



April 8, 2024

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California High-Speed Rail Authority
770 L Street, Suite 1180
Sacramento, CA 95814

Subject: Draft 2024 California High-Speed Rail Business Plan

Dear Chairman Richards, Members of the Board of Directors, and CHSRA Staff:

The Peninsula Freight Rail Users Group (PFRUG) offers the following comments on the Draft 2024 California High-Speed Rail Business Plan. PFRUG is an industry association whose members include freight rail shippers on the Caltrain corridor, the Ports of San Francisco and Redwood City, and other business and labor stakeholders. PFRUG has participated actively in the planning process for the project since 2009.

It is exciting to see the progress on the project over the past two years, particularly the commitment of federal funds. While the Draft 2024 Business Plan provides a useful update on the recently submitted 2022 plan, it also provides an opportunity to remedy the lack of attention to freight rail in the previous plan. In summary, we request that the 2024 Business Plan be revised to:

- Give greater attention to freight rail in the Business Plan
- Highlight the mutual benefits of moving both people and goods by rail
- Reaffirm the agency's commitment to compatibility with freight rail
- Acknowledge the benefits of CHSRA's work with freight stakeholders

Attention to Freight Rail in the Draft 2022 Business Plan

The draft plan gives minimal attention to freight, in contrast to previous High-Speed Rail Business Plans prior to 2020. For example:

2012: The first Business Plan recognized that "America's freight rail system is the envy of the world" and that freight rail is a vital component of California's intermodal infrastructure for goods movement by "providing efficient connections to and from California's ports."

2018: The Business Plan affirms that freight railroads "play vital roles in the national and statewide economy by maintaining and expanding their ability to move freight by rail, to serve the state's ports and other shippers, and to help relieve the state's crowded highway network." It also notes that freight railroads

“play vital roles in the national and statewide economy by maintaining and expanding their ability to move freight by rail, to serve the state’s ports and other shippers, and to help relieve the state’s crowded highway network.”

The 2024 Business Plan should give as much attention to freight rail as in the plans prior to 2020.

The Mutual Benefits of Moving People and Goods by Rail

It makes sense to describe the benefits of the project for both passenger rail and freight rail. There is an opportunity in the Introduction to highlight the benefits of High-Speed Rail for goods movement on the statewide rail network. The 2018 plan had a section on “Improving Safety and Security for Passengers and Freight.” It noted that HSR makes investments “that improve freight, local and regional passenger rail service...” and, “It’s about reducing congestion on our heavily-traveled roads to free up capacity for moving goods and freight.” (p14). These HSR benefits – improved infrastructure for freight rail and greater roadway capacity for goods movement – should be included in the Plan. This is consistent with the opportunity to secure further federal funding, which targets and embraces both passenger rail and freight rail as national priorities (as indicated in Table 3.2 of the current draft plan).

Planning for Compatibility with Freight Rail

PFRUG understands that HSR does not share tracks with freight in most parts of the state. Our comments pertain mainly to the San Francisco-San José segment, as well as the San José-Merced segment. It would be helpful for the Authority to clarify its stance on the interaction of HSR and freight on the Caltrain corridor. Our understanding is that HSR, as a tenant of the local owners of the passenger railroad, will support Caltrain in working cooperatively with the freight rail operator and shippers on the Peninsula. A clear statement about how HSR will plan for this relationship would strengthen the Business Plan.

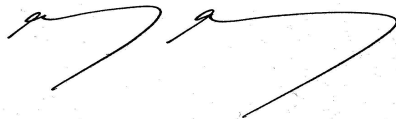
The 2018 Business Plan explained the need to plan for compatibility with freight: “A well-defined and collaborative relationship between the Authority and the freight railroads in California is critical to the successful implementation of the high-speed rail program....In Northern and Southern California, where high-speed trains will be either blended with existing services and/or share rail corridors, the Authority continues to work with our freight partners to address issues including railroad signaling, operational planning, safety and security assessments, and other coordination needed for high-speed rail implementation....The state is currently working closely with the freight railroads to find opportunities to make mutually beneficial investments” (p60).

Collaborative Work with Freight Stakeholders

In the past, the Authority has worked closely with freight rail operators and shippers. This investment in relationship building supports project implementation and should be acknowledged in the Business Plan. It also mitigates the risk of stakeholder opposition. The Draft Business Plan would benefit by emphasizing the importance of support from Bay Area freight rail shippers, ports, and other freight stakeholders. This is a relevant factor in describing potential risks (as noted on page 60) and would validate the agency's previous efforts to cultivate freight stakeholder relationships.

We assume the Authority will continue to engage freight rail stakeholders throughout the planning process on the Caltrain corridor. We urge you to incorporate our comments into the final Business Plan and look forward to working with you as the project moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Greenway', with a stylized flourish at the end.

Greg Greenway
Executive Director