



February 4, 2022

Cynthia T. Brown
Chief of the Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

Re: Gulf Coast Passenger Service between New Orleans and Mobile
STB Finance Docket No. 36496

Dear Ms. Brown:

The Louisiana Railroad Association (LRRRA) is an unincorporated trade association of which I the undersigned have been its General Counsel and Legislative Representative since March 1982. Six (6) Class I railroads and seven (7) short line railroads comprise the membership of LRRRA.

I am writing on behalf of the LRRRA members to urge and request the Surface Transportation Board to deny Amtrak's request to commence new passenger service between Mobile, Alabama and New Orleans, Louisiana without the addition of the necessary infrastructure needed to ensure freight fluidity. This new passenger service will start and terminate in New Orleans, Louisiana where all of the Class I railroads operate. We are concerned about Amtrak's ability to implement and operate this new passenger service on this freight rail corridor and provide a safe, efficient and sustainable service until such time as all of the necessary infrastructure is in place.

The LRRRA has deep reservations regarding Amtrak initiating new passenger rail service on the Gulf Coast route without the necessary investment on infrastructure to ensure freight and container intermodal rail service is not degraded, and ensuing there is sufficient capacity for continued freight growth. Moreover, we are concerned about resulting congestion or delay impacts to supply chains and transportation rates should passenger rail enter the corridor without the necessary infrastructure. It is LRRRA's concern that Amtrak's new passenger service, without the necessary infrastructure, will cause continued delays for freight rail movement, massive congestion and disrupted supply chains.

CSXT and Norfolk Southern Railway Company have submitted evidence, including a Rail Traffic Controller study that shows the introduction of Gulf Coast passenger service between New Orleans and Mobile will cause significant harm to freight service. This harm will manifest itself through decreased freight train speeds and delay as well as extreme operational variability. It is further our understanding that CSXT and NSR have proposed infrastructure projects that would support Amtrak's desired passenger service while protecting the quality and safe freight service on this Gulf Coast rail corridor. The Louisiana Railroads Association urges the Board to seriously consider the merits and benefits of these projects for the safe and efficient movement of both freight and passenger services on the Gulf Coast rail corridor.

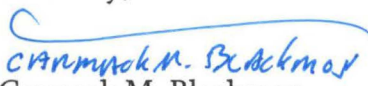
It is unfair for Amtrak to insist on operating passenger service without regard to the businesses it will share the corridor with. If Amtrak is permitted to commence passenger service without paying its own way, the cost of that service will inevitably fall on the shoulders of freight rail. Shippers will either be forced to turn to more expensive and less efficient alternatives to rail or will wind up subsidizing passenger service through increased rail service costs as CSXT and NSR are pressed to add infrastructure to stem the degradation to freight service.

The Board has an obligation to protect the interests of all parties that rely on the national rail network, not just those of passenger rail. Amtrak's desire for access to the Gulf Coast Corridor with no strings attached is not only harmful to freight rail service, but untenable given the substantial funding it received from Congress last year. The Louisiana Railroads Association requests that the Board require Amtrak to fund and facilitate the construction of infrastructure projects so as to avoid any harm to freight rail service.

The LRRRA does not oppose Gulf Coast passenger service and expresses no opinion on the merits of that service. However, it is important that the introduction of this passenger service does not decrease the quality of freight service provided by CSXT.

The LRRRA respectfully requests that the Board deny Amtrak's request to commence new passenger rail service on this freight rail corridor without the necessary infrastructure in place to safely and efficiently support both freight rail and passenger services on the Gulf Coast rail corridor.

Sincerely,


Carmack M. Blackmon

General Counsel and Legislative Representative
Louisiana Railroads Association

Cc: Parties of Record