October 17th, 2019

Ohio House Transportation and Public Safety Committee

77 South High Street

Columbus, Ohio 43215

Dear Committee Members:

On behalf of R. J. Corman Railroad Group, I am writing to express our opposition to HB186 and the proposed mandates that would impact our two short line railroads in Ohio and the entire rail industry across the state.

To provide some background, R. J. Corman Railroad Group is a family owned railroad transportation, logistics, and services company based in Nicholasville, KY. Our footprint in Ohio is extensive with two Railroad Services companies in London and Toledo that provide emergency response and other services to the railroad industry in Ohio. Our Material Sales company has a yard in Celina, we have a Distribution Center in Celina, and we have two short line railroads with over 160 miles of non-continuous track across the state.

R. J. Corman Railroad Company is under the Group umbrella of companies that has two short line railroads operating and serving business and industry in the state of Ohio. Short line railroads are a key piece of logistical infrastructure to the communities we serve and connect businesses to the Class 1 railroads and ultimately the nationwide transportation network. Short lines are often the “first mile and last mile” for customers, either as in-bound traffic delivering raw material and product to a facility for production or as out-bound traffic shipping their product from the facility and taking it to market. Short lines and Class 1’s are partners that work together to safely and efficiently serve the customers in Ohio and across the country.

Our Cleveland Line (RJCL) has been in operation since 1988 and stretches 68 miles from Uhrichsville to Warwick with a satellite operation in Wooster and a yard office in Dover. We interchange traffic with CSX, Norfolk Southern, and the Wheeling and Lake Erie Railroads on the RJCL. Our Western Ohio Line (RJCW) has been in operation since 1993 and stretches 93 miles from Lima to Ft. Recovery with a satellite operation in Ansonia plus a yard office in Celina in conjunction with our Distribution Center and Material Sales companies. The RJCW also interchanges traffic with the CSX and Norfolk Southern Railroads.

Our short line railroads provide service to 29 customers including Dover Chemical and Kraton Chemical on the RJCL and The Andersons and Fremont Company on the RJCW.  We haul a mix of commodities including chemicals, aggregate, food and farm products, and other miscellaneous commodities.  Of our largest customers, Dover Chemical and Kraton Chemical handle various chemicals while The Andersons are an ethanol shipper and Fremont receives inbound tomato paste on our RJCW line.

Based on some initial internal estimates, to meet the proposed lighting requirements in just one of our designated rail yards, would cost our company in excess of several hundred thousand dollars. This type of unnecessary investment would redirect funding allocated for maintenance and rehabilitation in our track infrastructure, making our railroads more at risk from both a safety and operations standpoint and would have the direct opposite result of the intent of the legislation.

Safety is our number one priority as a company and our number one asset is our people. We make a substantial investment in the education and training of our employees and we empower them to take the necessary corrective measures when a safety violation occurs to ensure they prevent the next one from happening in the future. If we are forced to make substantial and unnecessary investments in lighting alone, the operations of our railroads are put at risk which ultimately leads to less safe working conditions for our employees.

Our company wants to be able to make the necessary investments in our infrastructure and operations that keep our railroad safe and better equipped to serve the businesses in Ohio. Burdensome regulations and unnecessary costly mandates put our industry at a competitive disadvantage. The business and industry in Ohio deserve a safe and efficient rail transportation network to keep up with the demands of on-time delivery and a growing economy. Let’s work together to ensure the state remains competitive and attractive for companies to locate and do business in Ohio.

Respectfully,

William Downey

Director Government Affairs

R. J. Corman Railroad Group