Senate Bill 1098

LOSSAN Rail Corridor Working Group

Final Report to the Legislature
Pursuant to the Southern California Rail Revitalization Act

August 5, 2026

CALIFORNIA
STATE TRANSPORTATION
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Glossary of Terms and Acronyms

Absolute Work Window (AWW)	Pre-scheduled periods when the railroad grants track access for construction and maintenance.
Amtrak	The National Railroad Passenger Corporation; operates the Pacific Surfliner intercity service on the LOSSAN Corridor and LOSSAN ex-officio member agency.
BNSF	Burlington Northern Santa Fe Railway
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation; LOSSAN ex-officio member agency.
CCC	California Coastal Commission
CCJPA	Capitol Corridor Joint Powers Authority; operator of the Capitol Corridor intercity rail service.
CDP	Coastal Development Permit; approval required under the California Coastal Act for development in the coastal zone.
CEQA	California Environmental Quality Act; state law requiring environmental review of proposed projects.
CIDP	Corridor Identification and Development Program; the FRA framework for planning and investing in intercity passenger rail corridors.
COASTER	North County Transit District's commuter rail service linking San Diego's North County with downtown San Diego.
CRISI	Consolidated Rail Infrastructure and Safety Improvements; a competitive federal rail grant program.
Farebox recovery ratio	The share of transit operating costs covered by passenger fare revenue.
FRA	Federal Railroad Administration; the U.S. DOT agency overseeing railroads and administering rail grant programs.

FTA	Federal Transit Administration; the U.S. DOT agency that funds public transit.
JPA	Joint Powers Authority; a governing entity formed by two or more public agencies.
LCTOP	Low Carbon Transit Operations Program; a California program funding transit operations from cap-and-invest proceeds.
LA Metro	Los Angeles County Metropolitan Transportation Authority; LOSSAN member agency.
LOSSAN	Los Angeles–San Diego–San Luis Obispo Rail Corridor; the 351-mile passenger rail corridor that is the subject of this report.
Metrolink	The Southern California Regional Rail Authority's commuter rail service across six counties in the greater Los Angeles area.
MOU	Memorandum of Understanding; a formal cooperative agreement between agencies.
MPO	Metropolitan Planning Organization; a regional body responsible for transportation planning and programming.
NCTD	North County Transit – San Diego Railroad; provides COASTER, SPRINTER and other transit service in northern San Diego County and LOSSAN member agency.
OCTA	Orange County Transportation Authority; owns 40 miles of rail right-of-way in the corridor and LOSSAN member agency.
Pacific Surfliner	Amtrak's intercity passenger rail service operating on the LOSSAN Corridor.
RCTC	Riverside County Transportation Commission; LOSSAN member agency.
RTP	Regional Transportation Plan; a long-range transportation plan prepared by a Metropolitan Planning Organization.
SANDAG	San Diego Association of Governments; LOSSAN member agency.
SDMTS	San Diego Metropolitan Transit System; LOSSAN member agency.

SBCAG	Santa Barbara County Association of Governments; LOSSAN member agency.
SCAG	Southern California Association of Governments; LOSSAN ex-officio member agency.
SCCP	Solutions for Congested Corridors Program; a competitive transportation grant program administered by the California Transportation Commission.
SGR	State of Good Repair; the standard for maintaining rail assets in sound condition, and the associated funding programs.
SJJPA	San Joaquins Joint Powers Authority; operator of the San Joaquins intercity rail service.
SLOCOG	San Luis Obispo Council of Governments; LOSSAN member agency
STB	Surface Transportation Board; the federal board with economic regulatory oversight of railroads in the United States.
TCEP	Trade Corridor Enhancement Program; a California freight-focused competitive grant program.
TDA	Transportation Development Act; California law providing transit funding, including the farebox recovery ratio requirement.
TIRCP	Transit and Intercity Rail Capital Program; a California grant program for transit and rail capital projects.
UPRR	Union Pacific Railroad; a freight railroad operating within the corridor.
VCTC	Ventura County Transportation Commission; LOSSAN member agency.

Executive Summary

The Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Corridor is among California's most critical transportation assets. The Pacific Surfliner is the second-busiest intercity rail service in the United States, second only behind the Northeast Corridor, and carries millions of passengers annually between San Diego and San Luis Obispo along one of the most congested highway corridors in the country. Additionally, the Thruway bus service extends the reach of the Surfliner service by connecting communities to destinations that lack direct rail access. The Southern California Regional Rail Authority (Metrolink) provides commuter rail service across six counties in the greater Los Angeles Basin, connecting workers to major employment centers and relieving pressure on freeway infrastructure that is often at or beyond capacity. The North County Transit – San Diego Railroad (NCTD) COASTER service links San Diego's North County communities to downtown San Diego, serving a corridor where highway capacity is limited and congestion continues to worsen. The corridor passes through some of California's most economically productive and densely populated communities, and its reliability, resilience, and long-term viability are matters of statewide significance.

Senate Bill 1098 (Chapter 777, Statutes of 2024) directed the California State Transportation Agency (CalSTA) to convene a LOSSAN Rail Corridor Working Group, including representatives from rail infrastructure owners; passenger and freight rail operators; regional transportation and planning agencies; stakeholder organizations representing business, community, environmental, labor, transportation, and civic interests; and relevant state agencies with regulatory and rail oversight responsibilities. The Working Group is tasked with developing consensus recommendations on strategies to strengthen the corridor's coordination, management, and performance of all passenger rail services in the corridor. The Working Group convened to develop recommendations intended to strengthen coordination, management, and performance across the corridor. This report transmits the Working Group's consensus recommendations and feedback to the Legislature. To facilitate broader stakeholder input, CalSTA conducted targeted public outreach through small group listening sessions as well as a public comment period on the draft report prior to finalizing the working group recommendations.

Pursuant to statute, prior to submitting this report to the Legislature, CalSTA, on behalf of the Working Group, shared the report recommendations with the governing boards of NCTD, LOSSAN, and Metrolink to solicit input and feedback.[1] The report was presented to the LOSSAN board on June 15th, 2026; to the NCTD board on June 18th, 2026; and to the Metrolink board on June 26th, 2026. All resulting feedback received will be compiled and transmitted to the Legislature in a supplement to this report.

The timing of this report is significant. This work was informed by the context of growing fiscal pressure across the corridor's three primary passenger operators. The Pacific Surfliner, Metrolink, and NCTD services each face structural operating deficits in the coming years, which coincides with the buildup to the 2028 Summer Olympic and Paralympic Games and an expected surge in corridor demand. The 2028 Summer Olympic and Paralympic Games will be hosted across the greater Los Angeles region, with competition venues spanning from San Diego to Los Angeles. The LOSSAN Corridor will serve as a primary transportation spine connecting the Southern California megaregion with ridership demand expected to reach levels that will stress current operational capacity. The Olympics will generate a sustained surge in transit usage across the region, with elevated demand occurring over multiple weeks rather than a single event period. The increase in ridership is expected to generate additional fare revenue for the system while placing significant pressure on service capacity and operational resources.

Consistent with statutory requirements, the report addresses the following policy areas[2]:

Of the required report topics identified in statute, the following four policy areas are a primary focus of this report:

(A) strategies to increase rail service coordination and reduce disruptions or delays;

[1] California Senate Bill 1098 (Blakespear, 2024), *Passenger and Freight Rail: LOSSAN Rail Corridor*, Chapter 777, Statutes of 2024, California Legislature.
[2] California Senate Bill 1098 (Blakespear, 2024) § 1, subd. (c)(1) (A(- (D), Chapter 777, Statutes of 2024.

(B) alternative management and operations models or structures that improve intercity and regional rail services;

(C) changes to state statutes, rules, or funding necessary to improve corridor performance; and

(D) coordination of planning and project development through the federal Corridor Identification and Development Program (CIDP).

Pursuant to statute, CalSTA convened the Working Group and facilitated development of this report through a collaborative process involving Working Group participants, partner agencies, stakeholders, and other consulted parties. The recommendations contained in this report reflect an effort to identify consensus perspectives and areas of alignment across the diverse interests and operational realities present throughout the corridor and, unless otherwise noted, are intended to reflect Working Group input rather than formal positions adopted by CalSTA.

Key findings and recommendations include:

- Establishing a corridor-wide asset management and written fleet strategy that aligns equipment, facilities, and infrastructure needs with funding.
- Review state program for opportunities to support state of good repair (SGR) rail projects where feasible. Program guidelines are encouraged to develop and incorporate specific considerations for SGR eligibility, emphasizing safety, reliability, and maintaining existing infrastructure.
- Formalizing a cooperative agreement or memorandum of understanding (MOU) between CalSTA, the LOSSAN Corridor, and the California Coastal Commission to identify where streamlining solutions for rail projects in the coastal zone can be identified and other solutions to assist in the delivery of rail projects.
- Establishing a Vision Zero framework for rail safety along the LOSSAN Corridor, with a data-driven pipeline of safety improvement investments.
- Aligning state grant programs with the Federal Corridor Identification and development Program (CIDP) project development pipeline to strengthen the corridor's competitiveness for federal capital funding.
- Streamlining the California Environmental Quality Act (CEQA) review for passenger rail projects by establishing agency comment deadlines, a conflict resolution protocol for multi-jurisdictional projects, and a pathway

to make permanent the judicial review provisions introduced under Chapter 60, Statutes of 2023 SB 149 (Chapter 60, Statutes of 2023).

- Review opportunities to modernize the Transportation Development Act (TDA) by removing the farebox recovery ratio penalty and developing new metrics and performance measures that replace the farebox recovery penalty, which also aligns with consensus recommendations from the final Transit Transformation Task Force.[3]
- Developing and issuing statewide guidance for how intercity passenger rail, including the Pacific Surfliner, is documented and coordinated in Regional Transportation Plans (RTPs).

The sections that follow provide additional context on these findings and recommendations, including the operational, governance, funding, resiliency, and policy considerations that informed the Working Group's discussions and consensus recommendations.

[3] California State Transportation Agency. *Transit Transformation Task Force Final Report.* 2025. https://calsta.ca.gov/-/media/calsta-media/documents/tttf_-final_report-a11y.pdf

1.0 Background and Statutory Context

The LOSSAN Rail Corridor is one of the most complex rail environments in the country. Spanning 351 miles, the Pacific Surfliner is the second busiest passenger rail corridor in the country, with approximately 8.3 million passenger trips in 2019, the last full year pre-COVID pandemic. In addition, the corridor supports more than $1 billion in annual freight volume, transported by two Class 1 Freight operators—Union Pacific (UPRR) and Burlington Northern-Santa Fe (BNSF)—and serves multiple ports of national significance, including those in Los Angeles, Long Beach, San Diego, and Port Hueneme. The U.S. Department of Defense also has designated a section of LOSSAN as part of the Strategic Rail Corridor Network.[4]

Infrastructure ownership and operating authority along the corridor is distributed among multiple public agencies and freight railroads. Pacific Surfliner intercity service is managed by the LOSSAN Agency and operated by Amtrak. Thruway bus service extends the reach of the Surfliner service by connecting communities to destinations that lack direct rail access and provides bus bridges that maintain service during rail disruptions. Commuter rail services are provided by Metrolink in the greater Los Angeles Basin and Inland Empire with NCTD's COASTER operating between Oceanside and Downtown in San Diego County. NCTD also maintains the entire San Diego subdivision and is designated as a rail common-carrier by the Surface Transportation Board (STB) for the movement of interstate commerce by BNSF Railway (BNSF) and the Railroad of Record by the FRA related to safety responsibility for all activities on the railroad on the San Diego Subdivision.

