

BSPRA Member Counties

Big Horn

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Butte-Silver Bow

Carbon

Custer

Dawson

Gallatin

Granite

Jefferson

Lake

Mineral

Missoula

Park

Powell

Prairie

Rosebud

Sanders

Stillwater

Treasure

Wibaux

Ex Officio Members

**Confederated Salish & Kootenai
Tribes**

Crow Tribe

Northern Cheyenne Tribe

Amtrak

BNSF Railway

**Montana Department of
Transportation**

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March 8, 2024

Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: FRA Amtrak Daily Long-Distance Service Study

Dear FRA Long-Distance Study team,

The Big Sky Passenger Rail Authority (BSPRA), as a subdivision of state government and regional rail authority in Montana, is pleased to offer the below comments as a supplement to the input we provided at the Amtrak Daily Long-Distance Study (LDS) Northwest Working Group meeting in Seattle, WA, on February 8, 2024.

Our comments below focus on eight main areas: (1) timetable and process for development of new long-distance routes, (2) 16th route proposal, (3) route prioritization, (4) twice daily on-time performance and related analyses, (5) station analyses, (6) route advisory boards, (7) elimination of non-federal match for long-distance routes in the Corridor ID Program or seeking funding through other federal grant programs, and (8) previously submitted comments.

We are deeply appreciative for the work done thus far to expand and enhance passenger rail. Please let us know if you have any additional questions or if we can be of assistance in this generational opportunity to create a bold vision for passenger rail in America!

Best,



David Strohmaier
Chairman



**Comments to the Federal Railroad Administration
Amtrak Daily Long-Distance Service Study
March 8, 2024**

Comment 1: Timetable and Process for the Development of the New Long-Distance Routes

(A) The Federal Government should adopt a target date of 2036 for the completion of the Long-Distance Study’s Preferred Routes. Consistent with that completion date, the U.S. Department of Transportation (DOT) should design a planning and development process within the Corridor Identification and Development Program that will require a maximum of 8 to 10 years to place a new passenger rail route into operation. The proposed routes should be placed into a staged development pipeline with projects starting for selected routes in 2024 and additional route projects to be initiated successively through 2027 (with routes selected to start in 2027 placed on 8- or 9-year development schedules). This schedule will ensure that all new routes are placed into operation between 2032 and 2036.

The timetable proposed during the third round of the FRA study meetings for developing the new passenger rail routes—from 2040 for the first new route completions to an undefined 2060+ final date—is entirely unacceptable. In the Northwest Working Group meeting presentation on February 8 in Seattle, there was no clear rationale for this lengthy schedule (although, it was undoubtedly based on certain unstated assumptions). Delaying the completion of a true National Passenger Rail Network for a full generation beyond its conception likely dooms this effort to failure. The proposed schedule is incompatible with the passenger rail outcomes sought by the Bipartisan Infrastructure Law and the policies of the current Administration. Most importantly, the schedule fails to serve the public’s need for a more affordable, reliable, and safer transportation system that creates new economic opportunities and high-paying jobs, provides greater equity in transportation access to citizens and communities, and supports a clean and healthful environment resistant to climate change. It is imperative to set a bold vision with an aggressive critical path and then determine the means to that end, including removing obstacles that impeded a more accelerated schedule.

(B) The Federal Railroad Administration should ensure that each Preferred Route proposed in the Long-Distance Study is placed into the Corridor ID program under the 8- to 10-year development process.

There is currently no clear link or transition for route development from the Long-Distance Study to the route development process. To establish that link, the FRA should adopt the policy that all preferred routes will be placed into the Corridor ID Program on the project schedule described (A) above without requiring competition with state-supported or other corridors.

(C) The President should create a National Passenger Rail Authority within the Office of the Secretary of Transportation with participation of other federal agencies to mobilize national resources beyond the U.S. DOT and provide oversight to ensure the development of a true National Network by 2036.

