January 19, 2022

Federal Highway and Transportation Administrations
Joint Interim Committee On The Interstate 5 Bridge
IBR Executive Steering, Community and Equity Groups
Interstate Bridge Replacement/EIS Team

Re: Cascadia High Speed Rail Company's Four Part Bridge Plan Alternative to the IBR Program

I am writing because Cascadia High Speed Rail (CHSR) Company's Tier 1 Environmental Impact Statement (EIS) Study and Four Part Bridge Plan needs to be put on the public record and be analyzed as a viable alternative as part of the Interstate Bridge Replacement Program. This letter will be attached to these two CHSR studies we are sending to FHWA and FTA. As you are aware, FHWA and FTA have stated that "*any changes to the existing FEIS would render it a "revised FEIS" and necessitate a new ROD (Record of Decision) to effectuate it".* Cascadia High Speed Rail Company has recently undertaken and completed Economic Feasibility and Tier 1 EIS studies that can make a significant change to traffic on I-5 and other bridge crossings over the Columbia River. It demonstrates how the CHSR project could make an effective contribution to travel in the I-5 corridor between Seattle, Portland and Eugene by meeting all the USDOT Cost Benefit requirements and generating enough positive cash flow to excite private investment and spur progress towards forming a private public partnership.

So far, the dozens of contacts by our team, since June 14, 2021, have not been responded to in writing by any IBR/EIS Program staff or committee members. It has become clear that they do not wish to consider viable options that include a different multi-modal bridge for high speed rail, freight rail, vehicles and requires seismically upgrading the existing I-5 Bridge. (See: Four Part Bridge Plan) Our assessment determines that the Four Part Bridge Plan better meets Purpose and Need requirements. If CHSR was included as a supplemental transit mode, it would dramatically improve the matrix results for social equity and climate. The recent Tier 1 EIS study for Cascadia High Speed Rail shows that the HSR option diverts 60 percent of its traffic from auto users and will divert over 5.6 million passenger trips per year from crossing the bridge in 2030. What's truly amazing is that this intentional avoidance of CHSR Company's viable bridge alternative for both bullet trains and vehicles is occurring while Governor Inslee, Governor Brown and Premier Horgan recently signed a Memorandum of Understanding in the Cascadia region in support of high-speed rail, which needs a Columbia River Crossing.

The benefits of a Cascadia High Speed Rail transportation system are multi-faceted. It provides significant improvements to conditions related to CO2 reductions, congestion, social justice, environment, green energy, speed, efficiency and costs compared to a highway alone solution. These are the important issues that the IBR/EIS Team should consider with high-speed rail's zero crashes, zero emissions, zero congestion and significant station centered private development opportunities.

The IBR/EIS Team has clearly misunderstood the nature of the Cascadia High Speed Rail option that has been proposed. The high-speed rail corridor has never been considered by the IBR/EIS Team as a 6 minute

Cascadia Commuter Express (C-CE) option between the proprosed Portland Rose Quarter and Vancouver's Waterfront Station. Instead, high-speed rail in general has been identified as a long distance only transit mode, not knowing that the CHSR double track, electrified corridor option is designed to transport both commuters and parcel freight as well. Yet the IBR/EIS Team still only considers the 30 minute, 9 stop light rail only option for their new bridge. It is discriminatory not to consider the more effective Cascadia High Speed Rail as a supplemental transit alternative mode since it will remove many I-5 trips from the capacity requirements of the IBR. Furthermore, it will do this at a much lower cost to the public sector than other transit options because of long term private investment opportunities.

As a result, to assess the IBR Program without including such an effective public transportation solution as high-speed rail would clearly bias the analysis, by not properly reflecting some of the most important benefits that need to be assessed for a major infrastructure project that is in the same traffic impact area, located only 1.3 miles west of the existing I-5 Bridge. The IBR Executive Steering Group members voiced appreciation and support for a continued emphasis on both social equity and climate benefits that high-speed rail provides. The IBR/EIS Team needs to play by the NEPA rules that require the study and comparison of viable alternatives to major transportation projects. The new Infrastructure Investment Jobs Act demands that DOT's must seriously study private alternatives to transportation projects that cost over $750 million. Environmentalists and the public demand social equity and climate justice goals be met by major projects such as this.