San Diego Metropolitan Transit System (MTS) owns the right-of-way from the City of Del Mar border to the Santa Fe Depot; NCTD owns the right-of-way from the Orange County/San Diego County Line south to the City of Del Mar/City of San Diego border and has an easement from the Department of Navy for right-of-

[4] California State Senate. (2023). *The LOSSAN rail corridor report*. https://sor.senate.ca.gov/sites/sor.senate.ca.gov/files/LOSSAN%20Rail%20Corridor%20Report.pdf

way on Marine Corps Base Camp Pendleton.[5] The Orange County Transportation Authority (OCTA) owns the right-of-way between the cities of San Clemente and Fullerton; the Los Angeles County Metropolitan Transportation Authority (LA Metro) owns the right-of-way between Los Angeles Union Station and Chatsworth; the Ventura County Transportation Commission (VCTC) owns the right-of-way between Chatsworth and Moorpark; and both the Union Pacific Railroad (UPRR) and BNSF hold freight rights and own segments of corridor infrastructure in portions of the alignment. The corridor traverses a complex web of grade crossings, interlockings, and shared track arrangements.[6]

This structural complexity has historically presented challenges to corridor-wide coordination. The Legislature recognized these challenges in enacting SB 1098, which established the Working Group process as a vehicle for developing actionable, consensus-based reforms.

The corridor also faces escalating coastal hazards that are the subject of long-term adaptation planning by corridor owners and regulatory agencies. In the south Orange County segment, the California Coastal Commission (CCC), in approving OCTA and SCRRA's shoreline protection work at San Clemente, conditioned that approval on the permittees completing a Long-Term Railroad Adaptation Study by January 1, 2034[7]. That study must analyze providing rail service at an alternative location not subject to the coastal hazards threatening the existing alignment and assess the feasibility of relocation relative to strategies such as protecting, elevating, or otherwise adapting the corridor in place to protect coastal resources through at least 2100. Comparable long-term realignment planning is underway in the San Diego (Del Mar) segment. The recommendations in this report are intended to operate in concert with these longer-term efforts.

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[5] California State Transportation Agency, Final Report from the LOSSAN San Diego Regional Rail Corridor Working Group (Sacramento, CA: California State Transportation Agency, 2021), 9, https://calsta.ca.gov/-/media/calsta-media/documents/sdregrailcorridorfinalreportfinala11y.pdf
[6] California Department of Transportation. (2024). *California State Rail Plan 2024*. https://dot.ca.gov/-/media/dot-media/programs/rail-mass-transportation/documents/california-state-rail-plan/2024-ca-state-rail-plan-a11y.pdf
[7] California Coastal Commission, Staff Recommendation for Item W14f (May 2025), PDF, https://documents.coastal.ca.gov/reports/2025/5/w14f/w14f-5-2025-report.pdf

SB 1098 directed the Working Group to report to the Legislature on all the following policy areas:

- Policy Area A: Strategies to increase rail service coordination and reduce disruptions or delays, including those caused by resiliency vulnerabilities, track closures, state of good repair, equipment, and staffing.
- Policy Area B: Alternative management and operations models or structures that improve intercity and regional rail services.
- Policy Area C: Changes to state statutes, rules, or funding necessary to improve the quality, performance, usage, management, or frequency of passenger rail services, including a review of how local and regional planning agencies incorporate train service information in planning documents.
- Policy Area D: Coordination of planning and project development through the federal Corridor Identification and Development Program.[8]

The Working Group included representatives from:

- California Senate Staff
- California Coastal Commission
- Caltrans
- Federal Transit Administration (FTA)
- The Los Angeles County Metropolitan Transportation Authority (LA Metro)
- LOSSAN Agency
- Metrolink
- North County Transit District (NCTD)
- Orange County Transportation Authority (OCTA)
- Riverside County Transportation Commission (RCTC)
- San Diego Association of Governments (SANDAG)
- Santa Barbara County Association of Governments (SBCAG)
- Southern California Association of Governments (SCAG)
- Ventura County Transportation Commission (VCTC)

[8] California Legislature. (2024). *Senate Bill No. 1098 (2023–2024 Regular Session)*. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB1098

The initial restart of this group convened in person four times between February 2026 and May 2026 to deliver this draft report, which included full working group meetings as well as agency-specific consultations to augment the full working group meetings. Recommendations were developed through a deliberative process and reflect consensus positions of the Working Group membership unless otherwise noted. The Working Group is expected continue meeting on a quarterly basis to continue direction and implementation steps as it relates to this report.

The Working Group's deliberations unfolded against a backdrop of significant fiscal pressure across the corridor's three primary passenger operators. To illustrate this, NCTD is expected to have a projected funding gap of over $60 million through Fiscal Year (FY) 2030 and is proposing their first rate hike since 2009[9]. Metrolink faces a $35 million operating shortfall in fiscal year 2026–27. In response to equipment reliability issues, it has already reduced service and is considering deeper cuts of at least one-third of remaining service as soon as October 2026, along with a possible fare increase[10]. The Pacific Surfliner, while having recently achieved pre-pandemic service levels, may need to consider service cuts starting in FY 2027-28 as the recent restoration of service has been buoyed by a three-year augmentation to the state-supported intercity passenger rail program from Public Transportation Account, which is set to expire after FY 2026-27[11].

In addition, ridership recovery and farebox recovery continue to lag pre-pandemic numbers while operating costs have grown substantially due to a mix of inflationary pressure impacting the entire rail and transit industry[12]. These challenges are not unique to California rail operators, but the impact on the

[9] NCTD *Board Agenda Packet: April 16, 2026 (Revised)*. 16 Apr. 2026, https://d4lp5oxce4dvw.cloudfront.net/wp-content/uploads/Board-Agenda-Packet-April-16-2026-REVISED.pdf. Accessed 5 May 2026.
[10] Southern California Regional Rail Authority. *Board Meeting Packet, 27 Mar. 2026*. Metrolink, https://d2kbkoa27fdvtw.cloudfront.net/metrolink/81b4bd133a38182c6f558799b51329fe0.pdf
[11] Legislative Analyst's Office. *Overview of California's State-Supported Intercity Rail Routes and Funding*. 30 May 2025, https://lao.ca.gov/handouts/transportation/2025/Overview-of-Intercity-Rail-Routes-and-Funding-053025.pdf
[12] California State Transportation Agency. *Transit Transformation Task Force Final Report*. 2025. https://calsta.ca.gov/-/media/calsta-media/documents/tttf_-final_report-a11y.pdf

LOSSAN Corridor is compounded by the complex decision-making environment that SB 1098 was enacted to address.

The Working Group deliberated, but did not make recommendations on, specific appropriations or funding levels, but the broader fiscal context facing the agencies help inform the urgency of the recommendations in this report.

2.0 Policy Area A: Strategies to Increase Rail Service Coordination and Reduce Disruptions or Delays

Pursuant to Government Code Section 14072.6(c)(1)(A), the Working Group was directed to develop recommendations to increase rail service coordination and reduce disruptions or delays, including, but not limited to, those caused by resiliency vulnerabilities, track closures, state of good repair, equipment, and staffing. The recommendations made pursuant to this should result in improved maintenance and conditions of assets, reduced track closures, and greater on-time performance. The recommendations below are intended to support rather than displace the longer-term coastal adaptation planning already required along the corridor that was previously mentioned in this report.

2.1 State of Good Repair

CHALLENGE

The corridor lacks a comprehensive corridor-wide asset management framework or plan that integrates infrastructure, equipment, and facility conditions across all partners. Without a unified planning instrument, agencies operate against different asset inventories, performance standards, and replacement cycles, making it difficult to align investments, identify gaps, and present a coherent funding strategy to state and federal partners.

RECOMMENDTIONS

1. The corridor should develop a written fleet and asset management plan that aligns equipment, facilities, and infrastructure needs with funding. The plan should identify investment gaps with sufficient specificity to support grant applications and capital programming.
2. Require that the written fleet and facilities plan analyze opportunities for future shared equipment, maintenance and layover facilities, and processes that can drive efficiencies across all operators in the corridor. This should be complementary to the intercity fleet plan and layer analysis relevant to commuter rail operations where feasible.

CHALLENGE

State of good repair (SGR) projects remain needed and face significant hurdles. Administrative and policy barriers have adversely affected these projects and current federal, state, and local funding sources have proven inadequate in meeting increasing SGR needs.

RECOMMENDATIONS

1. Review state program for opportunities to support SGR rail projects where feasible. Program guidelines are encouraged to develop and incorporate specific considerations for SGR eligibility, emphasizing safety, reliability, and maintaining existing infrastructure.
2. Programs are encouraged to prioritize projects that include meaningful non-state local and federal funding contributions, while also recognizing circumstances where state investment may be necessary to address critical needs that exceed local fiscal capacity.

CHALLENGE

Grant funding deadlines for allocation and timely use of funds are nuanced, and agencies may not be fully aware of how to navigate them. Structured timelines can be challenging for common rail project uncertainties that are outside the control of project sponsors and may result in funding expiring before project completion. Additionally, while local agencies play a critical role in funding participation, non-state local and federal funding sources do not always prioritize regional and intercity rail investments when faced with competing needs.

RECOMMENDATIONS

1. Program criteria should allow for the prioritization of projects that demonstrate significant non-state local/federal funding contributions, recognizing local commitment as an indicator of project readiness and shared investment.

2.2 Coastal Resiliency

CHALLENGE

There is a need to carefully balance Coastal Commission policies that prioritize natural bluff, shoreline, and coastal access, with the need to protect critical rail infrastructure that supports statewide passenger service. In locations where existing improvements are vulnerable, there is a need to facilitate the timely repair or replacement of protective infrastructure necessary to maintain safe and reliable operations.

RECOMMENDATIONS

1. In coordination with the LOSSAN Working Group, CalSTA and the CCC should develop a cooperative agreement or MOU to identify where streamlining solutions for rail projects in the coastal zone can be identified and other solutions to assist in the delivery of rail projects. For example, if a federal nexus is identified project sponsors may coordinate with the Coastal Commission to determine whether the project can proceed through the federal consistency process in lieu of the traditional Coastal Development Permit (CDP). Additional clarity from the Coastal Commission on when each process applies would help project sponsors make informed decisions early and further improve permitting efficiency.
2. In coordination with the Coastal Commission, evaluate options to streamline and deliver projects that repair or maintain *existing* passenger rail infrastructure, including existing protective measures such as seawalls. This could include clearly defined pathways for the repair or replacement of existing protective infrastructure where necessary to maintain safe and reliable rail operations, particularly in areas vulnerable to erosion and slope instability.

> **CHALLENGE**
>
> Emergency closures resulting from bluff failures, slope instability, storm damage, sea level rise, or other coastal resiliency challenges have historically lacked a standardized, systemwide response protocol. In many cases, responses are developed in an ad hoc manner, varying by jurisdiction, owning agency, or incident type. This lack of a unified framework can complicate coordination among state agencies, local jurisdictions, rail operators, emergency responders, and regulatory bodies, particularly when rapid action is required to ensure public safety and restore essential transportation services.

RECOMMENDATIONS

1. The corridor should develop a corridor-wide playbook that defines roles, decision thresholds, and timelines for agencies when bluff instability is detected. Include pre-defined triggers (e.g., erosion rates, track exposure, geotechnical warnings) to reduce ad hoc decision-making. This should include standardized communication protocols across agencies and to the public to avoid fragmented messaging during closures. Roles should be clearly defined across all responsible agencies.
2. The State may develop a state emergency response protocol that mirrors the state's established role in freeway incidents for emergency incidents that exceeds a defined threshold. This may include, but is not limited to, Caltrans activating a standardized incident command structure for rail-related emergencies, including rapid deployment of field crews, engineers, and operations coordination. Utilize pre-positioned emergency contracts and resources to immediately stabilize infrastructure and protect the rail right-of-way. Coordinate directly with regional partners with authority to elevate issues to the Caltrans Director or CalSTA Secretary of Transportation as appropriate.

