



SUBMISSION TO THE FEDERAL RAILROAD ADMINISTRATION AMTRAK DAILY LONG-DISTANCE SERVICE STUDY

March 2023

Transport Action Canada represents Canada's intercity and local public transport passengers and their communities across all modes. Our brief includes transborder public transport and to that end we regularly work with our American counterparts, including the Rail Passengers Association, Rail Users Network, All Aboard Washington, All Aboard Northwest, the Michigan Association of Rail Passengers, All Aboard Ohio, and the Empire State Passengers Association.

Canada and the United States used to be far better connected by passenger rail than our two countries are today, allowing citizens of both countries to travel for business and leisure. Over the last few decades, these connections have been allowed to atrophy, increasing dependence on highways with often-congested border crossings and emissions-intensive short haul fights.¹

To a considerable extent, the decline of passenger rail was caused by the availability of very cheap fossil fuels and generous highway funding. We expect that over the next few decades, the economics of transportation will trend back towards being aligned with the physics, with the efficiency of rail becoming increasingly attractive.

In view of the above, we would like to present our comments on the Amtrak Daily Long-Distance Service Study, with a view to strengthening the passenger infrastructure and socio-economic ties between our two countries.

THE IMPORTANCE OF TRANSBORDER SERVICES

Amtrak's existing and future transborder routes are generally classified as corridor services. They also serve as the start and end point of longer-distance rail travel. At present this is not convenient, often requiring an overnight stay in New York, Chicago, or Seattle before continuing the rail journey. This means that anyone planning a rail itinerary faces considerable friction and non-farebox expenses.² Adjusting schedules or adding transborder services that make reliable connections to the rest of Amtrak's long-distance network would create significant for value travellers between the two countries.

¹ We recognize runway slots, gate capacity, and airspace at hub airports as a limited resource, best utilized by larger aircraft serving long-haul and transoceanic routes, supported by strong ground transport feeder networks, and for essential services to remote communities not easily accessed by other modes.

² It is currently possible to make same-day connections to the southern United States only if crossing the border by car and boarding Amtrak at Detroit, using the Wolverine to Chicago, or Capitol Limited to connect with the Silver Meteor through Washington DC, or to the Silver Star in the southbound direction only.

Providing morning arrivals and evening departures in New York or Chicago requires the transborder services to and from Toronto, Montreal and future destinations in Canada to operate overnight, and be equipped as part of the long-distance network. Overnight travellers are less sensitive to operating at lower track speeds, and recent developments in “business class” seating design offer the possibility of the same equipment being used for daytime and overnight operation on such routes, achieving a high level of equipment utilization and efficiency.^{3,4}

We recognize that adequate track speeds and improved running times on the Canadian side of the border are vital to improve the efficiency of Amtrak’s transborder operations, and that Canada’s infrastructure is sub-par in this respect. We will continue to advocate with Transport Canada and provincial ministries for the maintenance of suitable track standards, and for investments to address infrastructure bottlenecks.

SERVICE REGIONS

PACIFIC NORTHWEST

We are currently engaged with WSDOT regarding enhancement to the *Cascades* corridor service, through which passengers to and from British Columbia can access Amtrak’s long-distance network.

The current schedule of the *Coast Starlight* does not permit a same-day connection through to Vancouver, BC. With infrastructure and operational improvements along its route to tighten up the schedule, a same-day connection to the *Cascades* service could become possible, opening the train up to a larger share of the tourism, personal, and business travel markets between BC and California. A connection from the *Empire Builder* is possible northbound, but the connection time is currently too tight southbound.

Our recommendations to WSDOT, shared with the BC government, are aimed at reducing *Cascades* transborder running times by up to an hour, also making same-day connections in Seattle more achievable.

We support the proposal to reinstate the *Pioneer* route and would hope that such a service was also timed to allow onward connections through Seattle to Vancouver, BC.

There are also opportunities to provide a thruway bus service linking the Kootenay region of BC, plus Banff and Lake Louise, AB, to the *Empire Builder* at Spokane, WA.

PLAINS AND PRAIRIES

Communities across the northern plains share have much in common with their northern neighbours on the Canadian prairies, and strong socio-economic ties. The rail network does not reflect this reality, and indeed communities on both side of the border also share the experience of public transport cuts, imposed from far away.

We support the proposal to reinstate the *North Coast Hiawatha* and have held discussions about the possibility of a north-south thruway service, connecting Calgary, AB with the *Empire Builder* at Shelby, MT and the *North Coast Hiawatha* at Billings. As plans to restore rail service between Calgary and Banff come to fruition, and proposals to reinstate service between Calgary and Edmonton advance, this could be upgraded to a rail connection. The rail infrastructure on the route south from Calgary is maintained to a high standard but not congested, and operating a

³ Airlounge - <https://aircraftedbycollins.com/details-airlounge-business-class-seat>

⁴ Butterfly Rail - <https://www.butterflyseating.com/butterfly-rail>

Chicago-Billings-Calgary service as a second section of the *North Coast Hiawatha* could strengthen the economics of reinstating the service across Montana.

There is also a growing north-south economic axis between Alberta, Colorado, and Texas. The creation of a new long-distance service linking Calgary and Billings with Denver, CO, Amarillo, and Forth Worth, TX would address a long-standing blind-spot in North America's ground transportation strategy, creating a low-carbon mobility corridor between several cities and regions that are rapidly pivoting to sustainable technologies and new industries, and would link investment in the Front Range corridor into the wider Amtrak network.