This was exactly the view of Vancouver, WA Mayor, Anne McEnerny-Ogle who has stated "*We're committed to a really strong transparent reevaluation of all those items that have changed in our region since that last project."* She is *"especially looking for that relevant data that we need for high-capacity transit, not just the mode, but the alignment and station location."* This is exactly what our CHSR Tier 1 EIS study provides.

In 2002, the Portland/Vancouver I-5 Transportation and Trade Partnership proposed a Columbia River bridge crossing near where the CHSR Multi-Modal Bridge is proposed. Clearly, they determined a new four lane bridge corridor was needed to supplement the I-5 corridor. Jamming more cars onto existing congested freeways through downtown Portland simply does not make sense when the CHSR Company proposes two new corridors, one for HSR and one for vehicles between Columbia Blvd. and NW 78th Street's I-5 interchange in Vancouver. This would be a great time saving alternative for both the Portland/ Vancouver Ports and for people living and working in North Portland and West Vancouver.

In this regard, the IBR/EIS Team is acting as if an existing I-5 highway corridor alternative alone is enough to fully satisfy Purpose and Need requirements without any support from fast transit alternative corridors. However, a more balanced multi-modal solution would promote a better outcome for the region for the next 100 years. To understand this type of planning CHSR Company has provided a development plan derived from a 30,000 foot view of transportation systems in the Pacific Northwest and how they can connect with fast transit alternatives. (See: cascadiahighspeedrail.com) This long term, broad scaled approach helps meet most important climate change, equity, bottle neck and congestion concerns of the public.

It is necessary to understand that the Cascadia HSR proposal would relieve a great deal of demand on the I-5 corridor which changes the nature of the engineering solution to the existing I-5 Bridge. For example, a large capacity expansion in the I-5 corridor and major highway improvements, as envisioned by the current IBR project, may no longer prove to be necessary. Instead, a simple seismic retrofit as proposed in CHSR Company's Four Part Bridge Plan may satisfy the Purpose and Need, given the level of support that the supplementary CHSR transit alternative can provide. Cascadia High Speed Rail Company has developed such an alternative and provided it to the IBR/EIS Team numerous times. It is not possible for the highway alternative alone to fully satisfy all the requirements of the project. Cascadia High Speed Rail

can contribute towards satisfying the Purpose and Need of the project by providing an alternative to moving parcel freight, intercity travelers and commuter passengers fast and without delay to transportation hubs.

We would therefore respectively request that the framework for assessing a new Columbia River Bridge be revised to eliminate bias, avoid legal challenges and ensure that a thorough comparable analysis of both the IBR Program and CHSR Company's Four Part Bridge Plan occurs. The DEQ also needs to carefully assess the full environmental impact of the I-5 Bridge demolition as compared to the CHSR Plan.

A major concern by the public is well stated by former Metro Counselor, Robert Liberty, who testified during public comment, believes that the current effort is on "*path five*" which will result in another failed project. "*Path five is project collapse, a repetition of what happened with the prior stage of this project, the Columbia River Crossing,"* Liberty said. "*The very same fundamental differences in opinion over tolling, demand management, and transit, that contributed to the collapse of the CRC persists today or perhaps are even sharper now."*

This is another high stakes gamble of billions of dollars and time delays on a long term project that ignores potentially better options. The IBR/EIS Team must understand that the highway alternatives currently under consideration have not been able to garner enough community or political support to allow the project to proceed to funding and construction because the project, as currently constituted, cannot meet long term equity and climate goal demands. It would be a waste of time and money for the IBR/EIS Team to press ahead without making significant changes to the project planning process.

The IBR/EIS Team and committees should therefore avail itself of the opportunity it now has to really listen to community input and allow alternatives to be judged fairly during the EIS process that truly reflects 2022 priorities.

Thank you for your reconsideration of this issue. We are available to meet to give a power point presentation of Cascadia High Speed Rail and the Four Part Bridge Plan for further elaboration and discussion. We look forward to hearing from you.

Yours Sincerely,

Brad Perkins, President/CEO
Cascadia High Speed Rail Company
perkins@cascadiahighspeedrail.com
cascadiahighspeedrail.com
503-317-6455

Dr. Alexander Metcalf, President
Transportation Economics &
Management Systems, Inc.
Frederick, Maryland
301-846-0700