The National Passenger Rail Authority should be charged with:

- (1) Recommending methods to streamline the planning and development process for referred routes under the Corridor ID Program to achieve the 2036 completion goal;
- (2) Working with relevant private and public entities to break the bottleneck and backlog of new rail equipment production in the U.S. and ensure the availability of adequate equipment by 2036;
- (3) Maximizing the coordination of host railroads, Amtrak or other operators, and state, local and tribal interests in the development and operation of routes;
- (4) Mobilizing the appropriate use of new energy and transportation technologies in the National Passenger Rail Network;
- (5) Encouraging the coordination of long-distance routes with complementary transit, economic, housing, social and community development programs and activities to maximize the benefits of passenger rail;
- (6) Coordinating a process for states and/or regional rail authorities to create "Route Advisory Boards" with state, tribal, local and private interests for each existing and new long-distance route to advise Amtrak on the operation of their respective long- distance route (*see Comment 6 below for details on the function of the boards*); and
- (7) Carrying out such other tasks as needed to create a new National Passenger Rail Network by 2036.

Comment 2: The FRA should add to the list of proposed preferred routes a 16th long-distance route that connects the metro areas of Portland/Seattle with Phoenix-Tucson.

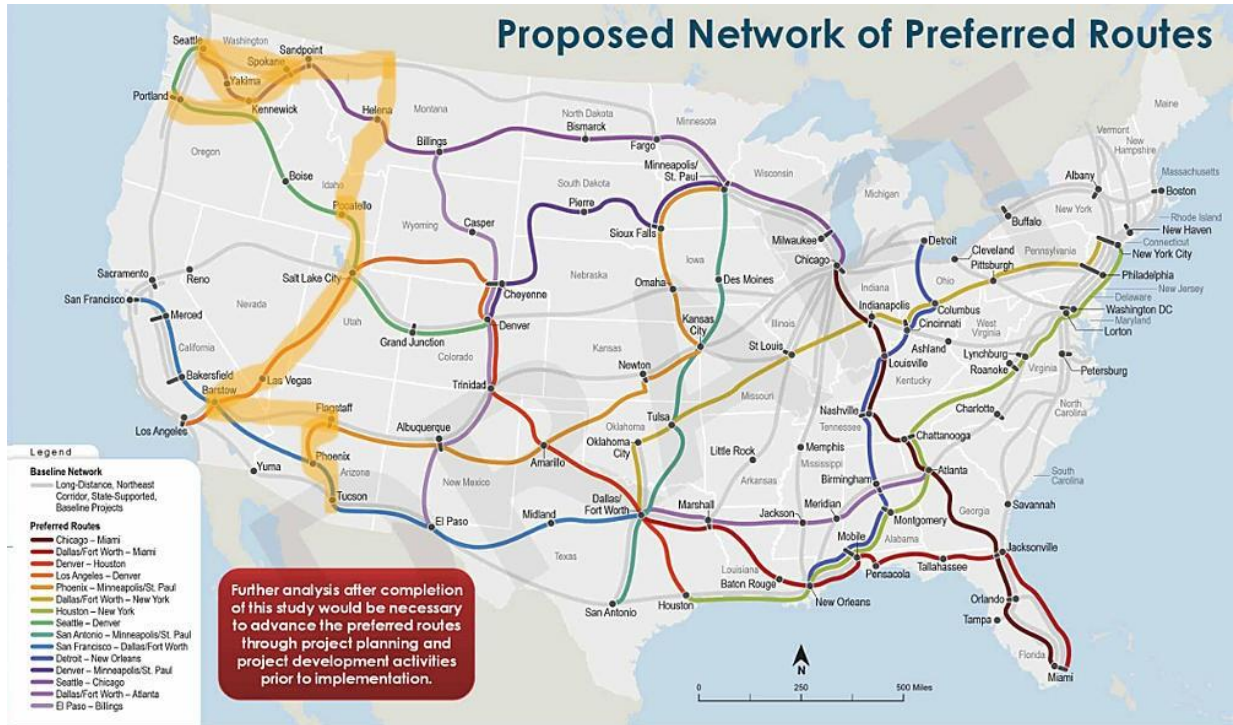


Figure 1. Proposed 16th Long-Distance Preferred Route.

The draft map of 15 new long-distance preferred routes presented by the FRA at the 3rd round of regional working group meetings creates a bold vision of a new National Passenger Rail Network, which we fully support. However, there is one obvious omission: the draft map fails to connect the major metro areas of Portland and/or Seattle with Phoenix and/or Tucson. It leaves the vast region from the Great Basin to the Northern Rockies and Pacific Coast unserved by a complete, continuous north-south passenger rail route. The proposed route fills that gap.

