

The Pioneer: An Alternative Vision
Cascadia Center for Regional Development/Pioneer Restoration Organization
November 2009
Executive Summary

Amtrak's feasibility study on the Pioneer train's restoration, released October 16, errs on numerous fronts. It neglects many opportunities for making the Pioneer the backbone of a regional transportation network in the Denver-Seattle corridor.

- On **scheduling and routing**, the study relies on low-potential stops without asking if a better mix of stations exists. The schedules provide poor service times at key tourist stops. We present a higher-ridership scenario that includes northern Colorado's Front Range cities and responds to expressions of interest from many communities.
- On **equipment**, Amtrak's analysis calls for high-level cars that it says it doesn't have. Cascadia highlights the good sense of an interim single-level-equipment option which would not require the study's proposed purchase of more than \$100 million of new equipment to begin running the train.
- Regarding public-transportation **connections** at the Pioneer's stops, the study falls silent, overlooking opportunities for new ridership. We show how the Pioneer could connect advantageously with resort destinations and off-route communities, bringing more and more people within the reach of public transportation.
- In spite of general population growth, the steady growth in travel on other Amtrak long-distance trains, and other factors, Amtrak assumes **ridership** will be less than it was on the Pioneer of the 1990s. The study offers no ideas for improving the numbers. We present numerous possibilities - better connectivity, better scheduling, better routing.
- Regarding **capital costs**, Amtrak presents, without question, a list of proposed capacity improvements representing hundreds of millions of dollars. We believe the Pioneer's impact, on the existing high-quality mainlines, can be fairly compensated with far fewer investments. Freight infrastructure improvement yields public benefits, but should not be cited, in effect, to eliminate chances for passenger rail expansion.
- **Railroad Rehabilitation and Improvement Financing funds** are available to Amtrak at low cost. We raise the possibility of Amtrak utilizing this very substantial funding source - if a big infrastructure budget is ultimately determined to be necessary.
- On **operating costs**, the study again overlooks opportunities for economy, including private provision of some services. We highlight the fact that the Denver-Seattle option, which we favor, has the lowest operating cost per train mile - that cost representing the platform on which the service is built. Better ridership divides that relatively static cost out, improving farebox recovery and thus operating performance.
- The study's implementation **timeline** leaves room for improvement. A recently announced service plan for another Amtrak route uses a much shorter timeline for station improvements, and the single-level equipment scenario we advocate would use cars that are already in the fleet or are part of a procurement process already initiated.

The study makes tomorrow look like yesterday. Where it sees past failings, we see future opportunities. Wisely implemented, the Pioneer service will anchor an effective public transportation system across a vast and largely under-served swath of the country.

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Amtrak's study on the feasibility of restoring the Pioneer train dismisses many exciting opportunities that this service restoration presents. In this analysis we attempt to elucidate some of those opportunities.

1. Scheduling and route

The study's set of schedule options does not include the scenario that, according to our analysis, promises the highest ridership and greatest return to the public: a two-night, stand-alone Pioneer running between Denver and Seattle. The westbound California Zephyr would follow its current schedule. Passengers transferring to the Pioneer in Denver would lay over there from morning until evening, when the Pioneer would depart on the BNSF Front Range Subdivision to Wyoming. The train would serve several Front Range cities and Cheyenne, cross Wyoming to Ogden during the night, and (without stopping in Ogden) arrive in Salt Lake City in mid-morning. It would wye in Salt Lake and return to Ogden (stopping there), then proceed to Seattle. Eastbound, the train would reach Salt Lake in early evening, again providing a conveniently timed overnight service when it continues on to Wyoming and Denver. We attach a timetable depicting this scenario.

