



April 10, 2020

Lenny Mendonca, Chair and Board of Directors  
California High-Speed Rail Authority  
Attn: Draft 2020 Business Plan  
770 L Street, Suite 620 MS-1  
Sacramento, CA 95814

Re: Kern COG Comments on the 2020 Draft Business Plan – Due April 12, 2020

Dear Mr. Mendonca and Directors:

Thank you for the opportunity for Kern Council of Governments (Kern COG) to provide comments and recommendations regarding the Draft 2020 Business Plan. As you may be aware Kern COG and its staff have been coordinating with this project for over twenty-five years and will continue to do so to ensure the best possible outcomes for the project and our region. It is important to note that 25% of the Phase I. System passes through Kern County, as such we have extensive comments attached. It would benefit the project if the Authority would add a representative from Kern to the Authority Board of Directors.

Please contact Robert Ball of our office at 661-635-2902, [rball@kerncog.org](mailto:rball@kerncog.org) if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Robert R. Ball'.

Robert R. Ball,  
Deputy Director & Planning Director

Enclosure:

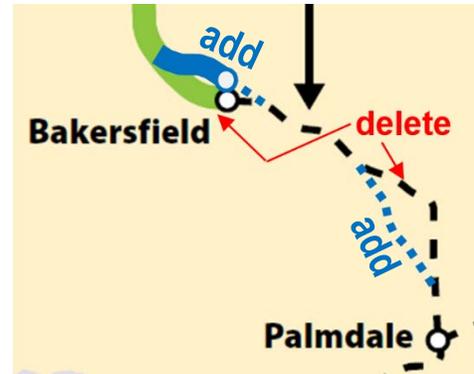
Draft 2020 HSR Business Plan – Kern COG Comments – April 2020

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[https://www.hsr.ca.gov/about/business\\_plans/2020/](https://www.hsr.ca.gov/about/business_plans/2020/)

On behalf of Kern Council of Governments, we kindly request you please consider the following comments to the Draft 2020 HSR Business Plan.

- 1) P. 12 Exhibit 1.0 – Map shows old alignments, see edits at right in blue. Show the shorter alignment.
- 2) P. 14 Exhibit 1.1 – Map shows old alignment, see edits at right in blue.
- 3) P. 48 – Map shows old alignment, see edits at right in blue.
- 4) P. 114 – Map shows old alignment, see edits at right in blue.



- 5) P. 45 – Map shows both old and new alignments, delete the old alignment designated by the dashed line on the map below. The ROD was signed on the new alignment in 2019.

