



JPB Board of Directors  
Meeting of January 6, 2022

Correspondence as of December 23, 2021

# Subject

1. 12/20/2021 Ca. Air Resource Board (CARB) In-Use Loco Regulation
2. Anna Eshoo letter regarding Infrastructure Investment and Jobs Act recd. 12-21-21



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MICHELLE BOUCHARD  
ACTING EXECUTIVE DIRECTOR

December 20, 2021

Hon. Liane M. Randolph  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**RE: Proposed In-Use Locomotive Regulation**

Dear Chair Randolph:

On behalf of the Peninsula Corridor Joint Powers Board (Caltrain), I write to you in strong support of incorporating an Alternative Public Transportation Agency Plan as the California Air Resource Board (CARB) finalizes the proposed In-Use Locomotive Regulation. Caltrain is currently undergoing a \$2.44 billion Electrification Project that will replace diesel trains with high-performance electric trains and install 51 miles of new electrical infrastructure. This transformational project will provide a more environmentally-friendly, fast, reliable service. While Caltrain strongly supports reducing rail emissions, we encourage CARB to adopt a regulatory framework that accounts for the commercial viability of zero-emissions locomotives, the unique operating environments of each passenger rail operator, and does not require annual funding set asides or commitments for zero-emissions locomotives.

In 2019, the Peninsula Corridor Joint Powers Board adopted Caltrain's ambitious Long Range Service Vision – a blueprint for growth that outlines how Caltrain will work with its partners and communities to build upon the ongoing investment in Caltrain Electrification, linking individual projects and investments into a cohesive corridor-wide program that will ultimately deliver the high-frequency blend of regional rail and statewide high-speed service that our corridor, region and state need. When fully achieved, the Service Vision will provide electrified rail service from Downtown San Francisco to Gilroy, improve regional and statewide connectivity, reduce travel times, and support ridership of 180,000 Caltrain passengers every weekday – the equivalent of adding 5.5 new freeway lanes worth of capacity to US 101. The Service Vision will also deliver tremendous environmental benefits, reducing 110 metric tons of GHG emissions every day and taking nearly a million vehicle miles off Bay Area roads.

By 2030, Caltrain anticipates that the majority of our service will be electrified, including the Peninsula Main Line from the current terminal at 4<sup>th</sup> and King Streets in San Francisco to Tamien Station in south San Jose. However, while the Long Term Service

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Vision assumes a blended service with High-Speed Rail from San Francisco to Gilroy, the section of track between Tamien Station and Gilroy Station is owned by the Union Pacific Railroad and the timeline for the electrification of this corridor is uncertain. Our current Fleet Management Plan assumes the need to run diesel trains beyond 2030 to provide service on this limited stretch of non-electrified territory for the foreseeable future, even after the Electrification Project is completed.

The proposed regulation as currently written places an additional burden on Caltrain's already precarious finances, further hindering our ability to provide essential passenger rail service in the near future. An unfunded mandate would require diverting financial resources from the operating budget, which is already under significant pressure due to the ongoing COVID-19 pandemic. Caltrain had one of the best farebox recovery ratios in the nation prior to COVID-19, meaning that it was heavily reliant on passenger fares to maintain operations. Unfortunately, ridership is rebounding very slowly and is still at only 20% of pre-pandemic levels. The only alternative to diverting operating funds would be to use our capital budget, which would delay essential capital and state-of-good-repair projects in future fiscal years. Caltrain Electrification is a giant leap towards CARB's zero-emissions goals. Although it is expected to be completed in 2024, the project currently faces a budget shortfall that will require additional funding over the next few years, making it impossible for us to create a separate spending account for this regulation. Accelerating deployment of zero-emissions line-hauled locomotives will require strong incentive funding to develop the technology. We strongly support the availability of funding under CARB incentive programs for passenger rail locomotives and are committed to continuing research and development for options to convert our remaining diesel fleet post-electrification.

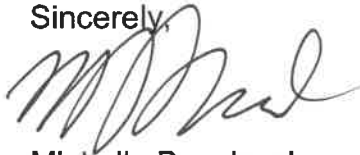
Caltrain has serious concerns regarding the timeline of the proposed regulation, given the lengthy procurement process that it must go through as a public agency for any new vehicle purchases. Caltrain has developed a long-term budget forecast assuming a portion of our existing diesel fleet will remain in service for at least the next decade, and there has not been any design effort or alternatives analyses started for new locomotives. There is no money currently available for additional vehicle procurement, so any funds set aside to create a Spending Account for new locomotives in 2023 would need to be diverted from other critical infrastructure renewal projects that keep the railroad in a State of Good Repair. We are certainly interested in exploring zero emissions technology (beyond our current commitment to the electric fleet program), but it will require a substantial amount of research to determine if there are proven products currently on the market that will achieve the railroad's operational and reliability needs. Caltrain is already partnering with the California State Transportation Agency and a number of other regional railroads to pursue funding for research and development of new zero emissions technologies suitable for passenger rail service.

Hon. Liane M. Randolph  
December 20, 2021  
Page 3

Passenger rail agencies have a history of successful partnerships that support the shared goal of cleaner air in California. It is in this spirit that we request your consideration of amendments to the proposed In-Use Locomotive Regulation. The current language creates unintended consequences without measurable reductions in emissions. The proposed alternative framework for public agencies accounts for local conditions and creates zero-emissions plans that are feasible and achievable.

Caltrain has been a leader in advancing clean rail technologies through its electrification program, and we believe the inclusion of the Alternative Public Transportation Agency Plan will be to the benefit of local air quality and the millions of California residents. We appreciate your consideration of this request and if we can provide further information, please contact Jadie Wasilco, Government and Community Affairs Manager at (650) 465-6301 if you have any questions.

Sincerely,



Michelle Bouchard  
Acting Executive Director

cc: Peninsula Corridor Joint Powers Board  
Peninsula Corridor Joint Powers Board State Legislative Delegation  
Heather Arias, Chief, CARB Transportation and Toxics Division  
Layla Gonzalez, Air Pollution Specialist, CARB Transportation and Toxics  
Division  
Dillon Miner, Air Pollution Specialist, CARB Transportation and Toxics Division



*Congress of the United States  
House of Representatives  
Washington, D.C. 20515*

*Anna G. Eshoo  
Eighteenth District  
California*

December 9, 2021

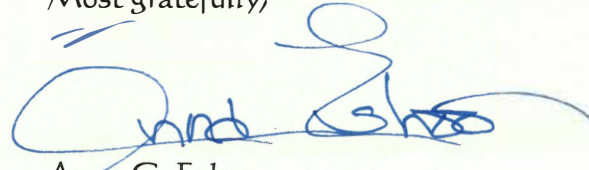
The Honorable Devora Davis, Chair  
Peninsula Corridor Joint Power Board  
1250 San Carlos Avenue  
San Carlos, California 94070-1306

Dear  Chair Davis,

Thank you for your kind letter regarding the passage of the Infrastructure Investment and Jobs Act. While I share your disappointment that the final law did not fund individual projects, including the Mini-High Project at Caltrain Stations, I'm thrilled the bill will provide \$4.5 billion in guaranteed funding for the Bay Area which will help accelerate the electrification of Caltrain and support its efforts to run faster, more efficient service.

Caltrain is the spine of the Peninsula's transportation system, and modernizing it is key to our region's economic growth. Thank you for your leadership, and know that I'm proud to be a partner with you in this important effort.

Most gratefully,

  
Anna G. Eshoo  
Member of Congress

cc: Members, Peninsula Corridor Joint Powers Board  
Ms. Michelle Bouchard, Acting Executive Director