This configuration offers many advantages. No city with a population over 100,000 is served during the middle of the night in either direction. None of the study's timetables accomplish this. Often asymmetrical, those timetables also ensure middle-of-the-night service, in at least one direction, at the key tourist stops in Idaho - thus cutting significantly into discretionary ridership. By contrast, the two-night Pioneer visits calls at these stations during the day in both directions. The "dip" into Salt Lake City (modeled on the Silver Star's long-established Auburndale-Tampa-Auburndale routing) establishes a quasi-corridor between Denver and Salt Lake, with travelers enjoying a choice between the scenic, lower-speed Rio Grande route during the daytime and a faster, overnight trip, via Wyoming, for predominantly non-tourist travel. The Pioneer serves the key Salt Lake stop at convenient times, and the connection with service to western Colorado is retained. The Pioneer-western Colorado layovers eastbound and westbound are long, but not much longer, in either case, than the 9:35 eastbound layover that Amtrak's study considers acceptable. At the same time, the Pioneer would not involve even moderately long Salt Lake layovers for most passengers, i.e. those traveling to or from Denver and points east. The Seattle service times, unlike those in the study, meanwhile allow for same-day transfers to and from Vancouver, BC - a key connection. The timetable is considerably more symmetrical than those in the study, meaning ridership is compromised at fewer stops.

We have developed the Portland-Seattle timetable in the light of the current Cascades schedule, and any Pioneer schedule should give the Cascades priority consideration. In our proposal, the northbound Pioneer will be discharge-only at points between Portland and Seattle, thus sustaining Cascades ridership. Since the southbound Pioneer, presumably, will be the last train of the evening, it will however be full-service rather than receive-only. This will in effect enhance the corridor service as presently configured.

We view the Denver layover as a plus. The possibility of passenger inconvenience when the study's 2:34 eastbound layover time at Denver fails to "capture" a late-arriving Pioneer is eliminated, reducing certain operating costs. Instead of a long sit at Denver

Union Station, as the study proposes, through-travelers find themselves conveniently positioned for a day of pleasure - or business - in the heart of the Mile High City. In a letter to Amtrak, Denver's Regional Transportation District has cited many possibilities for coordinating Amtrak travel with local bus tours, transit access, and the like. We attach the letter.

Of the options presented in the study, no. 3 (Portland-Salt Lake) offers an alternative to the two-night scenario. If option no. 3 is ultimately adopted, the train should however leave Salt Lake about two hours later, and Portland approximately nine hours later, so as to provide daytime service to more stops westbound and arrive in Salt Lake City, eastbound, with a moderate recovery/working time before its departure eastbound as a section of the California Zephyr. (See timetable attachment.) This adjustment would also make the schedule symmetrical and facilitate round-trip day travel between Portland and, for example, Hood River, where the service times would bracket excursions on the Mount Hood Railroad.

The attached schedules also differ from the study's options in their mix of stops. Boulder, Longmont, Fort Collins (to begin from Denver) replace Greeley in Colorado. A new stop in downtown Cheyenne replaces the remote Borie stop. Green River, a few minutes' drive from the larger city of Rock Springs, loses its station. Mountain Home, with its Air Force base, receives service. Nampa, which has no passenger station at all, and whose station location is undesirable, is replaced by Caldwell. Well-positioned halfway between Boise and Ontario, Caldwell has maintained a highly attractive station property and has expressed enthusiasm about receiving Amtrak service. In Oregon, the much-maligned stop at the UP Hinkle yard yields to Stanfield - a solution repeatedly sought by both Stanfield and the nearby off-line city of Hermiston. The timetables also include potential stops at Loveland and Weiser, for example.

These changes would both reduce certain costs and increase ridership substantially, as discussed below.

2. The BNSF Front Range Option

Central to our proposal is the routing of the train on the BNSF Front Range Subdivision, as opposed to the UP Greeley Subdivision, between Denver and Cheyenne. The study dismisses the BNSF option with one paragraph:

Between Denver and the Cheyenne area, BNSF's Front Range Subdivision which runs through Boulder (home of the University of Colorado) and Fort Collins (home of Colorado State University) to Speer and Cheyenne, is a theoretical alternative to the former Pioneer route through Greeley. However, distances via the BNSF line are longer—14 miles longer between Denver and Speer (where there is no connection to the UP line) and 26 miles longer if the train operated over the BNSF line into Cheyenne (where there is a connection, but no access to UP's historic station in downtown Cheyenne). Moreover, maximum freight speed on the unsignalled BNSF line is only 49 mph; over 30 miles are restricted to 30 mph or less; and there is a 15-20 mph speed restriction on the six-mile segment of the line through downtown Fort Collins where trains run down the middle of Mason Street. While operation via the BNSF line is not feasible at the present time due to much longer trip times, it could be a viable alternative in the future if proposals to upgrade the line for high speed rail service come to fruition.