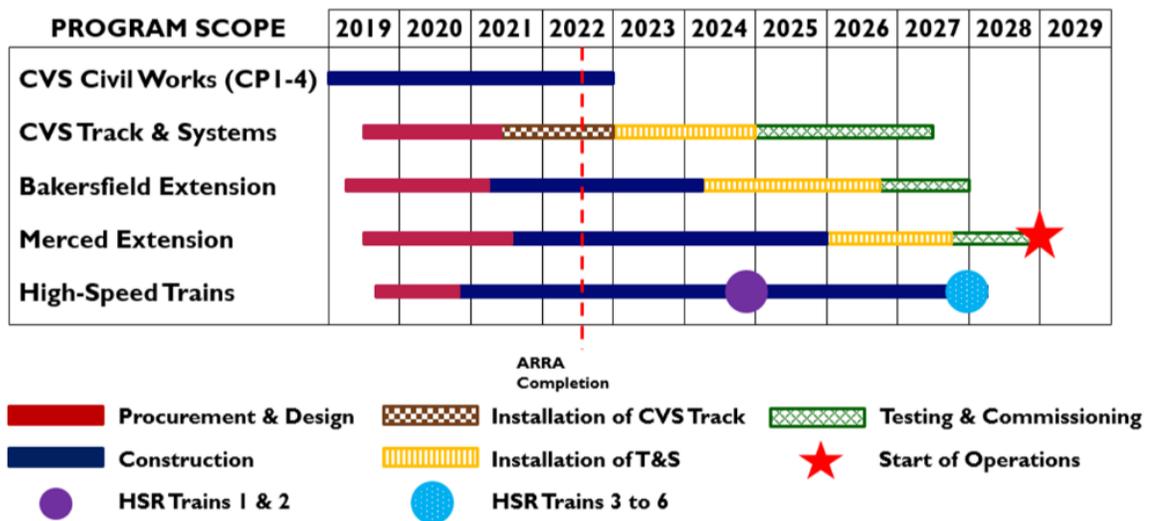


Note that maps above perpetuate the belief that the CHSRA is non-responsive to local input.

- 6) P. 3, item 2. – We agree with using existing funds to complete and expand the 119 mile Central-Valley segment to include Bakersfield station. Building this corridor frees up capacity for rail freight on the BNSF line currently taken up by 14 passenger trains per day.
- 7) Kern lacks representation on the HSR Authority yet has the largest segment of the system for any County in the State. Twenty-five percent of the Phase I. system is with Kern's boundaries.
- 8) P. 40 – Right-of-way acquisition – In Kern County in less than 2 years the City of Bakersfield has successfully acquired 300 parcels for the Centennial Connector Freeway Project through an affluent residential/commercial district using a federal provision that allows 15% payment above assessed value for early acquisition of property prior to completion of the environmental document. Not a single property required completion of a condemnation proceeding. We have mentioned this provision numerous times to Authority staff but they have refused to consider it. Perhaps now with new leadership and the success of the process in Kern they will reconsider the early acquisition procedure.

- 9) P. 43 – CP4 will be first to be ready for track installation. Suggest that the HMF be located there. The Wasco HMF site has been expanded to include property adjacent the mainline.
- 10) P. 47, 2<sup>nd</sup> column, 1st para. – Why is the Authority waiting to begin the next phases of pre-construction on the Bakersfield extension until after the ROD for the Merced extension is completed. The contract for the Bakersfield segment could be done as a contract amendment to the Segment 4 contract, likely saving more than 1 year in construction delays. This is contrary to the CHSRA’s #1 guiding principle “*Initiate high-speed rail service as soon as possible.*”
- 11) P. 55, #5 – The ROD has been completed on the extension to Bakersfield since October 2019. This extension was based in the 2018 Business Plan. Why hasn’t an RFP or an extension of the existing contract gone out for this segment yet. This is in violation of the CHSRA’s #1 Principle. Extension to Merced will add years before a first operational segment becomes available. The first operational segment should be Madera to Bakersfield, with bus connectors to the Silicon Valley and Southern California as well as existing Amtrak service to the rest of Northern California. Two years after that Merced could be added as the next extension when it is ready. The CHSRA needs to get riders on this train before 2029. This scenario could see the train in operation by 2027 in time for the 2028 Olympics, connecting Southern California via Thruway Bus connections with Yosemite and Northern California via Amtrak San Joaquins/ACE.
- 12) P. 55 - Reference to Business Case Assessment Study [https://hsr.ca.gov/docs/about/business\\_plans/2020\\_Business\\_Plan\\_Business\\_Case\\_Assessment\\_Study.pdf](https://hsr.ca.gov/docs/about/business_plans/2020_Business_Plan_Business_Case_Assessment_Study.pdf), p. 50 – Although we agree with study’s general conclusions, The following chart contains a faulty assumption and fails to consider an even earlier construction alternative.

