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February 11, 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

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

Dear Ms. Brown:

Holcim US is located in Theodore, Al, just outside of Mobile, Al and relies on the freight rail service provided by CSX Transportation, Inc. I write on behalf of Holcim US to express concerns regarding the impact on that freight rail service of Amtrak's proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama.

Holcim US produces bulk Cement and relies on CSXT to transport raw materials to our facility and finished products to our customers. Our entire Atlanta customer base, along with hundreds of other customers, receive their product from our Theodore facility. We run thousands of loads on this corridor annually and an equal number of empties. Because of the high volume we handle and the limited space at our facilities, we require "just in time" service from the railroads. Small delays can cause us to stock out at our terminals. Our customers are building runways, bridges, tunnels, highways, ports for Federal, State and local governments among others. They cannot have 100 men standing on a half complete bridge waiting for cement for a day or two or more. Not to mention the significant fines and penalties they face when they don't complete these jobs on time. Freight rail service is critical to the success of our business. We can't move large quantities of bulk cement inland without the quality of service CSXT provides, making freight rail the most efficient and environmentally friendly transportation alternative to maintain and grow our business in this area.

CSXT and Norfolk Southern Railway Company have submitted evidence, including a Rail Traffic Controller study, that shows the introduction of Gulf Coast passenger service between New Orleans and Mobile will cause significant harm to freight service. This harm will manifest itself through decreased freight train speeds and delay as well as

extreme operational variability. CSXT's local trains, the very trains that directly serve our facility, will be hit the hardest. Holcim US is deeply concerned about our ability to meet the demands of our customers and remain profitable if this harm to CSXT's freight rail service materializes. We have to have the daily service that CSXT provides us on local trains or we stock out of product at our terminals. How is introducing passenger service even practical on a single main track where local trains have to hold the main track while they switch us, and other customers, until ample sidings to pass are installed? Why is the public that Amtrak serves more important than the public we serve? Hundreds of customers with thousands of workers depending on product every day. Not to mention all the other shippers on this corridor. Our counsel is patience. Let's get the infrastructure that's needed so we can all operate and let's be safe about it.

Holcim US does not oppose Gulf Coast passenger service and expresses no opinion on the merits of that service. However, it is important that the introduction of this passenger service does not decrease the quality of freight service provided by CSXT. It is our understanding that CSXT and NSR have proposed infrastructure projects that would support Amtrak's desired passenger service while protecting the quality of freight service that Holcim US relies on. **Holcim US** urges the Board to seriously consider the merits of these projects.

It is unfair for Amtrak to insist on operating passenger service without waiting for the proper infrastructure, without regard to the businesses it will share this corridor with. It has the feel of a bully who doesn't want to wait his turn, so he pushes to the front of the line with total disregard for others. We need daily service on this Single Main corridor. Local crews will be held in the clear for Passenger trains that run 30mph faster than they are permitted to and will run out of Hours of Service waiting. If Amtrak is permitted to commence passenger service without paying its own way, the cost of that service will inevitably fall on the shoulders of shippers. Shippers like **Holcim US** will wind up subsidizing passenger service through increased rail service costs as CSXT and NSR are pressed to add infrastructure to stem the degradation to freight service.

The Board has an obligation to protect the interests of all parties that rely on the national rail network, including our customers, their workers, and their customers. Not just those of passenger rail. Amtrak's desire for access to the Gulf Coast Corridor with no strings attached is not only harmful to freight rail service, but untenable given the substantial funding it received from Congress last year. **Holcim US** requests that the Board require Amtrak to fund and facilitate the construction of infrastructure projects so as to avoid any harm to freight rail service.

Respectfully submitted,

Tom Giovinnazzi

Tom Giovinnazzi
Holcim US

cc: FD 36496 Service List