There is nothing "theoretical" about the BNSF route. The Denver Regional Transportation

District (RTD) FasTracks plan calls for developing the route's Denver-Longmont segment over the next six years for commuter service. From Longmont north to Fort Collins, plans including an environmental impact statement process whose completion is expected in 2010 have been outlined for a further extension of commuter rail service, again involving major infrastructure improvements. The Front Range Subdivision passes through metropolitan areas totaling 578,000 in population - well over twice that of the Greeley metropolitan area (2007 U.S. Census Bureau estimates). If routed on the Front Range line, the Pioneer would also serve two major universities with a combined enrollment of about 54,000 - more than four times that of Greeley's university. Further, the Greeley subdivision is not being developed for commuter or regional rail, meaning that the BNSF route offers rail connectivity wholly absent from the UP option. At present, the BNSF route has about half the freight traffic that the Greeley Subdivision sees.

The study understates the BNSF route's potential by mentioning the 49 mph freight speed limit. The passenger limit is 59 mph. The study also implies erroneously that the street running in Fort Collins totals six miles. In fact the segment is about 1.25 miles long, along a corridor that is being developed for a bus rapid transit system with at least one station that would naturally serve as an interchange point for the Pioneer's passengers.

Further, the BNSF route would serve downtown Cheyenne, as opposed to Borie, the Greeley route's nearest approach - a remote, unpopulated location on a windswept prairie 10 miles from the center of town. This shift would boost ridership from Cheyenne substantially. Perhaps as important, the city of Cheyenne, while it has no interest in underwriting an Amshack station in Borie, is at least in principle prepared to participate in the creation or maintenance of a station in the city center. Contrary to the study's statement, access to the historic UP station in Cheyenne is possible, and other possibilities for the siting of a station in central Cheyenne also exist.

The study thus disregards Cheyenne's ridership and station possibilities, say nothing of the city's clear interest in the matter. It insists instead on Greeley. In the last three fiscal years of the Pioneer's operation in the 1990s, Greeley generated 6,845 boardings and alightings - 2% fewer than the 6,991 generated by Laramie, a community with a somewhat smaller university and a far smaller population base. Both stops were served at convenient times. Pocatello, with a university roughly the size of Greeley's but with a somewhat smaller population, contributed 11,614 riders - with middle-of-the-night service (figures from National Association of Railroad Passengers).

The choice between the UP and BNSF Denver-Cheyenne routings should be clear. The latter has much more potential.

3. Equipment

Equipment for a restored Pioneer is far more available than the study asserts. We have drafted several scenarios by which the Pioneer could be restored, a southern Montana service inaugurated, and the Sunset Limited re-extended to Orlando as a thrice-weekly train, without any new equipment beyond that in the planned 130-car Viewliner order. We attach a summary of what might be the best initial, interim configuration, deploying single-level equipment to the Pioneer.

The May 2009 Amtrak fleet plan indicates that Amtrak expected to have 179 stored and wrecked cars and an active fleet surplus of 67 cars as of September 30, 2009 (Amtrak, "System Fleet Plan FY2009"). Most of all these cars are of a type usable on the Pioneer. Many of the stored and wrecked cars are being repaired with ARRA funds. The Viewliner

order, for which Amtrak has requested bids, would obviously complement that available single-level fleet.