Figure 15: Merced to Bakersfield Interim Service Projected Timeline



This Figure 15 chart is based on the faulty assumption that the 20-mile Bakersfield Extension track & system installation segment will take 2.5 years (yellow bar), 25% longer than the installation of 119-mile Central Valley Segment (CVS), a segment 6 times longer. Clearly the track & system installation for the 20-mile Bakersfield Extension can be ready for testing and commissioning at the same time as the 119-mile CVS segment if not before. The combined 139-mile Bakersfield to Madera segment can be ready for train operations before track & system Installation is complete on the Merced Extension. A Bakersfield to Madera system could begin full operations as early as 2027, and possibly even earlier. This Business Plan’s coupling of the Bakersfield and Merced Extensions could delay use of the CVS and

Bakersfield segments more than 2-years. The Business Plan should include an early “Start of Operations” date for the Bakersfield to Madera segment. This Early Operations segment would connect to the San Joaquins Amtrak passenger rail service in Madera and Thruway Bus service in Madera and Bakersfield. This segment will be ready for the 2028 Olympics, in time to capture the flood of tourists going to Yosemite and Northern California before and after the Games. Merced hasn’t even completed its Station Area Plan and to develop a major transportation center will likely require relocation of the Amtrak San Joaquins from the BNSF over to the UP over ½ mile away, and UP is not interested in accommodating any passenger rail service. When the Merced Extension is ready, service to Merced should be the first extension, but why delay the opportunity to begin demonstrating HSR viability before the track is completed to Merced? That is a potential 2-year delay in implementation of the system, in direct opposition to the CHSRA’s #1 principle: “*Initiate HSR services as soon as possible.*” It also delays the potential to develop a supporting constituency of riders for the project, that are desperately needed to fund future expansion of the project to the major urban centers, and close the rail gap between Bakersfield and Southern California.

- 13) P. 64, Exhibit 3.3 – Although reducing travel time within the Valley is important, this section should address the improved statewide travel times when connecting Amtrak Thruway Bus and Amtrak Passenger Rail services are used. This chart should show the reduced travel times with connecting thruway bus service to between L.A. Union Station & San Jose; L.A. Union Station & San Francisco; L.A. Union Station & Sacramento; Las Vegas & San Jose (with Thruway Bus connector between Bakersfield & San Jose. These travel time comparisons would show how an early HSR service combined with existing/modified connecting service is competitive with car travel, and will eventually be competitive with air travel. For Example: L.A. Union Station to San Jose (via. Thruway Bus between Madera and San Jose) is:

L.A. to San Jose with Connector Buses (Early HSR Service from Bakersfield to Madera)

Bus/HSR Train/Bus	~7 hours
Car (gas/food stops)	~7 hours
Greyhound	~7 hours
Current Train Service	~8 hours (assumes Thruway Bus connections at Bakersfield and Madera)

