

DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY

DOCKET NO. DOT–OST-2021-0160
AMERICA’S SUPPLY CHAINS AND THE TRANSPORTATION INDUSTRIAL BASE

COMMENTS OF
THE AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION

The American Short Line and Regional Railroad Association (“ASLRRA”) on behalf of the short line railroad industry, comprised of 603 small business railroads and industry suppliers, submits the following comments in response to USDOT’s December 30, 2021, Request for Information (“RFI”), to inform the development of DOT’s Research, Development, and Technology (RD&T) Strategic Plan for fiscal years (FY) 2022-2026.¹ ASLRRA appreciates this opportunity to provide feedback and looks forward to future opportunities to provide further insight.

As background, an average short line is about 70 miles long with approximately 18 employees serving about a dozen local customers. Class II and III Railroads in total support 478,820 jobs, \$26.1 billion in labor income, and \$56.2 billion in value-add to the economy, playing a particularly large role in the agricultural, manufacturing, and energy industries. Importantly, we provide the first- and last-mile connections for local areas connecting manufacturers, businesses and farmers in communities and small towns to larger markets, urban centers, and ports.

Listed below are ASLRRA’s responses to the questions found in the RFI. Please note, answers have been provided only for questions regarding areas where ASLRRA has expertise. The number identifying each question is noted to the left.

RFI Questions

2. What types of research activities should DOT undertake to meet its strategic goals?

¹ ASLRRA is a non-profit trade association representing the interests of approximately 600 short line and regional railroad members and railroad supply company members in legislative and regulatory matters. Short lines operate 50,000 miles of track in 49 states, or 29% of the route miles in the U.S., touching in origination or termination one out of every five cars moving on the national railroad system, serving customers who otherwise would be cut off from the national railroad network.

ASLRRA recommends that the DOT proceed with the implementation of the Transportation Research Board's (TRB) research plan titled, "Research to Support Evaluation of Truck Size and Weight Regulation."² The TRB research plan was compiled upon request of the DOT in 2019 and has not yet been acted upon. The plan identifies 27 research projects on truck size and weight that would help the federal government better understand how changes in the status quo could impact highway safety, environmental concerns, wear and tear of pavement and bridges, and modal shift of freight from rail to truck.

Any actions that would lead to an increase in the weight limit of trucks or allow for longer trailers or longer double trailers would create a host of negative consequences for both the short line railroad industry and the greater supply chain. It would shift freight from rail to truck, resulting in more trucks on our nation's highways, more pollution, greater congestion, and increased crash risk to the motoring public. Small railroads are largely privately-owned, and they reinvest 25 to 33% of their annual revenue into maintaining and improving their capital-intensive infrastructure, which is often acquired from previous owners in a state of disrepair.

Meanwhile, trucks enjoy the inherent advantage of operating over publicly funded highways, while underpaying for their damage to roads and bridges, as policy in many respects subsidizes their operations. These problems would be further exacerbated by heavier and longer trucks, which cause significantly more damage to public infrastructure. All of this occurs as fuel taxes and user fees have consistently proven insufficient to fully fund the Highway Trust Fund, and general fund taxpayer dollars are increasingly applied to road projects to the tune of approximately \$150 billion since 2008, and an expected \$270 billion by the end of the Bipartisan Infrastructure Law. In sum, short lines pay for their infrastructure and our competition's.

Completing the TRB research plan will allow full consideration of impacts to infrastructure and public safety if any changes to TSW are considered. We believe that the completion of these important 27 research initiatives will arm DOT with the information it needs to advise Congress on the numerous perils of increasing truck size and weight.

4. What emerging challenges or opportunities or knowledge gaps in transportation warrant additional Federal RD&T activities or investments?

We urge the USDOT to support funding for projects at the Federal Railroad Administration (FRA) to improve and streamline data collection efforts aimed at improving short line railroad safety and the accuracy of federal geospatial datasets, including updates to the North American Rail Network GIS data. At the same time, we ask for consideration of the fact that short line railroads do not have the administrative staff support nor the resources of larger railroads, which should be considered in any

² [Front Matter | Research to Support Evaluation of Truck Size and Weight Regulations | The National Academies Press \(nap.edu\)](#)

data requests made by FRA. ASLRRA stands ready to collaborate with FRA on projects, as appropriate.

ASLRRA also suggests that DOT continue working to engage with other agencies on initiatives that could impact the efficient movement and environmental impact of freight rail. The Department of Energy (DOE) Lowering CO2: Models to Optimize Train Infrastructure, Vehicles, and Energy Storage (LOCOMOTIVES) focuses on emissions reductions of Class I freight railroad operations. We encourage partnerships between agencies in order to share knowledge of the mode being studied. Short line railroads are small businesses and operate with much smaller revenues, far fewer employees, and limited resources. Having the modal offices available to work with agencies outside of DOT is important for sharing the unique needs of short line railroads.

7. Is there anything else you want to share or say regarding DOT's research portfolio and activities?

ASLRRA would like to commend the FRA on its Broad Agency Announcement (BAA) funding program. The programs identified in the 2021 round of applications are important to advancing technology and workforce development among the entire freight rail industry. The BAA program is a great opportunity for short lines, as there is no match requirement. Using an easy to access program like this one, helps the ASLRRA and our university partners develop cost effective ways for small business railroads to meet the environmental and social justice priorities of the Biden Administration.

ASLRRA recommends the Office of the Secretary take into consideration the TRB Special Report, "Review of the Federal Railroad Administration's Research and Development Program" when developing freight rail research programs.³ This report highlights the activities of the four research arms within FRA. It also suggests improvements that can be made when communicating research activities and results to the public and academic audiences.

Thank you for the opportunity to comment on this important RFI.

Sincerely,



Chuck Baker
President
American Short Line and Regional Railroad Association

³ [Review of the Federal Railroad Administration's Research and Development Program | Blurbs New | Blurbs | Main \(trb.org\)](#)