The attachment does not deal with locomotives for the simple reason that their supply appears very adequate. As of October 1, 2008, Amtrak had 7 wrecked P-42s, 30 stored P-40s, and 9 stored F-40s, and plans did not call for any of these 46 units to be activated as of October 1, 2009. Amtrak is reconditioning 15 of the P-40s, according to Amtrak's own project summary (Amtrak, "ARRA/NRPC Project Summaries," March 25, 2009; project number PRJ29110074), "in order for them to be used in long distance service." This rehabbing will leave a balance of 15 P-40s among the still-undeployed units. Given this information, it is difficult to believe that Amtrak needs to buy new locomotives for the Pioneer (and charge them up front to the Pioneer's account).

While adequate equipment for launching a Pioneer is available through rehabilitation or activation of idle existing equipment, in combination with the Viewliner order, many worthy expansions of Amtrak service are presently under consideration. We thus view the attached equipment proposal as a shorter-term solution until Amtrak's fleet can be replenished more generally through a system-wide program. According to a September 19 press report, Sen. Richard Durbin of Illinois is planning to reintroduce his TrainCARS bill to provide an ongoing funding source for new Amtrak equipment ("Demand for locomotives, train cars to pick up under push for high-speed rail," *Chicago Tribune*, September 19, 2009; http://www.pantagraph.com/business/article_10109942-a38f-11de-b399-001cc4c03286.html). We support Senator Durbin's initiative. A Pioneer train with largely rehabbed equipment is not a long-term solution; an adequate national fleet is.

The maintenance of that fleet is a system expense. We do not expect Amtrak to vow that the equipment charged to the Pioneer will never leave the Pioneer equipment pool. A railroad is far too fluid a system for that, and equipment moves from train to train for a variety of reasons. It would be preposterous to charge the anticipated order of Viewliner equipment, for example, to particular trains in the existing system - about like saying that the newborn baby has to buy an extension to the house because the family is now too big for the old one. Establishing the principle that capital assets belong to the entire system puts that system, including new services and old, on a fair and uniform footing. Burdening start-ups with the full cost of new cars, at \$4-4.5 million a copy, will only prohibit system expansion.

4. Connections

We see the Pioneer as much more than an 11-foot-wide vehicle moving along a set of tracks: it must constitute the backbone of a much broader system of public transportation. It should catalyze a marketing and business partnership that will welcome large and increasing numbers of tourists, business travelers and prospective residents to an entire region of America.

In the most obvious terms, this means feeder bus routes - of a sort that Amtrak's study ignores completely. Idaho offers a case in point. With a grant from the Idaho Transportation Department, the Yellowstone Business Partnership, based in Idaho Falls and Bozeman, Montana, is planning an innovative, regional public-private transportation cooperative that, in contrast to the Pioneer's history, could bring thousands of train travelers to two of America's most magnificent national parks, multiple ski areas, and numerous towns that today have very limited transit services. The partnership notified Amtrak and its consultant of this initiative in the course of the study draft's preparation. Regrettably, however, the study does not even mention the partnership or its potential for

boosting the Pioneer's patronage. If just 1% of all visitors to Grand Teton National Park arrived by connecting coach from the Pioneer's Pocatello station, and departed in like fashion, the train's ridership would jump by nearly 80,000 yearly - that is, if the train called at Pocatello at times convenient for tourists. The study's schedules generally give Pocatello wee-hour service.

The train has to be somewhere in the middle of the night, but the night-to-day differential in ridership at a station where the traffic is largely discretionary is far greater than the differential at a location where the travel is mostly a matter of business or personal necessity. That is, the study's bad times in Pocatello or Shoshone - stepping-off point for Sun Valley and Ketchum - repeat the train's history and constrain ridership much more than bad times in western Wyoming would. Our proposal - a two-night train calling at Pocatello and Shoshone at optimal times - would maximize ridership.

The situation in Pocatello is not much different from that in Shoshone, where the local public bus provider, Mountain Rides, has alerted Amtrak to the potential of connectivity with the Sun Valley-Ketchum resort area and Twin Falls. Mountain Rides has signalled an interest in meeting the train even in the middle of the night, if the schedule demands. None of this potential is mentioned in the study, which focuses instead on the discouraging historical example.