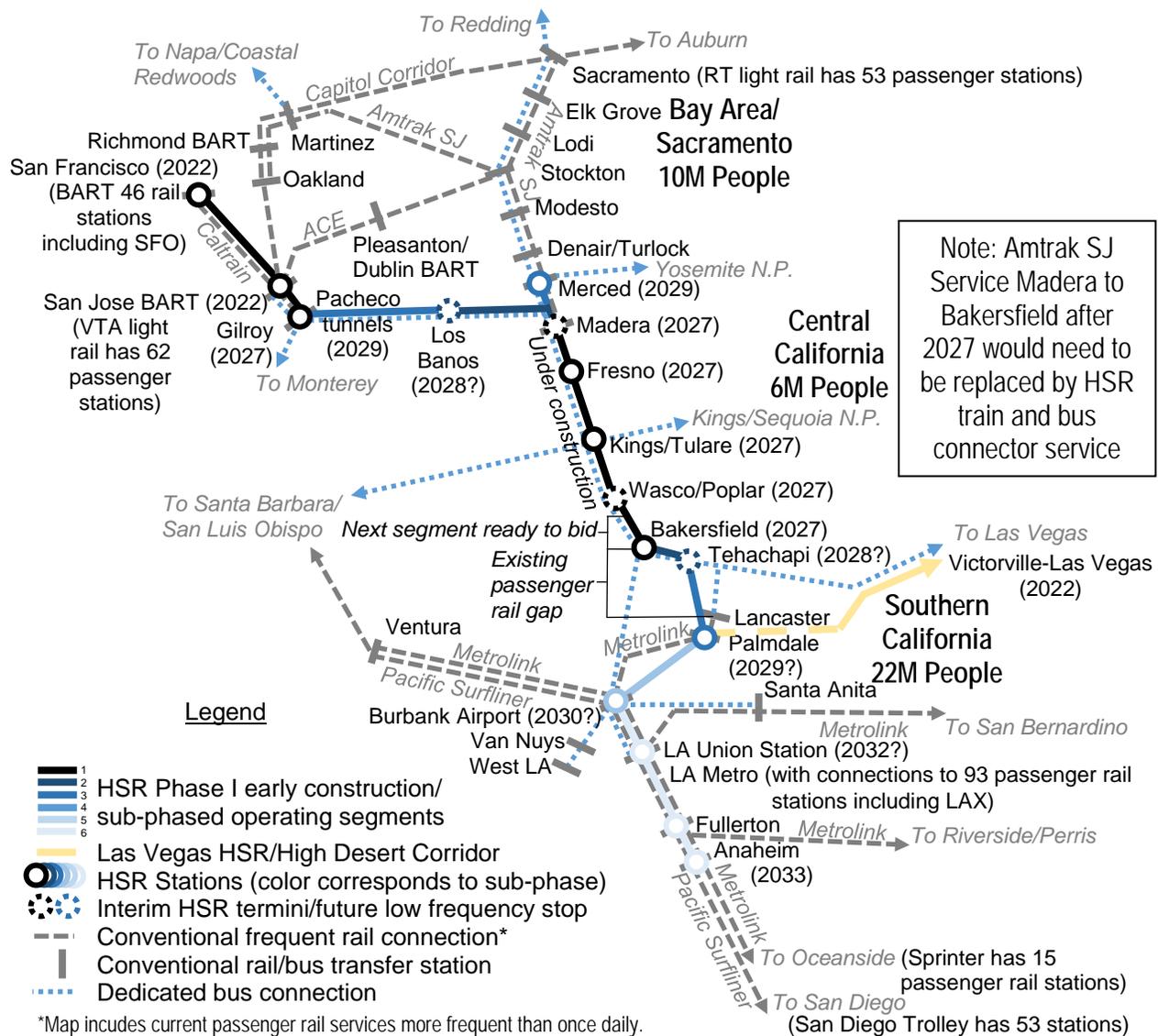
The reason for modifying this chart is to demonstrate that for the first time, rail travel will be competitive with car travel between L.A. and San Jose (largest City in the Bay Area), increasing ridership potential and viability tremendously of the system. And this service can be implemented approximately 2 years earlier than proposed in the business plan, in time for the 2028 Olympics.

- 14) P. 70, 2<sup>nd</sup> Paragraph – We agree that the RoW for Golden Empire Transit (GET) facility needs to be purchased and an alternative location identified ASAP. However, this is no longer a “long-lead project” since the environmental has been completed for this segment since October 2019 and the segment was identified for funding in the 2018 Business Plan. RoW acquisition on the entire F street alignment could have commenced 6 months ago. Continued delays like this impact the viability of the entire project GET capital planning unnecessarily.
- 15) P. 75 – We welcome the intent to discuss phasing of the station in Bakersfield. Note that the Adopted EIR location of the station differs from what was adopted in the Bakersfield Station Area Plan. The Authority Staff promised that the EIR would be revised to match the SAP.
- 16) P. 102 Rendering – Rendering shows an alignment approximately 500 ft. Southwest of the alignment in the Final Adopted F St. Alignment.

17) Elimination of Amtrak San Joaquin Service South of Madera at the start of HSR service – 2027

Kern COG supports the HSR early operation segment to include Bakersfield to Merced as a logical segment to complete before the Pacheco Pass segment. The Business Plan supporting documents reference the California State Rail Plan (SRP) model. On p. 135 of the SRP “Service Goals and Improvements” section, the first bullet point describes the San Joaquin service elimination from the Amtrak Bakersfield station to mid-corridor starts in Fresno. Later on Page 135, the elimination of all passenger rail service South of Fresno is discussed. The map below illustrates a Kern COG staff recommended phased replacement of Amtrak SJ diesel service as each segment of HSR Phase I system comes online. Replacement of duplicate diesel passenger rail service in this corridor with electric HSR and connector bus service will likely result in significant operating cost savings for the state. The proposal also frees up rail main lines for un-subsidized goods movement. Impacts from loss of passenger rail service to disadvantaged communities of Corcoran, Allensworth, and Wasco have yet to be addressed.

