



WSDOT Rail Office,

Pacific Northwest Economic Region (PNWER) is a binational convener and thought leader with a demonstrated commitment to enhancing our region's passenger and freight rail systems. This work, amplified by two U.S. Department of Transportation Regional Infrastructure Accelerator (RIA) grants, comprises a multi-state, public/private partnership approach to increasing capacity and performance of our region's rail lines for shared benefit between passengers, freight and the communities they serve. Building on this work, we submit the following comments to the Amtrak Cascades preliminary Service Development Plan (ACSDP).

PNWER's robust High Performance Rail initiative includes identifying, evaluating and pursuing multiple bundled improvement projects that will, in concert, improve passenger train performance, increase freight line capacity, reduce community safety conflicts between rail and road and enhance emergency access. This federally-funded work has resulted in a list of rail improvement projects from Seattle to Portland primed for federal rail infrastructure grant and credit programs. As presented to WSDOT and the House Transportation Committee, these projects are designed to improve rail operations and mainline travel times while enhancing port operations through quicker access to marine terminals. These recommendations will benefit Amtrak Cascades operation, and are included as a separate attachment.

The following high level comments reflect the themes in the detailed comment document:

- **Improved and expanded Amtrak Cascades passenger rail service can be a valuable tool to address housing affordability and help the state reach its emission reduction goals.**
 - While many companies will continue to allow telework, the general trend currently is towards a 'hybrid' working environment where employees come into the office 1-3 times per week, and work from home all other days. Improved Amtrak Cascades service could help address issues related to high cost of living within the Puget Sound metro area by enabling workers to live in relatively more affordable cities like Kelso, WA and commute by rail into work in Tacoma or Portland a few times per week.
 - Additionally, there are many potential opportunities for transit-oriented development (TOD) around these stations for commercial and housing opportunities.
- **A Corridor Governance structure is critical and necessary for bringing Oregon, Washington, and British Columbia together to maintain the viability of this intercity rail system.**

- **Although projects within or around yards, customer facilities, and junctions may be outside of WSDOT’s complete jurisdiction, there are ample opportunities for co-investing or coordinating with the host railroad, ports, and other partners to address these chokepoints.** The ACSDP would benefit from the inclusion of a process to evaluate such projects.
- **Discretionary riders are currently the primary ridership of Amtrak Cascades. The ACSDP must ensure it addresses the speed and reliability concerns of these customers in the investment strategy.**
- **The investment calculations made in the feasibility analysis should include the congestion and GHG emission reductions associated with moving people by rail, and where possible, evaluate that against how similar dollar investments in I-5 would address those same metrics.**
- **Planning activities should include route and service considerations from FRA’s Amtrak Long Distance Service Study**
 - Additional long-distance service under evaluation in FRA's Amtrak Long Distance Service study should be taken into consideration and factored into capacity constraint analysis for the ACSDP. WSDOT should take advantage of the FRA's CID award to the Big Sky Passenger Rail Authority (BSPRA) and evaluate the impact of passenger rail service along the North Coast Hiawatha / Stampede Pass Corridor to the Amtrak Cascades. The CID award, in conjunction with the FRA's Long Distance Service Study identification of North Coast Hiawatha utilizing Stampede Pass, demonstrates a federal interest in restoring this service. It is imperative that WSDOT consider this in the scoping and planning of the full SDP for Amtrak Cascades.

With the massive new federal rail infrastructure programs, the FRA's Corridor Identification and Development (CID) program marks a remarkable opportunity for WSDOT and partners to continue to leverage public and private investments in rail infrastructure for the enhancement of the Cascades service - as they have successfully in the past. Capital investments by Amtrak in support of the long distance Coast Starlight will also add capacity and improve operations.

