



Fact Checking the Amtrak Proposal to Replace the Southwest Chief with Bus Service in Kansas, Colorado, and New Mexico

The Southwest Chief would effectively cease to exist if the proposed bus bridge from Dodge City, KS or La Junta, CO to Albuquerque is implemented. While presented as a decision based in concern for passenger safety and cost reductions, the plan would make passengers less safe, dissipate the service's economic impact across the corridor, and—given the resulting collapse of ridership and revenue—effectively save no tax dollars on operational expenses.

The plan to truncate the *Southwest Chief* with a bus bridge would also shift costs to states that have the most to lose from its truncation. In its presentation on the proposed bus bridge, Amtrak points to plans for service expansions in Colorado, Kansas, and Oklahoma as evidence of its commitment to the region. However, the cost of these services would be borne by the states under PRIIA Sec. 209. While the continued presence of the *Chief* would in fact facilitate the development of these services with valuable passenger connections, the development of these urban corridor services shouldn't come at the expense of rural communities that currently depend on Amtrak National Network service.

The bus bridge will worsen the performance metrics Amtrak is using to justify this truncation without lowering taxpayer costs

- **The Chief's ridership trends are steady:** Amtrak's earlier statement that the number of passengers using the Chief is "steadily declining" is false. Ridership volume in FY 2017 was down only 1% from its peak in FY 2015; it was up 14% from eight years ago in FY 2009.
- Amtrak's presentation highlights the fact that 96% of Amtrak trips are under 750 miles. But for the *Chief's* 2,265 miles, conspicuously absent is the fact that trips on the *Chief* overlap along the entirety of the corridor. Having analyzed the *Chief's* passenger load throughout its route, Rail Passengers estimates significant ridership and **70% of the trains' current revenue is at risk under this proposal**. The proposed bus bridge would be of a significant enough duration – 6-12 hours—to decimate high revenue sleeping car ridership. This is made more disappointing because;
- **The Chief's seat occupancy rate compares well even to the NEC:** Amtrak's earlier claim that the *Chief* operates "40% empty" fails to fully capture how busy the train is. The reality is that passengers filled 61.5% of the *Chief's* available seat miles during FY 2017. This number puts the *Chief* within *the top 20% of all Amtrak's routes* (8th out of 48), higher than even the *Acela Express* service. (In assessing "occupancy," it's important to recognize that trains do not operate the same as airplanes; trains do not make a single trip between a pair of end points, they make numerous stops along a single corridor. As a result, there is a constant turnover of seats. That's the strength of a long-distance corridor train like the *Chief*; by connecting 36 stations, it provides a convenient, single seat ride for passengers traveling short, medium and long distances, serving 528 unique city pairs. This allows a single corridor to generate the volumes and revenues needed to serve people in urban *and* rural communities. In matter of fact, on the

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more heavily traveled segments of the Chief's route, the number of passengers can be 90% or more of the available seats, causing "sold out" conditions for prospective passengers.)

- By using a Fully Allocated Cost methodology, Amtrak fails to fully capture the incremental cost of running the *Chief*. Had the railroad also employed Avoidable Cost methodology—as stipulated in the Consolidated Appropriations Act of 2005 (Public Law 108-447)—the cost would have been significantly lower. Rail Passengers' estimate, developed using concepts developed by the Volpe Transportation Center for Amtrak in 2009, suggests that **as much as 80% of the costs that Amtrak allocates to the Chief may represent fixed costs for shared facilities and overhead**. These costs would not go away with the Chief's elimination and would instead be allocated to other routes.

Amtrak is asking its stakeholders for more, after renegeing on a partnership it has repeatedly and publicly committed to over the course of multiple grant applications

- States have already invested local funds in partnership with Amtrak: Colorado, Kansas, and New Mexico have all invested over \$9 million in state funds (\$6 million in previous TIGER grant applications with another \$3 million in the current round of TIGER grants), based upon an explicit agreement between Amtrak, Amtrak-served communities, and BNSF Railroad. For Amtrak to suddenly withdraw its support for the Chief in the middle of the preservation effort, without any opportunity for stakeholder input, constitutes a serious breach of trust.
- This sudden decision by Amtrak has stalled applications for additional infrastructure grants, including plans to apply for a share of the \$1.5 billion in grant funding offered through the Better Utilizing Investments to Leverage Development (BUILD) Transportation Discretionary Grants program. Given the BUILD program's emphasis on supporting rural transportation systems, it's safe to assume the Southwest Chief would have scored well.

The bus bridge will be less safe for passengers, less accessible to the public

- Amtrak's justification of forcing passengers onto busses for lack of Positive Train Control will make them less safe; Busses have 3.04 accidents per million passenger miles, while intercity passenger trains only have 1.7, **over 40% fewer accidents mile for mile**.
- Amtrak has enjoyed considerable gains in ridership from the Accessibility Community, because Busses and trains are not equal options for these passengers. **Bus Bathrooms are in no way ADA compliant**, while accommodations can be made on Amtrak, a real factor for a 6-12 hour journey. Ingress and Egress issues are a significant area of risk addressed in the ADA, and multiple transfers increase the probability of injuries.

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- Amtrak states that the \$50 million, ten year-investment in infrastructure investment “does not include positive train control (PTC) installation and implementation costs.”
 - The focus on safety is admirable and correct. However, the Federal Railroad Administration does not require PTC over lines with fewer than four passenger trains per day, and less than 15 Million tons of freight per year. (49 CFR 236.1019 - Main line track exceptions).
 - Risks are limited because competing traffic is light in some places, non-existent in others. The absence of heavy axle load freight traffic should also make derailment prevention easier, given the reduced risk of rail breaks and freight braking-induced kinks. This segment should have lower overall risk, even without PTC, than most of the network.
 - The Raton Route in question is considered safely exempt by the FRA, save for the Rail Runner district in Albuquerque; the Rio Metro Regional Transit District is currently working with the FRA to ensure that it meets all PTC requirements in a timely fashion.

The Rail Passengers Association represents the passengers and communities that depend on this corridor, and so we feel compelled to provide a broader and more complete context to help members of Congress evaluate the proper next steps to preserve this important transportation service for residents in the 36 communities across 8 states that depend on the Southwest Chief. We are available for any further elaboration.

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