Recommended 2027 Early Operational Sub-Phasing of Phase I. System Providing Daily Rail/Bus Service Connecting 40M+ People to HSR Core Segment



The state must mitigate the Impacts of eliminating Amtrak stations and passenger rail service to communities South of Madera (Corcoran, Allensworth, Wasco, Bakersfield and the surrounding communities that use these stops).

Page 135 of the 2017 State Rail Plan, under the “Planning, Analysis, and Project Development” section, in bullet point number five, states: *“Study potential regional rail and integrated Express Bus needs to communities between Fresno and Bakersfield, developing recommendations that consider capacity currently used for San Joaquin service, along with regional rail opportunities and the need to feed HSR stations at Fresno, Kings-Tulare, and Bakersfield.”* Since the planning period described in this section begins in 2022, we are assuming from the 2020 HSR draft business plan that HSR service could begin as early as 2027 between Bakersfield and Madera. Planning needs to begin immediately to mitigate the following impacts to the communities losing Amtrak service:

- a. **Comprehensive connector bus system** - Provide coordinated access to new HSR service and Southern California via dedicated connector bus service. This would include a parallel bus service to the operational HSR corridor that would pick up passengers at cities such as Shafter, Delano and Corcoran that don't have a HSR stop, and arrive just in time to catch the train at the appropriate HSR station.
- b. **Interim HSR termini** - Provide interim HSR platforms/stops at temporary HSR system termini, including a stop at the community of Wasco downtown at the current Amtrak SJ station site. Provide sufficient connector bus spaces and facilities to safely transfer passengers connecting with Southern California destinations. These temporary termini could also be co-located with railway maintenance facilities to make better use of the infrastructure investment in the stop.
- c. **Low frequency future and/or emergency stops** - As the HSR system completes portions of longer segments, provide new interim platforms at the termini at locations such as Wasco, Madera, Los Banos, and Tehachapi (see figure 1). These platforms will allow the HSR system to benefit from rail travel time improvements sooner, creating a potential future low frequency stop location or emergency turnout for the system. These also provide a node for future transit oriented development in these smaller communities. The stop platforms should include rail sidings off the two mainlines just like the regular HSR station stops. These stops also provide access to these impacted disadvantaged communities should the IOS be used by Amtrak San Joaquin Service.
- d. **Wasco-Bakersfield is next segment ready to bid** - The locally generated alternative alignment for the Wasco (Poplar Ave) to Bakersfield segment is completely environmentally cleared and is ready to be the next segment to bid and construct. Building all the way to Bakersfield prior to initial operation in 2027 will minimize traffic impacts and need for extra bus bays at an interim stop in Wasco. Still, a downtown platform in Wasco will be needed for future low frequency service and to mitigate impacts to that disadvantaged community to be the loss of an Amtrak station.
- e. **Reserve right to operate commuter rail on BNSF mainline in future in South Valley** - In 2012 Kern COG completed a Commuter Rail Study that included a plan

for commuter rail service between Wasco, Shafter, NW Bakersfield and downtown Bakersfield. The future NW Bakersfield stop is in the Amtrak SJ business plan. The state of California has invested hundreds of millions in improvements to the BNSF mainline, and based on that investment should retain the right to operate passenger service along the South Valley BNSF corridor in the future. The State should negotiate such an agreement with BNSF before Amtrak passenger rail service is eliminated in the South Valley. The agreement should anticipate future service in Kern between Wasco, Shafter, NW Bakersfield and Downtown Bakersfield to the Bakersfield HSR station when future ridership warrants such a service.

