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**Subject: Amtrak Cascades Preliminary SDP**

Thank you for reaching out and inviting us for your excellent presentation and dialogue on the Amtrak Cascades Preliminary Service Development Plan (SDP) February 1.

By way of background, Transport Action British Columbia, which is part of Transport Action Canada, has been working on the Amtrak Seattle-Vancouver, B.C. passenger service brief since our founding over 40 years ago, working closely with Washington and Oregon rail advocates. Transport Action B.C. director Brendan Read has served on the City of White Rock, B.C. transportation committee and has worked with the City of Blaine officials on seeking a border-area station.

Here are our written comments for consideration, and where relevant not just in the context of the SDP but for immediate action to address critical short-term (ST) issues with improvements, and also to lay the groundwork for medium-term (MT) and for long-term (LT) improvements.

**1. Incorporate the SDP, the 2006 Washington State Long-Range Plan for Amtrak Cascades (LRP), and the Cascadia Ultra High Speed Ground Transportation study (UHSGT) into doable, implementable (funding permitting) step-by-step, results-achieving program with ST, MT, and LT projects.**

We commend WSDOT, with the State of Oregon and the Province of British Columbia for the significant progress made since 1994 in developing the Amtrak Cascades rail corridor, which was virtually nonexistent then into an attractive, viable service it is today, notably between Seattle and Portland.

However, we must point out that the many proposals and indeed lofty goals stated in the LRP and UHSGT have unfortunately not turned into reality. To illustrate, the LRP talked about 4 round trips between Seattle and Vancouver, B.C. at a timing of 2 hours 37 minutes (Exhibits ES-3 and ES-4). Today we will have 2 round trips with 1 train taking 4 hours and the other taking 4 hours 30 minutes.

We are also, and understandably, skeptical whether there will be UHSGT. And we strongly warn against raising public expectations that it will happen. The demand, and returns, both revenue and social, including environmental, may not be

sufficient to outweigh the costs, including the environmental impacts, from construction.

There have been reams of paper high-speed rail (HSR) lines created and continue to be created in the U.S. and Canada since the 1960s. But there is still only one that approaches HSR and that is between Boston, MA and Washington, DC, utilizing 80+ year old electrification between New Haven and Washington and 100+ year old tunnels. And the only truly new HSR/UHSGT project in North America: in California, has been riddled with overruns, delays, funding issues, and strident opposition at all levels.

## **2. Re-evaluate demand and costs for ST, MT, and LT (UHSGT) in the New Normal.**

All projects and options and their benefits and costs must be realistically evaluated/re-evaluated in the context of the post-COVID-19 pandemic New Normal. These factors include, but are not limited to:

--Heightened alertness and plans of action in place for the next sudden dangerous communicable disease outbreak.

--Hybrid working and video meetings on commuter and business demand. Also, on the need to relocate closer to employers, resulting in fewer but longer trips.

--Rapidly rising costs affecting relocation to the region for employment, education, and retirement, and where and what types of housing.

--The long-anticipated "Great Retirement" of Baby Boomers and slower population growth, along with the Great Resignation and Quiet Quitting, on the types of employment location/remote working

--Increasing and accelerating extreme warmer climate posing more infrastructure and safety risks, including (but not limited to) flooding, landslides, wave damage and destruction, and washouts, and on the snowpacks and available hydroelectric power to support both electrified rail and electric vehicles. But also, potentially impacting demand e.g., shrinking skiing like in Vancouver and Whistler, B.C., and loss and disappearance of glaciers on cruise ship travel.

--Perceived and actual public safety dangers by using mass transit and walking in the city centres in both Canada and the U.S. Canadians, rightly or wrongly, see the U.S. as more dangerous than being in Canada. We have heard this sentiment expressed by dual American-Canadian citizens living in Canada.

*Therefore, we invite WSDOT, with Oregon and British Columbia, to focus more on setting out and achieve ST and MT projects that the stage for future and yes aspirational LT UHSGT. It will almost always be less disruptive and costly to plan and make provision for the future now than it is to retrofit later.*

*This way we can actually have a faster, more convenient, and attractive Amtrak Cascades rail system that we will be able to use, and our communities will benefit from, rather than to dream about.*

**3. Investigate and find solutions for the issue of Customs clearance partnership with Department of Homeland Security and the Province of British Columbia (Ministry of Transportation and Infrastructure [MOTI]) and through them the Government of Canada the issue of Customs clearance.**

This is the singular biggest obstacle to Amtrak Cascades and future UHSGT. The 4 hours 30 minute SB schedule from Vancouver, B.C. to Seattle, and any further delays at the border that happen is not competitive and acceptable. What is the point of arriving at Pacific Central at least 1 hour early as Amtrak recommends if the train is going to stop at Blaine for 30 minutes for CBP inspection?

