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215998

March 15, 2006



Via Fax and Overnight Mail

Mr. Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

Re: Docket No. AB-303 (Sub-No. 28X), Wisconsin Central Ltd.—
Abandonment Exemption — in Ashland County, Wisconsin

Dear Secretary Williams:

Enclosed for filing in the above-captioned proceeding are an original and ten copies of the Response of Wisconsin Central Ltd. to the Motion for Stay and Supplemental Comments of the Wisconsin Department of Natural Resources.

One extra copy of this transmittal letter is enclosed as well. Please date stamp this copy to show receipt and return it to me in the enclosed envelope.

Respectfully submitted,

Michael J. Barron, Jr.
Attorney for Wisconsin Central Ltd.

Encls.

cc: Wisconsin DNR
Mr. Scott W. Clark

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Office of Proceedings

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Public Record

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BEFORE THE
SURFACE TRANSPORTATION BOARD

DOCKET NO. AB-303 (SUB-NO. 28X)



WISCONSIN CENTRAL LTD.—
ABANDONMENT EXEMPTION — IN ASHLAND COUNTY, WISCONSIN

**RESPONSE OF WISCONSIN CENTRAL LTD. TO THE MOTION FOR
STAY AND SUPPLEMENTAL COMMENTS OF THE WISCONSIN DEPARTMENT
OF NATURAL RESOURCES**

Michael J. Barron, Jr.
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312-252-1500

ATTORNEY FOR
WISCONSIN CENTRAL LTD.

Dated: March 15, 2006

BEFORE THE
SURFACE TRANSPORTATION BOARD

DOCKET NO. AB-303 (SUB-NO. 28X)

WISCONSIN CENTRAL LTD.—
ABANDONMENT EXEMPTION — IN ASHLAND COUNTY, WISCONSIN

**RESPONSE OF WISCONSIN CENTRAL LTD. TO THE MOTION FOR
STAY AND SUPPLEMENTAL COMMENTS OF THE WISCONSIN DEPARTMENT
OF NATURAL RESOURCES**

INTRODUCTION

In this proceeding, Wisconsin Central Ltd. (“WCL”) has filed a Notice of Exemption pursuant to 49 C.F.R., Page 1152, Subpart F, to abandon its line of railroad in Ashland, Ashland County, Wisconsin referred to herein as the “Ore Dock Line” starting from a point of switch off WCL’s mainline through Ashland at milepost 434.49 and continuing 5,160 feet to the end of WCL’s Ashland Ore Dock.

Notice appeared in the Federal Register on February 23, 2006 and the Board’s Section on Environmental Analysis issued an Environmental Assessment (“EA”) on February 28, 2006. Comments on the EA are due today, March 15, and the abandonment is set to become effective March 25, 2006.

Yesterday, WCL received a copy of a petition of the Wisconsin Department of Natural Resources (“WDNR”) in this matter seeking a stay of the abandonment until a feasibility study has been completed for the Ashland Ore Dock, a final plan has been developed, the necessary approvals have been obtained, and that conditions include appropriate financial assurances to

guarantee the maintenance of the ore dock or its proper removal, as the case may be. WDNR also asked SEA to propose additional conditions to address long-term environmental impacts if the dock remained in the water after the abandonment. Finally, the WDNR requested that their request for stay be treated as comment to the EA as well.

The City of Ashland ("City") filed a pleading joining in the WDNR's petition.

RESPONSE OF WCL

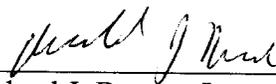
WCL anticipates that more comments concerning the EA are forthcoming, and would like the opportunity to respond to them in a comprehensive manner. WCL also appreciates that this abandonment proceeding presents many issues (impact on water resources, historical impacts, etc.) that would not normally be present in a typical no-business exemption. Therefore, WCL believes that the STB should extend the comment period on the EA until March 31, 2006, give WCL an opportunity until April 17, 2006 to respond to the cumulative comments in a comprehensive fashion, and stay the effective date of this abandonment until May 1, 2006. This will give the STB an opportunity to consider all comments received as well as WCL's response in an ordered fashion when considering any appropriate conditions to attach to this abandonment.

As information, WCL is in contact with Wisconsin's Board of Commissioners of Public Lands and has sent that Board considerable information so that it can consider a lease of the dock on Lake Superior. WCL also looks forward to undertaking and completing the Section 106 process for this abandonment.

CONCLUSION

WCL requests that the STB extend the EA comment period to March 31, 2006, give WCL until April 17, 2006, to respond to comments, and postpone the effective date of this abandonment until May 1, 2006.

Respectfully submitted,

By  _____

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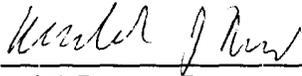
Dated: March 15, 2006

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the attached document was served upon the addresses listed below by facsimile and by mailing true and correct copies via First Class U.S. Mail, postage thereon fully prepaid and depositing the same in the United States Mail, Chicago, Illinois this 15th day of March, 2006.

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