The Amtrak Cascades state supported service has set a national benchmark through a successful incremental approach to expanding ridership and reliability over the last 30 years. The high water mark in capacity, safety and operational enhancements was in the 2008–2009 implementation of \$800 million in federal ARRA and HSR investment dollars. This included close cooperation and joint investment with the host RR BNSF, Amtrak, Federal Rail Administration to deliver a suite of projects on time and on budget that increased capacity for passenger and freight movement. In 2023, WSDOT received a \$25M federal INFRA grant to supplement a \$70M capital investment by BNSF to replace aging sections of the Salmon Bay Rail Bridge in Seattle.

The PNWER RIA team looks forward to continuing work with WSDOT, ODOT, Amtrak, and representatives in British Columbia to ensure the Pacific Northwest region has a safe, robust, and interconnected rail system that serves passenger and freight rail needs. Please feel free to reach out to our team with any further questions.

Thank you,



Bruce Agnew

Comments are also included in the PNWER ACSDP-Excel-Comment-Form

Page #	Line #	Comment
ES-3	16-21	Based on the policy priorities of Washington state, part of the ACSDP's objective should be to divert drivers from the road and make rail ridership an attractive, viable option for current drivers.
9	5-9	The growth of daily automobile trips in the suburban and rural areas between Seattle and Portland is a potential growth opportunity for Amtrak Cascades. Residents in Seattle and Portland are well-served by a fairly robust (and growing) transit system, while residents in Lewis and Cowlitz counties, for example, have less transit options. In the absence of mid-distance transit options, driving is the only alternative. Amtrak Cascades service is well poised to fill that mid-distance need to move people from the rural and suburban communities into the larger metro areas.
11	12-16	Amtrak Cascades service improvements and expansion can be framed as a tool to relieve some of the population growth pressure within Puget Sound by enabling people to live in more affordable areas between the Seattle and Portland metro areas. Improved Cascades service enables people to live in these areas and transit by rail into work in Tacoma / Seattle or Portland a few times per week.
21	16-21	We encourage the team to incorporate the recommended projects that the PNWER RIA team has submitted and presented to WSDOT during previous meetings. These projects were specifically selected to benefit both freight and passenger rail movement and are an opportunity to co-invest with the host railroad, ports, and other partners.
21	24-25	The analysis here that "eliminating some or all intermediate stops to reduce travel times did not improve ridership as much as increasing the maximum speed limit" should be a guiding principle as WSDOT evaluates investments and route alternatives. The preliminary SDP and supporting appendixes have data that clearly demonstrates that personal and discretionary travel is on the rise, business travel is in the minority of service and is on the decline. Although the majority of

		ridership may be picked up in the major metro areas, the mid-range ridership from suburban and rural communities is clearly a key demographic with room for growth. Although higher speeds do result in higher maintenance costs, there's reason to believe that higher speeds will result in increased ridership and thereby higher ticket revenues which can help offset those costs.
21	33-39	The cost effectiveness of a limited or express service option versus increasing maximum speeds is unclear based on the information provided throughout the ACSDP. As noted above, higher speeds will positively impact ridership, which consequently improves ticket revenues which can help offset the associated maintenance costs of higher speed service. Because speed and reliability issues are the top concerns of Cascade ridership today, the addition of express routes will not address the fundamental concerns that most riders have with the Cascades. Riders are unlikely to pay higher ticket prices for an express service that is not as fast - or faster - than driving. Under these circumstances, investing in infrastructure to support higher speeds is the most cost effective solution that will enable greater flexibility in service delivery, and result in higher ridership and higher ticket revenues over time.
22	12-14	Communication and enhanced cooperation with Canadian partners is critical to improving Amtrak Cascades service north of Seattle. This could be accomplished by working with the Office of International Relations and Protocol, the Legislative Committee on Economic Development and International Relations, and/or through the newly created Interparliamentary Exchange with British Columbia.
22	19-20	There is significant federal funding available through the CID and other BIL programs. This is a unique opportunity to evaluate what kinds of broader infrastructure investments are necessary to meet future needs beyond 2045. Critically, how do we avoid already hitting capacity constraints if we reach full service development goals in 2045? Although the commitment to reducing the costs associated with new infrastructure is admirable, there are opportunity costs to this scaled back approach.
23	10-12	Additional long-distance service under evaluation in FRA's Amtrak Long Distance Service study should be taken into consideration and factored in to capacity constraint analysis for the ACSDP. WSDOT should take advantage of the FRA's CID award to the Big Sky Passenger Rail Authority (BSPRA) and evaluate the impact of passenger rail service along the North Coast Hiawatha / Stampede Pass Corridor to the Amtrak Cascades. The CID award, in conjunction with the FRA's Long Distance Service Study identification of North Coast Hiawatha utilizing Stampede Pass, demonstrates a federal interest in restoring this service. It is imperative that WSDOT consider this in the scoping and planning of the full SDP for Amtrak Cascades.
23	27-28	Given that "capacity is most constrained at yards, customer facilities, and junctions," how might WSDOT work with these specific stakeholders to identify co-investment projects that would benefit movement of trains along these chokepoints? We understand that these projects may fall outside the scope of WSDOT's rail division. However, given their noted impact on the overall function of

