



March 28, 2016

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Chris Ratekin, Chief, Office of State Planning
Division of Transportation Planning, MS-32
Department of Transportation
P.O. Box 942874
Sacramento, CA 94274

Re: Comments on the California Transportation Plan 2040 Final Review Draft

Dear Ms. Ratekin:

The Train Riders Association of California (TRAC) is very pleased with the forward-looking direction of the Final Review Draft of the California Transportation Plan 2040 (CTP). We wish to comment on our area of expertise, rail.

We strongly agree with the intent of this Implementation Highlight:

Improve transit by completing the entire Phase 1 High-Speed Rail System by 2029, and making it the backbone of an integrated statewide transit system linking all transit operators with one-stop ticketing and well-coordinated transfers. (p. 114)

An integrated statewide transit system is the Holy Grail for us. However, we must offer our observations on the feasibility of Phase 1 ever being completed. Despite the Governor's commitment to HSR, the project is failing. Political compromises made early in the history of the CHSRA have resulted in a project that cannot achieve the travel times needed to compete with the airlines. It will not work as a business, but is far too expensive to be viable as public transit.

There are no realistic prospects for achieving the profitable operations needed to attract private investment. Not only are there no reasonable prospects for federal funding, sources within the state are drying up. Cap and Trade funds will require a legislative extension that is likely to be contentious in Southern California.

The courts have made it clear that the HSR project will have difficulty qualifying for Prop. 1A bond funds. That means the draft 2016 Business Plan has a giant funding gap. TRAC observes that if CHSRA had believed it could qualify for bond funds, it would have applied for them before starting construction two years ago. The draft Business Plan is not a reliable source of information for the CTP.

We also need to call attention to the proposal in Table 13, page 70, to reduce HSR fares. Prop. 1A defined HSR as a profit-making business, capable of at least paying its operational costs. The economics of HSR are fundamentally different from those of public transit. Because of this, its fares are not available to be a policy tool in the same way that CTP modeled free transit fares.

TRAC is a strong supporter of HSR as the convenient connection between the transit systems of the State's regions. We have long advocated for a lower-cost alternative to the current HSR project--one that is led by experienced rail operators. They need to be given the freedom to select a profitable route, subject to environmental review under CEQA.

The Final Review Draft presents the outline of an integrated statewide transit system that we fully agree with. Unfortunately, the CTP relies on a backbone that was irreparably fractured at birth. TRAC stands ready to help develop a realistic HSR plan, when this reality finally sinks in.

Sincerely,

Ronald Jones

Ronald Jones,

President