From: Jim Howell
To: Draft EIS Feedback;
CC:
Subject: Comment submission
Date: Monday, June 30, 2008 12:30:33 PM
Attachments: Commuter Rail 6.doc

P-0521-001 Please include the attached.

The other season of giving begins 6/24/08. Check out the i'm Talkathon. Check it out!

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P-0521-001

Thank you for taking the time to submit your comments on the I-5 CRC DEIS.

June 30, 2008

Questions and comments submitted on the CRC DEIS

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P-0521-002

A supplement to the DEIS is needed to address unanswered issues regarding the BNSF Rail Bridge, freight rail congestion and passenger service in the CRC Influence Area

The Draft Environmental Impact Statement failed to consider all reasonable alternatives by not adequately analyzing the existing heavy rail system in the corridor. Until it is thoroughly vetted by qualified experts in rail technology and operation, no Locally Preferred Alternative should be selected.

Please answer the following questions regarding environmental impacts that should have been covered by the DEIS or the process leading up to the DEIS.

1. How would a coordinated bus - light rail - commuter rail shuttle system, factoring in increased gas prices, impact peak hour- prime direction traffic demand on the I-5 Freeway in the CRC influence area?

2. What would it cost to replace the swing span on the BNSF Rail Bridge 9.6 with a lift span further south as previously recommended by the tugboat operators and local public officials?

3. What would it cost to add a third main track on Bridge 9.6 as suggested in the I-5 Rail Capacity Study?

4. What would it cost to upgrade Bridge 9.6 to meet recommended seismic standards and remove lead paint?

5. Would it be more feasible to replace Bridge 9.6 than to upgrade it and what would that cost?

6. What would be required to provide a separate passenger track that could bypass freight congestion in North Portland, and what would it cost?

7. What positive impacts could a separate passenger track over the river and through North Portland have on rail freight and passenger service in the CRC influence area?

P-0521-002

We have explained our analyses in different responses to your input regarding the BNSF rail bridge. Many different options for addressing the project's Purpose and Need were evaluated in a screening process prior to the development and evaluation of the alternatives in the DEIS. Chapter 2 (Section 2.5) of the DEIS explains why a third corridor, arterial crossing, and several transit modes evaluated in screening were dropped from further consideration because they did not meet the Purpose and Need. For a general description of the screening process see Chapter 2 (Section 2.7) of the FEIS. It should be noted that every proposal received from the public was considered, and many of the proposals that were dropped from further consideration included elements that helped shape the alternatives in the DEIS.

National Issues

P-0521-003

Trains are the transportation mode of the future. They are more energy efficient and climate friendly than cars, trucks and airplanes and can be operated with electricity without any new technological breakthrough. Electricity is an energy source in abundance in the Pacific Northwest and can be generated with renewable technology.

Inadequate track infrastructure in the U.S. is the primary reason railroads do not handle more premium freight. It is also the reason railroads cannot provide the capacity for passenger trains, especially in large metropolitan areas.

Demand for more rail service, for both freight and passengers may cause our national leaders to take notice. They may make wholesale changes in priorities and investment strategies in the next 6-year federal transportation authorization bill. Money for rail infrastructure could become more available while traditional funding for highway expansion might dry up.

Columbia River Crossing Influence Area Issues

P-0521-004

Fixing the rail infrastructure in Portland/Vancouver rail network, which is a major West Coast rail hub, could provide capacity for additional passenger service between Seattle and Portland as well as local shuttle service between Vancouver and Portland. This additional service could reduce SOV demand on the CRC, especially during peak hours. It could also provide an example to the rest of the nation how a transportation project could reduce oil consumption and greenhouse gas emissions.

The I-5 Rail Capacity Study

P-0521-005

An I-5 Rail Capacity Study done in 2003 laid out a plan to get started. It recommended about 10 projects costing less than $200 million that were needed just to correct existing train congestion conditions and to provide for modest growth for the next 5 to10 years. In addition, it recommended grade separating the UP - BNSF junction in north Portland and the relocation of the opening span on the Columbia River Bridge.

Nevertheless, according to the Study, these improvements would allow only about a 40% increase in freight capacity, capacity for 16 additional Amtrak trains and no capacity for commuter trains.

