



303951

ENTERED
Office of Proceedings
February 17, 2022
Part of
Public Record

By E-Filing

February 11, 2022

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:

Cargill, Incorporated ("Cargill") is an international provider of food, agricultural, financial, and industrial products and services. Our 155,000 employees across 70 countries work relentlessly to achieve our purpose of nourishing the world in a safe, responsible and sustainable way. Every day, Cargill connects farmers with markets, customers with ingredients, and people and animals with the food they need to thrive.

Cargill relies on the freight rail service provided by CSX Transportation, Inc. (CSXT) and wishes to express concerns regarding the impact on that freight rail service by Amtrak's proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama.

Cargill and its affiliates ship from Louisiana and rely on CSXT to transport food and agricultural products over the New Orleans, LA to Mobile, AL line segment to deliver to our customers. Freight rail service is critical to the success of our businesses. The quality of service that CSXT provides makes freight rail the most efficient transportation alternative to serve our customers.

CSXT and Norfolk Southern Railway Company have submitted evidence, including a Rail Traffic Controller study, that shows the introduction of Amtrak's Gulf Coast passenger service between New Orleans and Mobile will cause significant harm to freight service. This harm is expected to manifest itself through decreased freight train speeds and delay as well as extreme operational variability for shipments moving through the gateway. CSXT's local trains the very trains that haul our shipments will be hit the hardest. Cargill is deeply concerned about our ability to meet the demands of our customers if this harm to CSXT's freight rail service materializes.

Cargill 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. Cargill requests any track improvements required to accommodate the additional Amtrak volumes to be performed prior to introducing service and are not done at existing shippers' expense. It is our understanding that CSXT and NSR have proposed

15407 McGinty Rd W
Wayzata, MN 55391

Gulf Coast Passenger Service Between New Orleans and Mobile
STB Finance Docket No. 36496
February 11, 2022
Page 2 of 2

infrastructure projects that would support Amtrak's desired passenger service while protecting the quality of freight service that Cargill relies on. Cargill urges the Board to seriously consider the merits of these projects.

The Board has an obligation to protect the interests of all parties that rely on the national rail network, not just those of passenger rail. Amtrak's desire for access to the Gulf Coast Corridor without proper investment is not only harmful to freight rail service, but would be unreasonable given funding it received from Congress last year. Cargill requests that the Board require Amtrak to fund and facilitate the construction of any required infrastructure projects necessary to avoid harm to the current freight rail servicers and their customers, and all ultimate customers.

Respectfully Submitted,

DocuSigned by:

7633F96AB33F48A...

Jackie Bailey

Cargill, Incorporated

Global Transportation Leader

Jackie_Bailey@Cargill.com

cc: FD 36496 Service List

Mike Wagner, Managing Director • Cargill Starches, Sweeteners, Texturizers, Cargill Inc.

Larry Fauchaux, CEO & General Manager • Louisiana Sugar Refining, LLC