



April 26, 2021

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April 26, 2021
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Ms. Allison Davis
Director, Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Surface Transportation Board Docket FD_36496
ID 301767 - Gulf Coast Passenger Service
Between New Orleans, LA and Mobile, AL

Dear Ms. Davis:

The Alabama State Port Authority respectfully submits supplemental comments to the above listed docket. We deeply appreciate the opportunity to participate in this process and applaud the Board's transparency of record in this matter.

As noted in our prior submission, our Terminal Railway (TASD) uses the CSX mainline to service all eight railroads carrying freight/container intermodal volumes in and out of the public seaport terminals at the Port of Mobile. Our railroad also uses the CSX mainline to provide switching services for all railroads entering our interchange or the Siebert Yard.

I read with interest statements by the Southern Rail Commission (SRC) in its April 23, 2021, comment submittal to this docket that it "has diligently worked to address purported obstacles" and made "trips to ports and yards along the Gulf Coast to collaborate with locals identifying solutions to address access and movement concerns." First, we feel compelled to point out that the Alabama delegation of the Southern Rail Commission did not sign these comments. In fact, the Alabama SRC members are on record in wanting the now terminated Amtrak Rail Traffic Control Study that commenced in January 2020 completed. As to the SRC's engagement with this seaport, my predecessor, James K. Lyons, did in fact meet with Mr. Greg White of the SRC in January 2017 to discuss the proposed new passenger rail service. In that meeting, Mr. Lyons expressed his concern over the return of any daily Amtrak service without proper modeling, engineering and cost analyses. On September 10, 2020, I was invited to a tri-state SRC meeting in Mobile to discuss the new service and the Port Authority's concerns. I too reiterated our concerns over possible service disruptions, added congestion and its associated increased shipper costs sans appropriate modeling and understanding of necessary investments to avoid freight rail service degradation. It should be noted that no subject matter experts attended these two meetings, nor had the Port Authority been asked to provide operational service hours, yard schematics, daily revenue rail car volumes handled, or any information pertinent to conducting adequate rail traffic or modeling assessments.

Further, the SRC highlights the US Gulf Coast Working Group Report to Congress as justification to granting the Amtrak request. It is our read of this same report and its Appendices to Congress dated July 2017, actually included a HDR study using 2016 Berkley Simulation Software that assessed a daily extension of long distance study from Chicago through New Orleans arriving in Orlando with service returning west to New Orleans. We see no evidence the HDR work modeled a significantly shorter route of New Orleans Mobile with four stops in Mississippi. Further, the report concludes none of the passenger train alternatives modeled produced PRIIA-compliant on-time performance (OTP) results (End Point OTP), even with additional infrastructure. Further, this study noted: operational challenges associated with seven (7) drawbridges on the New Orleans to Mobile route that open on marine traffic

demand; inadequate siding infrastructure; lack of spare capacity for freight expansion at major terminals; and noted the abundance of local freight trains switching for customers from sidings to the main track. The study also stated certain assumptions in its analysis, including rights of way for additional track would be available, any improvements would avoid unmitigable impacts on surrounding land uses, and that any improvements are feasible from an engineering and environmental permitting perspective.

In the Gulf Coast Working Group's Appendix report to Congress published in 2017, Amtrak supported a phased approach to additional capacity improvements as funding became available. The report does acknowledge that "CSX, the Federal Railroad Administration, Amtrak, and the Southern Rail Commission need to verify the recommended improvements to ensure the proper investments are identified for the restoration of service." That verification, if done, has not been made public. Further, in this this report Amtrak recognized the need to work with CSX to jointly assess new intercity passenger service and reach agreement on the equitable distribution of costs for improvements to increase passenger service operating speed levels.

We also think it important to highlight SRC's claim that CSX provided an unjustified cost estimate for infrastructure investments to accommodate passenger rail with degrading freight rail service. The SRC fails to advise the Board that there were two studies completed. HDR identified the costs of over \$2 billion, but an HNTB study for Florida Department of Transportation titled Gulf Coast Passenger Service Implementation Study and Cost Estimate – December 2018, this report recommended new track and miles of new Positive Train Control systems as required by law among other needed improvements at a costs of \$1.3 billion. This study too stated it did not evaluate environmental factors nor did it include costs to rebuild stations. This study did identify On Time Performance greater than 90%, except for the eastbound Amtrak train running from New Orleans to Mobile due to drawbridge delays and stricter on-time performance standards for regional trains.

For these many reasons and consistent with our expressed concerns, Amtrak agreed in January 2020 that a modeling study was needed to understand the infrastructure needs to avoid conflicts with both freight and passenger rail, and more importantly to ensure the needs of the customer were met.

I appreciate your attention to this issue and ask that staff consider this clarifying and publicly available information.

Sincerely,



John C. Driscoll
Director & Chief Executive Officer

C: Parties of Record
James K. Lyons