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Surface Transportation Board
395 E Street SW
Washington, DC 20423

Dear Members of the Surface Transportation Board,

Colorado's robust rail network includes 14 freight railroads that operate over 2,636 miles of track and two Amtrak passenger routes, the Southwest Chief and California Zephyr, that utilize freight rails. As such, rail freight has a significant impact on the state economy, supporting 2,259 direct jobs and thousands more indirect jobs throughout the state. These railways are the reliable and sustainable conduits that connect Colorado manufacturers and producers to markets near and far.

Of course, railroads are just one piece of a connected transportation system that moves upwards of 60 tons of goods per American every year. This system will be asked to move more as demand is projected to grow significantly in coming decades. While other modes will seek federal funding to meet growing demand, freight railroads operate almost exclusively on self-funded infrastructure.

For this and several other reasons, we write today in support of healthy freight railroads—and urge you to reject the proposed rule on mandated switching.

The logistics network is already struggling, and more switching will worsen these challenges by complicating rail operations. A single car switch, for example, can take 6 days and 68 separate rail operations. When you consider the 1.5 million railcars moving across the U.S. rail network at any given time—or even just the 140 million tons of goods shipped to, from and through Colorado via rail annually—it's plain that more switching will compromise rail service.

The result of compromised rail service is more freight moving by truck. Needless to say, more trucks not only damage public infrastructure but also get us further from Colorado's sustainability goals. Every year freight rail translates to 7.7 million fewer truckloads on Colorado roadways and an emissions reduction of nearly 2.5 million tons of greenhouse gases.

This point is especially important because the transportation sector is the single largest source of U.S. emissions in the U.S., accounting for 27% of total emissions, according to the EPA. Yet railroads, which haul about 40% of long-distance freight in the U.S., are responsible for just under 2% of transportation-related emissions. The think tank Third Way in a 2021 report argued that policymakers should enact policies that shift freight away from more carbon-intensive modes like trucking and toward rail.

Colorado's passenger rail operations are also a factor. Amtrak in 2016 opposed forced switching for the potentially disruptive impact to its operations, which are hosted by freight railroads in

Colorado and generally out West. Especially as Amtrak is endeavoring to expand its service to new cities with money from the bipartisan infrastructure law, it is imprudent to introduce new network complications.

Colorado businesses—and the communities they support—require efficient and predictable shipping options to stay competitive in the marketplace. By mandating more switching, the STB is likely to inadvertently spark a chain reaction that constricts rail service and business activity at a time when the nation is struggling with pandemic recovery.

Thank you for considering these thoughts. We urge you to oppose the proposed rule on forced reciprocal switching (EP 711-1). Policies that are good for freight rail are good for our communities, the economic growth of Colorado, and good for confronting the climate crisis.

Sincerely,

Debbie Bell
Commissioner
Fremont County

Rod Bockenfeld
State Representative, District 56
Colorado House of Representatives

Longinos Gonzalez Jr., Lt Col, USAF
(Retired)
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Patrick Sherry, PhD
Director
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State Representative, District 48
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Commissioner, District 1
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CC: Colorado Congressional Delegation