We have also noted interest from potential partners like Northwestern Trailways and the Wild Horse Casino in Pendleton. These appear to have received no attention in the study draft. While the analysis did correctly note the growth in urban transit systems in Seattle, Portland, Salt Lake City and Denver, we have to wonder whether that increased connectivity was considered in formulating the remarkably low ridership forecasts.

5. Ridership

The ridership estimates, indeed, are the most pessimistic element of the entire study. The study methodology is not even entirely fair. That is, the authors penalize the raw ridership figures by deducting riders who would "defect" from other trains. The study reduces the projected raw ridership by about 10% to cover this predation on other trains. However, the study gives the Pioneer no credit for the added ridership that it certainly would generate on other Amtrak trains.

This summer's Sunset Limited report takes the proper approach, crediting that projected service restoration for an increase in ridership on the Silver Meteor, for example (Amtrak, "Gulf Coast Service Plan Report," pp. 7 and 33). Amtrak's 2000 Market Based Network Analysis likewise illustrates that connecting ridership is a very significant factor, whereby (expressed in negative terms) the elimination of one train cuts into passenger revenue on connecting trains (Amtrak, "Report to Congress: The Market Based Network Analysis of the National Railroad Passenger Corporation," p. 7).

The study exaggerates the role of competition with budget airlines. Trains compete meaningfully with airplanes in terms of time only in short travel lanes, where the airplane's cruising speed does not represent a major factor in the traveler's budgeting of time. For a long-distance train, ridership is drawn primarily from motorists, bus travelers, and people who would otherwise stay home.

The alternatives for the Pioneer's traverse of the central Rockies are Wyoming (including northern Colorado) and western Colorado (which term here includes some Utah communities). Serving both Denver and Salt Lake City as outlined above, the two-night

scenario sacrifices only a minor degree of connectivity between the Pacific Northwest and western Colorado: one has to wait somewhat longer in Salt Lake City for a transfer, but the connection is retained. At the same time, travel from the Pacific Northwest via the Wyoming route to Denver and all points east does not involve any significant layover, or the unpredictability of two train sections meeting, in Salt Lake City. The study's Pacific Northwest-Salt Lake options - that is, with the California Zephyr picking up the Pioneer in the Utah city - cannot match that advantage. Travel from the Northwest to Denver is also faster by the Wyoming route and, most obviously, the Wyoming-northern Colorado traverse brings many new destinations, and even more city-pairs, into the Amtrak network. The one downside of the somewhat more difficult connection in Salt Lake is more than outweighed, in ridership terms, by the other attributes of the two-night scenario.¹

Given all the factors in our proposal - retention of the Salt Lake City stop, routing via downtown Cheyenne and the BNSF Front Range route, improved scheduling for discretionary travelers, energetic development of connecting services - we believe that the Pioneer's raw ridership would be much higher than in the study draft's Denver-Seattle scenario. Further, ridership on Amtrak's long-distance trains has increased generally in recent years, rising 17% between FY 2002 and FY 2008. Ridership on the Empire Builder, California Zephyr and Southwest Chief, the three trains most comparable to the Pioneer, has increased by 33%, 7%, and 18%, respectively, over the 2003-2008 period. (Data from National Association of Railroad Passengers website; data from earlier years not readily available).

Amtrak West projected 42,339 annual riders for the Portland-Boise train contemplated in the late 1990s - on a stub route less than one third the full Denver-Seattle distance now under discussion ("Amtrak West's presentation on Portland-to-Boise rail service," September 8, 1999?). This projection, too, suggests that the study draft's forecasts are very low.

The 41% general population increase, cited by the study, in the Pioneer's states since 1992 - in contrast to the 19% national increase over the same period - also argues for the Pioneer's potential.

Given all the above, we believe the study's raw ridership forecast (that is, before impacts on other system trains) should be increased by at least 30 to 60%, i.e. to at least 160,680 to 197,760, and that the ridership increment, further, should reflect additional ridership on other Amtrak trains stemming from the reintroduction of the Pioneer.

6. Capital costs

While many recent passenger rail projects have contended with rising infrastructure demands from host railroads, this study's figures carry the trend to a daunting extreme.