		the Amtrak Cascades passenger rail system, this seems to be a critical area of necessary cooperation to improve overall Cascades performance.
24	6-10	Should WSDOT take this incremental improvement approach, the SDP should clearly outline which investments will be made to reach the increased service levels identified in Alternatives A and B, which should be made to reach service levels identified in Alternative C, and which will be needed to reach Alternative E. This incremental approach could then include clear budget estimates and milestones to demonstrate movement towards a higher functioning rail system.
25	Exhibit 21	We strongly encourage the consideration of projects identified by the PNWER RIA program (attached) which prioritizes both passenger and freight rail movement, and has identified investments in yard operations that would benefit travel times.
25	4-5	What does WSDOT need from its Canadian partners to have better cooperation, data, and buy-in to the Amtrak Cascades SDP process? A lack of Canadian participation in the broader process seems to be a major challenge for improving Amtrak Cascades service.
26	8-10	Assuming that the cost of train sets is one of the major costs associated with running each of the Alternative Routes, the need for a minimum of 11 additional train sets for Alternative D undermines the potential cost savings associated with running 'express' or 'limited service stop' lines.
33	2-4	The ACSDP would benefit from a clearer articulation of who the ridership demographic is for Amtrak Cascades. Appendix B does a good job of articulating who uses Amtrak Cascades and why, building on the 2019 state rail plan that found that most riders were 'visiting family/friends' and other leisure travel purposes. While business travelers are an important demographic, they are, on average, 8% of all riders. The current way the SDP is written implies that business travelers have a major impact on ridership, and provides recommendations designed to suit their needs, including Alternative D's express routes. Existing data from Appendix B and from the 2019 state rail plan demonstrate that discretionary travelers are the key ridership demographic. The future ACSDP should more fully reflect this reality, and prioritize service improvement strategies that benefit that key ridership demographic of leisure travelers.
33	16-18	While many companies will continue to allow telework, the general trend currently is towards a 'hybrid' working environment where employees come into the office 1-3 times per week, and work from home all other days. Improved Amtrak Cascades service could help address issues related to high cost of living within the Puget Sound metro area by enabling workers to live in relatively more affordable cities like Kelso, WA and commute by rail into work in Tacoma or Portland a few times per week.
36	16	As was outlined in Appendix A "Expanding I-5 to eliminate congestion is not a viable option in the multiple metropolitan regions served by the PNWRC." While automation could be a factor in improving congestion, it will not likely solve these issues in any meaningful way.

