

BSPRA Member Counties

Big Horn

Broadwater

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**

100 N. 27th Street, Suite 600D
Billings, MT 59101
406.258.3200
hello@bigskyrail.org

August 21, 2023

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 the largest transportation district in Montana, is pleased to offer the below comments as a supplement to the input we provided at the Amtrak Daily Long-Distance Study Northwest Working Group meeting in Boise, ID, on July 18, 2023. In addition, we incorporate by reference all previous comments we submitted on March 16, 2023.

Our comments below focus on two main areas: (1) enhanced network and service development, and (2) exercises held at meeting 2 in Boise (including routes, segments, and additional stakeholder engagement strategies).

We look forward to continuing our collaboration with the FRA on this exciting opportunity to expand and enhance America's long-distance national network of passenger rail. As in the past, BSPRA remains ready to help in any way we can to bring this generational opportunity to expand passenger rail service across America a reality.

Best,



David Strohmaier
Chairman

Big Sky Passenger Rail Authority
Enhanced Network Development (Meeting 2) Comments
FRA Amtrak Daily Long-Distance Service Study
August 21, 2023

(Note: we incorporate by reference BSPRA's comments submitted on March 16, 2023)

PART 1: Enhanced Network and Service Development

A. Mid-major population center weighting

The Long-Distance Service Study analyses presented in the round two meetings focused on two ends of the population spectrum: (1) travel flows among metropolitan areas and (2) accessibility needs of rural areas, including tribal nations and disadvantaged communities. As near as we can tell, the study has thus far failed to analyze the current and potential travel flows associated with the mid-sized population centers with populations between 50,000 to 250,000. These are significant communities in the Northwest and Upper Midwest that are centers of commerce, government, higher education, health care, media, culture, and social life both among each other and with smaller surrounding communities. Across the Great Lakes to the Pacific region, examples of these mid-major centers are Eau Claire, WI; Rochester and St. Cloud, MN; Fargo and Bismarck, ND; Billings, Bozeman, Butte, Helena and Missoula, MT; the Tri-Cities and Yakima, WA.

The potential passenger rail travel flows involving these mid-major population centers should not be ignored or underestimated in the study. For clarity, these travel flows are of three dimensions:

- between smaller communities and rural residents with these mid-major hubs,
- between the mid-major communities themselves, and
- between the mid-major communities and larger metropolitan areas.

All three of these travel flows are artificially depressed by the inadequacies of the Interstate Highway System across the northern tier of the Greater Northwest region. These highways are frequently closed in the winter (mountain pass closures, valley floor icing, and high winds) and are always significantly more hazardous as compared to passenger rail. The introduction of long-distance passenger will increase travel in the region, typically centered around the mid-major communities.

Travel among mid-major communities is also depressed substantially by the absence of direct air service among those communities. Current air service among the mid-majors typically involves taking connecting flights through out-of-state airports. Also, while there are direct flights between mid-major centers and some large metropolitan areas, there are no routes offering continuous, flexible travel access to multiple metropolitan areas along a single route. Long-distance passenger rail, again, would stimulate new travel opportunities and expanded ridership for these types of trips that would center around mid-major communities.

In analytical terms, using the results of a "spoke and wheel" private airline business model and an unreliable and inaccessible highway system to model passenger rail service is a serious mistake. Passenger rail studies need to account for the unique potential of passenger rail to expand mobility in a region with the demographic, socio-economic, topographical, and weather conditions present in the northern tier of the U.S. between the Great Lakes and Pacific.

While the failure to analyze current and potential travel flows involving mid-major communities has not prevented the identification of rail segments that would serve most of these communities, there are already some gaps. The Big Sky Passenger Rail Authority (BSPRA) would urge inclusion in the study of route segments in the Midwest that would serve communities such as Rochester, MN; Eau Claire, WI; and Madison, WI as alternatives within a renewed North Coast Hiawatha route. The recently released 2050 Wisconsin Rail Plan both notes these route options and endorses renewing service on the North Coast Hiawatha as one means of serving these communities.

BSPRA has a greater concern that failing to analyze travel involving mid-major communities, including their surrounding smaller communities, will lead to erroneous conclusions regarding route frequency and schedule performance standards. The bulk of ridership on long-distance trains occurs among intermediate points along those routes and not from endpoint-to-endpoint travel along an entire route. Further, the greatest potential for multiplying ridership on long-distance routes involves operating the trains on at least a twice-daily frequency in each direction—enabling complete trips among smaller communities and mid-major centers or among the centers themselves on a one-day basis without an overnight lodging stay. Failing to focus future study resources on travel involving mid-major communities will result in missing the tremendous potential that twice-daily frequencies can unleash, especially in the northern tier that does not otherwise have a reliably safe, weather-resilient transportation system.