2.3 Track Closures

CHALLENGE

Track closures resulting from trespassers and vehicle strikes along the LOSSAN corridor occur with relative frequency and can lead to significant service disruptions, delays, and cascading impacts across the regional rail network. These incidents often involve interactions at grade crossings or along the right-of-way, where a lack of physical separation, inconsistent safety treatments, and human factors contribute to vulnerability. There is a need for a standardized, corridor-wide approach to reduce the frequency and severity of trespasser and vehicle strikes.

RECOMMENDATIONS

1. The LOSSAN Working Group should establish a Vision Zero framework for rail within the LOSSAN Corridor, with the explicit goal of eliminating passenger and vehicle strike incidents through a combination of data-driven prioritization, targeted infrastructure investment, and coordinated interagency action.
2. Member agencies should compile and maintain a unified safety data set to identify and map high-risk locations with the greatest frequency and severity of incidents. Use that analysis to prioritize a ranked pipeline of targeted improvements: grade separations, enhanced barriers and fencing, upgraded crossing controls, and visibility and warning enhancements.
3. Implement ongoing performance monitoring to ensure continuous reduction of risk and measurable progress toward eliminating strikes corridor-wide.

CHALLENGE

While corridor-wide coordination among operators and infrastructure owners has improved through regular monthly forums, maintenance scheduling practices remain misaligned in terms of advance confirmation and temporal distribution. Short lead times for finalizing Absolute Work Windows (AWWs), combined with a concentration of closures on weekends when intercity ridership is highest, creates uncertainty for long-term planning, complicates customer communication and ticketing, and contributes to service disruptions, reduced ridership, and increased operational costs, often disproportionately affecting intercity services.

RECOMMENDATIONS

1. The corridor should commission an independent study to look at the most cost-effective way to implement work windows for all services across the corridor.
2. Establish a corridor-wide standard for earlier and more consistent confirmation of AWWs, aligning toward 60–90 day confirmation where feasible, while continuing annual and long-range AWW planning to preserve operational flexibility.
3. Expand coordination within existing monthly coordination calls to prioritize alignment of work windows — shifting where possible to nighttime or weekday closures that minimize intercity passenger impacts.
4. Proactively consolidate maintenance activities across operators to reduce the frequency and overlap of disruptions.

CHALLENGE

Equipment spare availability is a contributor to operational challenges. LOSSAN, the San Joaquins Joint Powers Authority (SJJPA), and the Capitol Corridor Joint Powers Authority (CCJPA) share a common pool of passenger equipment. NCTD and Metrolink do not share a common pool of equipment.

RECOMMENDATIONS

1. Leverage the Rail Fleet Consortium being led by the Caltrans Division of Rail as a primary vehicle for coordination. Use this venue to explore joint procurements and service contracting to attract more bidders and aggregate buying power statewide — broadening vendor competition, reducing unit costs, improving equipment interoperability, and strengthening overall fleet reliability and availability.

3.0 Policy Area B: Alternative management and operations models or structures that improve intercity and regional rail services.

Pursuant to Government Code Section 14072.6(c)(1)(A), the Working Group was directed to develop recommendations for alternative management and operations models or structures that improve intercity and regional rail services.

3.1 Alternative Management and Operations Models or Structures

CHALLENGE

There is a lack of an enforceable, corridor-wide decision-making forum or process, which often results in a reduced ability to align varying priorities, funding, interests between owners, operators, planners, regulators. As a result, corridor-wide outcomes are dependent on coordination that is largely voluntary and not always aligned with overall system performance.

RECOMMENDATIONS

1. Rather than creating a new layer of coordination by formalizing the SB 1098 Working Group, use existing avenues to formalize this coordination. Specifically, the working group recommends using the Rail Leadership Group for strategic leadership engagement and the LOSSAN Technical Advisory Committee as a staff led forum to advance priorities established by the Leadership Group. Membership should include all passenger rail operators as well as all passenger rail rights holders in the LOSSAN corridor.

The Working Group also discussed, but did not reach consensus on, two additional governance proposals considered during deliberations: establishing a formal corridor operating review process with authority over schedule and work window approvals, and formalizing the SB 1098 Working Group as a permanent standing body with board-designated membership and a defined charter. These proposals are noted for the Legislature's awareness but are not carried forward as consensus recommendations of the Working Group.

CHALLENGE

There is a need for enhanced coordination at key transfer points between intercity and regional services in order to further improve the passenger experience across jurisdictions.

1. Encourage corridor operators to align schedule changes during the same periods of the year, with April and October identified as preferred implementation windows, while preserving flexibility for ad hoc changes to account for unanticipated extenuating circumstances. The goal is predictability for passengers and connecting services without creating an inflexible mandate that fails to account for operational realities.
2. Require regular updates and revisions to the LOSSAN schedule optimization study on a fixed cadence established in advance, to ensure that operations across corridor services are continually optimized.

The Working Group also discussed, but did not reach consensus on, three additional proposals in this area: mandating that all corridor operators implement schedule changes on a single fixed date; establishing reciprocal Ex-Officio membership between the LOSSAN Agency board and the Metrolink *board of directors; and creating an independent entity with authority to review and approve schedules across multiple corridor operators. These proposals are noted for the Legislature's awareness but are not carried forward as recommendations of the Working Group.*

CHALLENGE

Passenger rail operations on the LOSSAN corridor are constrained by private freight railroad control over much of the infrastructure used by public operators. Dispatching authority on key corridor segments are retained by the private infrastructure owners, leaving public agencies without direct control over on-time performance and scheduling flexibility.

RECOMMENDATIONS

1. In coordination with CalSTA and the Caltrans Division of Rail, designate a primary host railroad liaison and negotiator. This role may lead a coordinated freight railroad sub working group so that the LOSSAN corridor can speak with one voice on freight issues relevant to all member agencies, with a specific focus on Amtrak's federal statutory rights and how those rights can be more effectively leveraged across the corridor and statewide.

4.0 Policy Area C: Changes to state statutes, rules, or funding necessary to improve services in the corridor.

Pursuant to Government Code Section 14072.6(c)(1)(A), the Working Group was directed to develop recommendations for changes to state statutes, rules, or funding necessary to improve the quality, performance, usage, management, or frequency of passenger rail services with a focus on streamlining, clarifying, and improving existing processes or procedures. In making recommendations and providing feedback, the working group shall review how local and regional planning agencies responsible for recommending transportation strategies include information about train service, operations, capital projects, resiliency, and performance in their respective planning documents, including, but not limited to, sustainable communities strategies, regional transportation plans, transportation demand management plans, and long-range transportation plans.

4.1 Changes to State Statutes or Rules

CHALLENGE

There are opportunities to streamline or clarify CEQA requirements as they apply to passenger rail projects, in ways that maintain environmental protection while reducing time and cost.

RECOMMENDATIONS

1. Define review deadlines for agency comments and approvals on passenger rail projects subject to CEQA and create a formal conflict resolution protocol applicable when multiple jurisdictions impose conflicting requirements. Clear timelines and a defined escalation pathway may reduce the ad hoc nature of multi-agency review coordination and provide project sponsors with greater certainty in scheduling environmental clearance.
2. Consider making permanent the CEQA streamlining judicial review provisions for certain transportation-related projects introduced through SB 149 (Statutes of 2023), once all ten authorized letters have been issued and program outcomes have been evaluated. If evaluation demonstrates that the streamlined process delivers timely and defensible environmental review, the Legislature should consider extending those provisions to provide a durable tool for accelerating high-priority passenger rail investments.

The Working Group also discussed, but did not reach consensus on, an additional proposal in this area: "Activities by an rail carrier or on behalf of a rail carrier under the authority of the Surface Transportation Board for the 'construction, acquisition, operation, abandonment, or discontinuance of spur, industrial, team switching, or side tracks, or facilities, even if the tracks are located, or intended to be located, entirely in one State.' "This proposal is noted for the Legislature's awareness but is not carried forward as a recommendation in the report.

4.2 Changes to Funding

As noted in the background section of this report, the Working Group's deliberations unfolded against a backdrop of significant fiscal pressure across the corridor's three primary passenger operators. Decreases in ridership and revenues, coupled with expensive capital projects (with costs rising faster than inflation), have led to a near-term funding crisis for some systems. Without intervention, agencies risk cutting service to balance operating and capital budgets, a move that would undermine ridership, reliability, and public confidence, and lead to further budget, service and ridership reductions. Costs are rising due to a number of factors outside of typical transit agency control, from broader inflation, lack of control of underlying infrastructure, and land-use patterns.[13] Looking ahead, broader rail and transit funding also faces risks tied to shifting economic conditions and the transition to zero-emission vehicles, underscoring the urgency of finding solutions that stabilize operations both now and in the future.

The Working Group did not make recommendations on appropriations or funding levels, which are within the Legislature's purview, but the fiscal context informs the recommendations in this report. It should also be noted that the topic of funding is covered in other sections of this report, specifically as it relates to SGR projects and competitive grant funding programs.

CHALLENGE

As currently written, the Transportation Development Act (TDA) contains features that have not kept pace with current operating conditions. The farebox recovery ratio penalty, currently suspended due to the COVID-19 pandemic but scheduled to resume in fiscal year 2027, is the most immediate example. Reinstating a metric that was designed for pre-pandemic ridership patterns would penalize agencies still rebuilding their ridership base and divert institutional attention toward compliance rather than performance improvement.

[13] California State Transportation Agency. *Transit Transformation Task Force Final Report.* 2025. https://calsta.ca.gov/-/media/calsta-media/documents/tttf_-final_report-a11y.pdf

RECOMMENDATIONS

1. Consistent with approved recommendations in the Transit Transformation Task force:
    a. Review opportunities to modernize the Transportation Development Act (TDA) by removing the farebox recovery ratio penalty and developing new metrics and performance measures that replace the farebox recovery penalty, which is currently suspended due to the COVID-19 pandemic, but is set to resume beginning in fiscal year 2027.
    b. Review opportunities to develop new metrics and performance measures that replace the farebox recovery penalty and update these measures on a regular cadence.
    c. Review opportunities to update other formulaic funding programs (i.e., LCTOP, SGR) to align with revisions to TDA reporting requirements and incentives.

4.3 Guidance for Addressing Intercity Rail in Regional Transportation Plans

CHALLENGE

Regional Transportation Plans (RTPs) travel demand models do not consistently or accurately account for the benefits of intercity passenger rail, which often accrue beyond the boundaries of any single metropolitan planning region. This means that the Pacific Surfliner service, as the second busiest intercity service in the country, is often undercounted in single-region planning processes.

RECOMMENDATIONS

1. Request Caltrans and CTC to provide greater technical assistance for intercity rail modeling in RTP development. For example, the Pacific Surfliner traverses the jurisdictions of six Metropolitan Planning Organizations (MPO), each of which independently develop its own travel

demand models. These models are not necessarily calibrated to a common standard for intercity rail and may not share consistent assumptions. As a result, the benefits tied to intercity rail are likely being understated.

2. Request Caltrans to develop standardized technical guidance for how intercity passenger rail services that span multiple regions should be modeled in travel demand models used in RTPs.

> **CHALLENGE**
>
> There is a need to better integrate intercity passenger rail in regional planning processes.

RECOMMENDATIONS

1. Statewide guidance should be issued to establish a common framework for how passenger rail is described and coordinated in RTPs.
2. This may include: expectations for baseline documentation of existing and planned rail services, key corridor characteristics, and coordination with operators and state agencies, as well as clarifying roles when corridors span multiple MPOs.
3. Statewide guidance should be issued for how MPOs should reference corridor-level resiliency needs, such as common data sources, definitions, and high-level assessment expectations.
4. Align guidance with existing state resilience funding programs to help ensure that identified needs can more easily move from planning into project development.

