

All Aboard **NORTHWEST**

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March 7, 2023

TO: To the Federal Railroad Administration and Consultant Team

RE: FRA Sec. 22214 Long-Distance Studies, Round 1 Feedback

Here is All Aboard Northwest's feedback for Round 1 of the Amtrak Daily Long-Distance Service Study. We've tried to be as succinct as possible, but please let us know if anything is unclear, or if you have any questions.

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Outline

- Graphics
- Market Opportunities
- Ridership
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- Greenfield & Abandoned Alignments
- Routes & Recommendations
- Route Overlap & Speed
- Existing Equipment Utilization
- Railroads for National Defense

Graphics

There are a number of graphics that the team can quickly and easily create that would showcase the value and critical importance of current, enhanced, and proposed long-distance services. We encourage the team to develop these graphics to illustrate what areas, amenities, and populations this backbone of long-distance routes could serve.

Geographic Accessibility

Defining [geographic accessibility](#) is always subjective to the individual, but we know that passengers often travel large distances to their nearest train station. Therefore, we suggest that the team show all current and proposed long-distance routes, together with a visual element (gradient) showing distance (25, 50, 75, 100, and 125 miles) to the proposed long-distance services.

In the Northwest Round 1 Workshop, the team stated they needed a common nation-wide standard: this would be one such common standard but with enough detail that people in their respective sub-regions could decide if a route or service would provide an “accessible point” to their general area.

People out east may want (and certainly should have) accessible long-distance services closer together, compared to the long expanses of the western United States. However, at some point a distance becomes too much for even a “Thruway bus connection” to yield merits; especially one that doesn’t have a unified ticketing system with Amtrak.

We highlight three existing Federal Resources to the team that may help with the construction of these graphics:

- USDOT Bureau of Transportation Statistics: Rural Access (Interactive Map):
 - <https://data.bts.gov/stories/s/Rural-Access-to-Intercity-Transportation/gr9y-9gjq/>
- USDA, "Atlas of Rural and Small-Town America":
 - I found the "Areas of Deep Poverty", "Persons over 65 Living Alone", and "Population Change 2010-2019" very insightful. I think you can download the information somehow or request from the USDA.
 - <https://www.ers.usda.gov/data-products/atlas-of-rural-and-small-town-america/go-to-the-atlas/>
- USDOT Areas of Persistent Poverty & Historically Disadvantaged Communities:
 - <https://www.transportation.gov/RAISEgrants/raise-app-hdc>

Native Nations

Show an overlay of the full proposed long-distances services on a map showing Native Nations/Tribal Lands. Recognizing the complex, and often unjust, history for Native Nations by the US Federal Government, we believe it's imperative that the project team proactively consider their needs and make every reasonable attempt to include Native Nations in discussions; including multiple attempts at outreach.

Disadvantaged Communities

Show an overlay of the full proposed long-distance services on a map showing areas of Persistent Poverty & Historically Disadvantaged Communities.

<https://www.transportation.gov/RAISEgrants/raise-app-hdc>

Non-Drivers

Show an overlay of the full proposed long-distance services on a map showing percentages of non-drivers, similar to this map from the Wisconsin DOT.

<https://wisdot.maps.arcgis.com/apps/webappviewer/index.html?id=5a275fcc732f48be98cb9913102ae07f>

FHWA Next-Gen MSA, Non-MSA Zones

Show an overlay of the full proposed long-distance services on a map of the FHWA Next Gen MSA Regions to show how improved and expanded long-distance services could connect these regions to one another and the Non-MSA regions.

Natural Resources & Monuments

Show an overlay of the full proposed long-distance services on a map showing United States National Parks and Monuments. Passenger services well-designed for the needs of local populations will become an attractive transportation option for visitors and tourists. The *Empire Builder* with Glacier National Park, *California Zephyr* with the Rockies and Glenwood Springs, CO; and The *Southwest Chief* with the Grand Canyon to name but three existing examples. Remember: “*You can get tourists to ride a passenger train but you cannot get a traveler from A to B to use a little tourist train for their travel needs.*”

This may in turn open up innovative funding and collaborative opportunities with the National Park Service, Department of Interior, and others, going far beyond the [Trails & Rails Host Program](#).

Higher Education

Show an overlay of the full proposed long-distance services on a map showing Colleges and Universities. The team could create multiple graphics of this showing 2 and 4 year colleges, private vs. public, and student size. We reference the “Small to large MSA pairs” in the Midwest region as one example. Ames and Iowa City, IA are both large University communities that showcase travel demands that passenger rail service may, in part, help satisfy.