Likewise, failing to analyze traffic flows surrounding mid-majors could also diminish attention to the need for a high-level of on-time performance by long-distance trains. The intermediate scale trips described here become particularly attractive and well-used by a larger number of travelers if the trains run on-time as much as possible.

The rule of thumb that doubling rail frequency triples the ridership is likely to be too conservative in the context of the northern tier of the U.S. The abundance of well-spaced mid-major cities, the dearth of air service connecting the cities and the great deficiencies of vehicle travel in this region are likely to produce ridership results well beyond normal expectations.

Consequently, we urge the Long-Distance Service study team to not simply analyze traffic flows among communities with populations exceeding 500,000 and the smallest rural communities. While that analysis is vital—especially for tribal and rural communities—we strongly urge the Long-Distance Service Study to introduce travel flows involving mid-major populations into your analyses on an effective and equal basis.

B. International connections

FRA states that the enhanced network, as currently proposed, does not take into account extensions into Canada and Mexico. However, Section 22214 of the Infrastructure Investment and Jobs Act *does not* preclude this. Rather, considerations enumerated in Section 22214 include routes that:

- link and serve large and small communities as part of a regional rail network;
- advance the economic and social well-being of rural areas of the United States;
- provide enhanced connectivity for the national long-distance passenger rail system; and

- reflect public engagement and local and regional support for restored passenger rail service.

Indeed, all things being equal, it would be a missed opportunity to not plan for long-distance routes that could be extended across international borders at some point in the future. And, none of the above considerations preclude taking into account international connectivity as an evaluation criterion. BSPRA has been in discussions with government and non-governmental entities in Alberta about the possibility of connectivity to Calgary, which is prudent given the fact that the population of Alberta is four times that of Montana.

At the very least, looking for opportunities to create a long-distance route terminus on the Empire Builder route at Shelby, MT, would create the opportunity for a future Canadian extension. Moreover, connecting to Shelby, MT with two north-south routes—one running on the eastern front range of the Rockies and the other west of the divide roughly through the Great Basin—would knit together the entirety of the east-west Amtrak routes originating in Chicago. This latticework of routes west of the Mississippi would maximize connections and travel flexibility for the entire National Network. Once this latticework is in place, connections to Canada become a logical next step.

C. Core Service Characteristics

1. Two times daily frequency in each direction (which avoids the scenario in which certain locations are only serviced at night)
2. Achieves on-time performance reliability standards and true weather resilience
3. Progressively improved operating speeds—to be determined
4. Continuous state of the art wi-fi connectivity
5. 21st century train sets to serve diverse needs of passengers and communities

PART 2: Interactive Exercise – Routes

Greater Northwest Priority Long-Distance Routes

6. **Priority Route:** North Coast Hiawatha/Limited—renewed and expanded as a model long-distance route (see orange line in Figure 1.)
 - a. Core endpoint destinations: Chicago to Seattle/Portland
 - b. Possible additional destination: Kansas City via St. Paul
7. **Key Connecting Route:** Empire Builder—enhanced
 - a. Core endpoint destinations: Chicago to Seattle/Portland
 - b. Route options to be coordinated with renewed North Coast Hiawatha/Limited
8. **Key Connecting Route:** Pioneer
 - a. Core endpoint destinations: Denver or Salt Lake City to Portland/possibly Seattle
 - b. Route options to be coordinated with renewed North Coast Hiawatha/Limited

B. Western Long-Distance Routes Stimulated by Trio of Routes under Item A

1. El Paso-Albuquerque-Denver-Billings-Shelby-Calgary/Edmonton (see yellow line in Figure 1.)
2. Los Angeles-Las Vegas-Salt Lake City-Butte-Calgary (via British Columbia or Great Falls) (see blue line in Figure 1.)
3. Service Connecting South Dakota to National Rail Network

