

April 20, 2021

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VIA ELECTRONIC FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room 1034
Washington, DC 20423-0001

ENTERED
Office of Proceedings
April 20, 2021
Part of
Public Record

Re: **Docket No. FD 36503**
Grand Elk Railroad, Inc.—Acquisition Exemption—Lines of Wisconsin Central Ltd. in Michigan

Docket No. FD 36504
Fox Valley & Lake Superior Rail System, L.L.C.—Acquisition and Operation Exemption—Lines of Wisconsin Central Ltd. in Wisconsin

Docket No. FD 36506
Watco Holdings, Inc.—Continuance in Control—Fox Valley & Lake Superior Rail System, L.L.C.

Dear Ms. Brown:

We are pleased to provide for filing in the above docket the attached letters submitted by various stakeholders in support of the above referenced transactions.

Please let me know if you have any questions.

Sincerely,

STINSON, LLP/s/ David F. Rifkind

David F. Rifkind

Attorney for Grand Elk Railroad, Inc.,
Fox Valley & Lake Superior Railway System, L.L.C., and
Watco Holdings, Inc.

Enclosures

Ms. Cynthia T. Brown

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DFR:mmma

cc: Thomas J. Litwiler
Kathryn J. Gainey
Parties of Record

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1. Green Bay Packaging Company, Inc.
2. Tri-County Railroad Team



Green Bay Packaging Inc.

April 15, 2021

Ms. Cynthia Brown
Office of Proceedings
Surface Transportation Board
395 E. Street, S.W.
Washington, DC 20423

Re: **Docket No. FD 36503**
Grand Elk Railroad, Inc. -- Acquisition Exemption -- Lines of
Wisconsin Central Ltd. in the State of Michigan

Docket No. FD 36504
Fox Valley & Lake Superior Rail System, L.L.C. -- Acquisition and Operation
Exemption -- Lines of Wisconsin Central Ltd. in the State of Wisconsin

Dear Ms. Brown:

On behalf of Green Bay Packaging Company, Inc., I am writing in support of the proposed sale of approximately 650 miles of railroad branch lines in Wisconsin and the Upper Peninsula of Michigan by Wisconsin Central Ltd. (CN) to subsidiaries of Watco. As a current customer utilizing rail freight service on those lines, we believe the proposed transaction will help assure the continuation of such service and preserve and enhance our ability to efficiently reach the national rail network.

Watco's railroads are established and experienced rail service providers in the states of Wisconsin and Michigan, and we believe FOXY and GDLK will be strong operators for the rail lines to be acquired in this transaction. We look forward to working with FOXY/GDLK and CN as these important rail lines change ownership.

We understand that the proposed line sales are being processed at the Surface Transportation Board under the agency's exemption procedures, and we support the STB permitting the transaction to become effective through that expedited process.

Very truly yours,

Green Bay Packaging Company, Inc

Frank E. Miller
Director of Logistics

GREEN BAY MILL DIVISION
1601 N. QUINCY ST. • GREEN BAY, WI 54302
(920) 433-5000 • www.gbp.com



TRI-COUNTY RAILROAD TEAM

PO Box 236
Loyal, WI 54446

Sheila Nyberg, Coordinator, 715-255-9151 or
sheila@clarkcountyedc.org

April 15, 2021

The Honorable Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E. Street, S.W., Room #100
Washington, DC 20423-0001

Re: FD 36503, *Grand Elk Railroad, Inc.—Acquisition—Lines of Wisconsin Central Ltd. in the State of Michigan*
FD 36504, *Fox Valley & Lake Superior Rail System, L.L.C.—Acquisition and Operation Exemption—Lines of Wisconsin Central Ltd. in the State of Wisconsin*
FD 36506, *Watco Holdings, Inc.—Continuance in Control—Fox Valley & Lake Superior Rail System, L.L.C.*

Dear Ms. Brown:

The **Clark County Economic Development Corporation** along with neighboring Taylor and Marathon Counties have united and organized for the betterment of rail service in our Tri-County region in North Central Wisconsin. Our “Tri-County Railroad Team” includes representation from three counties, seven cities and villages and other community leaders with a goal of advocating for the preservation and enhancement of freight railroad between Spencer and Medford, WI.

We write to you today with the exciting news of the transaction between the Canadian National Railway (CN) and Watco regarding the sale of approximately 650 miles of branch lines in Wisconsin and Michigan (STB Finance Docket #36504). This transaction, if approved, would mean not only continued freight rail service for shippers throughout the Tri-County area, but it also presents an opportunity to improve service and attract additional industries to utilize freight rail and boost employment and economic activity in our area. Very exciting!

Access to reliable rail service is critically important to the viability of our agriculture, timber and manufacturing sectors in the states of Wisconsin and Michigan. Having a

company like Watco operating these important branch line segments is a great move towards the future of rail transportation in these regions including central Wisconsin.

On behalf of the Tri-County Railroad Team, we ask for your strong consideration of an expedited approval of this transaction under Finance Docket #36504. Thank you for your consideration!

Sincerely,

A handwritten signature in dark ink, appearing to read "Sheila Nyberg". The signature is fluid and cursive, with a large initial "S" and a distinct "N".

Sheila Nyberg, Coordinator

Clark County Economic Development Corporation