Start-up infrastructure improvements charged to the Pioneer's budget should be limited to the following:

- a 10,000-foot passing siding at each point where the eastbound and westbound Pioneer are expected to meet. Under the two-night scenario, this would mean sidings in the Great Divide Basin of Wyoming, in Idaho west of Pocatello, and between The Dalles and Stanfield, Oregon.

¹ We can provide a more detailed comparison of the Wyoming and western Colorado routing options

- reconstruction of the station track at Ogden.²
- minimal track and signalling improvements on the BNSF Front Range Subdivision, in anticipation of more extensive upgrades to that line in conjunction with planned regional and commuter rail development.
- construction of a new run-through track at La Grande to prevent freight-passenger interference while the Pioneer is in the station. The run-through track improvements at Nampa and Hinkle are unnecessary for the simple reason that there should not be a stop at either location.

With the exception of the Ogden improvements, all these enhancements would also provide benefits for freight traffic.

In the case of Boise, improvements to the "Boise loop" are called for, but it remains to be seen, among other things, whether the city of Boise, which owns much of the loop, will itself underwrite the improvement of its track. Boise, the third-largest city in the Pacific Northwest, very much wants the service. The City is committed to the maintenance of the Boise Depot for passenger rail purposes.

In the case of Portland, a new crossover track allowing access between the Steel Bridge and Portland Union Station is needed, as the study notes. However, the Oregon Department of Transportation has applied for ARRA funding that would allow for the restoration of the crossover track, or another engineering solution serving the same practical purpose, as part of a larger package of ARRA projects in the area. Those projects include the Graham Line siding also cited in the study, which did not mention the hoped-for funding of either of these improvements from another source. We understand that the crossover itself would be a relatively minor cost item in any event.

We are thus unconvinced that the resumption of a single daily passenger train, at any point along the route proposed by the study, from Denver to Seattle, would in itself require major infrastructure projects, i.e., projects beyond those discussed above. Amtrak should not pass on these staggering estimates to the study's readers without questioning whether they serve freight rail only, without relevance to the passenger train.

Even the four projects listed above could be viewed as excessive. In 1991, Amtrak studied a reconfiguration of the Pioneer using UP track from Denver to Ogden - as the current study does. It concluded that track conditions on that entire segment "are a part of UP's primary main line and are considered satisfactory for the restoration of passenger service without need for capital expenditures" (Amtrak, "Reroute of the Pioneer and the Desert Wind through Central Iowa and Wyoming," p. 18). It is difficult to believe that the Denver-Ogden route, as a major active freight line, is significantly less capable of accommodating one new passenger train than it was at that time.

Recent events appear to confirm that conclusion. The California Zephyr has had to detour over the Wyoming route between Salt Lake City and Denver because of maintenance on the Rio Grande route. Several reliable reports we have received indicate that the train was typically reaching Denver or Salt Lake at least 2:30 sooner than it would have if it had followed the Rio Grande route's schedule. The Wyoming route is of course faster by nature; an extrapolation of Amtrak's 1997 timetable indicates that the Salt Lake-Wyoming-Denver route that the Zephyr has been using should take about 2:15 less than the Rio

² Should funding considerations so demand, it might be possible to defer the Ogden station track installation, temporarily omitting the Ogden stop. It could be replaced by Brigham City, 20 miles to the north, where the Pioneer once in fact stopped. An Amshack would likely be required..

Grande. The anecdotal evidence thus strongly suggests that the Wyoming route's condition, without any infrastructure improvements, will consistently support a passenger train moving at the 1997 timetable's speed.

Finally, either the two-night scenario or our suggested modification of the study's Option 3 allows for relatively slow running along the Columbia River. That will mean less need to overtake freights, making the need for the ten-mile second main track that the study calls for in the Columbia Gorge all the more doubtful. For passenger traffic access, the basic need is for 10,000-foot sidings at points where the eastbound and westbound Pioneers would meet.