Veterans’ Needs

Show an overlay of the full proposed long-distance services on a map showing Veterans’ hospitals and service locations. Rural areas served by long-distance services may have a higher percentage of US Service Veterans.

Specialty Medical Services

Show an overlay of the full proposed long-distance services on a map showing specialty hospitals/providers that would have a greater drawing area than local general hospitals and clinics. Patients typically “have to travel” to these specialty hospitals and clinics for services they cannot get, or cannot get in a timely manner, at their local hospitals (by way of traveling doctors). Examples include gastroenterology, cancer, heart, and orthopedic among many others.

Sold-Out Trains

Create a map showing the existing long-distance network and the route segments with the highest incidences of sold-out trains (broken down by segment and direction of running). Again, even with “demand pricing”, some trains have been completely sold-out, thus driving away potential ridership. This was true before COVID, and even more true recently with shortened consists in recent months.

This data may be able to be collected from https://juckins.net/amtrak_status/archive/html/home.php

See “Ridership” and “Equipment” sections below.

Market Opportunities, Further Analysis

While we understand why the project team limited the “Market Opportunities” to only the top 20 per region (largest to largest MSAs and small to large MSAs), we encourage the team to identify three or four “regional hubs” spread across each state and map the top two or three destinations from each city. This data may better highlight the regional travel needs, and latent demand, for

long-distance interregional passenger rail services. Indeed, many city pairs along the *Empire Builder* route showcased high demand but did not show up on these mapping exercises.

These regional hubs will help establish “[accessible points](#)” in their relative locations. Indeed, these “Hub Cities” may already have a regional airport, key medical facilities, colleges or universities and so on; offering more services and amenities than many surrounding communities but not quite to the specialization of cities over 1 million persons.

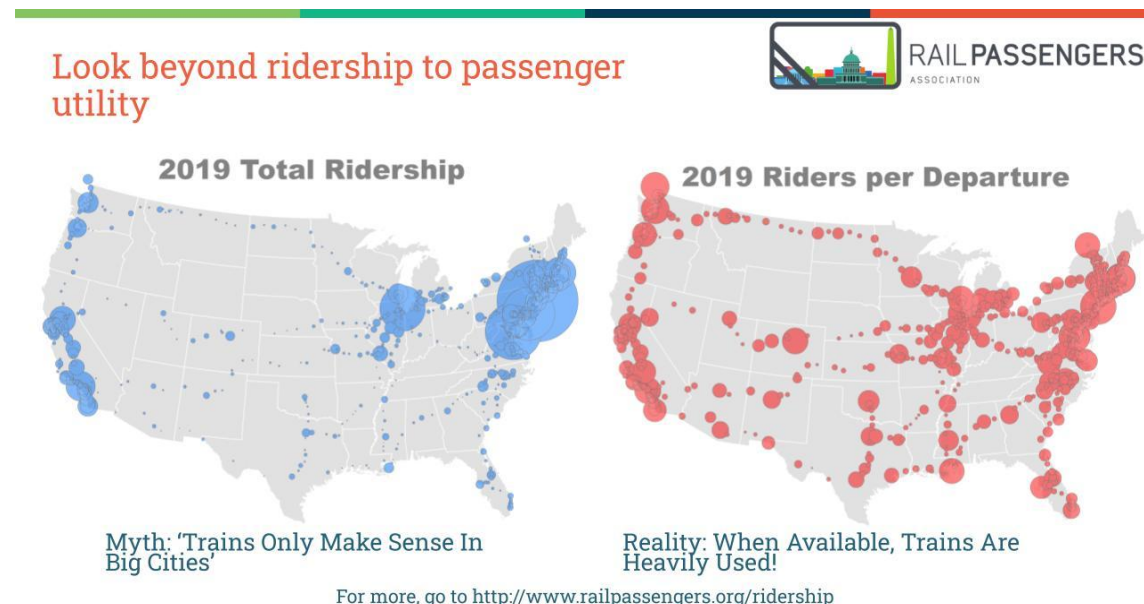
This may be a moot point now that there is a list of recommended routes for exploration from the first round of workshops, but this may help provide substantiation evidence to state and local leaders to carry the proposed routes forward.

Ridership

Projected ridership may indeed be one reasonable criteria of determining viability and inclusion of a proposed route; however, it must take into account how long-distance services attract and retain ridership differently than state-supported regional services. The team must have an understanding of how to interpret ridership by station location and the characteristics of the route, not just “total ridership.”

