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April 8, 2022

Mr. Brian P. Kelly  
Chief Executive Officer  
California High-Speed Rail Authority  
770 L Street, Suite 620  
Sacramento, CA 95814

**SUBJECT: Draft 2022 Business Plan**

Dear Mr. Kelly:

The Southern California Association of Governments (SCAG) appreciates the opportunity to provide comments on the California High-Speed Rail Authority's (CHSRA) Draft 2022 Business Plan (BP). SCAG supports the completion of the California High-Speed Rail (HSR) project and has shared a strong partnership with CHSRA over the last decade.

SCAG views the Draft Plan as a well-written and comprehensive document that builds on the 2020 Business Plan and demonstrates progress towards bringing true HSR service to California, including near-term improvements to our regional rail system.

SCAG has the following comments on the Draft Plan:

1. CHSRA's commitment of Prop. 1A funds to Southern California is for two Southern California projects: \$423 million to the LINK US project (Los Angeles Union Station Run-Thru tracks) and \$77 million to the Rosecrans/Marquardt grade separation project in Santa Fe Springs, California. SCAG reemphasizes that CHSRA should secure additional funding from non-Prop 1A sources for other critical rail infrastructure projects to deliver the balance of CHSRA's \$1 billion commitment to Southern California. Investment in the Southern California bookends and the eventual delivery of high-speed rail to Southern California are crucial components in implementing SCAG's Connect SoCal in the region.
2. CHSRA should include a section in the Final 2022 Business Plan on Phase 2 of the high-speed rail project from Merced and San Francisco to Sacramento and Los Angeles to San Diego. While the construction of Phase 2 is well into the future and unfunded, it is essential to discuss in terms of planning for future connectivity with existing transit and rail operators. SCAG and other regional transportation agencies have been involved with Phase 2 planning projects and alternatives analyses in the last few years, but these efforts have gone dormant.

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3. The Draft 2022 Business Plan retains a revenue start date of 2033. This remains unchanged from the 2020 Business Plan. As part of the increased risk assessment procedures and analysis now being implemented by CHSRA, a discussion should be included regarding how realistic this start date is considering the start date for the 171-mile Merced to Bakersfield Central Valley initial operating segment is scheduled for 2029, just four years prior.
4. Chapter 2, "Regional Updates," focuses on multimodal connectivity and overall benefits. SCAG suggests adding sections on potential construction challenges and mitigation efforts needed to bring high-speed rail to Southern California. For example, the Burbank to Los Angeles project section would require property takes at Metrolink's Central Maintenance Facility. This may potentially negatively impact Metrolink's operations, and CHSRA should address potential impacts and likely mitigation such as these in the Final 2022 Business Plan.
5. SCAG suggests the Final 2022 Business Plan include a chapter, or at least address, CHSRA's public engagement plan and information processes. Given the potentially significant environmental and public impacts due to the construction and operation of the high-speed rail project, this is an important part of the planning and environmental review process and should be highlighted. For example, to bring high-speed rail to the Los Angeles to Anaheim corridor, CHSRA and Burlington Northern Santa Fe Railway propose constructing and operating a new intermodal facility in Colton. In a formal public comment to CHSRA's revised Notice of Preparation to incorporate this facility into the Draft EIS/EIR for this project section, SCAG member agencies expressed the need for improved interagency coordination and public engagement and outreach to jurisdictions and the public affected by this new facility.
6. SCAG requests that CHSRA and its rail planning partners coordinate with SCAG on future studies analyzing how best to connect the Brightline West service to the cities of Palmdale in the Antelope Valley and Rancho Cucamonga in the San Bernardino Valley.

SCAG looks forward to continuing to work with CHSRA and the Southern California MOU partners to deliver short-term and long-term passenger rail improvements to our region and state. If you would like to discuss these comments further, please don't hesitate to call me at 213-236-1835.

Sincerely,



Kome Ajise  
Executive Director