

February 16, 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:

Kemira Chemicals, Inc. (“Kemira”) has a number of manufacturing facilities in the Southeast, including a large chemical plant in Mobile, AL, where we rely on the freight rail service provided by CSX Transportation, Inc. We 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.

Kemira produces chemicals for a number of industries, including municipal and industrial water treatment, pulp and paper, and oil and gas, at our facilities in the Southeast. We rely on CSXT to transport raw materials to our facilities and finished products to our customers. We recently made a significant investment at our Mobile, AL facility based in part on our ability to safely and efficiently transport goods via rail to and from that plant. Freight rail service is critical to the success of our business and CSXT provides us access to two major port terminals in New Orleans and Mobile through which we can access greater domestic and international markets than would otherwise be available.

We understand that 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 Mobile, AL facility, will be hit the hardest. Kemira is deeply concerned about our ability to meet the demands of our customers if this harm to CSXT's freight rail service materializes.

Kemira 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. We urge the Board to seriously consider the merits of these projects.

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 Kemira will either be forced to turn to more expensive and less efficient alternatives to rail or 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. Kemira 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,



Kelly Forrester  
Director, Supply Chain Management,  
Americas  
Kemira Chemicals, Inc.

cc: FD 36496 Service List