The additional proposed route (see Figure 1, above) will be an epic passenger rail route enabling travelers to experience some of the nation’s most spectacular scenic wonders and wild lands. It would connect 11 national parks, including the flagship Grand Canyon, Yellowstone, and Glacier Parks—several national monuments including Grand Staircase Escalante and the Craters of the Moon—numerous wilderness areas, ski areas and other notable recreation sites.

This route will improve the management and preservation of the ecology of the national parks and other wild lands of the region by lessening the impact of motor vehicle travel in the region. Travelers arriving by rail are more likely to use transit systems instead of personal automobiles to enjoy these lands.

This proposed route would serve and establish a transportation network among a impressively large number of tribal nations—including those in the Pacific Northwest, the Northern Rockies and Plains, the Great Basin, and the Southwest.

The route will support and expand upon the seasonal travel anticipated for the preferred route from Minneapolis-St. Paul to Phoenix, including “snowbird” travelers seeking to move from north-to-south in the fall and vice-versa in the fall. However, it will also enable seasonal travel from south to north for skiing and other winter recreational pursuits and huge travel in multiple directions in the spring through fall inspired by access to the vast parks and wild lands of the region.

The route would be anchored at each end by dual metropolitan areas with a combined population of more than 12 million people. Residents of all metropolitan areas served by the route comprises more than 17 million—and the total population served by the route will exceed 20 million people in nine states.

The proposed route would connect all nine existing and proposed east-west passenger rail routes in the West: the Sunset Limited, San Francisco to Dallas, Phoenix to Minneapolis-St. Paul, the Southwest Chief, the Desert Wind, the California Zephyr, the Pioneer, the North Coast Hiawatha, and the Empire Builder—making the route a ridership multiplier and premier creator of National Network connectivity.

Finally, the new route, through its joint station with the Empire Builder at Shelby, MT, would serve as a platform for the National Passenger Rail Network to extend its service connections internationally to Canada, specifically to Calgary and Edmonton, Alberta.

Comment 3: The U.S. DOT should establish priorities among the passenger routes for development by 2036 that are not already in the Corridor ID Program, with all new routes placed into initial planning and development by groups for 2024, 2025, 2026, and 2027. (Note: the North Coast Hiawatha is already placed into Corridor ID and will begin planning and development in the 2024 group.)

The primary factors for determining the order of development should be:

- Routes already in the development pipeline: Currently, the only new preferred route in the Long-Distance Study that is also in Corridor ID is the North Coast Hiawatha. This route, along with potential others that reflect the below prioritization criteria, should be among the first routes to advance through project development and deployment.
- Geographic balance: Each yearly group of new routes placed into development should include all the major regions of the nation as nearly as possible to ensure the balanced development of the National Network.
- State, local, or tribal sponsorship: Routes should be also prioritized based on the presence of state, local or tribal sponsors willing and able to serve as Corridor ID applicants.

- Within each region, the FRA should also consider rating each route separately on population served, number of rural disadvantaged and tribal areas served, population of rural disadvantaged and tribal areas, and presence of destinations of national significance on the route.

Comment 4: The FRA should establish a goal of operating all long-distance trains at minimum frequency of two times daily with a high level of on-time schedule performance to maximize ridership and fare recovery, minimize operating subsidies, facilitate routing options to reach more communities, increase transportation equity, and achieve the highest level of economic, social, and environmental benefits. FRA should anticipate and support the detailed analyses of ridership and benefits from enhanced levels of rail service frequency that should be conducted for routes during Corridor ID Service Development Plan planning. Those analyses under Corridor ID will take account of and benefit from local knowledge and data and will improve upon the once-daily frequency analysis performed by the Long-Distance Study contractor. Thus, the FRA should place a priority on the frequency and ridership analyses conducted under Corridor ID, provided they meet professional standards for such work.

We are confident that well-designed, professional studies of twice daily service in each direction (and more in selected cases) combined with on-time schedule reliability will confirm and document their substantial ridership, financial, economic, and social benefits. With that understanding, FRA should adopt for planning purposes a working goal that the National Passenger Rail Network will operate on that basis. Moving forward, the analysis of that goal should be incorporated into the Service Development Planning in Corridor ID for all new long-distance routes. Separately, the FRA should develop a process of planning for twice-daily service with on-time schedule reliability on all existing long-distance routes.