- f. **State plan missing planned commuter rail routes in Kern** - The State Rail Plan should include the planned commuter rail routes from the Kern COG 2012 Commuter Rail Plan, including stops in NW Bakersfield (Amtrak SJ) and Rosamond (Metrolink) which are currently funded in the out years of the 2014 RTP. These routes would provide an important future feeder rail system to the HSR stations at Bakersfield and Palmdale. See Kern COG's *Commuter Rail Feasibility Study*: [http://www.kerncog.org/wp-content/uploads/2010/03/KernCOG\\_Commuter\\_Rail\\_Draft\\_Report\\_20120720.pdf](http://www.kerncog.org/wp-content/uploads/2010/03/KernCOG_Commuter_Rail_Draft_Report_20120720.pdf)

- 18) Interim Use of the Initial Operating Segment (IOS) by the Amtrak San Joaquins - Any use of the IOS alignment by the Amtrak San Joaquins should mitigate the potential loss of service to the disadvantaged communities of Corcoran, Allensworth, and Wasco.
- 19) Potential Co-location of HMF at interim HSR stop at Wasco platform - Kern COG recommends that the State consider co-locating a HSR passenger boarding and alighting platform be located co-terminus with the HSR Heavy Maintenance Facility (HMF). Both the Wasco and Shafter HMF locations could serve as a low frequency stop on the HSR system. The sites could also be the location for a rail maintenance-of-way facility.
- 20) Tehachapi Pass Freight Capacity - Unlike passenger rail service, rail freight rarely requires a subsidy. One of the more expensive infrastructure projects on the HSR system will be the system of tunnels and viaducts between Bakersfield and Palmdale over the Tehachapi Pass. The Tehachapi pass is also a rail bottleneck. State Senator Beall has suggested constructing a third rail line for freight, adjacent (with sufficient protective rail traffic barriers) to the propose HSR alignment. The adjacent HSR corridor could provide a revenue stream that could be bonded off of to help finance the tunnel system over the Tehachapi Pass. This option should be explored further by the State and discussed in the 2020 HSR Business Plan.
- 21) Build South through 2028 - The decision to build North first was made before LA was awarded the 2028 Olympics. It makes sense now to build South to Palmdale by 2028 to connect with the Southern California Metrolink System and possibly the Las Vegas HSR ahead of the HSR connection to San Jose. During the 1984 LA Olympics, some events such as whitewater kayaking were held in central California, and Yosemite N.P. had a record number of visitors that year. This would provide a 3-seat rail ride (no busses) between Southern and Northern California with travel times that would

compete with passenger car travel. In addition, these segments are farther along environmentally than the Pacheco Pass alignment and can be delivered faster.

- 22) Budget for Zero Emission Vehicle Bus Connectors - Since one of the purposes of high-speed rail is to reduce vehicle emissions, there is no mention of the Authority purchasing or contracting with an electric over-the-road coach company to purchase or contract with bus services that operate electric buses only to offset the emissions generated by busing riders to and from the north of Bakersfield station (estimated to be at least 1,000 passengers per hour).
- 23) Tunneling Contracts Should Be Bundled to Save Costs - Tunneling contracts for the Pacheco Pass should also include tunneling through Kern County (Tehachapi Mountains) to keep the IOS Phase 1 on-schedule.
- 24) Improved Bus Connector Service Between Bakersfield and Santa Clarita - Page 70, sixth bullet states Improved express bus service is needed between Bakersfield and Santa Clarita, connecting to more frequent rail services between Santa Clarita and Los Angeles, Orange County and San Diego, as well as the rest of the Metrolink system. Please note that Kern Transit is beginning an inter-city service between Bakersfield and Santa Clarita (including the Metrolink Station) this Fall. Kern Transit could be a possible contracting agency once high-speed rail service commences in Bakersfield. Note that Golden Empire Transit is purchasing 5 hydrogen fuel cell buses and will have facilities to assist with re-fueling connector busses for the HSR system.