5.0 Policy Area D: Coordination of Planning and Project Development through the Federal Corridor Identification and Development Program

Pursuant to Government Code Section 14072.6(c)(1)(A), the Working Group was directed to develop recommendations on coordination of planning and project development through the federal Corridor Identification and Development Program (CIDP) established pursuant to 49 U.S.C. Section 25101. The CIDP represents a significant opportunity for the LOSSAN Corridor to access federal capital funding by embedding corridor projects in a nationally recognized, FRA-coordinated planning framework.

Further, California remains committed to the Corridor Identification and Development Program process as a planning and investment framework for the five Caltrans-sponsored corridors, including the LOSSAN Corridor, regardless of the federal program's status. The state will continue applying its core planning principles to the service development planning process, including capital project sequencing tied to key service outcomes and coordination between state, regional, and operating partners, as the organizing framework for corridor-wide planning and investment decisions.

5.1 Member Agency Participation in the CIDP Process

RECOMMENDATIONS

1. Acknowledging that Caltrans serves as the lead agency and primary coordinator for California's participation in the CIDP, LOSSAN member agencies and the LOSSAN Agency will support and actively engage in the CIDP process by providing timely data, participating in federally required planning activities, and coordinating local project development work with the state-led corridor planning effort.
2. This approach is consistent with FRA's expectations for state rail authority involvement and positions California to speak with a unified voice in federal planning processes. Full LOSSAN corridor participation will strengthen the quality and credibility of the corridors selected for CIDP participation and improve the competitiveness of projects that emerge from the process for federal capital funding.

5.2 Alignment of Funding with CIDP Priorities

RECOMMENDATIONS

1. To the extent possible, CalSTA and Caltrans should endeavor to align state grant programs, including TIRCP, TCEP, and SCCP, with the project priorities established through the CIDP process. Inclusion of projects on the CIDP capital project list should be an explicit selection consideration in grant

evaluations, recognizing that CIDP inclusion reflects a rigorous, federally coordinated prioritization process.

2. This approach reinforces the integrity and utility of the CIDP project list as a planning tool and positions LOSSAN Corridor projects to present a coherent funding strategy that pairs state investment with competitive federal applications under programs such as CRISI, the Federal-State Partnership Program, and other federal funding opportunities.

5.3 Standing Interagency Coordination Structure for CIDP Milestones

RECOMMENDATIONS

1. The LOSSAN JPA, in coordination with Caltrans, should establish a standing interagency coordination structure specifically organized around Step 2 CIDP milestones and deliverables. This structure should provide regular touchpoints aligned with FRA's staged development process, with clear expectations for member agency participation and data contribution at each stage.
2. Structured milestone coordination reduces the risk of gaps in corridor-level data submissions, improves the quality of FRA deliverables, and builds institutional readiness for the capital project development that follows CIDP selection.

5.4 Federal Advocacy Grounded in CIDP Status

RECOMMENDATIONS

1. CalSTA, Caltrans, and the LOSSAN member agencies should actively leverage California's participation in the CIDP as a foundation for federal legislative and policy advocacy on behalf of the LOSSAN Corridor and to further the goals in the California State Rail Plan. Corridors with formal CIDP status occupy a recognized position within FRA's national passenger rail framework, and that status should be used strategically in engagements with FRA leadership, the Office of the Secretary of Transportation, and California's congressional delegation.

2. Advocacy efforts should connect corridor-specific investment needs to national policy priorities and should seek to advance LOSSAN Corridor projects in FRA budget discussions and competitive program design.

6.0 Conclusion

The LOSSAN Rail Corridor is one of California's most important transportation assets. It connects major metropolitan regions along the state's coast, serves millions of passengers annually, and supports the economic vitality of communities from San Diego to San Luis Obispo. Sustaining and strengthening this corridor will require not only continued investment, but also the institutional structures capable of coordinating that investment effectively across a complex network of agencies, operators, jurisdictions, and infrastructure owners.

The Working Group approached its charge under SB 1098 with the recognition that many of the corridor's challenges reflect longstanding structural conditions. Governance arrangements, funding programs, and operational practices have evolved over time in ways that do not always align with the corridor's current scale, ridership, or performance expectations. The recommendations contained in this report reflect the Working Group's collective view that targeted and deliberate actions can improve coordination, strengthen reliability, and better position the corridor to meet future demand.

The recommendations in this report are intended to be actionable and designed to support both near-term implementation and long-term improvement. While some recommendations may be advanced administratively within existing authority, others may require additional coordination, policy development, or legislative action. Collectively, these recommendations are intended to improve corridor performance and strengthen the long-term viability, resiliency, coordination, and reliability of passenger and freight rail services.

The Working Group also recognizes that achieving the objectives outlined in this report will require sustained coordination among CalSTA, Caltrans, the LOSSAN Agency, corridor member agencies, the Legislature, as well as our partners at the federal, regional, and local levels. Continued collaboration, information sharing, and regular coordination among these entities will be important to maintaining momentum and advancing the recommendations identified in this report. Therefore, the Working Group plans to continue meeting quarterly to continue the discussions and coordination.

The California State Transportation Agency respectfully submits this report to the Legislature pursuant to SB 1098, and looks forward to continued collaboration with the Legislature, corridor partners, and federal stakeholders in support of these recommendations and the long-term performance of the LOSSAN Corridor.

Appendix A: Reference Documents

#	Document Title	Author / Agency
1	LOSSAN Corridor wide Schedule Optimization Study https://www.octa.net/pdf/LOSSAN_Optimization_Report_2022.pdf	LOSSAN Agency *2022*
2	LOSSAN Annual Business Plan https://www.octa.net/pdf/LOSSAN_Business_Plan_FY26-27-FY27-28.pdf?n=2026	LOSSAN Agency *2026*
3	The LOSSAN Rail Corridor: Advancing the Corridor's Capital Investment Priorities https://stran.senate.ca.gov/sites/stran.senate.ca.gov/files/LOSSAN%20Rail%20Corridor%20Report.pdf	California Senate Office of Research *2024*
4	2024 California State Rail Plan https://dot.ca.gov/programs/rail-and-mass-transportation/california-state-rail-plan	Caltrans *2024*
5	Corridor Identification and Development Program: Guidance for Applicants https://railroads.dot.gov/corridor-identification-and-development-program	Federal Railroad Administration (FRA) *2023*
6	Final Report from the Los Angeles-San Diego-San Luis Obispo (LOSSAN) San Diego Regional Rail Corridor Working Group https://calsta.ca.gov/-/media/calsta-media/documents/sdregrailcorridorfinalreportfinala11y.pdf	California State Transportation Agency (CalSTA) *2021*
7	Transit Transformation Task Force https://calsta.ca.gov/-/media/calsta-media/documents/tttf_-final_report-a11y.pdf	CalSTA *2025*

Appendix B: Working Group Meeting Agendas

[See Attachment]

Meeting Date	Meeting Title / Type	Location / Format	Agenda
February 19th, 2026	*LOSSAN Working Group Restart and Cadence*	*1 Gateway Plaza, Los Angeles, CA 90012*	*[Attached]*
March 27th, 2026	*Review Policy Areas A & D*	*550 South Main Street, Orange, CA 92863*	*[Attached]*
April 28th, 2026	*Review Policy Areas B & C*	*900 Wilshire Blvd, Los Angeles, CA 90017*	*[Attached]*
May 11, 2026	*Review Draft Report and Public Comment*	*Virtual*	*[Attached]*

LOSSAN Corridor Regional Working Group
February 19, 2026, from 11:30 AM – 2:30 PM
LA Metro Headquarters
1 Gateway Plaza
Los Angeles, CA 90012
Mulholland Conference Room (15th floor)

Time	**Agenda Item**	**Topic**	**Presenter**
11:30 am	Item 1	Welcome and introductions	Chair James Hacker, CalSTA
11:45 am	Item 2	LOSSAN Working Group Restart and Cadence	CalSTA
12:15 pm	Item 3	SB 1098 Overview, Framing and Discussion	CalSTA
1:00 pm	Item 4	LOSSAN Corridor ID Update + Discussion	Caltrans
1:30 pm	Item 5	Known Resiliency Projects	CalSTA, Caltrans + partner agencies
2:00 pm	Item 6	Open Discussion and Next steps	CalSTA + All
2:30 pm	Item 7	Adjourn	Chair James Hacker

CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom
Governor

Toks Omishakin
Secretary

400 Capitol Mall, Suite 2340
Sacramento, CA 95814
916-323-5400
www.calsta.ca.gov

LOSSAN SB 1098 Working Group

March 27, 2026
1:00 PM

MEETING LOCATION: 550 South Main Street
Main Conference Room
Orange, CA 92863

Questions or inquiries about the meeting may be directed to the California State Transportation Agency (CalSTA) by contacting CalSTA at LOSSAN.SB1098@calsta.ca.gov, or by accessing the LOSSAN Working Group website located at https://calsta.ca.gov/subject-areas/lossan-working-group

AGENDA

1) Welcome and Opening Remarks

2) Review Report Outline and Structure

3) Review Policy Area 1 *(Strategies to increase rail service coordination and reduce disruptions or delays including, but not limited to, those caused by resiliency vulnerabilities, track closures, state of good repair, equipment, and staffing)*.

4) Review Policy Area 4 *(Coordination of planning and project development through the federal Corridor Identification and Development Program)*

5) Review Governing Board Approach for LOSSAN Agency, Metrolink and NCTD

6) Open Discussion

7) Next Steps

Gavin Newsom
Governor

Toks Omishakin
Secretary

400 Capitol Mall, Suite 2340
Sacramento, CA 95814
916-323-5400
www.calsta.ca.gov

LOSSAN SB 1098 Working Group

May 11, 2026
1:00 PM

MEETING LOCATION: VIRTUAL MEETING

Questions or inquiries about the meeting may be directed to the California State Transportation Agency (CalSTA) by contacting CalSTA at LOSSAN.SB1098@calsta.ca.gov, or by accessing the LOSSAN Working Group website located at https://calsta.ca.gov/subject-areas/lossan-working-group

Interested parties may register using the following link:
https://events.gcc.teams.microsoft.com/event/f0d6042a-7d60-4099-8545-7b48adf92a33@621b0a64-1740-43cc-8d88-4540d3487556

AGENDA

1) Welcome and Opening Remarks
2) Review Draft Recommendations for Policy Area A – Public Comment
3) Review Draft Recommendations for Policy Area B – Public Comment
4) Review Draft Recommendations for Policy Area C – Public Comment
5) Review Draft Recommendations for Policy Area D – Public Comment
6) Open Discussion
7) Next Steps

Gavin Newsom
Governor

Toks Omishakin
Secretary

400 Capitol Mall, Suite 2340
Sacramento, CA 95814
916-323-5400
www.calsta.ca.gov

LOSSAN SB 1098 Working Group

April 28, 2026
1:00 PM

MEETING LOCATION: 900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

Questions or inquiries about the meeting may be directed to the California State Transportation Agency (CalSTA) by contacting CalSTA at LOSSAN.SB1098@calsta.ca.gov, or by accessing the LOSSAN Working Group website located at https://calsta.ca.gov/subject-areas/lossan-working-group

AGENDA

1) Welcome and Opening Remarks

2) Review Recommendations for Policy Area 'A' from March 2026 meeting.

3) Review Recommendations for Policy Area 'D' from March 2026 meeting.

4) Review Policy Area 'B' *(Alternative Management Models or Structures)*.

