



April 3rd, 2026

California High-Speed Rail Authority  
770 L Street, Suite 620  
Sacramento, CA 95814  
[BusinessPlan2026@hsr.ca.gov](mailto:BusinessPlan2026@hsr.ca.gov)

**Re: California High-Speed Rail Project - 2026 Draft Business Plan**

Dear California High Speed Rail Authority Staff and Board Members,

Californians for Electric Rail is an all-volunteer, statewide organization dedicated to advancing fast, frequent, zero emissions electrified mainline rail around the state. We strongly support the California High-Speed Rail program and continued investment to ensure it becomes the best it can be. Overall, we support the general approach taken in the 2026 Draft Business Plan to initiate service in the Central Valley as swiftly as possible while prioritizing delivering service to major metro areas on a shorter timeline.

CAHSR is projected to reduce greenhouse gas emissions by 3 million MT of CO<sub>2</sub>/year, about 1% of 2022 emissions, and the equivalent of taking 700,000 cars off the road. When complete, CAHSR will be one of the fastest trains in the world at 220 mph. CAHSR has already created 15,000 jobs in the Central Valley, and will enhance tourism, job access, and the overall economy. CAHSR has already been a boon to local transit, as seen through the resounding success of Caltrain electrification, which made Caltrain the nation's fastest-growing transit agency in the country, and the LA Regional Connector, which has increased ridership on Metro's A and E lines. California High-Speed Rail is a transformative project that deserves continuing public investment.

Given the long timeframe of geotechnical and design work, we support the authority's desire to do pre-construction work outside of the Central Valley allowing service to reach the Bay Area and Palmdale sooner. Gilroy-Palmdale should ideally be ready to start construction as soon as service in the Central Valley opens. For this reason, we support SB 1411 to enable increased spending outside of the Central Valley, with the caveat that spending should be restricted to activities that directly support high-speed rail project delivery, not tangentially-related local transit or active transportation infrastructure.

Below are some technical comments that we believe support this overall goal of balancing optimal service delivery with cost and timeline savings.

## **Streamlining Project Delivery**

As documented by Circulate San Diego's The Powerless Brokers<sup>1</sup> and the Office of the Inspector General (OIG), CAHSR has struggled to plan and deliver the program in part due to veto points and procedural hurdles from third parties. These include delays and exactions from utilities, local governments and special districts along the right-of-way. Without policymakers providing CAHSR with transparent, objective and rules-based processes for third parties with regards to planning, design and constructing the network, the program will continue to struggle to meet budget and schedule.

Such sorts of streamlining procedures are global best practices for high-speed rail programs. In fact, Canada is currently developing similar streamlining processes for their high-speed rail program Alto.

Consistent with the OIG's February 2025 report, the Legislature should support - as requested in the Draft Business Plan and Supplemental Project Update Report - third-party streamlining, judicial resources, encroachment permit authority and additional jurisdictional authorities for CAHSR.

## **Service Planning Analysis**

### **Station Locations**

We support having transfers to Gold Runner at Madera rather than building a connecting track between BNSF and Union Pacific. We do not support moving the Merced Station out of downtown to the southern edge of the city. This location will promote sprawl and induce driving while potentially reducing ridership due to lack of access to destinations and other modes of transit. While deeply frustrating for locals, we would prefer a resequence to the end of Phase 1 and building a downtown station at that time over a suboptimal station location. Given that the proposed Madera transfer will continue to serve downtown Merced via Gold Runner, running a HSR shuttle one additional stop to exurban fringes has little value relative to the cost, and we recommend eliminating it until the end of Phase 1.

### **Service Frequency - IOS**

In the Draft Business Plan, the service frequency has been reduced from the previous 16 round trips (RT) daily, matching the combined Gold Runner and ACE at Merced, to 8 RT daily - providing minimal improvement over existing Gold Runner service. While we understand and support the desire to reduce costs and initiate service sooner, we recommend increasing service to 12 RT daily to match the Gold Runner service proposed as part of Valley Rail, which should be possible with the level of capacity proposed in the Draft Business Plan. Schedule coordination with Gold Runner will be critical to the success of the initial operating segment prior to the completion of Phase 1 and the Sacramento Phase 2 extension.