The world has changed since this study was conducted. Cost of oil has tripled, global warming is a fact not a theory, long-haul truckers are going broke because they can't afford the diesel to run their rigs and commuters are flocking to available transit.

P-0521-003

Please see the response to comment P-0521-002. Despite trains having some technological advantages, projects that focused primarily on improving rail infrastructure were not found to meet the CRC project's Purpose and Need.

P-0521-004

Please see the FEIS, Chapter 2 (Sections 2.6 and 2.7), for key findings supporting selection of the LPA, and for a description of the process followed to consider and evaluate a wide variety of alternatives and options.

P-0521-005

Please see response to comment P-0521-004. Commuter rail was considered but could not adequately address the transit-related need for the proposed action, let alone meet the other stated needs.

P-0521-006

The I-5 Partnership Study did not do an in-depth study of commuter rail options. It never determined what trackage improvements would be required and how much these improvements would cost to accommodate commuter service, especially in the critical Vancouver/Portland corridor where this service is needed the most.

The Step "A" Screening Process

In 2006 during the Step "A" Screening Process, Commuter Rail was not advanced by the Task Force primarily because the above analysis had not been done.

At the June 14, 2006 meeting when commuter rail was dropped, according to the meeting transcript, one of the members said:

"We're going to have to make additional investments in all modes. If we were making policy statements in support of that, (commuter rail) I would support that 100 percent. But if we were going to do a technical analysis, I wouldn't be comfortable with it because I don't think staff has the expertise in it."

Another member stated:

"I support your recommendation of looking to the future. I also support the staff recommendation not to move this forward and not spend more money and time analyzing it."

Action: Motion not to carry forward passed. Three opposed.

The above is an example how this supposedly multi-modal project was "highway-jacked" by WDOT and ODOT staff and their consultants as they guided the Task Force toward a freeway solution.

The following is staff's rationale for not advancing ***TR-11 Commuter Rail in BNSF Trackage*** in the Step A Screening Report.

Rationale for Not Advancing:

Commuter rail operating on existing regional freight rail trackage fails Step A Question #2. To improve existing transit service in the Bridge Influence Area, it would have to be integrated with the existing bus and rail network, which is infeasible, as the technology would operate in a completely grade separated right-of-way.

In addition, during the I-5 Partnership Study, an in-depth study of commuter rail options determined that due to projected congestion in the existing freight rail system in the next 20 years, commuter rail could only be implemented on a separate passenger rail-only

P-0521-006

The articulation of the deficiencies with commuter rail is still accurate. Commuter rail is a valuable mode of travel which the FTA and FHWA both support. For the CRC project, commuter rail fails to address the Purpose and Need. Commuter rail doesn't have stops at the frequencies and intervals needed by many commuters, and therefore doesn't significantly improve transit performance. In addition, for a commuter rail project to have fast, reliable commuter service, it would require its own infrastructure through the entire corridor. The immense cost and impact of building its own infrastructure are also critical flaws inherent in this mode.

P-0521-006

network; it could not be implemented on existing regional freight rail trackage. Some of the key findings from this study include:

- 63 freight trains and 10 Amtrak trains cross the Columbia River on the Burlington Northern Santa Fe (BNSF) bridge now; in 20 years this is projected to grow to 90 freight trains and up to 26 passenger trains.
- Existing train speeds are very slow (12 to 15 mph) and about half of normal operating speeds. The delay ratio (delay hours/train running hours) is 33 percent; 15 to 20 percent is considered to be normal. As the delay ratio grows, commuter rail service degrades until it is no longer viable.
- Slow speeds and train "bunching" are due to track constraints (which are constrained by the built urban environment), topography, and limited bridge crossings. In addition, the large number of local and yard trains needed to serve area industries would also congest the mainline.
- Due to mainline congestion and bunching, there is poor recoverability if breakdowns occur anywhere on the network.
- The narrow rail corridor through the region restricts improvement alternatives (e.g., passing tracks, parallel routes).

While new commuter rail service along regional freight rail trackage could conceivably serve some transit markets in the Bridge Influence Area (e.g., North Portland), it would provide poor, out-of-direction service to some key activity centers (e.g., downtown Portland). That said, it is not feasible to implement this service on the existing rail network.

For the following reasons, commuter rail service should have been advanced for further analysis as a reasonable alternative.

