January 18, 2020

Draft Connect SoCal Plan Comments
Attn: Connect SoCal Team
Southern California Association of Governments
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

Re: Connect SoCal 2020 RTP/SCS, Passenger Rail Technical Report

Dear Connect SoCal Team:

The Rail Passengers Association of California & Nevada (RailPAC) welcomes the opportunity to provide input to the Connect SoCal 2020 Regional Transportation Plan/Sustainable Communities Strategy. The Southern California Association of Governments (SCAG) is in a unique position to encourage the state, county and local governments to work together to improve passenger rail service in Southern California.

RailPAC offers the below comments on the Connect SoCal Passenger Rail report.

The Passenger Rail report’s Vision and Purpose (p. 2) sets a very positive tone for passenger rail in the SCAG region over the next few decades, with goals to grow ridership and provide more frequent, and new, rail services.

RailPAC has always focused on intercity passenger service and regional rail. While it is important to move large numbers of people short distances by transit, it is equally beneficial to the community to move smaller numbers of passengers over relatively longer distances. An intercity train journey of 70 miles or more is the equivalent to 13 transit journeys in terms of vehicle miles avoided. Investment in Intercity and Regional Rail in the SCAG region has been totally inadequate for the past three decades. We still are trying to operate a modern service with many miles of single-track railroad. The approach to Los Angeles Union Station, the hub of the network, is circuitous and serpentine, unnecessarily adding 5 to 10 minutes to every journey. A bypass track is needed to avoid the near sea level alignment through San Clemente, a serious capacity constraint on the key route between California’s two largest cities.

Detailed comments:

Metrolink SCORE (pgs. 34-41)-

The Metrolink SCORE program is a welcome and long overdue step forward. It can transform Metrolink from a commuter-oriented system (focused on rush hour service to Downtown LA and Irvine) to a truly regional rail system with frequent service in all directions, 7 days a week, from early in the morning to late at night. These SCORE projects need to expedited, and funding needs to be clearly identified:

- Laguna Niguel/Mission Viejo Siding (OCTA)
- Raymer to Bernson Double Track (LA Metro)
• Brighton to Roxford Double Track (LA Metro)
• Doran Street Grade Separation (LA Metro)
• Lone Hill to White Double Track (LA Metro)
• Placentia Metrolink Station (OCTA)

LOSSAN Corridor Rail Service (pg. 28), San Diego to Orange County market:

SCORE needs to be integrated with LOSSAN and Surfliner. Due to the huge amount of traffic exchanged between SCAG and SANDAG every day, there should be a pooled Coaster/Metrolink additional service San Diego to Fullerton (stopping at Fullerton avoids the frequency conflict on the BNSF with the 91 line slots). The pool trains would connect to the Metrolink 91 and Orange County line trains at Fullerton, on continue to LA Union Station. SCAG and the LOSSAN agency should actively encourage this pooling of Metrolink and Coaster rolling stock and services, and start a working group on it with NCTD or SANDAG. Such a working group would figure out technical issues such as equipment compatibility between Coaster and Metrolink, voltage of hotel power, position of wheelchair ramps, position of locomotive on the train, etc.

New passenger rail services (pgs. 27-28) -

• Los Angeles to Coachella Valley -
This service is long overdue. There is an urgent need to start discussions with UP on the infrastructure upgrades needed. For the distance involved and the kind of traffic an intercity service similar to Surfliner is appropriate, rather than Metrolink regional rail.

• Victorville to Las Vegas/High Desert Corridor -
SCAG should work with Los Angeles County, San Bernardino County, and Virgin Trains USA to connect the Victorville-Las Vegas train to the Palmdale station via the proposed High Desert Corridor.

• Coast Daylight/ Coast Rail Coordinating Council (CRCC) -
RailPAC supports restoration of the Coast Daylight if a competitive transit time can be achieved.

• Southwest High-Speed Rail Network (pgs. 28-30) -
The 2014 study recommended a CA-AZ-NV volunteer passenger rail policy and planning group, and a ‘blue ribbon commission’ to study a Phoenix-Southern California Corridor. RailPAC would like to participate in this, if such a commission is created to start implementing an LA-Phoenix service (and not just another study).

Amtrak -

Pg. 8.
Exhibit 1 Amtrak services - Why not show Amtrak stations on the map?

Pg. 9.
Needs updating after passage of SB742 re Thruway busses.

