



METROLINK

SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY
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metrolinktrains.com

June 1, 2020

California High-Speed Rail Authority
Attn: Draft 2020 Business Plan
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

RE: Comments to California High Speed Rail Draft 2020 Business Plan

Dear Sir or Madam:

The Southern California Regional Rail Authority (SCRRA) has reviewed the California High-Speed Rail Authority's (CHSRA) Draft 2020 Business Plan. We appreciate the opportunity to comment and for the continued working relationships between our agencies and other stakeholders in this very important project that has the potential to transform rail service in California.

Need for More Investment in Southern California in the Draft 2020 Business Plan

SCRRA maintains a keen interest in making sure that plans for High-Speed Rail (HSR) benefits travelers in Southern California, home to 21.5 million people, more than 54% of the population of the entire state, as soon as possible. SCRRA is concerned that the 2020 Business Plan underestimates the value of investing in Southern California, including an underrepresentation of the network connectivity benefits gained from the major transit operators already connected to the Metrolink system. Simultaneously, the Plan overestimates the capital and operating expenses associated with that same potential investment in the Burbank to Anaheim Corridor by assuming double the rolling stock expense compared to what SCRRA previously provided. Also, the Early Train Operator Report that serves as the basis for Chapter 3 of the draft Business Plan overestimates the operating expenses by including projected and unverified SCRRA systemwide costs (not just for this corridor) along with Amtrak/LOSSAN operating expenses. Combined, this serves to diminish the benefit of investment in the Southern California corridor.

For the sake of an accurate comparison, it is important to note that the state's commitment to the Central Valley segment has increased over the years, growing from \$10.6 Billion (B) in the 2018 Baseline Budget to \$12.4B in the 2019 Baseline Budget to \$16.3B¹ in this draft 2020 Business Plan. With these adjustments to the High-Speed Rail Business Plan, more substantial investments in Southern California appear to be deferred until after

¹ \$16.3B = 12.4B(2019 Baseline for the Central Valley Segment) + \$2.5B (for the Merced Extension) + \$1.4B (for the Bakersfield Extension)

funding for Merced to Bakersfield is secured. According to the Draft Business Plan, High-Speed Rail service to Southern California under the current plan is not contemplated until at least 2033, and there is no funding plan articulated to realize service in that time frame. Some parts of the Early Train Operator Report show HSR service in Southern California starting as far out as 2040.

There is ample opportunity to make meaningful early investments much sooner to advance HSR in Southern California. Responding to a request of the CHSRA in 2019, SCRRA developed a list of projects valued at approximately \$9.8B in the Burbank to Anaheim corridor, the southern anchor segment of the Phase 1 California High Speed Rail system. This set of projects includes additional track capacity, grade crossing upgrades and grade separations, zero-emissions trainsets, and new and modernized maintenance facilities. A phased delivery strategy reduces that need in the short term to \$3.5 - \$5.5B by 2024. This early investment would allow the Burbank to Anaheim corridor to initiate a HSR-ready service and enhance connectivity and operational efficiency of the significant volumes of trains (80 freight trains and 50 passenger trains) and of passengers (1.8 million annually) that already traverse the corridor while building a foundation that could grow ridership by another five million even before HSR arrives.

Making more significant investments in Southern California now reduces the cost of HSR in the future. Specifically, investing in the Burbank to Anaheim Corridor will enhance access to the 1.2 million jobs and 2.0 million employed residents within five miles of the Burbank to Anaheim corridor. Furthermore, investment will bring benefits to low income and disadvantaged communities with 76% of the residents within half a mile of stations categorized as SB 535 Disadvantaged Communities and 70% categorized as AB 1550 Low-Income Communities. Benefits to safety, air quality, and congestion for these communities can improve environmental quality overall and address historic disparities in investment and community health outcomes. The identified investments result in a reduction of greenhouse gases (2.3 metric tons of CO₂ equivalent) and in localized pollution (10.8 million pounds of NO_x and 404,600 pounds of diesel particulate matter) through 2058. These benefits increase the market potential for HSR when it arrives in Southern California.

