



301883

ENTERED
Office of Proceedings
April 5, 2021
Part of
Public Record

April 1, 2021

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.

On behalf of the Alabama State Port Authority Board of Directors and management, I am writing to urge the Surface Transportation Board to deny Amtrak an Order to restore passenger service between Mobile, Alabama and New Orleans, Louisiana, and compel Amtrak to complete its Rail Traffic Control Study with supplemental engineering and cost report.

The Alabama State Port Authority is responsible for the development and operations of Alabama's public railroad and seaport terminal facilities at the Port of Mobile. This port is one of the nation's larger seaports handling over 54 million tons annually. Roughly 26 million tons of that total cargo annual volume transits through the public terminals and a significant portion of that volume is serviced by five Class I railroads and four short line railroads carrying both merchandise and containerized freight for shippers across Alabama and the United States. The Port Authority's vessel and cargo activities alone supports over 150,000 jobs and generates over \$25.4 billion in economic value.

The Port Authority fundamentally does not oppose passenger rail into the City of Mobile, but we do have deep concerns regarding Amtrak's impact on servicing current freight rail as well as servicing future freight capacity demand in the CSX corridor. Since Amtrak left the corridor in 2005, over \$1.3 billion has been invested in the rail served public seaport terminals and related transportation infrastructure at the Port of Mobile. Currently, there is over \$700 million in active or planned waterborne or surface transportation infrastructure projects to support shipper needs at Port of Mobile.

Our railroad, the Terminal Railway (TASD), services all railed freight and container intermodal volumes in and out of the port's public terminals, as well as provides switching services between eight railroads using the seaport. We are knowledgeable of the corridor's attributes and limitations and fear priority access for passenger rail without proper study or investment would degrade freight rail service, generate unmanageable levels of congestion, and adversely affect shipper transportation cost metrics and their market competitiveness.

To address our concerns, we strongly urged Amtrak to conduct the necessary operational modeling and corridor capacity assessments prior to initiating new service on the primarily

Surface Transportation Board/Port of Mobile
Page Two
April 1, 2021

single-track CSX corridor. Further, the State of Alabama and the City of Mobile funding for the passenger rail service was conditional to the completion of that study. In January 2020, Amtrak initiated that study, in cooperation with the CSX and the Norfolk Southern. In January 2021,

Amtrak refused to extend that study to complete that work and then petitioned the Surface Transportation Board (STB) to compel host railroads to provide access. Amtrak's STB petition deprives our seaport, our shippers and our freight railroads of appropriate assessments to preserve the safety and reliability of freight rail service at one of the nation's larger seaports.

The Alabama State Port Authority think it imperative that Amtrak return to the table to complete the modeling study along with infrastructure and cost assessments to support passenger rail without degrading freight service or safety. I appreciate your attention in this important matter.

Sincerely,



John C. Driscoll
Director & Chief Executive Officer

C: Parties of Record