UPPER MIDWEST

The 2,500-mile mid-continent gap in north-south passenger travel opportunities could also be addressed by connecting Winnipeg to the Twin Cities and Chicago. The current timing of the *Empire Builder* would require an overnight thruway bus connection, but with the introduction of second Amtrak frequency between Chicago and the Twin Cities a more attractive thruway bus schedule becomes possible. With Winnipeg serving as a nexus for both passenger rail and intercity motorcoach services in western Canada, this would result in a significant increase in network connectivity.⁵

Eventually, the second Twin Cities train could be extended north to Winnipeg, giving western Canada's hub a direct connection to Amtrak's Chicago hub. The route would diverge from the *Empire Builder's* after St. Cloud, using Canadian Pacific trackage to Emerson and then switching to Canadian National to reach Winnipeg Union Station.⁶

MICHIGAN

We support Amtrak's proposal to reinstate service between Chicago and Toronto and have encouraged the Canadian government and Ontario provincial government to fully co-operate with this project, including exploring the relocation the Windsor station to the Canadian Pacific corridor to the Detroit-Windsor railway tunnel. However, we do not believe the use of Essex Terminal trackage to reach the current VIA/CN alignment in Windsor is viable. In the immediate future, routing the train north from Detroit to cross the border at Port Huron could also be considered, allowing the service to commence while awaiting infrastructure changes in Windsor.

The running time of approximately nine hours for a Chicago-Toronto service, combined with the opportunity to connect to Amtrak's long-distance services through Chicago and VIA Rail services east from Toronto would make it attractive for this service to be considered part of the long-distance network, operating overnight between the border crossing point and Chicago, or with two round trips using night-and-day equipment as described above.

Travel south and east by Canadians crossing the border at Detroit currently requires a thruway bus to Toledo. Supplementing the *Capitol Limited* with a service between Detroit, Cleveland and the East Coast operating through Ohio in daytime would therefore be attractive to Canadians in southwestern Ontario, in addition to the considerable value it would offer to Detroit and southeast Michigan.

⁵ Following the closure of the Greyhound terminal, we are also recommending that intercity motorcoach operators be invited to utilise the facilities available at Winnipeg Union Station.

⁶ Alternatively, there is a short stretch of dismantled trackage on the most direct route north from Grand Forks through Pembina that could be reinstated.

NEW YORK AND NEW ENGLAND

We welcome the return of the *Adirondack* and *Maple Leaf* services and support the extension of the *Vermont* to return it to Montreal also. We believe the designation of track 23 at Montreal's Gare Centrale as a dedicated platform for transborder services, with appropriate border clearance and transborder lounge facilities, would significantly improve the passenger experience, and allow border security officers to do their jobs more effectively.

Customers travelling from Toronto and Montreal currently arrive in New York in the evening, as do passengers heading north, leaving few opportunities for onward rail connections. Hotel accommodation in all three cities is expensive, so the option of an overnight train trip would provide both improved onward connections or the opportunity to spend more time in the destination city.

The schedule of the *Adirondack* would allow a night-and-day schedule of two round trips to be operated with two sets of equipment, even before border clearance in Montreal is available, also proving a timely departure for any passenger denied entry to Canada.

We do not expect preclearance to be as easy to arrange for the *Maple Leaf*, and travel time will continue to be longer even with the improvements envisaged in the Empire Corridor Draft EIS.⁷ However, an overnight service could be added using three sets of equipment in rotation instead of the current two, with a southbound border crossing before midnight and northbound after 6am.

We note that the mural exercises completed for this consultation also suggested the return service between Montreal and Portland/Boston, which aligns with preliminary work that has been undertaken by the *Fondation Trains De Nuit* on the concept of an overnight train on that route, operating through Sherbrook, QC.⁸ Such a train might have both a precleared segment for passengers to and from the United States and a local segment for passengers traveling only within Canada.

ATLANTIC REGION

It has been a long time since passenger rail service has been available between New England and the Maritimes, even though they have deep social connections and considerable tourist traffic between the regions. The suggestion of extending the Downeaster to Bar Harbour, where passengers might make a ferry connection to Yarmouth, NS also appeared in the mural exercises.

We caution that bus connectivity onward from Yarmouth to toward Halifax is not currently available, and the track to provide rail service there has long since been removed, making a bus service the only option. We believe that options to reconnect the two regions with ground transportation should be the subject of further study, and if so the pre-Amtrak *Gull* route, operating from Boston to Saint John, NB, Moncton and Halifax could also be evaluated.

EQUIPMENT PROCUREMENT

The expansion of Amtrak's long-distance service network, expanding capacity to meet demand on existing routes, and the renewal of the current fleet mean that a substantial amount of new equipment will be needed. Similarly, VIA Rail Canada is in need of equipment to renew its long-distance fleet, which has long exceeded its life

⁷ <https://railroads.dot.gov/rail-network-development/environment/environmental-reviews/empire-corridor>

⁸ <https://montrealgazette.com/news/local-news/group-plots-montreal-boston-overnight-train-with-stop-at-old-orchard-beach>

expectancy due to a combination of high maintenance standards and excellent original build quality but cannot be expected to continue operating into the 2030s. Both Amtrak and VIA Rail Canada are already moving toward procurement for a next generation of long-distance equipment. While we expect continued differences in service concepts and equipment, there are also likely to be many common elements, including dining and panoramic dome cars that meet ADA and Canadian accessibility requirements. Many of these are likely to require new engineering.

We therefore believe the opportunities for joint procurement and a common platform should be explored, as has been the case with the respective corridor fleets, with a larger equipment pool both reducing capital costs per unit and improving long-term supportability. For this strategy to be financially beneficial for both governments and their respective taxpayers, we ask that potential carbuilders be permitted to leverage their integrated supply chains across North America.