



Western Upper Peninsula Planning & Development Region Commission

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VIA E-FILING

May 7, 2021

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

ENTERED
Office of Proceedings
May 7, 2021
Part of
Public Record

RE: FD 36503, *Grand Elk Railroad, Inc.—Acquisition—Lines of Wisconsin Central Ltd. in the State of Michigan*

Dear Ms. Brown:

On April 9, 2021, the Western Upper Peninsula Planning & Development Region Commission (WUPPDR) filed a comment seeking revocation of the exemptions and stay of the effective date in the above captioned Finance Docket. Subsequent to that filing, we have had the opportunity to meet with numerous stakeholders, including Watco management and staff, to address our concerns. Based on these meetings, WUPPDR is optimistic about the future of the rail lines subject to this transaction. Accordingly, WUPPDR withdraws its request for revocation and stay and expresses its full support for the Board's approval of this transaction under its expedited class exemption procedures.

WUPPDR, a Michigan state designated planning and development region with a membership that includes the counties traversed by the rail line subject to this transaction, has a mission to foster stable and diversified economies in the Western Upper Peninsula. Access to reliable rail service is critically important to the viability of our region's forestry, mining, and manufacturing sectors. GDLK and Watco have demonstrated a new vision and commitment to existing rail customers and for development of new business. Watco's customer focus and strong relationships with public and private partners will have a positive impact on transportation throughout our region.

Notwithstanding our support for the transaction, we ask the Board to take one matter into consideration, regarding the Board's 2001 decision in STB FD 34000, *Canadian National – Control – Wisconsin Central*. An April 21, 2021 letter from WCL's counsel to the Wisconsin Department of Transportation that WCL filed in FD 36504 stated that "Nothing in the

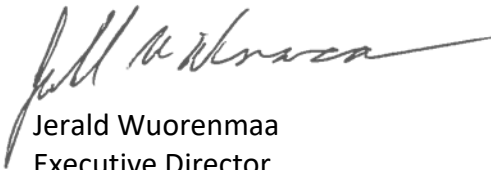
Cynthia T. Brown
Page 2
May 7, 2021

proposed sale of WCL rail lines to FOXY will affect the 2001 STB conditions or change whether or how those conditions apply for shippers on the lines." We ask that the Board confirm that it will hold WCL to that statement with the inclusion of the Grand Elk Railroad lines in Upper Michigan as well as any discontinued rail lines that are brought back into service.

As it stands, the subject transaction, which also encompasses FD 36504, would improve the possibility of any discontinued rail lines being brought back into service while continuing access to freight rail service for shippers throughout the Upper Peninsula of Michigan and Northern Wisconsin. It presents an opportunity to improve service and attract additional industries to utilize freight rail and boost employment and economic activity in our region.

The Western Upper Peninsula Planning & Development Region Commission now asks for your strong consideration of an expedited approval of this transaction. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jerald Wuorenmaa", is written over a horizontal line.

Jerald Wuorenmaa
Executive Director
jwuorenmaa@wuppdrr.org

cc: Parties of Record