



February 9, 2022

Ms. Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
Office of Proceedings
395 E. Street, SW, Room 1034
Washington, DC 20025

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Office of Proceedings
February 9, 2022
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RE: Docket No. EP 711 (Sub-No. 1) – Reciprocal Switching

Dear Ms. Brown:

On behalf of the California Joint Power Authorities (JPAs) and the state-supported routes we oversee and manage, we write to express our concerns regarding the Surface Transportation Board's (STB) 2016 NPRM, Reciprocal Switching.

As background, California is home to the nation's leading state intercity passenger rail network. The *Pacific Surfliner*, the *Capitol Corridor*, and the *San Joaquins* intercity services are all among the six highest state ridership lines in the nation. Combined, the three routes carried over 5.6 million passengers throughout California in Fiscal Year (FY) 2019. Pre-pandemic, one out of every five Amtrak riders boarded a train in California.

California's intercity services are managed by the Capitol Corridor Joint Powers Authority (CCJPA) the Los Angeles – San Diego – San Luis Obispo (LOSSAN) Rail Corridor Agency, and the San Joaquin Joint Powers Authority (SJJPA) and funded by the California State Transportation Agency (CalSTA).

Over the last four decades, California has invested over \$7 billion in improving its intercity passenger rail network. We have collaborated closely with local stakeholders, state funding partners, freight railroads, and our service operator Amtrak in successfully planning and implementing capital investments to enhance our services. In addition to our state investment, we are anxiously anticipating the historic investments proposed by the Investment and Jobs Act (IIJA). This unprecedented surface transportation reauthorization provides needed investments in our passenger railroad network, and we look forward to working closely with our stakeholders to expand and enhance intercity services in our state.

As proposed, the reciprocal switching NPRM would risk the progress we have made as a state and nation in sustainable passenger rail infrastructure investments and add unneeded complexity to passenger railroad operations.

Freight railroads operate in a highly competitive and complex freight transportation environment. In order to remain competitive – as well as to improve railroad safety and network fluidity – freight railroads constantly invest in their infrastructure to maintain a state-of-good-repair and expand service.

We are concerned that the NPRM would create disincentives for continued investment in our national railroad network. Our agencies require reliable, safe, and maintained freight railroad infrastructure to serve our passengers. Additional uncertainty in railroad infrastructure investment, especially during an



unprecedented opportunity and time to expand and enhance passenger railroad infrastructure and connectivity, would risk so much of the progress we as a state and nation have made in recent years.

Our agencies work closely with Union Pacific Railroad (UPRR) and BNSF Railway (BNSF) to maintain and expand scheduling windows for passenger trains, ensure network fluidity, and enhance our operating environment to the benefit of all parties. Implementation of a reciprocal switching regulation would significantly increase interchanges of freight cars, adding unnecessary operational complexities, and compromise the efficiency and fluidity of both freight and passenger rail operations.

These changes would not only harm freight rail; increased network congestion and complexity would have impacts on intercity passenger operators and overseeing state agencies, who rely on freight railroad tracks to operate. We believe the STB should strive to ensure freight rail operations remain as efficient and fluid as possible in order to encourage continued and new investments in our passenger railroad network, especially during a historic time for passenger railroad investment, and maintain and expand scheduling opportunities for passenger rail trips.

We appreciate the opportunity to provide our perspective on this matter and encourage your careful consideration of the potential impacts of this proposal on passenger rail investment and operations.

Sincerely,

A handwritten signature in blue ink that reads "Stacey Mortensen".

Stacey Mortensen
Executive Director
San Joaquin Joint Powers Authority

A handwritten signature in black ink that reads "Rob Padgette".

Rob Padgette
Managing Director
Capitol Corridor Joint Powers Authority

A handwritten signature in black ink that reads "Donna DeMartino".

Donna DeMartino
Managing Director
Los Angeles – San Diego – San Luis Obispo
Rail Corridor Agency