1. <u>Commuter rail can be integrated with the existing bus and rail service.</u>

Commuter rail can provide various functions. The only function considered for analysis in the *I-5 Rail Capacity Study* was as an extensive two line system extending from Portland Union Station or a new station near the Rose Quarter to Woodland and to Camas/Washougal.

Commuter rail as a shuttle service between Union Station and Vancouver Station was never considered or analyzed. This segment of the BNSF Railroad is ideal for shuttle service. With track and bridge improvements that would be required to accommodate commuter service, the running time could be less than the 15 minutes Amtrak trains currently take to traverses this 10-mile segment of track. Two trains shuttling between the stations could provide service every 20 minutes in each direction.

P-0521-006

Capacity would depend on the length of the trains. For example, Two, four-car double-deck self powered trains, similar to the ones that will run on the Beaverton to Wilsonville commuter line, could carry 2,400 seated passengers in each direction every hour.

It is very feasible to integrate shuttle service with bus and light rail networks.

No modifications would be needed at Union Station. Starting next year, light rail will be able to distribute passengers along the length of the transit mall.

In Vancouver, C-Tran could reorient many of its bus lines to connect to the trains at the Rail Station. All of its peak hour express buses could make this connection instead traveling to and from downtown Portland on I-5. The total travel time would be faster and much more reliable.

The Interstate (Yellow) Light Rail Line, extended to Vancouver over another alignment, will provide the essential connecting transit service between Clark County and North/Northeast/Eastside Portland.

Shuttle service between transit modes can efficiently carry many passengers when well designed and operated. For example: In Vancouver BC, a fast passenger ferry, the *Seabus*, shuttles passengers every 20 minutes between the Canadian Pacific Train Station in downtown Vancouver and a bus hub in North Vancouver. Incidentally this service was established in the 1960s primarily because there were no funds available for a freeway bridge.

2. Commuter rail can bypass freight rail congestion.

As mentioned above, shuttle service between stations was never analyzed. It is correct to assume that commuter service would interfere with freight operations if only the improvements recommended in the *I-5 Rail Capacity Study* were implemented. Nevertheless, **no effort was made to determine what additional track improvements would be needed to establish shuttle rail service**.

The distance between stations is ten miles. The four-mile segment between Vancouver Station and the St. Johns Cut that includes Bridge 9.6, Bridge 8.8, North Portland Junction and several spur tracks would have to be modified or bypassed to allow more passenger trains than anticipated in the Study.

The two-track Bridge over the Columbia River would also need to be upgraded or replaced. It was built in 1907, has a swing-span opening that has been identified as a navigational hazard, lacks seismic upgrading and is coated with lead paint. The Rail Study states that further analysis of a third mainline track be conducted when the relocation of the movable span is considered.

P-0521-007

The structural stability of this bridge is far more critical to the economic health of the Portland/Vancouver Region than the I-5 Bridges which have the I-205 Bridge as backup in the event of a major earthquake or other disaster.

The assumption leading to this DEIS, that public funds can be expended on a $4.2 billion project to rebuild a five-mile stretch of freeway including replacing three bridges, but not for heavy rail projects, is ludicrous.

The fact that the railroad is privately owned is not a factor. Public/private partnerships between private railroads and government have proven to be beneficial to both the rail operator and the general public. The very successful partnership between the Union Pacific Railroad and the State of California in developing the Capital Corridor Line is a case in point.

P-0521-007

The I-5 bridges, like many older bridges in the region and nation, are not seismically sound and were never designed to survive a significant earthquake. In 1995, ODOT commissioned a study to look specifically at the lift spans of the I-5 bridges, which are considered the most vulnerable sections of the bridges. Vulnerabilities were found in the bearings, piles, piers, and lift span tower truss members. Both the northbound and southbound bridges have been identified as functionally obsolete bridges. This classification means they no longer meet the geometric and/or load capacity criteria of the Interstate system. The fact that there are other bridges in the region that are seismically unsound does not diminish the importance of protecting the I-5 crossing from failure in the event of a significant earthquake. As discussed in the DEIS and FEIS, there are numerous reasons, in addition to seismic issues, why the I-5 crossing needs to be replaced. The purpose of this project is not to replace the railroad bridge.