



March 8, 2024

Ms. Katie List
Community Planner
Office of Amtrak and Northeast Corridor Program Delivery
Office of Railroad Development
Federal Railroad Administration
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

RE: *Formal Comments on Federal Railroad Administration Daily Long-Distance Service Study, Meeting Series Three, Route Identification*

Dear Ms. List:

The Rail Passengers Association, also known as the National Association of Railroad Passengers, is the nation's oldest and largest organization speaking for the nearly 40 million Americans who rely on passenger rail of all kinds every year. Our staff and our advocates have been honored to take part in all 18 regional FRA Daily Long-Distance Service Study workshops conducted to date, and we thank you for the opportunity to provide feedback as the agency moves to the final phase of the study.

Observations About The Third-Round Map

Before detailing areas which we believe should be reconsidered in the fourth and final round of workshops, we would like to begin by acknowledging the extraordinary and encouraging work that has been done to-date, both by the study team and by the FRA professionals assigned to lead this study project – yourself, Mr. Lyle Leitelt, and Mr. Frank Loetterle. This has been a truly remarkable project aimed at simultaneously shaping an ambitious vision while remaining grounded in data and analysis, producing a result that could double America's long-distance rail network.

This vast expansion would give 45 million more Americans access to trains including millions of rural residents, the disabled, veterans, and those living on tribal lands, connecting hundreds of metro areas, universities, hospitals, and military training facilities – including many which, today, are unreachable in any way other than driving. Regardless of any specific modifications or reconsiderations our Association might suggest, FRA can take justified pride in delivering to Congress a careful, thoughtful, and thorough analysis to set the stage for detailed studies of individual routes capturing capital costs and investment needs.

Recall that we have discussed with the study team having our staff produce independent economic-benefits assessments for each of the 15 proposed routes. These assessments are underway, although they will not be completed in time to meet the March 8th deadline for Round Three feedback. Nevertheless, a very broad assessment based on preliminary data suggests a total annual benefit to the economy of as much as \$10 billion, without even including economic stimulus from construction and capital upgrades.

Moreover, using a broader environmental lens, the benefits are even more impressive. Traffic flows of all kinds along the points connected by these routes come to nearly 1.6 billion trips every single year. Even assuming no traffic growth and using the behavior we already observe on today's trains in terms of diverted vehicle miles traveled (VMTs) from highways, these routes could generate around 175 million annual trips, collectively. And that's not including induced demand, which we've seen – and documented – everywhere train service is made available. Using the cost-of-carbon yardstick to assess economic harm from emissions, diverting about 11 percent of the trips that take place along these routes from cars and planes could eliminate some 893.7 billion tons of carbon emissions every single year, reducing emissions 12 percent per year. Even using the most conservative cost-of-carbon estimates available today that could represent a savings to the economy of \$4.5 trillion every year.

Below we respond to the questions you and your colleagues presented to stakeholders at the conclusion of the Round Three workshops, in which you sought ideas for ongoing long-distance collaboration involving the communities served and proposed recurring cycles of long-distance rail network planning similar to those carried out under state rail plans today. We then turn to specific observations our staff produced as a result of the Round Three work.

1. Ongoing Long-Distance Collaboration and Long-Distance Governance

Rail Passengers Association strongly endorses the FRA's position during the workshops that there needs to be a continuous and organized effort to involve stakeholders of all kinds as the ambitious plans begin to play out.

We also fully agree with the motivation behind the study team's proposed "Long-Distance Public Committee" to be created by Congress. However, we also believe that such a body would need to be more than just advisory in nature. Just as the State-Amtrak Intercity Passenger Rail Committee has some limited statutory role in setting the terms for state-supported Amtrak services, the long-distance committee should also have some way of exerting influence beyond simply surfacing preferred ideas.

To that end, along with other advocacy groups who have been wrestling with this question for some time, our Association recommends formation of a National Long-Distance Rail Service Commission – likely as part of the Dept. of Transportation – to bring together all the Federal agencies with a role to play in building out this new Network, as well as key stakeholders such as tribes, organizations representing state agencies, local elected and appointed officials, relevant Class I representatives, and passenger groups.

Fully realized, this study represents a long-term infrastructure strategy that will play out over decades and involve tens of billions of taxpayer dollars. Therefore, we believe it is vital to create a quasi-independent entity, such as the Commission we propose, to oversee the network's construction, to account for community desires, to involve all the parties needed to achieve success, and to ensure that no single actor has the ability to advance – or retard – this development on bad-faith grounds.

With congressional oversight, this Commission could serve as a transparent "honest broker" mediating disputes among the parties, keeping the overall project on track, and managing the planning process associated with it (see Item #2 below).

2. Repeating Long-Distance Rail Planning Cycle

Rail Passengers very strongly supports the study team's suggestion of beginning and sustaining a repetitive National Network planning cycle similar to those now undertaken by states producing state rail plans. Periodically revisiting the underlying work as it relates to each proposed route would ensure that changed conditions are taken into account to update each route selection, would help to focus the use of taxpayer funds, and also speed project delivery by producing outputs that could be "recycled" into individual route design and engineering plans to avoid repeating the same work,

duplicating cost, and adding years to implementation as work is continually started from scratch.