The report does not explain the extensive State role in LOSSAN and refers to the service as "Amtrak's Pacific Surfliner".

Pg. 22 - Pacific Surfliner On-Time-Performance (OTP):
The Surfliner OTP statistics need tighter metrics than 10 minutes or 15 minutes off of schedule.

The Metrolink OTP standard (pgs. 22-23) is 6 minutes off schedule.

Not surprisingly, the report makes no mention of the pitifully small market share of both intercity or commuter rail, nor does it mention the lack of connectivity between Metrolink routes at LA Union Station. 3 million a year is about 4100 round trips a day, 8200 single rides, in a population catchment of at least 16 million. That's not even a rounding error 0.06%. 46 mph and 69% OTP factor in.

Metrolink's story on pgs. 22 and 23 is similar, a tiny percentage of journeys in the region. Also, the definition of commuter rail (pg. 11) is completely out of date with modern travel patterns and needs to be updated to a definition of "regional rail".

Hollywood Burbank North Station (pg.24) - the airport no longer provides a shuttle to meet every train, on demand only. The station will not be used by HSR and will most likely be demolished when the second track is added.

*California High Speed Rail* (pgs. 12-15)-

SCAG should press for completion of the Southern California tunnels as soon as possible. First priority is Antelope Valley to San Fernando Valley which will initiate high speed regional service.

Los Angeles to San Diego - this Phase Two section needs to be accelerated, especially in light of the ongoing erosion of the Del Mar bluffs. In addition, the existing LOSSAN route needs a bypass track to take the line away from the near sea level section at San Clemente. This single track is both vulnerable to sea level rise and is a serious capacity bottle neck.

*Locomotives-*

The paragraph ‘Tier 4 Locomotives and Electrification’ (pg. 12) implies that the 40 diesel F125 locomotives purchased recently will be the only locomotives that Metrolink will operate for the next 30 years. However the quantity of 40 locomotives is not nearly enough for the level of service increases that Metrolink is proposing over the next 10 years. Metrolink is expecting rapid growth in its train frequency, under its SCORE funding plan the Orange county line currently at less than 1 train per hour (13 trains per day), will have minimum frequencies of 2 trains per hour in 2025 and 4 trains per hour by the 2028 Olympics, for example. The existing fleet of several dozen diesel locomotives is not enough to support this growth. Even if Metrolink had the amount of diesel locomotives needed, it still doesn’t justify delaying electrification. Continuing to run a 100% diesel fleet for the next two decades will not be environmentally or socially acceptable. At the very least a hybrid solution of a battery locomotive supplementing a diesel will help meet air quality and carbon goals.

There need to be more federal, state and locally-funded programs that could support zero-emission locomotive research and development (R&D) projects and technology demonstration projects. There are plenty of incentives and R&D programs, at both the state and federal levels, supporting electric cars and trucks. By contrast, public R&D funding opportunities for electric rail technologies are few and far between. Southern California should be a leader in zero-emissions, electric rail technology, and SCAG could be a major advocate for this technology.
It is commendable that SCAG recognizes that freight rail infrastructure investments have great public benefit. RailPAC fully supports expansion of freight rail capacity and new grade separations on shared corridors, as this will reduce potential for congestion conflicts and delays to passenger trains. More capacity also allows more passenger trains to run.

One issue that needs attention is the safety and reliability impacts of Precision Scheduled Railroading (PSR) practices of several of the Class I railroads, notably Union Pacific (UP) in Southern California. UP in particular is adopting so-called PSR to cut costs, running longer and heavier trains, two miles or more in length, which are slower to accelerate. There are several reasons that the longer trains are not in the public interest. First of all, the waiting times for vehicles and pedestrians at the various UP railroad crossings on roads and streets in the SCAG region are getting longer. This inconveniences the public (hundreds of people at a time), creates more pollution from idling vehicles, and harms the flow of local commerce. It also makes it more difficult to share the tracks with passenger trains, which end up running late because of long slow trains taking up so much space on the rails. PSR’s focus on short term profit is a danger to the future of rail transportation, and is leading to corners being cut on safety. Over 100 long freight trains pass through the SCAG region each day.

The use of the term "freight railroads" is inappropriate and misleading. "Common Carrier Class I Railroads" should be used.

Thank you for your consideration.

Sincerely,

SIGNED

Paul Dyson
Vice President, Southern California
Rail Passengers Association of California & Nevada (RailPAC)