



A bold voice for transportation workers

May 15, 2013

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

**Re: STB Finance Docket No. 35724, California High-Speed Rail Authority
— Construction Exemption — In Merced, Madera and Fresno Counties, California**

Dear Ms. Brown:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I write to oppose the request to once again extend the comment period on the California High-Speed Rail Authority's petition for an exemption from the prior approval requirements of 49 U.S.C. §10901. TTD consists of 33 affiliated unions that together represent workers across all modes of transportation and we therefore have a significant stake in the timely commencement and completion of this project. Specifically, TTD member unions represent workers who will benefit from the jobs created when the California High-Speed Rail system constructs dedicated railroad track, orders domestically manufactured trainsets and operates high-speed passenger rail service.¹

Earlier this month, a group of U.S. Representatives petitioned the Surface Transportation Board (STB) to extend the comment period on the California High-Speed Rail Authority's petition for an exemption from the STB's application procedures until July 15, 2013. The 13 signatories, who expressed their desire "to ensure the project is properly regulated," called on the STB to delay any additional action until the end of a 90-day public comment period.

The STB already provided 42 days for interested parties to comment on the petition. The original deadline for replies to the California High-Speed Rail Authority's petition was April 16, 2013. On April 18, the STB extended the deadline to May 8, 2013, which allowed more than twice the normal time for comment. The letter asking for another extension fails to specifically explain why more time is needed other than offering a vague observation that the public must

¹ As STB members know, a number of railroad unions, including several TTD affiliates, have already submitted comments in this docket. We endorse their position and encourage the board to render a decision on the issue in short order.

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Edward Wytkind, President / Larry I. Willis, Secretary-Treasurer



have ample opportunity to comment. We maintain that the original comment period and the first extension meet and exceed this objective.

It is also relevant that the high-speed rail project that is the subject of this proceeding has been extensively debated and considered by both political leaders and citizens in California. As a result of these considerations, California voters passed Proposition 1A in 2008, the Governor of California supports high-speed rail, the state legislature has provided funding, the environmental review process allowed significant public input and the California High-Speed Rail Authority already published its business and financial plans. While these considerations do not substitute for STB review, the Authority's high-speed rail plan has been scrutinized for many years and is well known to interested parties.

The request for an extension has all the appearances of a dilatory tactic designed to halt construction and sideline this project all together. If construction commencement is delayed, costs will increase placing further financial strain on this project – a fact that signatories to the extension letter are well aware. This problem would be exacerbated by the fact that the over \$2 billion in federal Recovery Act grants would be placed at risk due to deadlines that limit when the grant money must be expended.

For these reasons I urge you to reject the extension request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Wytkind', with a large, loopy flourish at the end.

Edward Wytkind
President