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December 7, 2017

Mr. Malcolm Dougherty
Director
California Department of Transportation
1120 N Street
Sacramento, CA 95814

Re: Comments on the Draft 2018 California State Rail Plan

Dear Director Dougherty,

Thank you for the opportunity to provide comments on the draft 2018 California State Rail Plan (plan). The California Transportation Commission (Commission) commends both the California State Transportation Agency (CalSTA) and the California Department of Transportation (Caltrans) for the development of a rail plan for California that serves to identify and prioritize future investment decisions. Its focus on the user experience is a change from previous state rail plans. The framework of articulating a long-term vision based on service goals will help operating and implementing agency partners focus on investments that create a statewide, user-friendly network to help California achieve its ambitious climate and transportation goals. The Commission offers the following comments for your consideration:

Planning for Future Rail Technological Advances - The entire transportation sector, including passenger and freight rail, is experiencing increasing technological advances that will provide great benefit to the public. The draft plan mentions emerging rail technologies such as Positive Train Control, advances in locomotive technology, and High Speed Rail. We suggest the plan provide more detail on how passenger and freight rail systems will most likely experience the

same level of impacts due to technological innovation that will re-shape the automotive sector. The plan should address potential innovations that are expected to alter the future landscape of passenger and freight rail transportation in California.

Plan Development Process and Consultation - Extensive consultation with federal, state, regional/local and Tribal governments during the development of a statewide plan is important. Although the plan extensively outlines the connection with the California Transportation Plan; it should also clearly articulate the connection with other key state planning efforts such as the California Air Resources Board Scoping Plan and the California Energy Commission Integrated Energy Policy Report. Given the importance of High Speed Rail development in implementing the key goals of this plan, there should also be an extensive overview of the High Speed Rail Authority's planning efforts.

Consultation With Rail Companies - The Burlington Northern and Santa Fe (BNSF) and Union Pacific (UP) Railway Companies are the two Class I railroads that operate in California. These two companies also own a significant amount of track and right-of-way necessary to accommodate planned passenger rail expansion. The plan should describe how the planning process took into account the needs and commercial values of both BNSF and UP.

Coordination With Regional Agencies - The plan should address how regional transportation agencies, rail Joint Powers Authorities (JPAs), and transit providers will or have incorporated the rail projects that are identified through 2040. The Commission encourages ongoing dialogue between Caltrans and regional agencies to implement the plan.

Integration With Existing State Freight Plans – The plan articulates how projects and policy directives coordinate with the 2016 Sustainable Freight Action Plan and the 2014 California Freight Mobility Plan, as identified in Chapter 5. The plan should strengthen the discussion in this chapter with more detail as to how freight rail can be integrated with existing state freight plans.

Future Rail Funding, Ridership and Freight Estimates – The identification of projected funding and ridership levels over the next 20 years are critical components of a statewide rail plan.

1. According to the plan estimates, \$136.8 billion is necessary from both private and public funding sources to build the necessary rail improvements over the next twenty years. This level of spending would require an average annual expenditure of approximately \$7 billion per year. The plan should provide a strategy for identifying and prioritizing where rail funds should be invested over the next 10 years to conform with state statute regarding the development of statewide rail plans, (California Government Code Section 14036[2][A]). This prioritization is necessary to inform the public, stakeholders and the Commission as to where limited state funding should be allocated.
2. Table 6.1 identifies 43 capital projects totaling \$4.8 billion to be implemented by 2022. It should be clarified how much of this \$4.8 billion has received funding commitments.

3. Tables 6.2 and 6.3 estimate that \$47 billion would be necessary to implement the projects identified through 2027, and \$85 billion is needed for rail projects to complete the 2040 vision. Appendix A (Tables A.32 and A.33) lists the specific projects for both 2027 and 2040. Given the importance to clearly identify the 10-year projects for the public, the Commission suggests that Table A.32 be moved into the actual state rail plan document and not be relegated to an appendix.
4. *Although Chapter 6 of the plan explains Senate Bill 1 funding amounts, it is difficult to ascertain the anticipated sources of funding for the 2027 and 2040 rail projects. The plan should identify the anticipated sources of funding for the \$132 billion needed over the next 20 years.*
5. Section 6.3.2 anticipates a 12-fold increase in statewide rail ridership levels from its current 110,000 daily trips to 1.3 million daily trips by 2040. The plan should be more explicit about how network-wide planning drives ridership benefits and operational and capital cost reductions. Along with several funding level scenarios, the plan should include estimated ridership levels based on those funding scenarios.
6. *The plan should identify how Caltrans intends to measure the implementation of the 2022 short-term programmed projects, and the planned longer-term 2027 and 2040 projects. Therefore, the next rail plan in 2023 should contain a thorough overview of how short-term projects were implemented, and if the longer-term projects have committed funding and will be completed.*
7. Several key passenger lines such as the Capitol and San Joaquin Corridors utilize the same track as freight trains. Therefore, the plan should articulate how, or if future expansions of passenger service will conflict with increased freight rail activity.
8. To reduce air emissions, it is important to increase shipments of goods by rail. The plan estimates that freight rail tonnage on California's rail lines will increase from 98.6 million tons in 2013, to 213.3 million tons in 2040; this represents a 116 percent increase in freight tonnage shipped by rail. The plan should provide more detail on how this dramatic increase in freight activity will be accommodated and discuss potential impacts to passenger rail utilizing the same rail tracks.

Climate Change Impacts - Transportation infrastructure, including railroad operations will be impacted by climate change. In addition to sea level rise, severe storm activity and the resulting flooding and landslides will increasingly impact rail operations on certain routes in the future.

Although the plan identifies several Bay Area or Southern California rail lines that may be impacted by sea level rise, the plan should recommend additional research to identify and estimate the cost to address climate change related impacts to rail infrastructure. In addition, subsequent updates to the rail plan should include comprehensive cost estimates and other actions to address climate change related rail impacts.

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Development of Rail Grade Separations – Construction of rail grade separations with surface streets is a very important component for both increasing the safety and throughput of trains along a corridor. The plan should stress the importance of grade separations and also ensure they are included in the project lists.

Rail Interactive Map – The Commission commends the development of the Internet-based interactive map to identify the existing rail system and a vision for the 2040 passenger rail system. Understanding the proprietary nature of freight railroad business plans and services, the Commission suggests that significant, public elements of the 2040 vision for freight rail should also be included on the map.

Draft Plan Comment Period - California Government Code Section 14036(a) states the plan shall be submitted to the California Transportation Commission for its advice six months prior to approval by CalSTA. Although the Commission was informed of its development, the draft plan was not submitted to the Commission consistent with this timeframe. Future plans should be submitted to the Commission for its input six months prior to approval by CalSTA as stated in statute.

The Commission appreciates the opportunity to provide comments on the draft 2018 California State Rail Plan. Please contact Garth Hopkins, the Commission's Deputy Director for Transportation Planning, at (916) 653-3148 if you have any questions.

Sincerely,

BOB ALVARADO
Chair

c: Commissioners, California Transportation Commission
Susan Bransen, Executive Director, California Transportation Commission
Brian P. Kelly, Secretary, California State Transportation Agency