

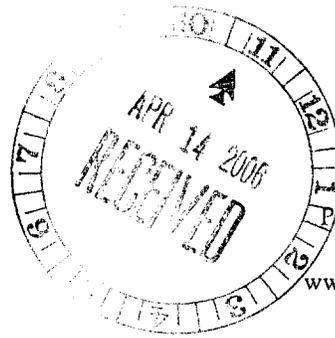
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April 13, 2006

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 Comments submitted in Response to the Environmental Assessment.

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.

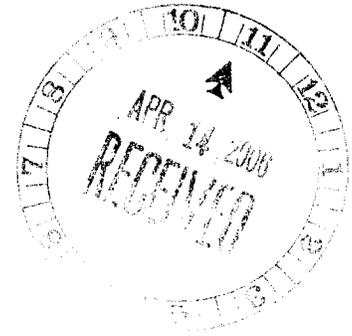
Encls:

cc: Wisconsin DNR
Wisconsin DOT
Mr. Scott W. Clark

ORIGINAL

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 COMMENTS SUBMITTED
IN RESPONSE TO THE ENVIRONMENTAL ASSESSMENT**

Michael J. Barron, Jr.
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ATTORNEY FOR
WISCONSIN CENTRAL LTD.

Dated: April 13, 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 COMMENTS SUBMITTED IN
RESPONSE TO THE ENVIRONMENTAL ASSESSMENT**

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 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 were due March 31, WCL has until April 17 to file responsive comments, and the effective date of the exemption is May 1, 2006.

The Wisconsin Department of Transportation (WDOT) and the Wisconsin Department of Natural Resources (WDNR) submitted substantive comments, and the City of Ashland submitted a statement joining the WDNR’s comments. WCL will now take this opportunity to respond to the comments of the WDNR and WDOT.

Both the WDOT and WDNR statements acknowledge that the EA recommends that a 106 condition be imposed. WCL supports that condition and looks forward to working with

SEA and the Wisconsin SHPO in going through the 106 process. Both WDOT and WDNR request conditions above and beyond what the EA recommended. WDNR requested that the STB suspend a final decision until a feasibility study has been completed and a final plan for the long term future of the Ashland Ore Dock be developed, and that environmental and regulatory issues be addressed in the final solution for the Ashland Ore Dock. WDOT's comments in part echoed WDNR's concerns and indicated the need to complete the feasibility study on the Ashland Ore Dock prior to any decision being made on its long-term disposition.

In response WCL is informing the STB that it has recently granted an access agreement to Westbrook Engineering, the engineering firm retained for the feasibility study.

WCL has also provided significant information to the Board of Commissioners of Public Lands in Wisconsin so that WCL and the State can attempt to work out the issues under Chapter 27 and Chapter 30, Wis. Stats. that WDNR addressed in the comments.

WCL will only be able to carry through on its proposal to have the dock remain where it is as a valuable resource only if it comes to agreement with WDNR, the SHPO and other state agencies, regardless of the conditions imposed by the STB.

Therefore, WCL proposes that the STB issue an order incorporating EA's recommendations, give authority to WCL to take the Ashland Ore Dock off the national rail network, but stay any disposition or conveyance of the Ashland Ore Dock for at least six months, during which time WCL and the various agencies can attempt to work out agreements on many outstanding issues and the feasibility study can be completed prior to the six months expiring. WCL shall submit a status report just prior to six months expiring, and other parties may submit one if they please. At that time, the STB can determine what remaining conditions are appropriate on the abandonment.

Respectfully submitted,

By 

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Dated: April 13, 2006

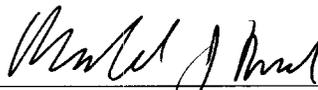
CERTIFICATE OF SERVICE

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 13th day of April, 2006.

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