

All Aboard Northwest

PO Box 22225 / Seattle, WA 98122-0225 / 206-966-6333 / allaboardnw.org

All Aboard Northwest Comments on USDOT/FRA RFI for the Corridor Identification and Development Program

1. What is the appropriate role for Amtrak, in the submission and development of proposals submitted by other entities, for corridors that currently are or would be intended to be operated by Amtrak?

Comment 1: Amtrak should be a participant in discussions regarding proposed routes and corridors; however, they should not be the sole participant.

Rationale: Amtrak management should not be the decider on routes, or be able to veto or dismiss routes of consideration. Amtrak should not limit the efforts undertaken by other local authorities or advocates. Amtrak has invested significant time and resources in developing the “ConnectsUS” vision map; however, this vision leaves large areas of the country disconnected and unserved.

2. What are the appropriate roles for FRA and other parties in the preparation of SDPs under 49 U.S.C. 25101(d), or in other Program activities?

Comment 2: The FRA is uniquely situated to integrate previous FRA Regional Rail Plans, any new regional rail plans, and BIL-mandated planning activities into the CIDP. One relevant example is Sec. 22214, daily long-distance studies. All Aboard Northwest encourages the FRA to integrate Sec. 22214 findings into the CIDP as they become available.

Rationale: The USDOT and FRA should take a more active role in proposing and preparing SDPs than they have in the past. The FRA should act as the convener and be able to invite the correct stakeholders to the table. The FRA should work to transcend state boundaries and ensure that projects 1). Promote and develop regional equity, 2). Are likely to be successful, and 3). Benefit the overall transportation network. The FRA should effectively communicate the total impact of increased connectivity to Congress, the media, and the general public.

6. 49 U.S.C. 25101(e) requires that FRA consult with certain stakeholders in the preparation of SDPs under the Program. What approaches could FRA take to ensure the consultation process is effective and meaningful?

Comment 3: The FRA should conduct meetings in communities and talk with local stakeholders, including landowners, communities, businesses and the public about their concerns and insights regarding railroad operations. The FRA should not rely solely on official information to gather stakeholder feedback and input.

Rationale: Projects should be prepared with the aid of Working Groups, by region or route, to solicit public involvement, and help identify key considerations. This public input will be critical to understanding local travel patterns and needs. Perspectives should be gathered that can inform project development and identify issues that could or should be explored, such as freight congestion relief or development of corridors to enhance economic development. This work could be undertaken through the aid of public engagement grants.

Consultation should be used to hone projects, but they should not be reliant solely on community input. A politically-expedient compromise should not be allowed to harm the long-term vision and effectiveness of a project.

7. Should capital projects identified in the project pipeline be required to be ready for immediate implementation (i.e., final design and construction), and be supported by a completed environmental determination under NEPA, completed preliminary engineering, and (as applicable) agreements with the relevant host railroad(s)?

Comment 4: No, requiring that capital projects be ready for immediate implementation will unduly limit the candidates for funding at the beginning of the process, favoring urban areas at a cost to chronically disadvantaged, marginalized, and rural communities.

Rationale: Focus should be on projects with the greatest benefits to regional and geographic equity, serving places unserved or underserved today. Focus should be on “shovel worthy” projects, not strictly “shovel ready”. Projects that are not yet in final design (NEPA and signed contractual agreements with relevant host railroads) should not be left out.

9. Through what means, and in consideration of what factors (beyond those enumerated in 49 U.S.C. 25101(g)(4)-(7)), should FRA establish the order (or prioritization) of the list of capital projects eligible for funding identified under the project pipeline, as called for in 49 U.S.C. 25101(g)(3)?

Comment 5: AANW believes that in the pursuit of equity, all regions of the United States should be funded for showcase projects that will bring the value of the CIDP to

them. The earliest implemented projects should be chosen in such a way that all regions feel that they are benefitting from the program.

Rationale: The FRA should take a 50-state approach and help facilitate a project in each state (and US territories if prudent) to showcase the positive benefits this program will have on local communities. A truly national network that facilitates movement of people and goods north-south and east-west throughout the entire nation is needed; large areas of the nation cannot continue to be disconnected, as the present skeletal network does.

The FRA should focus on equity in the true sense of the word. It should work with communities to fast-track critical projects and get key substantiated wins in the short term, while planning and building for long-term network needs.

Equity means not only ensuring participation in contracting for design and construction services, but also ensuring that underserved, disadvantaged, marginalized, tribal and rural communities will benefit from proposed projects.

Comment 6: In future appropriations and reauthorizations of the CIDP, All Aboard Northwest strongly encourages the FRA to call for national network equity in investment.

Rationale: In the Bipartisan Infrastructure Law (BIL), the Northeast Corridor (NEC) (representing approximately 51 million people) could see up to \$30 Billion dollars guaranteed to it. In comparison, the rest of the nation (representing the remaining 300 million people) only is guaranteed \$28 Billion.

