WI 53706	
	Tel:	
	Fax:	