5) Review Policy Area 'C' *(Changes to Statutes, Rules, or Funding Necessary for Improvement)*

6) Open Discussion

7) Next Steps

Appendix C: Public Comment Received

#	Sender	Date Submitted
1	Amy Cheshire	June 12, 2026
2	Mark J. Handzel	June 14, 2026
3	Peter Cramton	June 14, 2026
4	Betsy Milich	June 15, 2026
5	Joseph Potocki	June 15, 2026
6	Annette Wiesel	June 16, 2026
7	Michael Deftos	June 16, 2026
8	Ulla Rang	June 16, 2026
9	Warren Spieker	June 16, 2026
10	Coalition for Safer Trains	June 22, 2026
11	Save Our Beaches SC (SOB-SC)	June 22, 2026
12	Orange County Coastkeeper	June 24, 2026
13	City of Del Mar	June 26, 2026
14	Rail Passenger Assn. of California & Nevada (RailPAC)	June 26, 2026
15	Mark Rittenbaum	June 28, 2026
16	Capo Cares	June 28, 2026
17	Southern California Association of Governments (SCAG)	June 29, 2026
18	Udo Wahn	June 29, 2026

#	Sender	Date Submitted
19	San Diego Assn. of Governments (SANDAG)	June 30, 2026
20	Santa Barbara County Assn. of Governments (SBCAG)	July 2, 2026
21	San Luis Obispo Council of Governments (SLOCOG)	July 2, 2026
22	Orange County Transportation Authority (OCTA)	July 2, 2026
23	Riverside County Transportation Commission (RCTC)	July 2, 2026
24	22nd District Agricultural Association (Del Mar Fairgrounds)	July 3, 2026
25	Southern California Regional Rail Authority (Metrolink)	July 3, 2026
26	Surfrider Foundation	July 3, 2026
27	Californians for Electric Rail (CER)	Not dated

From: Amy Cheshire
To: LOSSAN.SB1098
Subject: Opposition to the LOSSAN Working Group"s recommendation to create a new statutory exemption from CEQA
Date: Friday, June 12, 2026 9:51:33 PM

Senator Catherine Blakespear and other members of the California State Legislature,

I am opposed to the LOSSAN Working Group's recommendation to create a new statutory exemption from CEQA for railroad-related activities and infrastructure projects (Recommendation 4.3). CEQA environmental review of such projects is critical to protecting the numerous environmentally sensitive areas in California that the railroad tracks traverse, including the 351-mile LOSSAN Corridor from San Luis Obispo to San Diego. I am very concerned that such an exemption would lead to substantial adverse environmental impacts, particularly to the coastal environment of Southern California, which has already been substantially adversely impacted by the LOSSAN Corridor. Please promptly and resolutely reject this recommendation from the Working Group.

Respectfully,

Amy Cheshire
Del Mar resident

Senator Catherine Blakespear and other members of the California State Legislature,

Good governance requires public institutions to regularly evaluate whether public resources are being allocated effectively, efficiently, and equitably. As travel patterns have changed significantly since the COVID-19 pandemic, California's commuter rail agencies should reassess long-term investment priorities, service models, and funding assumptions. This raises an important public policy question: is it appropriate for taxpayers across an entire region to continue subsidizing increasingly costly commuter rail services when ridership remains substantially below pre-pandemic levels and benefits may be concentrated among relatively affluent travel corridors?

For decades, commuter rail offered a service that was often faster than driving and cheaper than parking for many downtown office commuters. But in 2020 ridership on all public transportation services hit record lows followed by slow recovery, with most still significantly below their 2019 levels. Remote and hybrid work arrangements have reduced the downtown commuter market, which now represents a lower share of total regional travel.

Commuter rail stops making sense when travel distances are either too short for heavy trains, population density is too low to support high operational costs, or service frequencies cannot compete with the flexibility of driving. While it effectively moves large numbers of people from distant suburbs into city centers, its economic and practical viability breaks down under specific conditions. As an example, the North County Coastal area of San Diego is largely considered a low-density region. Rather than featuring high-rise buildings or dense urban centers like Downtown San Diego, this stretch is characterized by laid-back suburban beach towns, single-family homes, and mid-density commercial corridors.

Key Characteristics of San Diego North County Coastal Density

- **Zoning:** The vast majority of land is zoned for low-density residential use, preserving the "suburban beach town" aesthetic.
- **Housing Types:** The region consists primarily of detached single-family homes, smaller beach cottages, and low-rise townhomes.
- **Building Heights:** Coastal communities actively resist or restrict tall high-rise or mid-rise developments to maintain their community character.
- **Open Spaces:** The area is punctuated by large protected wetlands, lagoons, and state parks that inherently limit sprawl and high-density development

Low Density and Population

- **Insufficient ridership:** Lower-density communities generally generate fewer transit riders per mile of infrastructure than urbanized areas, making it more difficult to achieve strong farebox recovery and operational efficiency.
- **High cost per passenger:** Running massive, heavy trains is highly expensive.

- **Better alternatives:** In some lower-density corridors, buses, express bus services, or micro-transit may provide comparable mobility benefits at a lower operating cost.
- **Low Frequency and Rigid Schedules**
  - **Timetable reliance:** Commuter rails typically run with massive gaps between trains during off-peak hours.
  - **Loss of flexibility:** Infrequent service means passengers must carefully schedule their lives around the train.

COASTER Plummeting Fare Revenue and Ridership

According to NCTD annual financial and operating reports, COASTER fare revenue declined from approximately $18.9 million in FY2013 to approximately $11.7 million in FY2024, while operating costs increased from roughly $79 million to more than $166 million over the same period. As a result, farebox recovery fell from approximately 22 percent to less than 8 percent. Tables 1 and 2 show the severe economic challenges that face NCTD commuter rail system.

- **Changing Commuter Market**: The Coaster train, NCTD's premier coastal route, largely serves higher-income commuters who have primarily adopted work-from-home schedules.
- **Fare Evasion Crisis**: Public reports regarding fare inspection and enforcement suggest that fare evasion may contribute to revenue losses. However, the relative impact of fare evasion compared with broader post-pandemic ridership declines warrants further analysis.

NORTH COUNTY TRANSIT DISTRICT
OPERATING INDICATORS BY TRANSPORTATION MODE (continued)
LAST TEN FISCAL YEARS

	2025	2024	2023	2022	2021	2020	2019	2018	2017	2016
REVENUE HOURS (thousands)										
BREEZE	431.0	411.9	376.8	404.8	420.4	424.7	424.0	448.7	478.1	462.0
LIFT	54.7	53.7	52.2	39.7	37.5	62.2	94.0	115.3	119.4	116.4
FLEX	26.6	17.4	17.0	16.9	17.3	17.0	16.5	16.5	7.6	8.5
COASTER (a)	12.2	12.3	12.4	11.4	4.6	7.3	8.5	6.9	6.9	6.9
SPRINTER	22.8	23.3	23.4	23.4	23.5	23.6	23.7	23.5	23.4	23.6
NCTD+ (b)	7.2	0.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL	554.5	518.6	481.9	496.1	503.3	534.8	566.6	610.8	635.4	617.4
FARE REVENUE PER REVENUE HOUR										
BREEZE	$ 12.18	$ 12.49	$ 12.86	$ 10.53	$ 6.01	$ 12.45	$ 15.39	$ 14.41	$ 13.38	$ 16.13
LIFT	13.78	15.07	11.01	15.68	16.53	10.93	7.61	6.44	6.60	6.67
FLEX	7.24	7.30	4.11	1.92	1.40	9.16	12.33	10.95	7.38	7.80
COASTER	339.78	291.30	282.05	240.97	233.83	597.37	669.70	795.25	940.53	994.87
SPRINTER	57.59	46.23	42.98	47.76	61.66	101.04	114.17	117.08	115.12	126.16
NCTD+ (b)	2.15	1.71	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SYSTEM	$ 21.05	$ 20.70	$ 20.73	$ 17.69	$ 11.33	$ 24.01	$ 27.92	$ 25.52	$ 25.79	$ 29.39
COST PER REVENUE HOUR										
BREEZE	$ 159.96	$ 148.10	$ 147.09	$ 122.45	$ 107.56	$ 104.90	$ 102.00	$ 107.55	$ 103.17	$ 98.74
LIFT	277.04	248.40	215.12	230.14	257.74	152.97	111.53	88.01	79.59	72.43
FLEX	185.03	219.55	240.67	208.06	137.02	132.14	120.62	76.54	96.35	75.14
COASTER	3,368.37	3,145.95	2,954.33	3,003.97	5,166.27	2,923.56	2,356.81	2,486.39	2,718.71	2,515.00
SPRINTER	1,580.50	1,436.08	1,320.22	1,225.90	957.38	973.42	911.04	842.48	659.40	691.48
NCTD+ (b)	65.99	1,115.62	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SYSTEM	$ 300.51	$ 289.90	$ 286.93	$ 252.10	$ 206.08	$ 187.94	$ 171.63	$ 157.98	$ 147.37	$ 143.15

(a) Includes in-service hours and adjusted layover hours.
(b) Pilot program introduced on June 10, 2024. Pilot programs are not reported in the National Transit Database (NTD).

Source: *NCTD Internal Financial Information*

Table 1. NCTD Operating Indicators by Transportation Mode

NORTH COUNTY TRANSIT DISTRICT
OPERATING INDICATORS BY TRANSPORTATION MODE (continued)
LAST TEN FISCAL YEARS

	2025	2024	2023	2022	2021	2020	2019	2018	2017	2016
PASSENGERS (thousands)										
BREEZE	5,458	4,876	4,503	3,919	2,991	5,135	6,373	6,483	6,732	7,547
LIFT	111	105	93	72	57	116	169	186	202	200
FLEX	100	49	39	25	22	31	32	28	21	25
COASTER	928	853	813	588	163	944	1,409	1,433	1,455	1,556
SPRINTER	1,876	1,823	1,685	1,322	1,225	2,066	2,409	2,533	2,549	2,678
NCTD+ [(a)]	22	0	-	-	-	-	-	-	-	-
TOTAL	8,496	7,706	7,132	5,927	4,458	8,293	10,392	10,663	10,959	12,006
FARE REVENUE PER PASSENGER										
BREEZE	$ 0.96	$ 1.06	$ 1.08	$ 1.09	$ 0.84	$ 1.03	$ 1.02	$ 1.00	$ 0.95	$ 0.99
LIFT	6.78	7.68	6.17	8.59	10.79	5.84	4.24	3.99	3.90	3.89
FLEX	1.92	2.61	1.81	1.28	1.13	5.05	6.25	6.55	2.72	2.66
COASTER	4.47	4.19	4.29	4.66	6.67	4.59	4.03	3.81	4.44	4.42
SPRINTER	0.70	0.59	0.60	0.84	1.18	1.15	1.12	1.09	1.06	1.11
NCTD+ [(a)]	0.69	1.32	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SYSTEM	$ 1.37	$ 1.39	$ 1.40	$ 1.48	$ 1.28	$ 1.55	$ 1.52	$ 1.46	$ 1.50	$ 1.51
COST PER PASSENGER										
BREEZE	$ 12.63	$ 12.51	$ 12.31	$ 12.65	$ 15.12	$ 8.68	$ 6.79	$ 7.44	$ 7.33	$ 6.04
LIFT	136.37	126.64	120.67	126.11	168.25	81.77	62.10	54.53	47.01	42.24
FLEX	49.00	78.57	105.80	138.75	109.95	72.90	61.18	45.75	35.52	25.59
COASTER	44.30	45.27	44.94	58.12	147.42	22.47	14.18	11.90	12.82	11.17
SPRINTER	19.21	18.35	18.38	21.67	18.35	11.13	8.95	7.81	6.05	6.09
NCTD+ [(a)]	21.22	864.23	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SYSTEM	$ 19.61	$ 19.51	$ 19.38	$ 21.10	$ 23.27	$ 12.12	$ 9.36	$ 9.05	$ 8.55	$ 7.36

(a) Pilot program introduced on June 10, 2024. Pilot programs are not reported in the National Transit Database (NTD).

Source: *NCTD Internal Financial Information*

Table 2. NCTD Operating Indicators by Transportation Mode (continued)

The challenges facing COASTER are not unique. Similar trends are evident throughout Southern California's commuter rail network. Metrolink, which serves six counties, has also experienced reduced farebox recovery and lower ridership compared with pre-pandemic levels as shown in Figures 1,2, and 3.

