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Comments on USDOT Draft Strategic Plan for FY 2018-2022

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Before the
United States Department of Transportation (USDOT)

Comments from the
OneRail Coalition

The OneRail Coalition is pleased to submit comments in response to the U.S. Department of Transportation's Draft Strategic Plan for 2018-2022.

The nearly 140,000 mile, privately owned and maintained freight rail network carries approximately 40% of the nation's intercity freight by ton-miles, including intermodal, agricultural and energy products, automobiles, construction materials, chemicals, coal, metals, minerals, and paper. Our freight rail network is considered the envy of the world and provides an enduring competitive advantage to American shippers.

Intercity passenger rail, provided by the National Railroad Passenger Corporation (Amtrak), serves more than 500 communities in 46 states on more than 21,000 route miles, while commuter rail provides service to over 1,200 stations in 21 states on 7,760 track miles. The 457-mile Northeast Corridor alone hosts 260 million intercity and commuter rail trips annually, earning 77% of the air/rail travel market between Washington, D.C. and New York City, and 57% of air/rail travel between New York City and Boston. Ridership on Amtrak's national network of state supported and long distance passenger trains accounts for more than half of total intercity



passenger rail ridership. The nation's intercity and commuter rail systems experienced a 23% increase in ridership over the past decade, growing at a faster pace than either air or highway travel. However, as opposed to our world class freight rail system, the nation's passenger rail system lags behind systems in Asia and Europe in terms of speed, frequency, reliability, and availability, and thus provides an opportunity for substantial improvement and investment.

Travel by rail is safer than its main competition (highway/road) and safer than it has ever been. A host of new initiatives are underway that will make rail even safer going forward. Increasing market share for rail by getting more goods and people onto trains would save lives and reduce injuries, significantly improving the overall safety of the nation's transportation system.

General Comments:

OneRail supports the Department's adoption of broad interconnected strategic goals including safety, state of good repair, and economic competitiveness and believes that a mode-neutral, outcome-oriented approach is essential when assessing the appropriate investment for new capacity.

OneRail believes a performance-based approach with emphasis on outcomes is also an important aspect of a strategic plan and recommends the inclusion of performance metrics that guide investment decisions to best serve the national interest.

Our Nation is facing unprecedented challenges and our national transportation policies, programs, and priorities and must be aligned to meet them. OneRail urges that the final plan be used to guide transportation investment and policy decisions based on data that demonstrate how the Nation can achieve other high-priority objectives such as improved safety, reliability and congestion relief. We believe that broad, national strategies should be performance-based, and that select targeted investments in rail are an effective approach to addressing these objectives. Adopting a comprehensive approach to investing in the full transportation system can help achieve multiple objectives within available budgetary resources.

OneRail looks forward to working with the Department to help assure that transportation policies and investments affecting and promoting rail are effectively harmonized as part of a larger integrated strategic vision.



Comments by Section:

2.1. SAFETY

The OneRail Coalition agrees with the importance of maintaining safety as DOT's top strategic and organizational goal.

Travel by rail is inherently safer than by highway. Over the past 10 years, train accident rates have declined by 31%, derailments by 33%, and accidents resulting in the release of hazardous materials by an impressive 72%.

When looking across modes, fatality rates for freight and passenger rail are significantly lower than highway fatality rates. Looking at freight accidents per 10 billion ton miles, fatal accidents involving freight rail take place at less than one third the rate of truck accidents. Similarly, traveling on intercity passenger rail or commuter rail is on average more than ten times safer than riding in a passenger vehicle.

2.1.1. STRATEGIC OBJECTIVE 1: Systemic Safety Approach

In pursuit of overall safety of the transportation system, **OneRail recommends** that the DOT adopt a strategy to increase the market share for both freight and passenger rail to reduce the overall number of transportation related fatalities and injuries.

Adoption of policies aimed at diverting traffic off of the Nation's highways and on to rail would increase rail's market share and have a significant impact on safety. By adjusting federal funding programs and regulations to reflect an explicit goal of increasing freight and passenger rail utilization, hundreds if not thousands of lives would be saved every year.