SCRRA looks forward to continued partnership with the CHSRA to deliver rail improvements in Southern California, such as the committed investments in 2010 of high speed rail bond funds toward two projects in Southern California – the Rosecrans/Marquardt Grade Separation (\$76.7 million in Prop 1A funds) and the initial phase of Link Union Station (\$423 million in Prop 1A funds to the Los Angeles County Metropolitan Transportation Authority).

Specific Comments to the Draft 2020 Business Plan

Below is a list of comments to the Draft 2020 Business Plan:

1. Need for an Investment Strategy and Regional Equity for Southern California
Advancing projects in Southern California sooner will be important to maintain consistency with the ridership forecast assumptions that undergird the Business Plan. The ridership forecasts (described on Page 141) assume that the Silicon Valley to Central Valley segment will commence service in December 2031 with the full Phase 1 operation (including a complete southern California operation between Palmdale through Burbank and Los Angeles Union Station) by December 2033, just two years after the initial operating segment.

The discussion on funding (p. 67) appears to pre-commit cap-and-trade revenues from being considered for investments in Southern California. This proposed allocation is not equitable. Given the relatively low level of investment of high-speed rail funds (from bonds and cap-and-trade revenues) in Southern California, weighted investment in Southern California for other state programs in amounts commensurate to the level of under investment in Southern California of HSR funds relative to the Central Valley and Northern California should be considered.

2. Need to Complete Environmental Reviews to Support Project Implementation
The draft Business Plan acknowledges the need to complete environmental clearance of projects to allow for investments (Page 12-14, p. 91). This has been a reason given for lack of investment in Southern California. SCRRA encourages the timely completion of all environmental documents to ensure projects and elements of projects remain competitive and become “shovel-ready” should additional funding be identified. A clear strategy of investment into Southern California by or before 2024 should be part of this plan. This strategy should identify elements of the HSR Corridors such as grade separations, and double track sections that can be implemented in advance of the entire line.

3. Intermodal Connections to Southern California
While reaching downtown Bakersfield represents a significant southern terminus for the Central Valley section of the high-speed rail system, intermodal connections to Southern California should be described in more detail, with the benefits explained. It is noted that the interim service plan on the Merced to Bakersfield segment still requires additional investments from state and regional partners (p. 54). This appears to pre-commit the state (through other programs) or these regional partners to these investments. This pre-commitment may bias the allocation of funds from existing or future state programs and prevent an equitable consideration of projects in Southern California. SCRRA requests that a set of projects in Southern California be identified for investment commitments in a similar manner.

4. More Detail on Connecting High Speed Rail Services

Discussion of partnership with Virgin Trains should provide further consideration for necessary connectivity investments, such as the High Desert Corridor from Victorville to Palmdale, which will support the importance of Palmdale to Los Angeles and Palmdale to Bakersfield sections. The potential through connection to Southern California via Metrolink corridors, especially the Burbank to Anaheim corridor, should be described in sufficient detail to clearly articulate these benefits.

5. Consideration of Alternative Propulsion Systems for Shared Corridor Operation

The Plan heavily emphasizes the importance of electrification (p. 18). There are emerging alternative zero-emissions technologies that deserve to be acknowledged. For example, the state has provided funding for a pilot of hydrogen-battery hybrid multiple unit trains on the Redlands Passenger Rail Project, where these zero-emission trains may share track with other train types. The state has also provided funding in 2020 Transit and Intercity Rail Capital Program funding to pilot zero-emissions technologies on the Metrolink Antelope Valley Line. This potential for shared corridor operation creates opportunities to extend the benefits of HSR infrastructure investments to a more extensive network, especially in Southern California. We recommend the plan recognize these efforts by name and include description of how the HSR system will accommodate the benefits of blended operation of these technologies with electrified rail.

Thank you again for providing us with the opportunity to comment on this important transportation project.

Should you have any questions, please feel free to contact me at (213) 452-0468 or via e-mail at MclntyreT@scrra.net or Roderick Diaz, Director, Planning and Development, (213)435-4193 or via e-mail at DiazR@scrra.net.

Sincerely,



Todd McIntyre
Chief Strategy Officer