**4. Address, with MOTI, Semiahmoo First Nation, and Government of Canada the urgent safety issues on BNSF rail operation from the border to Colebrook with a permanent effective solution that will also enable higher speeds and greater reliability.**

There are access delays to the Crescent Beach neighborhood caused by long BNSF freight trains that threaten to impede first responders. To illustrate, there was recently a three hour blockage caused by a stalled BNSF train.

There are also pedestrian safety issues in White Rock at its popular Pier and Promenade. At the same time landslides from the bluff and winter storms threaten the rail right of way: all of which leads to slow and dangerous train operation. Demonstrating the risks the White Rock Pier was destroyed by a storm in December 2018. The transportation of toxic substances on BNSF freight trains further adds to the dangers—as highlighted by the recent Ohio train derailment--both to the residents and to the environment, on both sides of the border.

**There are two options that need to be examined, decided on, and implemented in the ST and MT.**

**-- One, harden the existing tracks with complete vehicle and pedestrian crossing grade separation, fencing, track improvements, and measures to prevent blockages from unstable slopes and from storms impacting Semiahmoo Bay.**

**--Two, build the long-discussed White Rock bypass on the Highway 99 corridor. with provision given the cost and scale of the investment for UHSGT as well as freight, such as with a low grade and a separate freight track.**

**5. With the same partners examine and build a border-area station.**

The Metro Vancouver, B.C. population is growing south and eastward: witnessed the explosive growth that is occurring in Surrey and Langley that will only accelerate with the construction and opening of the SkyTrain extension to Langley. There are, and will be, but at a smaller scale in today's New Normal new offices being built there. And if CBP is going to insist that it also clear the SB trains at Blaine then it behooves Amtrak/WSDOT to see if the service can benefit from it.

There has been debate over whether a border-area station should be built in Canada, in Surrey or White Rock, or in Blaine. Blaine has better road access as the major highways (Hwy 99, Hwy 15) funnel into the city and there are more station location options. Blaine has been interested but we were told when the proposal was being actively discussed that the city/surroundings did not meet WSDOT's station criteria.

But there are two critical factors tipping the scale towards Canada: reliability and transit access. Canadians would be more likely to use the trains if they could board in Canada because they would not have to worry about missing them because of Customs delays. Once you are in your car and you have undergone the stress of crossing the border you want to keep going. Also, TransLink transit buses cannot cross the border: which limits access to private vehicle and for-hire vehicles that may or may not be able to drive across the border.

A Canadian border station would also allow CBSA officers to check passengers enroute; both CBSA as well as CBP officers can use it. There alternatively could be a sealed railcar north of Bellingham for passengers detraining at the border station and being cleared at that facility.

#### **6. With MOTI address freight train-caused delays at Colebrook.**

Amtrak Cascades face conflict with, heavy, slow, and long freights crossing over to/from Deltaport. The solution is either a flyover or flyunder, built at higher speeds but noting the curve northward from Colebrook roughly parallel to Highway 91.

#### **7. With MOTI press to have the New Westminster Rail Bridge (NWRB) replaced.**

Amtrak Cascades trains are also slowed and made more unreliable by the aging NWRB between Surrey and New Westminster. The NWRB is a bottleneck for passenger and freight rail due to its single track, tight curves, and slow speeds. It has been struck by vessels on numerous occasions over the years.

We recommend that WSDOT coordinate through/with MOTI with the Canada Infrastructure Bank's study of options for the replacement of the NWRB to ensure that the replacement bridge will provide for ST and MT passenger rail capacity requirements out to 2040 and is forward-compatible with future UHSGT or other service enhancements that might be envisaged in a 20-50 year horizon.

*Several of these recommendations: in points 4, 6, and 7, would improve—and make more attractive—shipping freight by rail that would help alleviate traffic congestion and border and port delays and lower pollution including greenhouse gases.*

#### **8. Add to current and planned track improvements in Canada, with MOTI.**

The LRP calls for 110 mph north of the border. On one segment, through the Central Valley, CN Rail has been expanding the trackage. Could WSDOT, through/with MOTI, contact CN, to see what further improvements would be needed to bring it up to Class 6 110 mph standards in the ST or MT? Similarly,

could MOTI be asked to contact BNSF to see what enhancements would be required to raise speeds from Colebrook to Scott Road/foot of the NWRB?

**9. Investigate, within the WSDOT purview, connecting services such as, but not limited to:**

**--East-West Amtrak over the Stampede Pass.**

We fully support this proposal; we also see the potential ridership/revenue-growing synergy by enabling more rail journeys between Canada and Washington State.

**--A SeaTac shuttle to/from Tukwila Station.** This would serve Canadians seeking affordable flights and Washington State residents including airport/air industry employees wanting and needing reliable and affordable airport access. King County Metro requires taking two buses from Tukwila Station to reach SeaTac Airport. The LINK LRT to SeaTac is slow for Canadians, and other Americans travelling from/to north of Seattle. It is not feasible for Americans going to/from Tacoma and points south until when the Tacoma Dome Link Extension opens, which is now planned for 2032.

