

March 15, 2022

The Honorable Martin J. Oberman, Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

EP 711 (Sub-No. 1)
304107

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March 15, 2022
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Dear Chairman Oberman:

Maryland is served by major railroads CSX and Norfolk Southern, as well as seven short line and regional railroads. These vital economic rail corridors haul the equivalent of 4 million truckloads across our state annually, an efficient and affordable option that helps keep Maryland businesses competitive and roadways less congested. Freight rail access is also one of the pillars of success at the Port of Baltimore, which supports nearly 140,000 jobs across Maryland.

It is our concern that the Board's proposed rule on reciprocal switching (EP 711-1) would introduce inefficiency on the rail network, hurting shippers and jeopardizing future investment in railways.

Any divestment from rail infrastructure would work in direct opposition to Maryland's long-term transportation goals, a centerpiece of which is expansion of the Howard Street Tunnel. This \$466 million project, a public-private partnership between the State of Maryland, the federal government and CSX, just broke ground at the end of 2021. It will improve the Port's ability to handle double-stack intermodal traffic, reducing fuel consumption by roughly 140 million gallons annually.

But projects like the Howard Street Tunnel would be diminished if forced switching were to reduce the ability of our railroad partners to maintain and grow their infrastructure. Intermodal service, a growth area for Maryland, would especially suffer. The Intermodal Association of North America has written that forced switching could decrease network velocity, lead to a

decline in domestic intermodal service, and undermine rail's ability to compete with over-the-road trucking.

Passenger rail service in Maryland could also be negatively impacted by the rule. Amtrak has written that they believe the policy would “lead to otherwise unnecessary increases in freight operations on the Northeast Corridor (NEC)” and make it harder for Amtrak and its state partners like Maryland to improve and expand intercity passenger service.

The economy and community-level development are top of mind in Maryland. Our leaders recognize that efficient and affordable transportation options are critical to this formula—not to mention encouraging private railroad companies to keep investing a collective \$25 billion annually into infrastructure, which provides clear benefits in our state.

But forced switching would take our rail network backward, creating inefficiencies that damage shippers and drive them away from rail at a time that we need it more than ever to meet demand and move freight sustainably. We urge you to take this into consideration as you deliberate on this matter and refrain from implementing the reciprocal switching rule.

Sincerely,

Sandy Bartlett
Delegate, District 32
Maryland General Assembly

Bennard Cann
Mayor
Town of Morningside

Craig Moe
Mayor
City of Laurel

Joanne Benson
Senator, District 24
Maryland General Assembly

Sharon Middleton
Councilwoman
City of Baltimore

Michael Rogers
Delegate, District 32
Maryland General Assembly

CC: Members of the Maryland Congressional Delegation