

April 9, 2024

California High-Speed Rail Authority
Attn: Draft 2024 Business Plan
770 L Street, Suite 1180
Sacramento, CA 95814

RE: Draft 2024 Business Plan

Dear California High Speed Rail Authority (“the Authority”),

The City of San José appreciates the opportunity to comment on the 2024 Draft Business Plan (Plan). The Plan notes a number of recent successes, most notably in the realm of federal funding, and also in terms of construction progress in the Central Valley. While the progress is notable, the Plan is also clear that significant challenges lay ahead, particularly in the realm of funding. While we appreciate this transparency, if the California High-Speed Rail project is to be delivered within a reasonable timeframe, the challenges raised in the Plan must be approached with a greater sense of urgency.

Funding Challenges

As the Plan notes, identifying a source of funding that is significant enough, stable enough, and durable enough will be critical to move ahead decisively with the project, beginning with advanced design, land acquisition, and relocation of utilities, among other things. More concerning is that the longer it takes to advance construction in the Central Valley, the longer it will take to turn to the bookends of the system in Northern and Southern California, which will ultimately produce the greatest ridership for the system.

We appreciate that the Plan has identified possible federal and state funding sources, however, even these funding sources alone will not be sufficient to set the overall program on stable financial footing. Other options will be necessary to do this, such as those proposed by the California High-Speed Rail Peer Review Group. Without foreseeable connections to San José, the Bay Area, and Southern California, the project will fail to deliver on its promise to serve the state’s largest population centers and thereby be the most useful system that it can be.

With that said, the City of San José strongly urges that the Authority take the following critical first steps to pave the way for a Central Valley connection to the Bay Area, including:

- **Geotechnical studies and project design of Pacheco Pass;**
- **Acquisition and electrification of the Union Pacific Coast Line from San José south through Gilroy;**
- **Reconstruction of a fully integrated San José Diridon Station, as envisioned by San José, the HSR Authority, and other partners in the Diridon Integrated Station Project; and**
- **Rail/road grade separations, including Skyway Drive, Chynoweth Avenue, Branham Lane, West Virginia Street and Auzerais Avenue in San José.**

These investments will prepare San José and the Bay Area at large for CAHSR.

[Connection to State Rail Plan](#)

The California High-Speed Rail Project should be the backbone of a future integrated statewide passenger rail system, as articulated in the State Rail Plan. However, we only found one mention of the State Rail Plan (SRP) in this draft document. **We request that the Authority elaborate in the Plan on how the project fits into the State Rail Plan.**

[Connecting California through Integrated Station Investment](#)

The SRP envisions a future statewide rail system in which people can travel to and from within California by rail. The SRP puts passengers first, recognizing the need to transfer quickly and easily between high-speed, intercity, and regional trains, express buses, and transit at integrated stations with coordinated arrivals and departures and significantly reduced wait times.

Integrated Stations connect people to transit and rail services across different parts of California – from statewide high-speed rail to regional rail, to local transit. Well-designed stations also reconnect communities, removing barriers for people walking and bicycling and knitting neighborhoods back together. Taking a truly integrated approach promotes higher ridership and advances the State’s fundamental goals, including reduced greenhouse gas emissions, improved safety, better movement of people and goods, an enhanced economy, and affordable and equitable access to opportunity.

Integrated Stations that offer the frequency and quality of service envisioned in the SRP generally do not exist today in California. And creating them will require concerted actions in terms of planning, design, corridor preservation, engineering, funding, and political leadership. The following are challenges that Integrated Station projects like Diridon Station face:

- **Difficulties when applying for competitive funding opportunities: While station projects may be eligible to compete for existing funding programs, evaluation metrics for most**


funding pots tend to be corridor-based, including measures of travel time savings over distances of many miles.

- Organization and governance challenges: stations, by definition, are the places where many different services intersect. To the extent that these services are operated by different entities, this often leads to a situation in which there is no clear leader for carrying out the kind of integrated, passenger-centric multimodal station plan that the SRP would suggest.

To realize the SRP's 2040 Vision and the important role that stations play in the future statewide rail network, the State should partner with cities and transportation agencies to advance Integrated Stations. **We request the State develop an Integrated Station Investment and Technical Assistance Program to advance station and station area development projects of statewide significance.**

In closing, we are excited for the future of California High-Speed Rail and remain ardent partners in the delivery of this once-in-a-generation project. For any questions relating to our comments, please contact Eric Eidlin at eric.eidlin@sanjoseca.gov. Thank you for your consideration!

Sincerely,

A handwritten signature in black ink, appearing to read "John Ristow", is written over a light gray rectangular background.

John Ristow
Director, Department of Transportation
City of San Jose