Given the safety advantages of freight rail, **OneRail recommends** DOT adopt a strategy of maintaining the current truck size and weight limitations. Bigger trucks would divert traffic off of the safer rail system onto the less safe highway system, thus reducing safety.

OneRail recommends that the DOT adopt a strategy of an expanded public information initiative to raise public awareness of the dangers of rail-highway grade crossings and trespassing on rail right-of-way.

Since 92% of rail accidents involving fatalities are the result of accidents at highway-rail grade crossings or trespassing on rail property, improving public awareness of these dangers is a critical element of measurably improving rail safety.

Rail stakeholders partner with the DOT-supported Operation Lifesaver (OLI) to educate the public about the dangers of rail-highway crossings and trespassing along railroad rights of way. OLI is a nonprofit public safety education and awareness organization dedicated to reducing collisions, fatalities and injuries at highway-rail crossings and trespassing on or near railroad tracks. Rail stakeholders, through initiatives like OLI, community outreach, and the use of social media,



continue to work diligently to reduce accidents and fatalities at grade crossings that result from trespassing, but more work is still needed. OLI is an example of a successful public private partnership.

Federal funding for railway-highway grade crossing safety is provided through a dedicated program under the FHWA, known as Section 130. This program allocates funding to State DOTs through an apportionment formula. The states take responsibility for evaluating grade crossing risks and prioritizing grade crossings for improvement, including the decisions to install specific types of warning devices at particular public grade crossings. **OneRail recommends** a strategy of retaining a separate, dedicated funding category and increasing the utilization of these funds with a goal of 100% obligation.

Enacted into law in 2008, Positive Train Control (PTC) technology is designed to avoid certain train accidents. **OneRail recommends** the DOT adopt a strategy of providing financial assistance to commuter and passenger railroads to fully implement this important safety requirement by the upcoming deadlines.

Full implementation of PTC by the freight, intercity and commuter railroads is expected to cost over \$13 billion on this unprecedented safety undertaking. As an example of the magnitude of this safety initiative, the New York Metropolitan Transportation Authority secured a \$967 million FRA RRIF loan in May 2015 to cover the costs of installing positive train control on the Metro North and Long Island Rail Road commuter rail systems alone.

The Class 1 freight railroads are on schedule for having PTC fully implemented across the country and in accordance with statute. To date, over 15,000 route miles of track are in PTC operation, installation of wayside equipment is nearly 50% complete and over 50% of locomotives have been equipped. This unprecedented safety undertaking required the geo-mapping of over 60,000 miles of track and the ground-up development of new software and related technologies.

When fully installed and operational, PTC will prevent train-to-train collisions, derailments due to excessive speed, entry on track where maintenance activities are underway, and the improper movement of a train through a switch, further improving rail safety.

2.2 INFRASTRUCTURE

OneRail agrees that targeted transportation investments are needed to preserve mobility and accessibility of the traveling public and freight movements.

2.2.1. STRATEGIC OBJECTIVE 1: Project Delivery, Planning, Environment, Funding and Finance

OneRail recommends that the U.S. DOT maximize existing loan and loan guarantee programs by building on improvements to the RRIF and TIFIA programs.



These two major loan programs, TIFIA and RRIF, are appropriate vehicles to leverage federal funds for rail projects. RRIF is authorized to provide direct loan and loan guarantees up to a \$35 billion pool of revolving credit. Currently, just over \$5 billion has actually been lent.

The OneRail Coalition recommends inclusion of a strategy to improve both the speed and efficiency of the administration of these programs to maximize the use of these financing tools for the benefit of passenger and freight rail.

The RRIF program at full strength could be processing 5-10 or more loans per year, far more than the 13 loans issued in total over the last 8 years. The movement of the RRIF program into the newly created Build America Bureau is a positive step, and good progress has been made in standing up this Bureau – the Administration should commit to aggressive and professional execution of the new Bureau's mission.

