



CITY OF COLUMBIA  
SOUTH CAROLINA  
OFFICE OF THE MAYOR

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Surface Transportation Board  
395 E Street SW  
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***Submitted Electronically***

**RE: DOCKET EP 728 (Policy Statement on Implementing Intercity Passenger Train On-Time Performance and Preference Provisions of 49 USC 24308(c) and (f))**

Dear Chairman Elliott, Vice Chairman Miller & Commissioner Begeman:

The City of Columbia appreciates the opportunity to submit comments on this matter.

In general, the City of Columbia fears that the policy outlined in this notice would substantially harm the on-time performance of Amtrak passenger trains. The Board's current system and procedures work well at balancing Congress' clear intention that passenger trains be given preference with their directive that the Board balance the preference for passenger trains with the shipping needs of host railroads and their customers. We urge the Board to withdraw this proposal. We further urge the Board to reconsider its specific proposal to measure the on time performance of passenger trains based on departure and arrival solely at origin and terminal stations.

The capital of South Carolina, Columbia is a city of 133,358 people and the hub of a metropolitan area of 800,495 people. In addition to state government offices and numerous federal offices and institutions, Columbia is the home of the University of South Carolina (28,481 students), as well as Allen University, Benedict College, Columbia College, and Midlands Technical College (with a combined total enrollment of 16,840). Columbia is also the home of Fort Jackson, the Army's largest basic training center (45,000 soldiers/year). Columbia is a transportation hub and tourist destination. Three major interstates converge in Columbia and the state's largest airport is located here, too. Three major rivers traverse the area, and it is home to Lake Murray, a 50,000-acre earthen dam lake. Columbia has an 86,000-seat football stadium, a large civic center, a 19,000-seat public arena, and Riverbanks Zoo, which receives over 1 million visitors per year and was voted one of the 10 Best Zoos in America.

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The City of Columbia has long advocated for improved rail transportation. Rail played a key role in the growth and development of Columbia in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries and continues to play an important role in its economy. Several important rail lines converge on Columbia, including key rail lines connecting Savannah and Charleston to points west and north of Columbia. Columbia is a major interchange between the CSX Transportation Main Line serving the East Coast and the Norfolk Southern line linking Charleston with the Norfolk Southern Main Line that runs between New Orleans and the Northeast. Until the middle 1900s, Columbia was an important passenger rail hub. Although the role of passenger rail in Columbia's intercity travel mix has diminished since then, Amtrak continues to play an important role in Columbia. It serves 38,000 passengers per year despite its limited service, which consists of two trains per day that arrive in the early morning hours.

City leaders have long been supportive of increased investment in both freight and passenger rail. A clear sign of this commitment is the completion of the Congaree Vista Railroad Relocation Project. One of Columbia's most important infrastructure investments of the past half-century, this project relocated all of the railroad lines converging on downtown Columbia to a depressed right-of-way running 12 city blocks on the west side of the City. Completion of this project provided important benefits to Norfolk Southern and CSX Transportation, removed a traffic bottleneck, and eliminated countless grade crossings in a congested urban area. This project also sparked the renaissance of the City's center in general and the Congaree Vista in particular.

In 49 USC 24308(c), Congress clearly outlined that, absent an emergency, host railroads must give preference to Amtrak passenger trains using their tracks. This preference is crucial to ensuring the reliable, on time performance of the Amtrak passenger trains that serve Columbia. We fear that the Board's proposal would run counter to clear congressional intent and bias the process against passenger trains. In addition, current law (the remainder of 49 USC 24308(c) and then 49 USC 24308(f)) already allows STB to set aside the preference for passenger trains in cases of emergency or where railroads petition the agency for relief if they show legitimate concerns with granting preference to passenger trains over freight trains on specific routes in the unlikely event that passenger trains harm freight service.

Simply put, current law, current regulation and current procedures have worked well to ensure Congress' intent to maintain reliable and efficient passenger rail service and to balance that intent with the needs of freight. The City fears that the Board's proposal would upend that delicate balance and tip the scales in a manner that would significantly harm passenger rail service.

Surface Transportation Board  
Page 3  
April 13, 2016

Adding to our concern is that this imbalance would hurt passenger rail at the moment when our nation, led by our nation's cities (which are often at the forefront of emerging policy and innovation), is looking to improved passenger rail to improve mobility, promote economic development, increase regional connectivity and address the challenges of congested airports, congested highways, meeting federally-mandated air quality standards, and climate change. In South Carolina, state officials, local leaders, business leaders, and citizens are working to reestablish passenger rail service between Columbia and Charlotte, an effort the City of Columbia views as a first step to creating a robust regional passenger rail system. We fear that the Board's proposal could significantly set back these efforts.

We are also deeply concerned about the Board's proposal to measure the on time performance of Amtrak passenger trains based on originating and terminating stations. That approach would provide an incomplete picture of Amtrak on-time performance and its impact on passengers. The Board should measure on-time performance at all stations. The Amtrak passenger train that serves Columbia, the *Silver Star*, is a 1,522-mile route. Columbia is located approximately in the middle of this route; whether the *Silver Star* leaves or arrives in Boston or Miami on time means relatively little to a passenger boarding or alighting the train in Columbia. In addition, the northbound *Silver Star* arrives Columbia at 4:01 am and the southbound *Silver Star* arrives in Columbia at 1:38 am. These are already inconvenient times for most passengers, making the on-time performance of the *Silver Star* in Columbia all the more important.

The City of Columbia submits these comments in the spirit of cooperation and collaboration. The City has a strong, collaborative relationship with the freight railroads that serve our community and host our passenger rail service. This partnership allowed for the completion of the Congaree Vista Railroad Relocation Project and continues to be valuable as we work to address quiet zone and grade crossing concerns and reestablish passenger rail service between Columbia and Charlotte.

Thank you for your attention to the City of Columbia's concerns.

Sincerely,



Stephen K. Benjamin  
Mayor