The point here is not that freight infrastructure improvements are not needed on the route, but that such upgrades should not be charged to a passenger train. If however decision-makers conclude that most or even all of the proposed improvements should be implemented, the Railroad Rehabilitation and Improvement Financing (RRIF) program may provide an alternative. RRIF provides a total pool of \$35 billion of capital, currently available to Amtrak at somewhat over 4% interest. Amtrak could borrow the entire \$324.1 million foreseen by the study for the Denver-Seattle route and pass it on to the railroads in question under attractive terms. The UP, for example, has to pay nearly 12% to obtain capital on the private market, according to the federally calculated cost-of-capital figures for the industry, providing "room" to pay Amtrak a premium above the 4%. That premium could defray part of Amtrak's operating loss for the train.

The issue reduces itself to the allocation of investment costs in a complex national economy. Two passenger train movements daily on a high-quality rail line should involve little need for new infrastructure. We agree that capacity investments such as those Union Pacific is calling for will yield social benefits. Shippers will see their products move more expeditiously, expedition of traffic flows will reduce carbon emissions, and so forth. Decision-makers need however to distinguish between the benefits for and needs of passengers, on the one hand, and freight on the other.

The study's projected equipment costs express the reflexive public-sector tendency towards expensive turn-key solutions, rather than the resourcefulness of a private-sector business. As the attached equipment scenario makes clear, rehabilitation of existing equipment will reduce costs substantially. According to Amtrak's ARRA project summaries (cited earlier), the cost for rehabilitation of the variety of equipment being restored with the stimulus funds comes to just under \$1 million per car. Those cars represent only part of Amtrak's inactive fleet: other equipment is sitting - waiting. A private businessman who has expressed interest in operating the Pioneer (see under Operating Costs, below) points also to the availability in the open market of considerable additional bi-level equipment that could be acquired and rehabbed for about \$1.2 million per car.

Even if, for example, rehabilitated single-level equipment were used in combination with new Viewliner sleepers and diners, the cost per car would still be far less than the study projects.

Cobbling together consists from different sources is not necessarily an ideal solution. Ultimately equipment needs to be obtained system-wide, and that equipment should be treated as a system expense, not a charge against any one train.

Station costs could be reduced in certain instances by the willingness of communities to invest (or, in fact, continue investing) in station properties they own. Ultimately, Amtrak has to move in the direction of the local provision of station infrastructure, and local players will have to secure the resources to do that. Existing opportunities for local

contributions in these sources of civic pride and utility should be explored energetically.

Most of the stations on the potential Pioneer route are either in use as train stations, or have been maintained (in some cases after restoration) through local initiatives, for other purposes. Many of the current station-facility activities cited in the study either do not occupy the whole facility or serve only occasional events. Because Amtrak will not have agents at most of the stations, the only modification needed at many sites is restoration of the platforms so as to meet ADA requirements.

7. Operating costs

The study does not weigh the possibility of private entry into any aspect of the Pioneer's operation (excepting, of course, the private ownership of the railroad). The Passenger Rail Investment and Improvement Act, which mandated the study, also specifically encouraged private operation of passenger trains, precisely because it might save the public money (Public Law 110-432, Division B, Title II, Sections 214, 216 and 217).

We have explored the potential for private operation of some aspects of the Pioneer's service. To date, one operator has indicated interest in an arrangement whereby Amtrak would exercise its right of access, and hire the private firm for operations. Having read the study draft, the operator predicted that operating costs could be reduced by about \$5 million annually by such a contractual arrangement. While seeking private operators, admittedly, lies beyond the study's scope of work, the potential for entrepreneurial entry into the Pioneer's operation needs to be scrutinized, and certainly offers opportunities for economy. We will continue to investigate these possibilities, and would be happy to discuss them in greater detail with Amtrak and appropriate decision-makers.

The study's enumeration of operating costs seems mostly reasonable; the only expense that appears clearly excessive is the 4 to 14 full-time employees perceived as necessary for added services at the staffed stations. A Denver Union Station employee with whom we spoke stated that the station staff there was not larger during the Pioneer's tenure than it is now, with only California Zephyr service. To some extent, of course, the simultaneity of two trains in a station would raise the question of increased staffing needs; however, the two-night scenario, at least, avoids such a convergence of schedules.