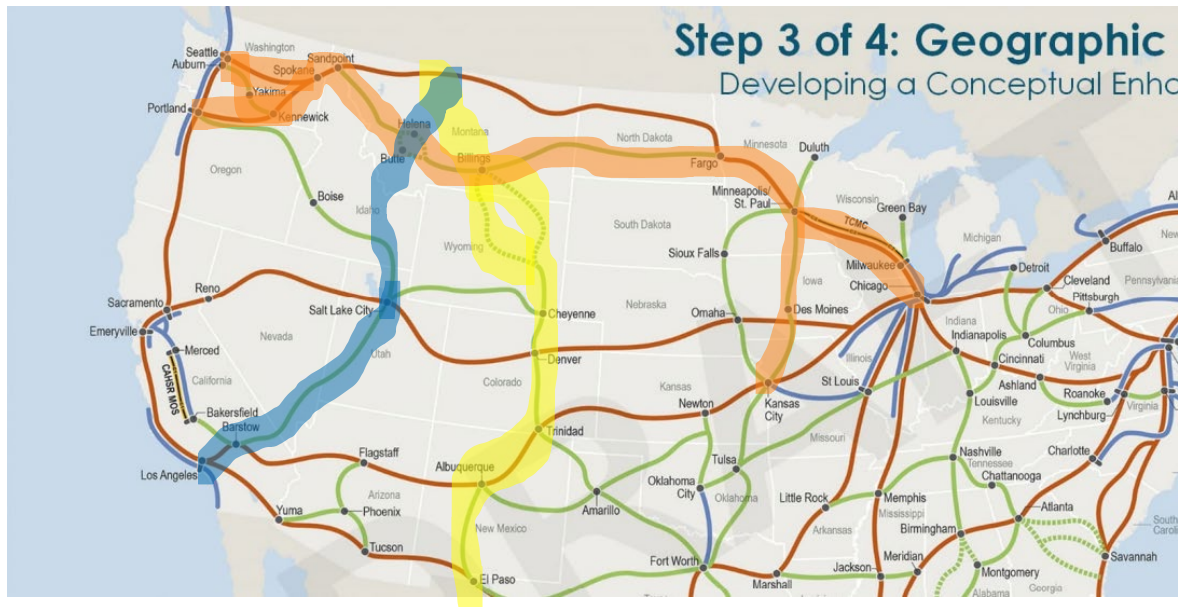


Figure 1.

PART 3: Interactive Exercise – Additional Segments

Coordinated Route/Segment Options for the Long-Distance Routes under Part 1 Items A and B

4. **Midwest:** Eau Claire, Madison, or Rochester (potentially others)
5. **Mountains:** Serving both Butte and Helena, MT, and Mineral and Lake Counties (see Figure 2.)
 - a. **Segment A: Mineral County, MT, connecting Missoula to Paradise via Superior and St. Regis.** This segment option for the North Coast Hiawatha is in addition to the Missoula to Paradise, MT, via Evaro Hill and Lake County segment option currently depicted on the map as the only segment. (Also see yellow highlighted segment in Figure 3.)
 - b. **Segment B: Pocatello to Butte.** This is an active segment of Union Pacific line and could be utilized for a LA/Salt Lake City to Butte/Helena/Shelby or Sandpoint route.
 - c. **Segment C:** Billings to Shelby. This would create a natural extension from Billings to the Empire Builder route, extending a possible route from El Paso/Denver to Shelby. This would be an important segment to create system-wide connectivity and prepare for a future international connection to Canada. (Also see yellow highlighted segment on Figure 4.)
 - d. **Segment D:** Helena to Great Falls. This segment would connect the North Coast Hiawatha and/or an LA/SLC/Butte route to Great Falls and on to Shelby, thereby facilitating a future international connection to Calgary. (Also see blue highlighted segment on Figure 4.)
6. **Northwest:** Northern route/segment to Seattle, Yakima Valley route/segment to Seattle, north side of Columbia River, or south side of Columbia River.

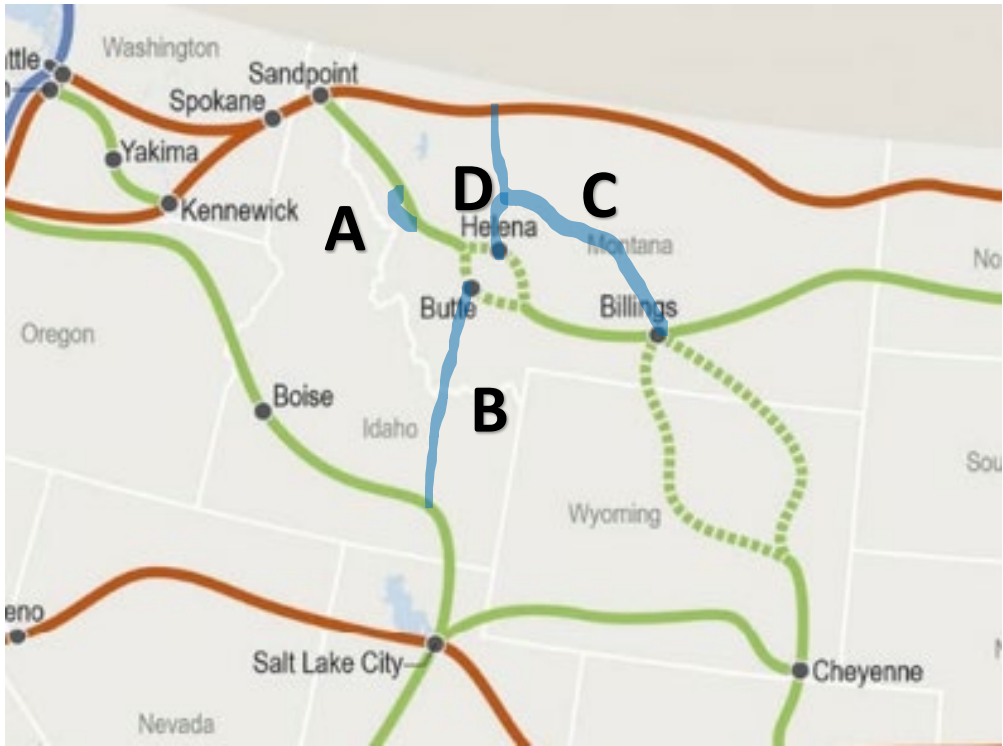


Figure 2. Additional Mountain West Segments (in blue)