Metrolink Financial Costs

- **Farebox Recovery:** Fares cover only a small fraction of operating costs.
- **Post-Pandemic Ridership:** As hybrid work models reduced the traditional 9-to-5 commuting patterns, Metrolink has not returned to historical ridership highs, making per-trip costs higher.
- **Service Competitiveness:** Inconsistent off-peak frequency and slower travel times compared to driving make the commuter rail less competitive on some routes.

PASSENGER FARES

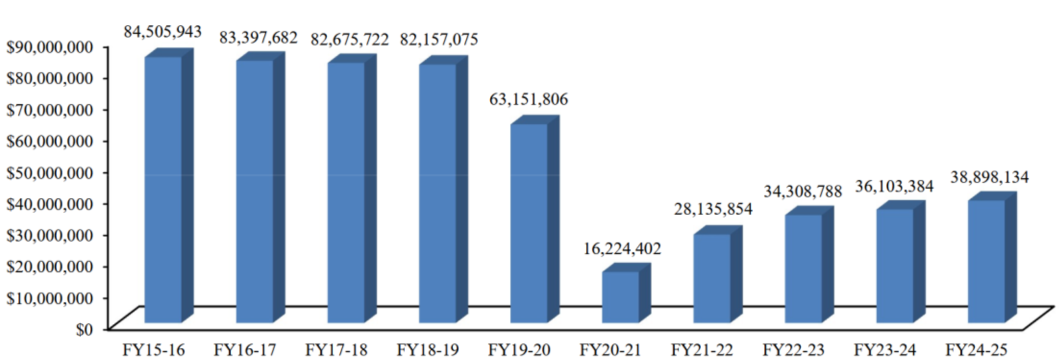

Figure 1. Metrolink Passenger Fares

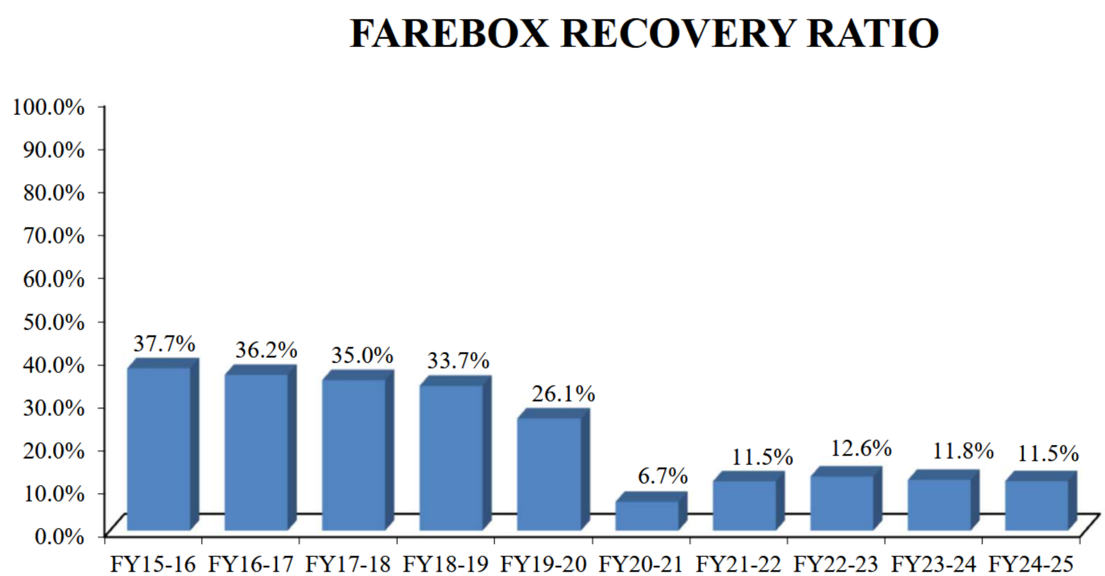

Figure 2. Metrolink Farebox Recovery Ratio

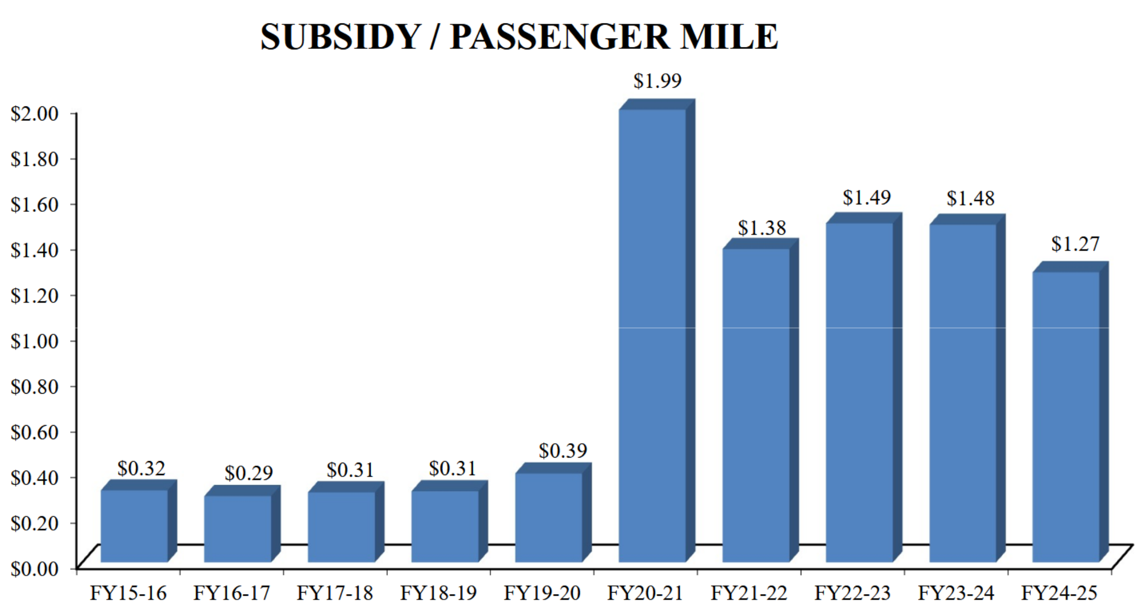

Figure 2. Metrolink Subsidy/Passenger Mile

The purpose of these observations is not to argue against all passenger rail investment. Rather, they highlight the need for California's transportation agencies and policymakers to evaluate whether existing commuter rail service models remain aligned with current travel behavior, demographic patterns, and fiscal realities. Future investments should be guided by measurable public benefits, transparent performance metrics, and realistic ridership forecasts.

Passenger rail can provide important public benefits, including congestion mitigation, emissions reductions, mobility options, and economic development opportunities. However, good governance requires periodic reassessment of whether these benefits are being achieved at a cost that remains reasonable and sustainable given changing travel patterns and competing transportation priorities.

Finally, I oppose Recommendation 4.1(3), which would create a statutory exemption from CEQA for certain railroad-related activities and infrastructure projects. Environmental review serves an important public purpose by identifying potential impacts, evaluating alternatives, and providing transparency and public participation. This is particularly important along the 351-mile LOSSAN Corridor, which traverses numerous environmentally sensitive coastal, wetland, lagoon, and habitat areas. Eliminating or substantially reducing environmental review could increase the risk of unintended environmental consequences and diminish public confidence in project decision-making. Accordingly, I urge the Legislature to reject this recommendation.

Respectively,

Mark Handzel
100 12th Street
Del Mar, Ca. 92014

From: Peter Cramton
To: LOSSAN.SB1098; Catherine Blakespear; lossancorridor@sandag.org; frapa@dot.gov; rrswebinquires@dot.gov; pra@stb.gov; rcpa@stb.dot.gov; rcpa@stb.gov; sdonaghy@nctd.org; mlevin.press@mail.house.gov; Tash, Salome; Serna, Anthony@CalSTA; governor@governor.ca.gov; Garcia, Yana@EPA; Huckelbridge, Kate@Coastal; SanDiegoCoast@Coastal; Davis, Alex; Diana.Kutlow@sen.ca.gov; SouthCentralCoast@Coastal; CentralCoast@Coastal; behlers@encinitasca.gov; jduncan@coronado.ca.us; keith.blackburn@carlsbadca.gov; eshanchez@oceansideca.org; loefflerR@sanclemente.org; lheebner@cosb.org
Subject: Opposition to CEQA exemption
Date: Sunday, June 14, 2026 1:00:49 PM

Senator Catherine Blakespear and other members of the California State Legislature,

I am opposed to the LOSSAN Working Group's recommendation to create a new statutory exemption from CEQA for railroad-related activities and infrastructure projects (Recommendation 4.1 (3)). CEQA environmental review of such projects is critical to protecting the numerous environmentally sensitive areas in California that the railroad tracks traverse, including the 351-mile LOSSAN Corridor from San Luis Obispo to San Diego. I am very concerned that such an exemption would lead to substantial adverse environmental impacts, particularly to the coastal environment of Southern California, which has already been substantially adversely impacted by the LOSSAN Corridor. Please promptly and resolutely reject this recommendation from the Working Group.

Respectfully,
Peter Cramton
Del Mar CA 92014

pcramton@gmail.com cramton.umd.edu +1 530 408 6698
University of Maryland and Max Planck Institute for Research on Collective Goods

From:	Betsy Milich
To:	LOSSAN.SB1098; Senator.Blakespear@senate.ca.gov; lossancorridor@sandag.org; frapa@dot.gov; rrswebinquires@dot.gov; pra@stb.gov; rcpa@stb.dot.gov; rcpa@stb.gov; sdonaghy@nctd.org; mlevin.press@mail.house.gov; Salome.Tash@mail.house.gov; Serna, Anthony@CalSTA; governor@governor.ca.gov; Garcia, Yana@EPA; Huckelbridge, Kate@Coastal; SanDiegoCoast@Coastal; alex.davis@sen.ca.gov; Diana.Kutlow@sen.ca.gov; SouthCentralCoast@Coastal; CentralCoast@Coastal; behlers@encinitasca.gov; jduncan@coronado.ca.us; keith.blackburn@carlsbadca.gov; eshanchez@oceansideca.org; loefflerR@sanclemente.org; lheebner@cosb.org
Cc:	Angelina Neglia
Subject:	Senate Bill 1098, creation of eliminating CEQA from railroad projects
Date:	Monday, June 15, 2026 11:23:00 AM

Senator Catherine Blakespear and other members of the California State Legislature,

I have reviewed in detail the Senate Bill 1098 LOSSAN Working Group's recommendations and take exception with their recommendation to create a new statutory exemption from CEQA for railroad-related activities and infrastructure projects (Recommendation 4.1 (3)).

The CEQA environmental review process of projects like those the LOSSAN Working Group is addressing is critical to evaluating environmental impacts to and ensuring the protection of the numerous environmentally sensitive areas in California that the railroad tracks traverse, including the 351-mile LOSSAN Corridor from San Luis Obispo to San Diego.

I am very concerned that such an exemption would eliminate a critical part of the planning process to ensure that all potential environmental impacts are fully addressed and that mitigation, including project changes and selecting less impactful project alternatives are required to avoid adverse environmental impacts, particularly to the coastal environment of Southern California.

Please do not support any new statutory exemptions for

railroad related activities and construction projects and reject this recommendation from the Working Group.