It may be possible to provide the train's on-board staffing on the model of Amtrak's Auto Train, which in financial terms out-performs all other Amtrak long-distance services, and whose labor arrangements are more flexible than those elsewhere in the system. Sensible labor contracts could result in some cost savings, for example by allowing employees to cross craft barriers more flexibly.

It is the severe underestimation of revenue - of ridership - that draws our attention far more than any expense item, however. The analysis should have at least pointed in the direction of fresh, imaginative approaches to boosting ridership. The study draft's consist (like the ridership figures) is very small. As the attached equipment summary suggests, a larger consist would facilitate certain innovations. One coach car - an Amfleet I coach, with its existing seat configuration - would provide budget transportation for persons of limited means who would take a bus if it weren't for the fact that the bus service is no longer available. Another coach, with a capacity lower than that of a standard long-distance coach but exceeding that of a sleeper, would be outfitted with seats that recline to full horizontal position, and each two seats would be enclosable by a retractable curtain to provide a modicum of privacy for sleeping - at a somewhat increased fare, naturally. The potentials for attracting new market segments are not the most obvious subjects for a

feasibility study, but nothing prohibits their consideration, either.

The Pioneer needs to be seen in terms of its possibilities, not its difficult history. The most telling statistics in the study are the cost per train-mile and net per train-mile in Table 12 (p. 46). The Denver-Seattle option wins the competition here. While the study considers that route less attractive in the light of other metrics, cost per train-mile trumps those other considerations when we consider the Pioneer not as something static, but as an embodiment of opportunities whose potential has never been tapped. Cost per train-mile does not increase markedly as the train's occupancy increases or cars are added to the consist - as those opportunities are realized. It is the platform we have to work with, and in that sense the table makes it clear that the Denver-Seattle option is best equipped to minimize subsidies per unit of travel.

8. Timeline

The study presents a discouraging timeline, and we have to wonder why. The analysis concludes that even ADA projects "will average approximately 36 to 48 months" (p. 26). New equipment must be ordered. Existing equipment cannot be rehabbed, even as a temporary measure to get the wheels rolling while grander solutions await. The possibility of using Viewliners, which would be available relatively soon, is brushed aside because the California Zephyr is a bi-level train.

The 36 to 48 months for ADA-compliance upgrades contrasts with the Sunset Limited service plan (cited earlier), which (on p. 55) allots 9-26 months for comparable enhancements. One is left feeling that the study stretches out the timeline much as it maximizes expenses - and to no one's benefit in either case.

Tri-Met (Portland), the Utah Transportation Authority (Salt Lake City) and RTD (Denver) have experience with building ADA platforms and ramps and working safely in railroad rights-of-way in this region. Amtrak has little experience in implementing improvements in this rugged country, and therefore may be anticipating higher-than-necessary costs. An innovative alternative would be for Amtrak to utilize regional transit agencies as general contractors for this work, to reduce costs and expedite the service launch.

9. Conclusion

Under the Amtrak legislation in force since 1970, the nation's passenger railroad has a right to operate on the tracks of private railroads. It needs to exercise that right at its discretion rather than the discretion of private railroads. The study gives the contrary impression of a federal institution whose duties include reporting, without question, the claims asserted by private railroads as the price of passenger access. We agree that costs engendered by Amtrak trains should be defrayed by Amtrak and that investments in freight rail infrastructure are necessary and will yield important public benefits. The study appears, however, to mix the two priorities, going beyond the scope of what is the passenger train's "responsibility." It is up to Amtrak and Congress to correct this confusion of purposes.

We also perceive the study's infrastructure and equipment budgets as a means of discouraging interest in this system expansion - or any system expansion, for that matter. There are ways to do this more economically. We have advanced some possibilities in this paper, and we urge the further exploration of those possibilities. It behooves us to fulfill the Pioneer's considerable promise without ignoring the need to conserve public resources.