To the extent that we could “recycle” a three-year or five-year planning cycle’s outputs into service development plans, project planning, and project development, significant savings could be realized in time and expense getting through the FRA’s project pipeline phases to prepare routes for final design and construction.

The planning process absolutely should account for non-long-distance corridor development, including private rail operators and state-supported services, but would have no direct effect on those efforts, instead confining itself to refining and advancing the route selections laid out in this study. This avoids the perception that this five-year planning cycle would constitute a “National Rail Plan.”

3. Daily Long-Distance Service Study and the Corridor Identification and Development (Corridor ID) Program

The FRA should add all of the corridors included in the final report to Congress into the Corridor ID Program (the North Coast Hiawatha has already been selected). This would expedite key planning activities while a longer-term governance structure is established. In the near term, the FRA itself could administer the planning process for the collection of routes, providing a national vision and building on the expertise and working relationships established during this study.

4. Assumptions Regarding Average Speed

Rail Passengers disagrees with the decision to establish conceptual runtimes based on the average speed of 49 miles per hour between stations. We believe that, at minimum, the study should assume an average speed of Amtrak routes *as scheduled*.

We understand the rationale behind this decision, which is based on the average speed for fiscal year 2022 Amtrak long-distance service. However, it must be acknowledged that in the year this data comes from, all 15 Amtrak long-distance routes operating over freight rail tracks failed to meet the minimum threshold of acceptable service established by the FRA Metrics & Standards ($\geq 80\%$ Customer On-Time Performance).

To accept this shameful state of affairs is to absolve host railroads of culpability for ignoring Amtrak’s statutory right to preferential dispatching and communicates to America’s passengers that the freight railroads remain free to treat them like a third-class freight shipment.

5. Assumptions Regarding Implementation Timelines

Rail Passengers believes the FRA should use the study’s publication and conclusions to advance a more robust timeline for route development, design, and implementation. The conceptual timelines offered on Slide 154 of the Round Three results slide deck are far too long to be politically and fiscally feasible. The “Near Term” implementation timeline posits a requirement for sustained political and funding support across six presidential administrations, and “Long Term” would take potentially ten Presidents or more to carry out.

Congressional direction around the study constrains consideration to Amtrak as the operator and no new greenfield construction. These two requirements alone should remove significant cycle time from the equation, obviating the need for all-new operating agreements between the Class Is and some other operator and presumably creating space for liberal use of categorical exclusions to streamline compliance with environmental-review requirements.

Moreover, the two years engaged in this study effort should, by themselves, help to speed the

creation of deliverables needed to satisfy the stages of FRA’s project pipeline. At a bare minimum, the detailed, thoughtful, professional work undertaken in support of this study should provide a significant head start in creating a Service Development Plan for any of the proposed new routes. The thousands of public comments produced in response to this study should satisfy, or nearly satisfy, the public-comment requirements for new service. And if FRA were to endorse – and Congress (or the next Administration) were to create – the independent long-distance rail commission or authority we proposed above in **item #1**, the cyclical rail-planning efforts carried out by that entity could also contribute to creating deliverables needed for subsequent pipeline stages.

And finally, because there’s no greenfield construction, the only new construction we would expect would involve sidings, crossovers, platforms, stations, and signaling. For the most part, the trains will be running in places where trains already run today. This creates negotiating room for streamlined environmental review processes within the existing framework of FRA’s approved list of categorical exclusions.

Given the above, we would recommend structuring implementation around an assumption of between eight to 10 years for brand-new service on existing right-of-way: no more than two years for project planning (as a result of leveraging work done for this study), no more than three years for project development, and no more than five years for final design and construction. Ten years should be plenty of time to design and build sidings, stations, and platforms, add signals, and acquire or redeploy the necessary rolling stock.

Further, we would urge adoption of a staggered implementation timeline, so that when the first group of routes – for example, the first five – have reached year three, a second batch of five routes might begin at the Service Development Plan stage, kicking off an eight- to ten-year launch cycle. Thus, it is conceivable that after eight years dozens of communities might begin to see new service, and every two to three years thereafter, more communities would join the map.

For comparison, the U.S. technology company Intuitive Machines began conceiving and designing a NASA lunar lander in 2018, and only six years later launched and landed that spacecraft on the Moon’s South Pole — about as much time as it takes to prepare a typical rail Environmental Impact Statement, and for the same price as Amtrak says it must pay now to buy 16 new railcars by 2035.

6. Complications Arising From The 750-mile Long-Distance Definition

Rail Passengers Association recommends that the team find a way in the final report to specify that if a new route must open in stages, including individual stages which are potentially less than 750 miles long, designation of that stage as part of the formally endorsed long-distance route would insulate it from the requirement that it be operated and funded via the state-supported paradigm.

7. Rail Passengers Will Provide Economic-Benefits Analysis

As mentioned to the study team throughout Round Three, we will use our suite of economic-modeling tools to perform very basic economic-benefits assessments of each of the 15 routes as proposed. We will provide this analysis soon, under separate cover.

Respectfully submitted,



Jim Mathews
President & CEO
Rail Passengers Association