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February 10, 2022

By E-Filing

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

ENTERED
Office of Proceedings
February 10, 2022
Part of
Public Record

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

Dear Ms. Brown:

The Ohio Railroad Association (ORA) writes to express our concern regarding the impact on freight rail service resulting from Amtrak's proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama as a number of Ohio companies rely on freight rail service along this corridor. Ohio has one of the nation's most dense freight rail networks, with over 5,100 miles of track and nearly 5,800 grade crossings. Ohio's geography and topography have made it one of the most heavily utilized rail 'states' in America, with hundreds of freight trains operating over Ohio corridors on a daily basis. Ohio rail corridors include some of the busiest in the nation. Adding passenger trains into this mix would require significant and expensive improvements. The Gulf Coast freight corridor also requires careful consideration of the effects and needs of adding passenger trains.

To be clear, the ORA does not oppose Gulf Coast, or any other, passenger service and expresses no opinion on the general merits of any passenger rail service. However, it is critically important the introduction of this, and any other passenger service, does not: (a) decrease the quality of freight service provided by freight railroads; (b) does not increase the operating and ongoing maintenance costs for the corridor borne by the operating railroad, thereby increasing the costs that must be shared by rail shippers; and (c) avoid a detailed review and implementation of risk control measures (including but not limited to safety devices, infrastructure needs, communications, and steps taken to reduce conflict with affected communities).

As discussion in Ohio grows regarding the potential for new Amtrak service on multiple freight rail corridors, we believe it is unfair for Amtrak to insist on operating passenger service without regard to the railroads who own the corridor, who operate trains serving rail customers (trains with whom it will share the corridor's capacity limitations), and the rail customers themselves. If Amtrak is permitted to commence passenger service without paying for and completing required infrastructure, safety, and capacity enhancements, the cost of those necessities will inevitably fall on the shoulders of freight railroads and, thereby, their Ohio customers. This would be manifestly unfair and costly to both the railroads and their customers.



Furthermore, the Board's review process in the Gulf Coast proposal could set a new precedent for future passenger rail development, including here in Ohio. It is our view that the Board has an obligation to protect the interests of all parties that rely on the national freight rail network, not just those of passenger rail.

Amtrak's desire for access to any freight rail corridor must follow an established process to identify and complete all infrastructure, safety, and rail capacity improvements prior to implementation of passenger rail service, whether it be along the Gulf Coast or here in Ohio.

Thank you for your consideration of our position.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arthur J. Arnold', with a stylized, cursive script.

Arthur J. Arnold

Executive Director

cc: FD 36496 Service List