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California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

Subject: Draft 2020 California High-Speed Rail Business Plan

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

The Peninsula Freight Rail Users Group (PFRUG) offers the following comments on the Draft 2020 California High-Speed Rail Business Plan. PFRUG is an industry association whose members include the freight rail shippers on the Caltrain rail corridor, the two public ports on the San Francisco Bay Peninsula (San Francisco and Redwood City) and other business and labor stakeholders. PFRUG has participated actively in the planning process for the project (HSR) since 2009.

Attention to Freight Rail in the Draft Business Plan

Compared with previous HSR business plans from 2012-2018, the Draft 2020 Business Plan gives minimal attention to freight rail in relation to the project. As you know, the Authority has worked closely with freight rail operators and stakeholders, and this work should be acknowledged in the plan. More generally, the benefits of improved passenger rail and freight rail service are complementary and closely connected. The plan should acknowledge this close relationship in making the case for high-speed rail and describing how collaboration with freight rail stakeholders supports project implementation.

PFRUG strongly encourages you to include more extensive language about the Authority's commitment to making a shared freight/passenger corridor work successfully on the San Francisco-San Jose and San Jose-Merced corridors. How, for example, do the lessons of shared corridor modeling in Southern California apply to Northern California? What steps is the Authority taking to ensure successful operations between high-speed rail and freight rail on the shared Caltrain corridor?

The 2020 Business Plan would be strengthened by discussing freight rail in three ways: (1) the economic value of freight rail, (2) the benefits that high-speed rail will bring to goods movement, and (3) the need for compatibility with freight operations to implement high-speed rail.



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Economic Value of Freight Rail

The Authority's first business plan in 2012 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." The most recent business plan in 2018 affirmed 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."

There is no comparable language in the Draft 2020 Business Plan and PFRUG strongly recommends that this theme be similarly emphasized in the final 2020 plan.

Benefits of High-Speed Rail for Goods Movement

The draft plan misses an opportunity in chapter 1 to highlight the potential benefits of high-speed rail for the entire statewide network, including goods movement. The 2018 plan had an entire section on "Improving Safety and Security for Passengers and Freight." It noted that the project is making investments "that improve freight, local and regional passenger rail service..." and stated, "It's about reducing congestion on our heavily-traveled roads to free up capacity for moving goods and freight." (p14). Both benefits of HSR – improved rail infrastructure for freight and greater capacity for goods movement on roadways – should be included in the final 2020 plan.

Planning for Compatibility with Freight Rail

The Draft 2020 Business Plan acknowledges the critical need to work with freight rail stakeholders to design a project that embraces the mutual benefits of moving both passengers and cargo by rail:

"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" (p66).



The CHSRA deserves credit for working with Caltrain, cities and UPRR on “how passenger and diesel freight trains could share the corridor” (p18). PFRUG suggests four edits to the final plan that would underscore the nature and importance of this work:

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- (1) In chapter 3 (Moving Northern California Forward), add a description of the work with UPRR and freight stakeholders in the Bay Area comparable to the CHSRA partnership with BNSF in Southern California.
- (2) Emphasize broader collaboration with freight rail stakeholders beyond negotiations with UPRR and BNSF (e.g., meetings with PFRUG over ten years and our organization’s participation in the Agency’s Community Working Group).
- (3) Provide some detail on how freight rail stakeholder input has affected the design and implementation of the project (connecting the Business Plan to the upcoming environmental review process).
- (4) In chapter 5, call out the critical need to maintain the confidence of freight rail stakeholders in the section on “Stakeholder Support Risks,” and emphasize the commitment to compatibility with freight operations on shared corridors as an essential concept to facilitate third-party agreements.

PFRUG has appreciated the availability and proactive approach of CHSRA staff in the two years since the adoption of the 2018 Business Plan. We expect that the Authority will continue to work with local freight shippers (in addition to freight operators) throughout the planning and implementation process for the project. 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".

Greg Greenway
Executive Director