

March 8, 2022

The Honorable Amit Bose  
Administrator  
U.S. Department of Transportation  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Corridor Identification and Development Program Request for Information (FRA-2022-0006)

Dear Administrator Bose:

The American Association of State Highway and Transportation Officials (AASHTO) is pleased to provide comments on the U.S. Department of Transportation's Request for Information on the Corridor Identification and Development Program (FRA-2022-0006) published in the Federal Register on February 7, 2022.

AASHTO is a nonprofit, nonpartisan association representing the state transportation departments (state DOTs) in the 50 states, the District of Columbia, and Puerto Rico. AASHTO and the State DOTs have a long history of successful partnership and collaboration with the U.S. Department of Transportation (USDOT) and the Federal Rail Administration (FRA), as well as Amtrak and industry partners. We look forward to joining our partners in continuing the important work of advancing passenger rail across the country in this landmark time for rail implementation.

AASHTO supports the restoration and enhancement of an effective, equitable intercity passenger rail corridor system, to connect communities and enhance the economy. AASHTO has continually emphasized the importance of federally supported State DOT rail planning for the sustainability and success of the intercity passenger rail system.

The establishment of the new Corridor Identification and Development Program (the Program) is a key step toward advancing the national system. AASHTO thanks FRA for providing the opportunity to share feedback at this early stage of implementation. AASHTO recognizes that FRA has considered the Program through seven themes in the Request for Information, and has provided the following comments accordingly:

**Roles and Responsibilities Within the Program (1-2)**

State DOTs (and state designated entities established to manage and implement rail service) should be considered primary partners to FRA in the preparation of Service Development Plans (SDPs) and assessment of proposals for the program. State DOTs deliver connective passenger rail projects in geographically and economically diverse systems while implementing State Rail Plans, carrying out the responsibilities appointed to States in Section 209 of the Passenger Rail Investment and Improvement Act, partnering with host railroads, and serving public needs for rail transportation. Given State DOTs' existing role in managing rail systems, State DOTs should lead in the development of the pipeline of projects that will serve local and regional communities while fitting within an effective planning program.

State DOTs hold key expertise for developing rail network plans, and Amtrak is an important partner to State DOTs. Where Amtrak is an intended operator of a corridor, States and Amtrak should be consulted in partnership on the preparation of SDPs. Furthermore, State DOTs should be consulted alongside parties responsible for the implementation of SDPs and the operational cost of proposed corridors. FRA should encourage clear communication from parties developing proposals, as State DOTs should also be enabled to facilitate partnerships with stakeholder parties in the preparation of SDPs.

FRA should maintain an oversight role of SDPs and the NEPA process and should adopt best practices of other USDOT modal agencies, such as FHWA's Every Day Counts.

### **Service Development Plans (3-6)**

This Program is a valuable vehicle to further ongoing State Rail Plan and SDP rail planning. Therefore, States should have the option to develop SDPs as longer-range planning documents that can prioritize projects for multiple phases of implementation. SDPs should have the flexibility to include a balance of projects from all lifecycle stages of planning to ensure that corridor proposals address both existing and future growth opportunities.

AASHTO strongly supports that State rail programs would benefit from formula funding to the rail planning and project development process. The Program is a key opportunity to take inventory of the variety of rail programs present across State DOTs, assess short and long term project goals for State Rail and Service Plans, and identify phases of funding needs to advance rail projects at all stages of planning, design, and implementation.

AASHTO supports the opportunity presented by the Program to align environmental review of rail projects with a process similar to highway and transit projects under appendix A to 23 CFR part 450. AASHTO acknowledges that FRA has historically pursued project-by-project environmental reviews and encourages FRA to instead consider means to adopt a streamlined review process for projects that will be accepted into the designated project pipeline of this Program. To streamline and improve project delivery, states should be provided with opportunities to assume more federal responsibilities and the associated accountability. By increasing programmatic and funding flexibility to plan, design, and construct rail projects, States will have increased flexibility, reduced program burdens, and improved project delivery.

AASHTO suggests FRA consider developing key stakeholder questions to be addressed at consultations for consistent feedback from stakeholder groups, on topics including operations and shares of ongoing responsibilities. FRA should consult State DOTs on States' existing State Rail Plans, SDPs, and project planning initiatives as FRA develops further guidance on SDPs and the Program.

### **Project Pipeline (7-9)**

The Program's project pipeline should include all lifecycle stages of project planning. Immediate implementation readiness should therefore not be a requirement for all capital projects in the project pipeline. The Program's project pipeline needs to support and provide funding to projects at phases of planning, preliminary design and environmental review, final design and right-of-way acquisition, construction, and operation. Project readiness may be an appropriate evaluation criterion to ensure a full understanding of the project characterization of a corridor proposal.

To expedite the project pipeline, implementation-ready projects should be advanced in the early establishment of this Program. The Program would additionally benefit from a pre-project pipeline to ensure that corridors are strategized with consistent long-term development visions in place. A pre-project pipeline could provide additional guidance and support to proposals in all lifecycle phases of planning.

**Funding of Program Activities (10)**

Funding should be provided to States for SDPs and for all stages of project development, including environmental review. Such funding will enable States with diverse rail programs and visions to develop and propose projects for the Program pipeline. AASHTO also maintains that flexibility on State and local Match is an important tool to support the development of rail programs across geographically and economically diverse communities, as well as to support State and local collaboration on rail projects.

This Program provides a valuable opportunity to streamline the grant process by prioritizing awards to projects with completed SDPs. SDPs will require projects to be well reviewed, sponsored, and planned for phasing toward implementation; these projects should therefore be considered key components of the intercity rail system by FRA, and should be awarded as such for funding through the Program’s project pipeline.

**Readiness of Proposals for Selection into the Program (11-12)**

Degree of commitment from all parties to a proposal should be considered when assessing a proposal’s readiness, and State DOTs should additionally be closely consulted when evaluating proposal commitment. Project sponsors should be granted the flexibility to work with intercity passenger rail operators, to ensure that a proposal is optimally ready for development.

**Criteria for the Selection of Proposals (13-14)**

The successful development of an intercity rail corridor is facilitated by State DOT consultation in the planning and implementation process, as State DOTs help serve their rail networks and surrounding communities. AASHTO considers the fourteen criteria enumerated in 49 U.S.C. 25101(c), of equal priority for the successful development of an intercity passenger rail corridor. All factors will be identified as either project goals, or criteria in upcoming preliminary Alternatives Analysis and Service Development Plans.

During the selection process, AASHTO emphasizes the benefit of considering proposals whose projects are also part of other existing planning processes, whether State Rail Plans, Transportation Improvement Programs, or other State, regional, or MPO planning processes.

**Selectivity of the Program (15-16)**

Proposals that meet the Program selection threshold should be admitted into the Program. It is important to prepare a project pipeline that will advance projects at all stages of lifecycle planning and project development, ensuring program diversity. The Program should consider readiness of those projects in the project pipeline and prioritize construction ready projects for immediate implementation.

AASHTO appreciates the opportunity to provide these comments on FRA’s Corridor Identification and Development Program Request for Information. We look forward to working with FRA to further develop and realize the goals of this new and exciting Program. If you would like to discuss the issues raised in this letter, please contact Shayne Gill, AASHTO Program Director for Multimodal Transportation, at [sgill@aaashto.org](mailto:sgill@aaashto.org).

Sincerely,



Shawn D. Wilson, Ph.D.  
President, American Association of State Highway and Transportation Officials  
Secretary, Louisiana Department of Transportation and Development