



April 11, 2022

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California High-Speed Rail Authority
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Port of San Francisco
Seaport Industrial Association
San Francisco Bay Railroad
SF Chamber of Commerce
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Subject: Draft 2022 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 2022 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.

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

- Give greater attention to freight rail in the Business Plan
- Highlight the mutual benefits of moving both people and goods by rail
- State 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 2020 and 2022 Business Plans give minimal 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 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 2022 Business Plan should give as much attention to freight rail as in these previous Plans.

The Mutual Benefits of Moving People and Goods by Rail

Given the theme of “Opportunities” in the Letter from the CEO, 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 also consistent with the opportunity to secure federal infrastructure funding, which targets and embraces both passenger rail and freight rail as national priorities.

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.

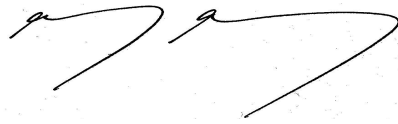
The 2018 Business Plan explains the need to plan for compatibility with freight: “A well-defined and collaborative relationship between the Authority and the freight railroads in California is critical to the successful implementation of the high-speed rail program....In Northern and Southern California, 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. The Business Plan could describe the importance of the agency's efforts to engage freight rail stakeholders in Chapter 2, under "Bay Area Connectivity," and in Chapter 4, under "Stakeholder Support Risks." The Draft Business Plan only mentions freight rail in the context of implementation negotiations and agreements with freight rail operators, while the importance of support from Bay Area freight rail shippers, ports, and other freight stakeholders is entirely neglected. This is an oversight in describing potential risks, and a missed opportunity to promote the work the agency has done to cultivate stakeholder relationships.

We assume the Authority will continue to work with 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