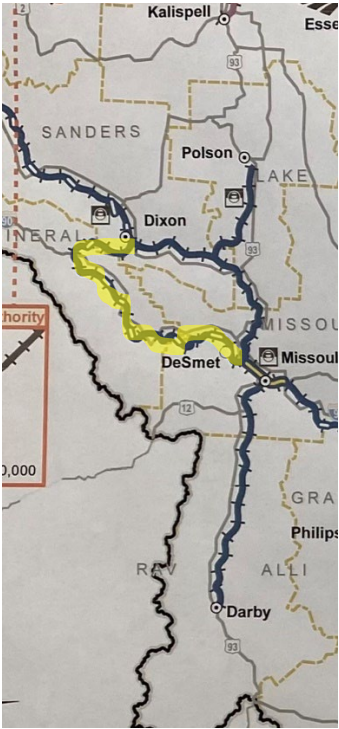


Figure 3. Mineral County, MT, North Coast Hiawatha Segment (yellow).

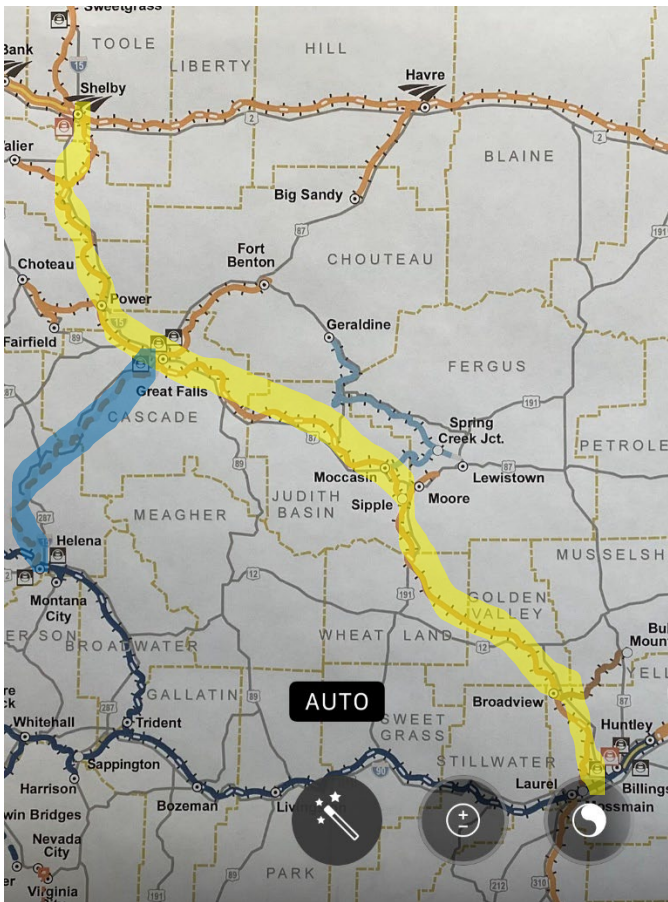


Figure 4. North Central Montana Segments.

PART 4: Interactive Exercise – Engagement
Important Stakeholders to Involve

- Tribal nations
- Rocky Mountain Tribal Leaders Council
- State DOTs throughout the region
- Host railroads
- Amtrak
- Rail authorities and districts
- MPOs
- Relevant port authorities
- Transit agencies
- Statewide municipal organizations (e.g., Montana League of Cities and Towns)
- Statewide county organizations (e.g., Montana Association of Counties or National Association of Counties)
- Universities (e.g., Montana State University, University of Montana, tribal colleges throughout the region)
- Regional rail NGOs

Big Sky Passenger Rail Authority's Active Assistance with Engagement

With financial support from the Montana Healthcare Foundation, BSPRA has recently completed a round of six rural and tribal engagement meetings in Montana regarding the renewal of passenger rail service in the region, focusing on the renewal of service on the North Coast Hiawatha. BSPRA will be forwarding a report on those meeting to the FRA and the Long-Distance Service Study.

BSPRA is also seeking additional funding to expand its outreach and engagement in both Montana and in surrounding states. We welcome opportunities to confer with the FRA and the Long-Distance Service Study team on the results achieved thus far and on exploring ideas for enhancing the engagement process in the future.