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

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Re: Application of the National Railroad Passenger Corporation under 49 U.S.C. § 24308(e) – CSX Transportation, Inc., and Norfolk Southern Railway Company, FD 36496

Dear Ms. Brown,

On behalf of the Alabama members of the Southern Rail Commission, I am writing to recommend that the Surface Transportation Board (STB) consider the following items when determining a path for the potential return of passenger rail services to Mobile.

- **Location of the Mobile station.** Amtrak's location for servicing Mobile as part of the Gulf Coast Service should be located within the Mobile Aeroplex at Brookley Field. The Mobile Airport Authority, City of Mobile, and Mobile County Commission have initiated dedicating resources into making the Brookley Aeroplex the transportation and industrial epicenter of the central Gulf Coast. In April 2021, the Federal Aviation Administration approved a master plan by the Mobile Airport Authority to move all passenger air service to a new international airport terminal at Brookley Field. This master plan addressed the inclusion of introducing passenger rail services to Brookley Field. This was specifically noted during the STB hearings by Chris Curry, President of the Mobile Airport Authority, who voiced his support of locating the station at Brookley Field. Locating the new station within the Brookley Aeroplex has also received support by the Alabama Congressional Delegation, Mobile Chamber of Commerce, Mayor of Mobile, Mobile City Council, and Mobile County Commission. A station at this site provides a unique opportunity to create a more centralized transportation hub providing access to passenger and freight rail in addition to road, water, and aviation infrastructure. Furthermore, by locating the station at Brookley Field, all passenger rail activity would not interact with the downtown Interchange Yard and Riverfront Yard.
- **Infrastructure improvements before service begins.** Before the Gulf Coast Service begins operating in Alabama, infrastructure improvements should be addressed to ensure that passenger services do not cause undue delays in freight operations in and around Mobile. As noted in the text of the \$33 million CRISI grant that was awarded to the Southern Rail Commission in June of 2019, various infrastructure improvements to support On-Time Performance (OTP) and safety upgrades have been identified to ensure the return of passenger services does not negatively impact freight activity. This also includes the construction of a dedicated House Track that would allow Amtrak services to vacate the single-track mainline as fast as possible when entering Mobile. It is our position that these items, and any other infrastructure concerns identified by the represented parties, should be carefully considered by the STB and completed before the Gulf Coast Service begins operating.

- **Port of Mobile.** We sincerely appreciate the STB allowing the Alabama Port Authority and its terminal railroad operating division, Terminal Railway Alabama State Docks' (TASD) involvement in this proceeding. The return of passenger rail should be carefully considered when examining the intricacies of the Port of Mobile operations and the Port's economic impact on the State of Alabama and City of Mobile. The Port is responsible for supporting 161,130 jobs in the region with an overall economic impact of \$26.8 billion in economic revenue. The Port of Mobile is one of the largest U.S. seaports by volume and is an important gateway servicing commerce for the United States. Since Amtrak last operated in Mobile, public and private entities have invested more than \$1.4 billion into infrastructure improvements to support rapid growth at the Port. The return of passenger services should not impede fluidity and growth at the Port of Mobile and we encourage the return of passenger services in a fashion that has the least amount of impact on the Port as possible.

The Southern Rail Commission exists to engage and inform public and private rail interests in order to support and influence southeast rail initiatives. The vision of the SRC is to promote the safe, reliable and efficient movement of people and goods to enhance economic development along rail corridors; provide transportation choices; and facilitate emergency evacuation routes. As noted in our mission statement, we believe that the voices of all rail interests, passenger and freight alike, should be considered with equal importance and coexist in a fashion that allows each to serve the people of Alabama. We appreciate the STB allowing all stakeholders to present their evidence with the purpose of finding solutions and an outcome that will benefit all parties. It is for all these reasons that we believe the aforementioned points are important and we ask that the STB consider them carefully and with great deliberation.

Respectfully submitted on behalf of the members of the Alabama Southern Rail Commission,



Stephen McNair
Alabama Chairman, Southern Rail Commission

CC:
Wiley Blankenship, Alabama SRC member
David Clark, Alabama SRC member
Steven Brom, Alabama SRC member
Toby Bennington, Alabama SRC member
John Clyde Riggs, Alabama SRC member

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