To further support the use of the RRIF program, **OneRail recommends** that the Administration work with Congress to cover the cost of the Credit Risk Premium and other application costs for borrowers, similar to the TIFIA program. Expanding eligibility of TIGER, INFRA, and CRISI program funds to cover application costs would be an effective way to accomplish this.

Additionally, **OneRail recommends** the development of a specific RRIF Program for smaller railroad projects that would provide simplified application procedures and a streamlined process.

OneRail agrees that improving interagency coordination, reducing duplication of reviews, and enhancing transparency and accountability are useful strategies. Continuing to migrate to a uniform review process for all project sponsors regardless of mode would be a step toward leveling the decision making process among modes.

On prioritization, **OneRail supports** expansion of the competitive, discretionary grant programs for nationally significant projects. The current discretionary freight program INFRA limits funding support for non-highway projects to \$500 million. This arbitrary limitation greatly restricts the ability of freight rail providers to partner with public partners to provide shippers a safer, more efficient, less costly transportation option. Important rail projects such as new and improved rail intermodal facilities are by their nature multimodal, requiring both roadway and rail investments.

2.2.2. STRATEGIC OBJECTIVE 2: Life Cycle and Preventive Maintenance

OneRail recommends maintenance of current truck weight limits.

Any change to the current federal truck size and weight maximums would divert freight traffic from the Nation's private rail network to publicly funded highways, raising federal, state and local governments' life cycle and preventative maintenance costs. Any diversion of freight from rail to truck would likely diminish railroad resources available to invest in maintenance and capacity and therefore have a negative impact on the intercity rail and commuter rail services that depend on freight rail infrastructure. Additionally, such a shift would also add to congestion, increase



transportation related fatalities and injuries, fuel consumption, harmful emissions, and highway maintenance costs, and worsen pavement conditions.

At a time when state and local transportation departments are straining to meet infrastructure maintenance demands, actions that will accelerate highway damage and maintenance costs by diverting freight traffic from privately funded railroads to publicly subsidized roads and that put heavier trucks on those roads are not in the national interest.

With increasing highway maintenance costs and ever more limited resources, allowing heavier trucks on the nation's highways would make an existing problem even worse.

STRATEGIES

On Rebuilding: OneRail agrees with the strategy to restore transportation infrastructure and assets to a state of good repair and urges the DOT to include the nation's passenger rail networks in this strategy. The Northeast Corridor along with other key passenger corridors connecting major metropolitan centers within the nation's megaregions support a majority of the nation's economic activity. Improving the ability to move goods and materials and a growing population safely and efficiently by rail is an important element in the nation's ability to compete in the global marketplace.

OneRail recommends the DOT include strategies to expand and improve the nation's national intercity passenger rail network.

2.2.3. STRATEGIC OBJECTIVE 3: System Operations and Performance

STRATEGIES

On performance: OneRail suggests that the DOT's Strategic Plan should promote the evaluation of rail passenger and freight investments in ways that measure fairly against equivalent investments in other modes.

OneRail recommends that performance measures be established to enable comparison across modes and more efficient investment decisions. In many cases improving a rail line for freight and or passenger could be more efficient and provide greater safety and reliability than a highway investment in the same corridor.

2.2.4. STRATEGIC OBJECTIVE 4: Economic Competitiveness and Workforce

OneRail appreciates the draft's recognition of the role that freight rail and intermodal can play in achieving critical national economic competitiveness and other goals and welcomes this focus on freight performance.

In advancing U.S. transportation-related economic competitiveness, OneRail observes that it is important for the growth of robust passenger rail manufacturing and construction sectors in the United States to avoid the boom/bust cycles that uneven funding creates. Providing higher,



consistent and sustained funding for intercity and commuter rail service and encouraging expansion of our freight rail infrastructure can help to achieve significant levels of domestic content in rail manufacturing and revitalize a domestic passenger rail equipment manufacturing base in the United States.