10. What other Program activities should be undertaken with the support of funding provided under 49 U.S.C. 24911(k)?

Comment 7: Concurrently with the Corridor Identification and Development Program, the USDOT and FRA should continue to develop the FRA Regional Rail Plans, by completing the un-evaluated regions of the Greater Northwest, TX-OK-AR-LA, and to update the National Rail Plan, last updated in 2015. The USDOT and FRA should take a more proactive approach in planning activities, coordination, and implementation for maximum public benefit.

Rationale: All Aboard Northwest believes the FRA should take a holistic approach when working with rail projects. It should look for win-win opportunities for multiple services along a corridor segment (long-distance, regional, commuter) so that

individual projects are implemented in such a way as to accommodate complementary services later without having to rework the component in question. It should utilize the findings from other studies to inform the CIDP and vice-versa.

13. Of the fourteen selection criteria enumerated in 49 U.S.C. 25101(c), are certain criteria of greater importance to the successful development of an intercity passenger rail corridor?

Comment 8: Yes, Number 12, “*whether the corridor would enhance regional equity and geographic diversity of integrity passenger rail services.*”

Rationale: We believe that a proactive, equitable approach to provide service to unserved and underserved areas of the nation is an important and cost-effective method to build political support for the continuation and growth of CIDP. For example, the 2008 PRIIA costs for both the Pioneer and North Coast Hiawatha routes (needing re-evaluation under Sec. 22214) in 2021 dollars is orders of magnitude less expensive than projects limited to one city or metropolitan area.

South Dakota, for example, has been left out of the national network, and thus has lost out on economic benefits; an even greater dollar amount than what is provided to the state through the “Special Transportation Circumstances” grants. In FY 2020, South Dakota received \$5.6 Million in STC grants whereas North Dakota received over \$23 Million in economic benefits from the Empire Builder in 2019.

Comment 9: Less emphasis should be placed on “*projected trip times and their competitiveness with other transportation modes*”. This does not recognize the mountainous topography in the greater west that can significantly affect speed.

Rationale: Admittedly, there is value in travel-time saved. However, it is inappropriate and unreasonable to penalize proposed corridors in mountainous areas based on uncompetitive speeds compared to other modes where curves and gradients preclude any reasonable possibility of increasing track speeds. Less emphasis should be placed on travel-time saved and more emphasis placed on providing the service itself, particularly where there is no service.

Comment 10: The FRA should not emphasize the benefits of “whether a proposed corridor connects at least 2 of the 100 most populated metropolitan areas” BIL Section 25101(c)(11).

Rationale: Large metropolitan areas generally have more and better transportation options than smaller underserved areas. It is more equitable to emphasize routes that

connect at least one large metropolitan area with smaller metropolitan areas so that those smaller areas have a means to access at least one large metropolitan area. Research conducted in 2020 on behalf of the Washington State Legislature’s Joint Transportation Committee shows that there is a significant need for service between smaller communities. Research by Rail Passengers has highlighted that there is a strong ridership response from rural communities; many with few other transportation alternatives save for driving.

Comment 11: While “committed or anticipated State, regional transportation authority, or other non-Federal funding for operating and capital costs” is important in determining whether a project is currently ready to receive federal funds, it does not, in and of itself, determine whether a corridor will be successful.

Rationale: State budgets can be affected by many different factors year-to-year. In the greater west, many of our state legislatures do not meet regularly, or for as extended periods, as those elsewhere do. This timing constraint can make it difficult to source matching public funding immediately.

14. What other considerations may be appropriate in evaluating proposals for corridors to be developed under the Program?

Comment 12: Include consideration of whether a proposed corridor would restore or enhance service to all, or a portion of, any Amtrak long distance route that as of the date of enactment of the BIL, was discontinued or occurs on a non-daily basis.

Rationale: While this recommendation is not included in 49 U.S.C. 25101(c) selection criteria, it recognizes the intent of BIL Section 22214 by emphasizing restoration of heretofore discontinued and non-daily service.

15. In general, how selective should the Program be, particularly during the period directly following its establishment? Should all proposals that meet a minimum threshold be selected for development under the Program, or should only a limited number of top proposals be selected, and if so, why?

Comment 13: All Aboard Northwest believes the CIDP should define a vision for a fully national intercity passenger rail network. All proposals that expand the current limited network should be selected as soon as feasible.

Rationale: The program should focus on the maximum public benefit nationally, not just in key select metro areas or the coasts. The nation made a commitment to a

complete national network in the BIL. It is time for the FRA to implement that commitment to the nation through the Corridor Identification and Development Program. This includes service to as many states as can be accomplished.

The FRA should fund projects that will establish precedents in all regions of the country and for all service levels (commuter, regional, state-supported and long-distance) to build the case for increased funding for existing services and continued expansion. This should expand participation from a variety of communities and showcase the effectiveness and value of the program.