Regards,
Betsy Milich

From: Joseph Potocki
To: LOSSAN.SB1098; Senator.Blakespear@Senate.ca.gov; lossancorridor@sandag.org; frapa@dot.gov; rrswebinquires@dot.gov; pra@stb.gov; rcpa@stb.dot.gov; rcpa@stb.gov; sdonaghy@nctd.org; mlevin.press@mail.house.gov; Salome.Tash@mail.house.gov; Senator.Blakespear@Senate.ca.gov; Serna, Anthony@CalSTA; governor@governor.ca.gov; Garcia, Yana@EPA; Huckelbridge, Kate@Coastal; SanDiegoCoast@Coastal; alex.davis@sen.ca.gov; Diana.Kutlow@sen.ca.gov; SouthCentralCoast@Coastal; CentralCoast@Coastal; behlers@encinitasca.gov; jduncan@coronado.ca.us; keith.blackburn@carlsbadca.gov; eshanchez@oceansideca.org; loefflerR@sanclemente.org; lheebner@cosb.org
Subject: Proposed recommendation for statutory exemption to circumvent CEQA
Date: Monday, June 15, 2026 7:11:04 AM
Attachments: image001.png

Senator Catherine Blakespear and other members of the California State Legislature,

I am strongly opposed to the LOSSAN Working Group's recommendation to create a new statutory exemption from CEQA for railroad-related activities and infrastructure projects (Recommendation 4.1 (3)). CEQA environmental review of such projects is critical to protecting the numerous environmentally sensitive areas in California that the railroad tracks traverse, including the 351-mile LOSSAN Corridor from San Luis Obispo to San Diego. Such an exemption will lead to substantial adverse environmental impacts, particularly to the coastal environment of Southern California, which has already been substantially adversely impacted by the LOSSAN Corridor. I think it is also highly inappropriate for people that represent California to be delegating this decision to outsiders who neither reside nor work in California. Please promptly and resolutely reject this recommendation from the Working Group.

Regards,

JOSEPH P. POTOCKI

Chalifoux
Brast
Thompson &
Potocki

9665 Chesapeake Dr., Suite 305, San Diego, CA 92123
T: (858) 222-8236 EXT. 104

cbtp-law.com

From:	annette wiesel
To:	LOSSAN.SB1098; Senator.Blakespear@Senate.ca.gov; lossancorridor@sandag.org; frapa@dot.gov; rrswebinquires@dot.gov; pra@stb.gov; rcpa@stb.dot.gov; rcpa@stb.gov; sdonaghy@nctd.org; mlevin.press@mail.house.gov; Salome.Tash@mail.house.gov; Serna, Anthony@CalSTA; governor@governor.ca.gov; Garcia, Yana@EPA; Huckelbridge, Kate@Coastal; SanDiegoCoast@Coastal; alex.davis@sen.ca.goV
Subject:	PROTECT OUR COASTLINE
Date:	Tuesday, June 16, 2026 8:37:47 AM

I am opposed to the LOSSAN Working Group's recommendation to create a new statutory exemption from CEQA for railroad-related activities and infrastructure projects (Recommendation 4.1 (3)). CEQA environmental review of such projects is critical to protecting the numerous environmentally sensitive areas in California that the railroad tracks traverse, including the 351-mile LOSSAN Corridor from San Luis Obispo to San Diego. I am very concerned that such an exemption would lead to substantial adverse environmental impacts, particularly to the coastal environment of Southern California, which has already been substantially adversely impacted by the LOSSAN Corridor. Please promptly and resolutely reject this recommendation from the Working Group.

Respectfully,

Annette Povlich-Wiesel

From:	Michael Deftos
To:	LOSSAN.SB1098
Subject:	Public comment on SB1098 draft report.
Date:	Tuesday, June 16, 2026 12:58:36 PM

Senator Catherine Blakespear and other members of the California State Legislature,

I am troubled by the LOSSAN Working Group's Recommendation 4.3 to legislate a new CEQA statutory exemption for:

> *"Activities by an (sic) rail carrier or on behalf of a rail carrier under the authority of the Surface Transportation Board for the 'construction, acquisition, operation, abandonment, or discontinuance of spur, industrial, team switching, or side tracks, or facilities, even if the tracks are located, or intended to be located, entirely in one State.'"*

This language comes directly from 49 USC Section 10501(b), the federal statute that gives exclusive jurisdiction to the federal Surface Transportation Board over railroad transportation, preempting state and local law.

> *49 USC Section 10501 (b)*
> *The jurisdiction of the (Surface Transportation) Board over-*
>
> *(1) transportation by rail carriers, and the remedies provided in this part with respect to rates, classifications, rules (including car service, interchange, and other operating rules), practices, routes, services, and facilities of such carriers; and*
>
> *(2) the construction, acquisition, operation, abandonment, or discontinuance of spur, industrial, team, switching, or side tracks, or facilities, even if the tracks are located, or intended to be located, entirely in one State,*
>
> *is exclusive. Except as otherwise provided in this part, the remedies provided under this part with respect to regulation of rail transportation are exclusive and preempt the remedies provided under Federal or State law.*

Importantly, in the seminal case of *Friends of the Eel River v. North Coast Railroad Authority (2017)*, the California Supreme Court ruled that *49 USC Section 10501* does not preempt the California Environmental Quality Act (CEQA) for state-owned rail projects:

"(A)pplication of CEQA in this context constitutes <u>self-governance on the part of a sovereign state</u> and at the same time on the part of an owner. It appears to us extremely unlikely that Congress, in enacting the ICCTA, intended to preempt a state's adoption and use of <u>the tools of self-governance</u> in this situation, or to leave the state, as owner, without any means of establishing the basic principles under which it will undertake significant capital expenditures."

"The ICCTA's deregulatory sweep must protect the <u>zone of autonomy belonging to the state</u> when it is the owner, such that within the deregulated zone, the state as owner may <u>make its decisions based on its own guidelines</u> rather than some anarchic absence of rules of decision."

"(A)pplication of CEQA…constitutes the <u>state's governance of its own subdivision</u>, a matter of self-management that the ICCTA presumptively was not intended to entirely preempt."

(Emphasis added)

If the Working Groups' recommendation were adopted, the State of California would be abdicating its sovereign right of oversight of adverse environmental impacts from the "*construction, acquisition, operation, abandonment, or discontinuance of spur, industrial, team switching, or side tracks, or facilities*." Instead, this environmental oversight would fall entirely with the Surface Transportation Board, a remote federal agency whose primary purpose is the economic regulation of interstate railroad transportation, with no inherent interest in protecting the environment of California. It is not clear exactly what railroad projects such a statutory CEQA exemption would apply to, but undoubtedly, railroad interests would attempt to apply it liberally.

Why would the State of California abdicate its sovereign authority of environmental oversight to the Surface Transportation Board? CEQA environmental review of such projects is critical to protecting the numerous environmentally sensitive areas in California that railroad tracks and facilities traverse and occupy, including in the LOSSAN corridor. I am very concerned that legislating such a new statutory exemption to CEQA could lead to substantial adverse environmental impacts on California, particularly on the coastal environment of Southern California, which has already been adversely affected by the LOSSAN Corridor.

Please promptly and resolutely reject this recommendation from the Working Group.

Respectfully,
Michael Deftos

From: ulla rang
To: LOSSAN.SB1098; Senator.Blakespear@senate.ca.gov
Subject: Reject CEQA exempt suggested by LOSSAN Working Group
Date: Tuesday, June 16, 2026 9:01:32 PM

Dear Senator Blakespear and other members of the California State Legislature,

I strongly oppose the LOSSAN Working Group's recommendation to exempt railroad related activities and infrastructure from CEQA environmental reviews (Recommendation 4.1(3). The railroad traverses many miles of ecologically sensitive areas in California, including the LOSSAN corridor and the 1.7 mile stretch on the geologically sensitive Del Mar Bluff. It is of utmost importance that these sensitive areas go through a CEQA review before any changes, such as double tracking or added infrastructure, take place.

Please reject this recommendation from the Working Group as it would undermine local control and protection of California's ecologically sensitive areas.

Sincerely,

Camilla Rang, Del Mar, CA

From: Lacey Jensen on behalf of Warren Spieker
To: LOSSAN.SB1098; Senator.Blakespear@Senate.ca.gov; lossancorridor@sandag.org; frapa@dot.gov; rrswebinquires@dot.gov; pra@stb.gov; rcpa@stb.dot.gov; rcpa@stb.gov; sdonaghy@nctd.org; mlevin.press@mail.house.gov; Salome.Tash@mail.house.gov; Senator.Blakespear@Senate.ca.gov; Serna, Anthony@CalSTA; governor@governor.ca.gov; Garcia, Yana@EPA; Huckelbridge, Kate@Coastal; SanDiegoCoast@Coastal; alex.davis@sen.ca.gov; Diana.Kutlow@sen.ca.gov; SouthCentralCoast@Coastal; CentralCoast@Coastal; behlers@encinitasca.gov; jduncan@coronado.ca.us; keith.blackburn@carlsbadca.gov; eshanchez@oceansideca.org; loefflerR@sanclemente.org; lheebner@cosb.org
Subject: Please Reject LOSSAN Working Group Recommendation 4.1(3)
Date: Monday, June 15, 2026 2:33:40 PM
Importance: High

Dear Senator Blakespear and Members of the California State Legislature,

I am writing to urge you to firmly reject the LOSSAN Working Group's recommendation to exempt railroad activities from CEQA compliance (Recommendation 4.1(3)).
Our coastal communities rely on CEQA to ensure that major infrastructure projects—like double tracking and rail realignments—do not harm our local environment. Bypassing state environmental review and transferring power to an unelected federal agency is a massive step backward for California's environmental protections.
Please stand with your constituents and protect the 351-mile LOSSAN Corridor by opposing this dangerous exemption.

Respectfully,

Warren Spieker
Del Mar Resident
Avenida Primavera

Where Residents & Employees Thrive

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https://safertrain.org/

Coalition for Safer Trains
1955 Seaview Avenue
Del Mar, CA. 92014
Angie.neglia@gmail.com

June 22, 2026

Senator Catherine Blakespear (North Coast San Diego County; South Coast Orange County) (SB 1098 sponsoring senator); Chair, Senate Committee on Environmental Quality
Senator.Blakespear@senate.ca.gov
Senator Robert Archuleta (Pico Rivera)
Senator.Archuleta@senate.ca.gov
Senator Benjamin Allen (24^{th} Dist. Los Angeles cities)
Senator.Allen@senate.ca.gov
Senator Sabrina Cervantes (Riverside)
Senator.Cervantes@senate.ca.gov
Senator John Laird (Santa Cruz)
Senator.Laird@senate.ca.gov
Senator Monique Limón (Santa Barbara).
Senator.Limon@Senate.ca.gov
Senator Tom Umberg (Santa Ana)
Senator.Umberg@senate.ca.gov
Assembly Member Tasha Boerner (Solana Beach)
Assemblymember.BoernerHorvath@assembly.ca.gov
Assembly Member Laurie Davis
Assemblymember.Davies@assembly.ca.gov
Assembly Member Diane Dixon (Newport Beach)
Assemblymember.Dixon@assembly.ca.gov

Southern California Rail Revitalization Act Working Group
Attention: Anthony J. Serna, Senior Advisor and Policy Lead, Rail and Transit
LOSSAN.SB1098@calsta.ca.gov
anthony.serna@calsta.ca.gov

Re: Coalition's Comment No. 1 to Southern California Rail Revitalization Act (SB 1098) Working Group's "Public Comment Draft" Dated June 10, 2026

Dear Senator Blakespear, other distinguished members of the Senate and Assembly, and members of the Southern California Rail Revitalization Act Working Group:

The Coalition for Safer Trains is a grassroots organization of citizens dedicated to preserving the environment and economic well-being of cities along San Diego's coast that host the LOSSAN corridor.

We reviewed the initial **draft** recommendations published on **May 11, 2026** of the Working Group created by the Southern California Rail Revitalization Act sponsored by Senator Blakespear, enacted on September 24, 2024 (the "Legislation"). We submitted comments to the Working Group on that draft by letter dated **May 17, 2026.** We thank Mr. Anthony Serna (CalSTA) for taking time to meet in person with representatives of the Coalition on May 19, 2026 to hear our comments and concerns regarding the May 11, 2026 draft.

What follows are comments and concerns regarding the **"Public Comment Draft"** of the Working Group recommendations to the Legislature published **June 11, 2026.** This is our first letter commenting on the June 11, 2026 draft (as we seek clarification of certain other recommendations not addressed herein).

