



March 12, 2021

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

**Subject: Revised Draft 2020 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 Revised Draft 2020 California High-Speed Rail Business Plan. PFRUG is an industry association whose members include the freight rail shippers on the Caltrain 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 since 2009.

Our comments reiterate those that PFRUG made in 2020 on the first draft of the Business Plan. In summary, we request the following:

- Give greater attention to freight rail in the Business Plan
- Highlight the mutual benefits of moving people and goods by rail
- Reiterate the commitment to planning for compatibility with freight rail
- Recognize the benefits of CHSRA's work with freight stakeholders

**Attention to Freight Rail in the Revised Draft Business Plan**

Both drafts of the 2020 Business Plan give little attention to freight, in contrast to every previous High-Speed Rail Business Plan. 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 current 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.”

At a minimum, the final 2020 Business Plan should give as much attention to freight rail as the previously adopted Plans.

- Port of Redwood City*
- Port of San Francisco*
- Seaport Industrial Association*
- San Francisco Bay Railroad*
- SF Chamber of Commerce*
- SF Dept. of the Environment*
- ILWU Local 10*
- BAE Systems SF Ship Repair*
- Calstone*
- CEMEX*
- Central Concrete*
- Clean Harbors Environmental*
- Darling International*
- Dean’s Services*
- Graniterock*
- Lehigh Hanson*
- Lyngso Garden Materials*
- Marine Highways, LLC*
- METRO Ports*
- Operating Engineers Local 3*
- Pacific Agri-Products*
- Peninsula Building Materials*
- Pine Cone Lumber*
- Sheedy Drayage Co.*
- Sierra Point Lumber*
- Sims Metal Management*
- South City Lumber*
- Summit Signal*
- The Pasha Group*
- Unilever*
- Univar*
- Waste Solutions Group*

**The Mutual Benefits of Moving People and Goods by Rail**

There is an opportunity in chapter 1 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). Both HSR benefits – improved infrastructure for freight rail and greater roadway capacity for goods movement – should be included in the 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 only to the San Francisco-San Jose 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 explains 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**

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. In Chapter 5, under “Stakeholder Support Risks,” the Business Plan could describe successful efforts to engage freight rail stakeholders (among others).

PFRUG appreciates the proactive approach of CHSRA staff since the adoption of the 2018 Business Plan. We know the Authority will continue to work with local freight shippers 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,



Greg Greenway  
Executive Director