Smaller rural communities often have a disproportionately high ridership due to being an “accessible point” for the surrounding community. If the team wishes to use a ridership metric, we strongly encourage them to use an evaluation method that will recognize the outsized ridership potential of these small rural communities compared to their census population. “Ridership percentage by station location population size” may be one concept for the team to further explore.

We recommend that the team consult with the Rail Passengers Association to discuss the information shown on this slide:



“Population density” does not ride trains, people do. And people in rural areas may have a greater need for long-distance intercity services than those in urbanized regions.

Potential Maximum Demand

The project team should thoroughly examine what existing demand may be **unmet** by existing routes; what may be skewing understanding of the full potential ridership along a route or location (besides hours of service).

Even the best-performing existing Long-distance routes may be operating below what they are ultimately, and desirably, capable of. Existing services may be constrained by:

1. Extremely-high ticket prices,
2. Consists operating below the maximum size permitted on a route,
3. Poor on-time performance, and
4. Worn-out, poorly maintained, and thus unattractive equipment.

Benefits

Amtrak does not exist to make a profit; its purpose is to provide a public service. Passenger rail provides immense benefits to local communities and to the nation. It is an ideal option for bringing benefits to the economy, the environment, and equity—we call them the “3 Es”..

Along with ridership, the economic benefits of passenger rail service to communities should be well understood. The team should evaluate the economic benefits at each stop along a route, and the difference daylight or nighttime service to the stop (or some combination) can make.

The Rail Passengers Association has done a considerable amount of research into the economic benefits of passenger rail services.

https://www.railpassengers.org/site/assets/files/25442/economic_benefits_2022_final.pdf

Greenfield & Abandoned-Rebuilt Alignments

We agree with the prudence of the team not to look at “greenfield” alignments for the full routing of proposed long-distance services. However, the team should not completely dismiss opportunities for creation of limited new greenfield ROWs, or rebuilding abandoned ROW, in order to better connect our existing national rail system; especially for segments with recognized freight transportation needs as well as passenger needs.

If we as a nation are still funding, studying, and promoting new interstate highway construction ([I-14](#) proposal and [I-69](#) construction) and expansion of existing highways requiring procurement of new [ROW](#), then the team should not totally dismiss the opportunity for *limited tactical*

intervention to more fully unite our National Rail Network in a similar manner that the US Interstate Highway System binds the nation together.

Routes like the *National Limited* are too critical to simply be dismissed, or routed in a detrimental circuitous manner. If we wait another 10 years, we'll lose the opportunity to preserve, secure, or railbank some of these critical missing connections. Yes, we can ultimately always build these back, but the costs will escalate exponentially. Some abandoned ROW may be Rail Trails today. This similarly should not preclude this connection from consideration. We suggest the team review the policy paper from the Virginia Rail Policy Institute about [Rails WITH Trails](#).

We strongly encourage the Project team to meet with the [Railroads for National Defense](#) Office on all proposed routes that include “greenfield” or rebuilt abandoned ROW for a part of their proposed routing. Please see the “Railroads for National Defense” section below.

It is imperative that critical missing links of a robust connected national rail network are recorded and considered for further exploration, even if they are not selected as top-tier prioritized routes for enhancement, restoration, or creation.

Routes & New Route Recommendations

In reviewing the various Mural exercises, we are glad to see many common themes and recognition of key routes and key criteria. There is a healthy interest in expanded long-distance services. Certain routes made their appearance on many (if not all) of the Mural sessions. Key among these:

- Enhancement of the *Cardinal* and *Sunset Limited* to daily operation (if not more frequent)
- Restoration of missing links such as the *National Limited*, *Floridian*, *Pioneer*, *North Coast Hiawatha*, *Desert Wind*, and *Broadway Limited*.

All should be high priorities for the team.

Again, we recommend that the team not only evaluate routes on their individual merits but also how they contribute to, and strengthen, the overall network. Rather than “cannibalizing” ridership, parallels routes close together, serving unique travel corridors between key nodes may in fact induce greater ridership (more routes, more frequencies, more access). If the network of “Shortlist of Routes” is estimated to be underperforming, the team should not preclude the opportunity to add more routes to its recommendations, even when such additions may require sizable projects to realize.