36	18-19	Previous modeling in the ACSDP already established that skipping the suburban and rural train stations negatively impacts overall ridership, indicating that the current suburban and rural rail customers are already a key Cascades demographic. Amtrak Cascades could be poised to benefit from the growth of mid-distance travelers who occasionally or frequently need to travel into major metro areas for services and work, but who cannot afford to live in those metro areas. This is an opportunity to collaborate with transit-oriented development (TOD) projects, and expand services like long term parking to better serve these customers.
34	24-28	What will it take to reach Scenario 4 and what do those investments look like?
35	12-18	The current preliminary ACSDP does not emphasize the potential role of passenger rail in reducing VMT, which is a clear priority for the state legislature. Similarly, even with existing diesel locomotives, rail travel has a lower GHG emission footprint compared to all other modes, including flying and driving. Given the state of Washington's focus on lowering emissions and reducing GHGs, the role of passenger rail in reaching these goals must be accounted for and seen as a viable solution to reaching state-wide emissions reduction goals.
36	15-22	Given that the initial master agreement with BNSF allowed speeds up to 110 mph along this corridor, the ACSDP should scope and evaluate the improvements needed to raise speeds above 90 mph. If speeds above 90 mph are unobtainable due to technical issues beyond WSDOT's control, this can be noted. Speed and reliability are two of the key issues identified by riders, and additional investigation should be made into understanding what is needed to reach maximum allowable speeds.
36	24-27	The potential revenue performance under Alternative D with higher fares should account for the increased total operating costs of needing 11 new train sets and the adequate crew needed to staff them. It should be noted that these are two additional train sets than the next two most frequent service options. The ACSDP should clearly articulate the price at which these 'express' tickets would result in better revenue performance, and how that compares to airfare.
36	28-31	Can the models predict how ridership patterns would change if relevant upgrades and investments were made on the Canadian side of the Amtrak Cascades?
36	33-34	We strongly agree that future planning, including the next steps of the CID process, should place a high priority on improving rail service amenities and the experience of passengers getting to and from Amtrak Cascades stations. There are many potential opportunities for transit-oriented development (TOD) around these stations for commercial and housing opportunities. The ACSDP should seek to better understand what supportive rail and transit service improvement investments are needed to drive ridership to the Amtrak Cascades route. Affordable housing is a critical issue for Washington state, and improving connection to these suburban and rural communities with more affordable housing - with options for further housing developments - is a major opportunity for growth

		for Amtrak Cascades service.
38	8	Corridor governance is absolutely critical. The lack of participation from Canadian partners in this process, and an overall lack of investment on the Canadian side of the Amtrak Cascades corridor, demonstrates the dire need for a corridor governance structure that can accommodate 2 U.S. states and 1 Canadian province. Oregon has developed a stakeholder engagement process for the private sector through ORULE.
A-5	10-16	Investment in Amtrak Cascades service improvements is a more cost-effective alternative to continued investment on the I-5 corridor in most circumstances. The ACS DP can lean into these cost savings principles when looking at a holistic transportation system, and can then position itself as a key tool in decongesting I-5 corridor traffic.
D-3	Exhibit 3: Preliminary list of capacity improvements (north of Seattle)	At Everett, the Bay side yard, which was the industry yard used for switching local traffic for the north branch lines was shut down and the traffic was moved to Delta Yard next door. The idea was to utilize Bayside yard for train staging and in the future, improve the operations by adding signalization, which could improve the 10MPH speed to 25 MPH. Improvements to a turnout and to the bridge on the north end would also increase the allowable operating speed and improve the entire throughput. The staging tracks could also be signalized and would open up the Rogers main line for expedited traffic, especially passenger rail. Rogers Main line has other improvements in the works where main line speed and switches can be improved to enhance operations.
D-5	Exhibit 5: Preliminary list of capacity improvements (south of Seattle)	The extended triple track improvements are a good investment, especially in the short to medium-term. Long term, a dedicated passenger-only track in the rural areas between Olympia and Vancouver, WA would help decongest the freight line and allow for a maintenance schedule that is more feasible for regularly scheduled passenger rail service. This would be a substantial investment, but the speed improvements would have a high return on investment, especially if they are able to draw additional ridership onto the Amtrak Cascades. Given the flexibility of the CID program, this is a good opportunity to scope the feasibility of this type of study to evaluate whether it would be a worthwhile investment for the route.