**--Extend Amtrak Cascades trains 519/516 to/from Tukwila or Tacoma.**

Either service would attract more customers and revenue by enabling additional faster (than LRT, bus) access to SeaTac and Tacoma. The Tukwila station is also a convenient hub for Burien, Renton, South King County travelers. Amtrak trains would have to stable at Tacoma if that choice is made but could deadhead back to Seattle if it is decided to serve only Tukwila.

**10. Investigate, in partnership with MOTI, connecting services, such as:**

**--Extend the TransLink 257 and 250 buses to Pacific Central station, eventually operating through to the Broadway Subway.** These routes connect West Vancouver but equally if not more critically, enable access from/to central and western Vancouver Island through Nanaimo, the Sunshine Coast, and Bowen Island by way of BC Ferries.

The abandonment of direct roll-on/roll-off intercity buses that had operated out of Pacific Central make these expanded TransLink services essential. Helping to make the business case for them is the redevelopment of the False Creek Flats area, noted with the building of the new St. Paul's Hospital.

**--Loop the TransLink 84 bus from UBC to VCC-Clark into Pacific Central and add early morning and late evening runs to meet trains.** This route would provide convenient direct access—even when the Broadway Subway opens—to the key UBC, Vancouver Wes End, Kitsilano, Granville Island, and False Creek South communities and markets.

**----Investigate, alternatively, the market for a connecting bus to BC Ferries at Tsawwassen, potentially roll-on/roll-off to Victoria, B.C. should a Canadian border station be built.**

This is the longest and most indirect route to Victoria, but it would also provide access to the Gulf Islands and a second access to Nanaimo. But such a service

would be an improvement over having to travel at present to Pacific Central and then back out to Victoria, which may be facing delays once construction begins on a replacement for the Massey Tunnel.

**--Weigh in, should the conversation begin again, on the on/off downtown Vancouver streetcar proposals by suggesting having service into the False Creek Flats, including Pacific Central.**

**--Examine the potential of a Bellingham-San Juan Islands-Victoria, B.C. year passenger-only fast ferry.** The Anacortes-Sidney WSF ferry, which once operated year-round and was limited only to summer months, has been suspended and its return is uncertain.

While the Victoria Clipper operates year round and is fast and direct, its market and usefulness north of Seattle is limited. The M.V. Coho also operates year round from Port Angeles to Victoria, B.C. but getting there requires a WSF ferry trip to Bainbridge Island and a bus from there, resulting in a long and slow journey. Both the Clipper and the Coho also go into refit every year, resulting in an absence of service.

Facilitating the potential of such a service from Bellingham, as well as improving the experience of Clipper and Coho customers is a new, much-needed downtown Victoria ferry terminal that will have consolidated passenger and Customs facilities. MOTI and Transport Canada recently agreed to make that happen, with federal funding promised.

**11. Discuss with MOTI the future of Vancouver, B.C.'s station and in partnership with it through it with VIA Rail Canada decide on an action plan.**

Pacific Central station has several critical liabilities:

**-- On the edge of downtown Vancouver that is not where most people: visitors and residents, want to go, or use.**

Access is dependent on SkyTrain, buses, or taxis to prime destinations including the city center, Gastown, hotels/restaurants, offices, convention center, the cruise ship terminal, and air, ferry (SeaBus and new Vancouver-Nanaimo/Sunshine Coast ferries), and regional rail (West Coast Express).

**--The transit service is indirect, requiring transfers to reach most other parts of Metro Vancouver.**

**--The area (False Creek Flats) is rapidly being redeveloped, which may create pressure to remove the tracks.**

WSDOT reports have discussed two alternatives that should be dismissed immediately: Scott Road SkyTrain and YVR/Canada Line. And for the same reason: inconveniencing particularly American customers, resulting in lower ridership, revenues, and environmental and social benefits by forcing them to transfer on overcrowded SkyTrain and Canada Line trains.

**This leaves only one option: relocating to a waterfront terminal for all rail and intercity bus operations close to/at the downtown ex-CPR Waterfront station: which is the hub of Metro Vancouver's mass transit and air/passenger ferry network.**

Such a hub was envisioned in the 1970s and have gradually happened with the opening of SeaBus, SkyTrain, WCE, and the Canada Line. Any such move of Amtrak but also VIA Rail and intercity bus services will be expensive and complex. However the ROI may justify the investment. But a decision to move—and with it to protect the property and access—must be made soon in the face of ongoing development and competing freight rail needs.

The Vancouver terminal must be a genuine hub. However the development of the SkyTrain network and TransLink service patterns over the past couple of decades have not treated Pacific Central as such, focusing on the Waterfront station instead.

WSDOT should ask MOTI for strategic clarity on this question before making joint capital investments to allow Amtrak Cascades services to reach the chosen terminal quickly and reliably. We recommend study of the two alternatives be undertaken.

Yours sincerely,

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*Transport Action BC is an advocacy group that promotes the use of sustainable transportation. We are affiliated with Transport Action Canada, a national federation of consumers devoted to the public interest in transportation systems.*