As was brought up in a number of the Workshops, the team missed a number of April 1971 routes that meet today’s Long-distance criteria. While a number of these were ultimately recommended for study consideration through the Mural exercises, we also suggest the team

try to accurately tabulate the number of long-distance routes and number of trains (frequencies like the *Western Star vs Empire Builder*) that were lost. Trains and routes from the Union Pacific and Burlington Northern are just two examples. A great resource to research these is the book “*Journey to Amtrak*” by Harold Emonson, 1972, Kalmbach Publishing.

In addition, we wish to give a nod of recognition to these routes that may not have had someone championing them due to juggling priorities while working on the Mural sessions.

Routes/Options to also explore:

- *San Francisco Chief*: This route, or an updated iteration, could also be a massive benefit to the long-distance network. While advocates had previously shied away from suggesting this due to the growing traffic demands on BNSF’s Southern Transcon, after passage of the IIJA/BIL, previous obstacles may now be opportunities for such a service.
- *City of Miami*: This should be explored for Chicago-Florida service in addition to (not in replacement of) service options through Louisville, KY. If routed via Memphis, a section could overlap with another long-distance service to the southeast and Florida.
- *George Washington* (St. Louis section): This could be another critical missing link along with (not in replacement of) the *National Limited* if care is taken to devise both routes for optimal coverage vs. overlap.
- Billings to Denver Connection: While North-South service from Billings to Denver was called out multiple times, we want to specifically highlight the Wyoming “Coal line” as well as Wind River Canyon. The team should explore a route linking Billings via Sheridan and Gillette, Wyoming. The Coal Line would be an addition to (not a replacement for) the route via Wind River Canyon. Gillette and Sheridan should also be considered for the critical missing link between Rapid City, SD and Billings, MT.
- *Desert Rose*: Service between Los Angeles, Las Vegas (NV), Salt Lake City, Boise, and eastern Oregon, where the train would split. One leg would serve Hood River and Portland; the other would serve Pasco (WA), Yakima and Seattle. This route would provide vitally-needed north-south connections. Amtrak currently has no north-south service in the enormous region between the *Coast Starlight* on the west coast and the *City of New Orleans* between Chicago and New Orleans.

Route Overlap & Speeds

In considering how routes may overlap and reinforce one another, consider how tactical speed improvements in certain sections may improve performance of the overall system by spacing out frequencies along the segments where routes overlap. While 79 mph is nominally the design standard for long-distance services, we believe it's more desirable to look at speed *improvements* to maximize benefits of frequency rather than speed reduction. BNSF, for example, will permit up to 90 MPH passenger rail operations on shared-use corridors according to their "[BNSF Commuter/Passenger Principals](#)".

Yes, across the nation there are significant geographical constraints to deal with, so we understand that this may not be an option for everywhere. Regardless, be open to the opportunity, especially if such an improvement would "continuously improve public use of intercity passenger rail service".

Existing Equipment Utilization

In regards to analyzing historic and potential ridership trends, again we strongly recommend that the team *thoroughly* understand how much potential ridership has been turned away by a lack of equipment. The team should request information from Amtrak about the number of long-distance trains (and which trains) that have operated sold-out for a part of their journey in the last decade.

The team should also explore how prior decisions by Amtrak leadership and the choices about refurbishment or disposal of long-distance equipment have impacted the existing system and ridership. The FRA should explore opportunities to repurchase equipment that can be refurbished for long-distance services in order to try to meet existing demands while new equipment is manufactured. Amtrak should be required to get all available equipment, properly serviced, and back out on the road in the shortest amount of time possible.

The project team should come up with recommendations for oversight and enforcement to ensure Amtrak Leadership pays as careful attention to the long-distance services as they do to Acela. We need to see deliverable results in a short time frame and hold leadership to it.

Railroads for National Defense

As noted above, we strongly encourage the project team to meet with the Department of Defense, [Railroads for National Defense](#) Office about any greenfield alignments before rejecting them outright.

We do not believe it's insignificant that the DoD submitted comments to the Corridor ID program RFI response last spring.

[The US Department of Defense \(DoD\)](#): "In general, a travel corridor that is served by an interstate highway would also likely be well served with a rail route. In most cases, infrastructure improvements that enhance Amtrak should also be viewed as opportunities to improve rail freight movement."

There have been a number of constraints on our existing rail system, or reasons brought to dismiss consideration of passenger rail services on a particular route (in addition to events of recent months), that may signify far greater problems for our national rail network to perform under stress or national crisis.

End of All Aboard Northwest Comments, 3/7/2023