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<sup>1</sup> <https://www.circulatesd.org/powerlessbrokers>

## Tunneling Tradeoffs

The Draft Business Plan proposes initial single-track tunnels. We support the goal of reducing costs, and applaud the Authority's efforts that have reduced the necessary amount of tunneling. However, single track tunnels create a hard capacity constraint that limits service (as well as revenues) and is more costly to remedy in the future than a single track section of ordinary track. We encourage legislators and the Authority to consider whether the savings are worth long term service constraints - particularly for tunnels that could be shared with other services, for instance, Metrolink in Southern California.

## Antelope Valley Line

We support the overall approach of providing initial blended service with the Antelope Valley Line in order to bring high-speed trains to Los Angeles sooner. However, we strongly encourage blending Lang to Los Angeles with the high speed bypass being built between Lang and Palmdale, and urge the High-Speed Rail Authority to formally study this routing. This would avoid the slowest segment though Soledad Canyon, which has intervals of 20-25 mph maximum speeds and over a dozen curves smaller than CAHSR's minimum radius. Limited capacity in Soledad Canyon currently limits Metrolink service north of Vista Canyon to hourly frequency, and additional capacity may be difficult and costly due to the geography. The proposed investment in Soledad Canyon is likely to become stranded when the high speed bypass is built given the massive time difference.

### Southern Regional Alignment



Blending Lang to Los Angeles also allows Metrolink to use electric trains which would reduce the performance difference between high speed rail service only stopping at Burbank and Metrolink with 8 intermediate stops. LA Metro has already identified that Tunnel 25 needs to have a 2nd tunnel constructed to allow the first tunnel to be repaired and upgraded. Brighton to Roxford double track was designed with higher speeds in mind. Given the straight alignment between Sylmar and Los Angeles 100-110 mph should be possible in a blended segment just

like north of Gilroy. Californians for Electric Rail's *Electrolink* report<sup>2</sup> found that electrification and level boarding make a Metrolink trip from Vista Canyon to LA Union Station under one hour, competitive with driving. 110 mph service and a Soledad Canyon bypass were not studied in our report, but would be transformative for commuters in the Santa Clarita and High Desert areas.

### Burbank Station

As an additional value maximizing measure, we recommend moving the Burbank station from the airport to downtown Burbank. This location has better transit connections, serving both the Metrolink Antelope Valley and Ventura County lines, and has better development potential - important for EIFD financing (as discussed below). Building a station footprint in downtown Burbank will require no significant land acquisition beyond that which CAHSR has already committed to - unlike with Burbank Airport. Additionally, the Burbank airport is capacity capped, so it is unclear how beneficial direct CAHSR access is for both the airport and high-speed rail.

## **Funding/Financing**

### EIFDs to Accelerate Southern California Investment

Streets for All's recent EIFD report<sup>3</sup> further bolsters the case for both the Authority's prioritization of earlier service to major metro areas, as well as optimizing Palmdale-Los Angeles tunneling for Metrolink blended service. The report finds that an enhanced infrastructure financing district around Los Angeles County high-speed rail stations could raise \$15-23B while being revenue-positive for the county – enough to fund the \$16.8B cost of interim service proposed in the Draft Business Plan. We are strongly supportive of this approach, which would accelerate CAHSR's arrival in Los Angeles, and would benefit from SB 1411. This substantial contribution of local support strengthens the case for a Palmdale-Lang tunnel routing, which optimizes benefits for Metrolink as well as HSR.

### Cap and Invest

We understand that many of these proposed design choices have been made in the interest of reducing costs on a project that still has unmet funding needs. We urge the legislature to consider the incipient tradeoffs and take steps to secure existing and additional funding. The legislature must ensure that Cap and Invest allowances are designed to provide sustainable revenues to the Greenhouse Gas Reduction Fund, CAHSR's largest source of revenue, through 2045.

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<sup>2</sup> <https://calelectricrail.org/electrolink-modern-passenger-rail-service-for-southern-california/>

<sup>3</sup> [https://data.streetsforall.org/blog/cahsr\\_eifd/](https://data.streetsforall.org/blog/cahsr_eifd/)

In conclusion, we support the Business Plan's direction of faster delivery of connections to population centers and gradual, phased delivery of the full system. Additionally, we urge the Authority to maintain their commitment to quality service and capacity and optimize for connections to local transit.

Sincerely,  
Adriana Rizzo  
Founding Member, Californians for Electric Rail