OneRail Coalition recommends the DOT adopt strategies and policies that foster the most effective investment, public or private, to achieve the desired safety and reliability outcomes along with lasting economic benefits from a fully integrated multimodal network for American workers and businesses.

STRATEGIES

Regarding Freight: OneRail commends the DOT's inclusion of a strategy for increasing freight mobility and reliability in support of economic competitiveness.

Our freight rail network is considered the envy of the world and provides an enduring competitive advantage to American shippers. Any policies the Department chooses to adopt should reinforce this advantage for American businesses.

Regarding Workforce Development: The U.S. rail industry provides hundreds of thousands of well-paying American jobs and it could provide many more if the right policies were put in place.

To ensure American workers have the necessary skills to qualify for these well-paying US jobs in the rail industry, the **OneRail Coalition recommends** U.S. DOT support efforts by to provide technical training in a wide variety of transportation fields, specifically including rail.

Between the providers of passenger and freight rail services, including commuter railroads, light and heavy rail transit agencies, intercity passenger railroads, Class 1 and short line freight railroads, and the companies that manufacture the critical components of rail infrastructure, the rail industry accounts for over 380,000 well-paying U.S. jobs and total compensation in the freight rail industry averages almost \$110,000.

Regarding Rural Transportation Investments: Amtrak's 15 long-distance and 29 state-supported routes are vital parts of the national passenger rail network. Across the country, intercity passenger rail serves more than 500 stations in 46 states, the District of Columbia, and three Canadian provinces connecting hundreds of smaller towns and rural communities to urban centers as well as places in between and providing alternative travel options for those who are unable to fly or drive. Some 225 stops (43%) in 35 states are served only by long distance trains. In FY 2016, national network trains carried 62% of Amtrak's more than 31 million passengers. Improving reliability on the national intercity passenger network will strengthen the nation's intercity passenger system.

2.3. INNOVATION



2.3.1 STRATEGIC OBJECTIVE 1: Development of Innovation

OneRail recommends DOT continue its support for the Short Line Safety Institute, an initiative to improve the safety culture of the nation's 600+ short line and regional railroads that largely serve rural America.

2.3.2. STRATEGIC OBJECTIVE 2: Deployment of Innovation

The U.S. rail industry is advancing a number of new technologies, including phased array ultrasound for track inspections and drones for multiple functions.

On Collaboration: OneRail commends the DOT's recognition of the need for collaboration between the different modal stakeholders. **OneRail recommends** that the DOT ensure that rail interests are included in discussions regarding research and implementation of new technologies for all modes, including autonomous vehicles.

The OneRail Coalition appreciates the opportunity to provide these comments.

About the OneRail Coalition:

OneRail is a diverse group of rail stakeholders who have come together to educate America about the benefits of a strong freight and passenger rail system. Our members include the American Association of Private Railroad Car Owners (**AAPRCO**), American Public Transportation Association (**APTA**), American Short Line and Regional Railroad Association (**ASLRRRA**), **Amtrak**, Association of American Railroads (**AAR**), Brotherhood of Locomotive Engineers and Trainmen (**BLET**), Brotherhood of Maintenance of Way Employees (**BMWE**), Brotherhood of Railroad Signalmen (**BRS**), International Association of Sheet Metal, Air, Rail, and Transportation Workers – United Transportation Union (**SMART-UTU**), National Association of Railroad Passengers (**NARP**), National Railroad Construction and Maintenance Association (**NRC**), Railway Supply Institute (**RSI**), States for Passenger Rail Coalition (**S4PRC**), Surface Transportation Policy Partnership (**STPP**), Sheet Metal Workers International Association (**SMWIA**), and the Transportation Communications International Union/International Association of Machinists (**TCU/IAM**).

Our Associate Supporters include **AECOM**, **Alstom**, **Caterpillar**, **General Electric**, **HNTB**, **Parsons**, and **WSP USA**. These global companies represent the engineering and manufacturing sectors that are an essential component of private sector job creation in the transportation industry in the United States.