The Long-Distance Study analysis of once-daily frequency of service per route and its corresponding ridership estimates utilizes a “one-size-fits-all” approach that does not vary with individual route conditions. For example, the long-distance analyses depend heavily on estimates of passenger rail trips displacing existing air and motor vehicle trips between destinations without adjusting for the impact of passenger rail generating new trips not previously taken (i.e., induced ridership). For example, the North Coast Hiawatha will provide service to a more than a 1,000 mile-plus stretch between Fargo and Spokane where this is no direct air service between the several major cities. Moreover, motor vehicle travel within that area is frequently disrupted or prevented by snow and ice storms that can over six months of a year. Under those conditions, different levels of rail service frequency will produce new rail ridership from trips that otherwise would not have been taken. For those reasons, the FRA should anticipate and support the detailed analyses of ridership and frequency of service levels to be undertaken in Step 2 Service Development Planning under Corridor ID.

Comment 5: The FRA should anticipate and support the station location analyses to be undertaken under the Service Development Plan phase (Step 2) of the Corridor ID Program. Those analyses should take priority over the historic station analysis conducted in the Long-

Distance Study, which to-date do not appear to account for current demographic, social, economic conditions, and policy goals.

The long-distance analysis of stations is necessarily based on historic locations which reflected conditions decades or even a century ago. The historic stations, at times, reflect unfortunate aspects of history. For example, a century ago a station may not have been located on an Indian reservation even though, geographically, a station could have been justified there. A wide variety of demographic and other changes may have occurred as well. So, the Corridor ID Program should yield a more reliable and relevant set of station locations than the historical record.

Comment 6: The Long-Distance Study should fulfill its duty to “develop recommendation for methods by which Amtrak could work with local communities and organizations to develop activities and programs to continuously improve public use of intercity passenger rail service along each route” by recommending the establishment of a “Route Advisory Board” for each long-distance route. (See the reference under Comment 1 (C)(f) regarding the National Passenger Rail Network Advisory Authority coordinating the creation of such boards.)

The Long-Distance Study should develop a model memorandum of understanding (MOU) to be developed between Amtrak and states and/or regional rail authorities to establish a Route Advisory Board for each route. Such boards should be broadly representative of state, tribal, local, public service entities, private interests, and host railroads along each route. The term “public service entities” refers to educational institutions, health care organizations (including the Veterans Administration), national and state parks, and established tourism organizations. The MOU should require Amtrak to meet in public sessions with the advisory boards, support their operation, and consider their recommendations—with a public record of its response to each recommendation. Each advisory board should advise Amtrak on measures it can undertake to improve public use of the route. Matters such as local content being reflected in service options and route information, operational and station improvements, cooperative marketing, local organizational relationships, and similar matters might be typical matters of discussion and consideration.

Comment 7: Eliminate onerous non-federal match requirements for long-distance routes participating in the Corridor ID Program or utilizing other federal grant programs for infrastructure that will support expansion of the National Long-Distance Network.

There is a precedent for eliminating non-federal match requirements in other USDOT programs that support rural and disadvantaged regions of the country (e.g., the Federal Land Access Program). In addition, the National Network is a national asset and system that should be fully federally supported. Without that, transportation equity will be impossible to achieve across the nation. Currently, it appears as if the non-federal match requirements for Corridor ID and other grant programs geared toward passenger rail are artifacts of traditional state-supported intercity corridors, which, to be expected, are joint federal-state responsibilities. However, the National Long-Distance Network is by definition a national asset and should *not* require local

and state governments to cover match for either project planning or implementation. The Long-Distance Study should identify administrative options to eliminate non-federal match. If statutory or regulatory changes are necessary, the Long-Distance Study should identify specific sections of code or regulation requiring modification.

Comment 8: The Authority incorporates by reference all its prior comments submitted as part of the Long- Distance Study.

The Authority previously submitted comments to the FRA Long-Distance Study on March 16 and August 21, 2023. Please continue to consider all our prior comments to the extent they remain relevant to the study.