The final version of the draft recommendations is to be submitted by the Working Group to the Legislature on the specific topics outlined in the Legislation. We support Senator Blakespear's proposed legislation (SB 1324) that would provide a year's extension to the original February 2026 deadline for the required report because the public will not have had sufficient time to digest and comment on the June 11, 2026 Draft by July 3, 2026 and because, as discussed below, the Working Group should be augmented to comply with the Legislation.

The following are our comments and concerns, subject to supplementation:

I. The Working Group's Members Do Not Reflect the Legislation's Mandate

The Legislation mandates that the Secretary of Transportation create a Working Group whose member entities are described in Government Code section 14072.6(b). The Working Group entities are to include track owners and certain governmental agencies as well as **"business, community, transportation, environmental, labor, and civic organizations**."

The members of the WG do not include representatives from: "business, community, … environmental, labor, and civic organizations" as the Legislation requires. The public successfully petitioned for the inclusion of the Coastal Commission to the Working Group, but, currently, rail interests are nonetheless **very disproportionately** represented in the Working Group. Certain rail policy subject areas, such as Policy Area B, are technical in nature and require rail agency expertise. But other policy subject areas, such as Policy area C which includes "Changes to state statutes, rules, or funding necessary to improve services in the corridor," have the potential to profoundly and permanently affect the environment and the local communities hosting the LOSSAN corridor. That is why the Legislation mandates that all interested stakeholders be represented in the WG.

We agree with the Coastal Commission's comment dated June 4, 2026[1] **that the public has a critical interest in ensuring that projects along the rail line protect and enhance access to our beaches and avoid impacts to coastal resources,** an interest that is **co-equal** to the public interest served by maintaining service along the LOSSAN corridor. The Legislation recognizes the impact that the recommendations of the WG are expected to have on the coastal environment and local communities.[2] Unfortunately, the Legislative mandate has not been honored because membership in the Working Group is skewed towards transportation interests and does not reflect the balance needed from participation from the environmental, business and civic groups.[3]

In addition, the public at large was effectively barred from attending the Working Group meetings prior to May 11, 2026 (even as spectators). A few weeks' opportunity accorded to the public to provide input cannot cure the fundamental flaws in the make-up of the Working

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[1] https://calsta.ca.gov/-/media/calsta-media/documents/sb-1098-lossan-working-group-ccc-comments-a11y.pdf

[2] The Legislation provides: "The working group shall consider the known and expected impacts of recommendations on the coastal environment and local communities, and consider opportunities to support the coastal zone and local communities when making recommendations." (Gov. Code section 14072.6 (c)(2))

[3] The agency members of the Working Group are: Caltrans, the Federal Transit Administration (FTA), The Los Angeles County Metropolitan Transportation Authority (LA Metro), the LOSSAN Agency, Metrolink, North County Transit District (NCTD), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC), San Diego Association of Governments (SANDAG), Santa Barbara County Association of Governments (SBCAG), Southern California Association of Governments (SCAG), Ventura County Transportation Commission (VCTC) and the California Coastal Commission. (June 10, 2026 Draft Recommendations, p.3)

Group. It needs to be augmented and balanced to comply with the statute, otherwise its recommendations will be invalid.

II. Policy Area C – "Changes to state statutes, rules, or funding necessary to improve services in the corridor"

Working Group Recommendations, 4.1: "Changes to state statutes, etc."

"**4.1 Changes to State Statutes or Rules**

……..

"3. Clarify CEQA and **add the following to the existing statutory exemption**: Activities by an [sic] rail carrier or on behalf of a rail carrier under the authority of the Surface Transportation Board for the 'construction, acquisition, operation, abandonment, or discontinuance of spur, industrial, team switching, or side tracks, or facilities, even if the tracks are located, or intended to be located, entirely in one State.'" (emphasis added)

Coalition Comment to Recommendation No 3 of Section 4.1, Policy Area C

The Coalition strongly opposes WG recommendation 3 in Section 4.1.[4] because, in sum, the recommendation, if enacted:

- **Adds a Sweeping Exemption to CEQA that Would Rewrite Settled California Environmental Law**

- **Expands Categories of Rail Projects in California that Escape Environmental Study and Mitigation to Communities**

- **Enacts a Sweeping New CEQA Exemption That Would Undermine Existing State Funding Contracts Which Were Granted Without Considering the Exemption**

- **Abdicates Oversight and Authority Over California-Created Agencies and Rail Projects by the State of California as Enforced by the California Attorney General and Transfers it to a Remote Federal Administrative Agency that Prioritizes Freight Commerce**

[4] Recommendation No. 3 of 4.1 was not in the May 11, 2026 draft that the Coalition was sent for comment, nor identified at our meeting with Mr. Serna on May 19. There was no public meeting discussing it. It was apparently added shortly before publication of the Draft for Public Comment issued June 11, 2026. It is not referenced in the Coastal Commission's comment letter of June 4, 2026.

- **Is Not Within the Mandate of the Legislation**

The more detailed basis for the Coalition opposition:

1. **Recommendation No. 3 of Section 4.1 Proposed Exemption to CEQA Reverses Settled California Environmental Law and Abdicate California's Power to Regulate, Transferring it to a Federal Agency.**

    - This Working Group recommendation would have the Legislature **overrule** California Supreme Court's long-standing decision in *Friends of Eel River v. North Coast Railroad Authority, (2017) 3 Cal. 5th 677 ("Eel River").* There the Court rejected a railroad's argument that CEQA was preempted by the *same federal statute* on whose language the recommendation is modeled.[5]

    - In rejecting a railroad's argument of federal preemption, the Court held that California has the power to enforce CEQA compliance on projects of California-created public agencies (examples of which are NCTD, OCTA, SANDAG and the NCRA), as a matter of state sovereignty and self-governance.

    - Specifically, the California Supreme Court ruled that *49 USC Section 10501(b)* of the ICCTA does not preempt CEQA for rail projects of state-created agencies, stating:

        "(A)pplication of CEQA in this context constitutes <u>self-governance on the part of a sovereign state</u> and at the same time on the part of an owner. It appears to us extremely unlikely that Congress, in enacting the ICCTA, intended to preempt a state's adoption and use of <u>the tools of self-governance</u> in this situation, or to leave the state, as owner, without any means of establishing the basic principles under which it will undertake significant capital expenditures." 3 Cal. 5th at 724. *(emphasis added)*

        The Court further stated:

        "The ICCTA's deregulatory sweep must protect the <u>zone of autonomy belonging to the state</u> when it is the owner, such that within the deregulated zone, the state as owner may <u>make its decisions based on its own guidelines</u> rather than some anarchic absence of rules of decision." 3 Cal. 5th at 724 *(emphasis added).*

....

[5] The language of recommendation No. 3 of 4.1 is borrowed from language of the Interstate Commerce Commission Termination Act ("ICCTA"), 49 USC 10501(b), addressed by the Court in *Eel River.*

"(A)pplication of CEQA…constitutes the <u>state's governance of its own subdivision</u>, a matter of self-management that the ICCTA presumptively was not intended to entirely preempt." 3 Cal. 5th at 723-724. *(emphasis added).*

- The proposed new CEQA exemption needlessly abdicates the State of California's power over rail development projects in California. The exemption transfers environmental oversight of our coast and inland cities through which LOSSAN passes to the **Surface Transportation Board, a remote federal agency whose primary purpose is the economic regulation of freight transport, with no inherent interest in protecting the environment or passenger rail lines.** Railroad entities will undoubtedly urge liberal application of the exemption to serve their own economic interests. The recommendation would change state law to exempt significant environment-altering coastal and inland rail projects from CEQA compliance *as a matter of state law.*

- The recommendation is not a "clarification" of CEQA as characterized in the draft; it is a **dramatic change** to current California law. It would profoundly affect the San Diego coastal environment by weakening environmental protections on coastal and inland railroad projects, including construction of all rail "facilities" and auxiliary and other track projects on bluffs, beaches, bridges, lagoons or anywhere.[6]

  The Working Group has failed to explain why this statutory exemption is required to boost ridership and improve passenger rail lines in the LOSSAN corridor. By creating this exemption, the Legislation would relinquish the state's own sovereign oversight to a federal agency, the STB, that is required to prioritize the movement of freight. This self-imposed waiver would relinquish the state's power over its own agencies to protect its sovereign police powers, local environmental standards, and land-use authority and allows it to be overridden by federal law. Abdicating our state's oversight of an environmentally sensitive coastline to a federal regulatory agency mandated to prioritize freight rail movement does not advance the goals of Senate Bill 1098.

2. Recommendation 3 of Section 4.1 Legislates a New CEQA Exemption That Undermines State Funding Contract Requirements for Compliance with CEQA

[6] The proposed expansion of the CEQA exemption was not called out in the "Key findings and recommendations" section of the draft, pp. 3-4, though it should have been.

- State funding contracts with California transportation agencies and rail carriers (such as NCTD, OCTA and SANDAG) require rail carrier projects to comply with CEQA or show an exemption. For example, hundreds of millions of Transit and Intercity Rail Capital Program ("TIRCP") project funds granted to NCTD and SANDAG require compliance with CEQA and are not exempted under current exemptions.[7]

- The Working Group's recommendation would circumvent provisions in state contracts with rail carriers designed by California to ensure that projects spending money on passenger and rail complies with California's existing "permitting and mitigation duties," including those required by CEQA.

- If accepted, hundreds of millions in state funding on current and future rail projects would be swept up under the new exemption (or create litigation regarding the change to the statute) and would escape environmental scrutiny and mitigation; hence, the recommendation would not only reverse state law, it would create a new exemption not in existence at the time of agreements, for current State of California's funding agreements (such as TIRCP) that require compliance with CEQA as a condition to funding of railroad projects.

3. Recommendation 3 of Section 4.1 Would Transfer Oversight and Authority Over California Rail Projects to a Remote Federal Administrative Agency

- The Working Group's proposed expansion of CEQA exemptions would transfer authority over the environmental consequences of rail facilities construction on California's Coastal and inland cities from California and local communities that host the LOSSAN corridor to the Surface Transportation Board as a matter of *state law.*

- **California environmental laws are intentionally stronger than federal laws. The recommendation is the latest attempt by some railroad interests to preempt or eviscerate California' environmental laws and substitute a remote federal agency governing freight as the decision-maker over California's environment.**

- The STB is a remote Washington D.C.-based administrative agency of unelected appointees focused on advancing the economic interests of freight carriers.

[7] See, e.g., California State Transportation Agency Transit and Intercity Rail Capital Program (TIRCP), Master Agreement No. 64 NCTDMA (granting $501,000, 000 to Recipient NCTD for rail projects) dated effective October 1, 2018, Article III, Section 3 (Special Requirements), subsection A.3. ("Recipient shall conform to all permit and mitigation duties associated with Project….") and subsection O (requiring compliance or documentation of an exemption from CEQA), and Master Agreement 64NCTDMA A01. Dated effective October 2, 2021. (same)

Why would the State of California abdicate its sovereign authority of environmental oversight to the Surface Transportation Board? CEQA environmental review of such projects is critical to protecting the numerous environmentally sensitive areas in California that railroad tracks and facilities traverse and occupy, including in the LOSSAN corridor. Allowing railroads to bypass the environmental review mandated by CEQA will lead to the construction of facilities and auxiliary tracks that do not adequately account for multi-decade sea-level rise and accelerated coastal bluff failures. The proposed new and sweeping statutory exemption to CEQA would lead to substantial adverse environmental impacts on California, particularly on the coastal environment of Southern California, which has already been adversely affected by continuing massive construction in the LOSSAN Corridor.

4. **Recommendation 3 of Section 4.1 Is Outside of the Legislation.**
The Legislation asked the Working Group for recommendations regarding "(C) Changes to state statutes, rules, or funding necessary to improve the **quality, performance, usage, management, or frequency of passenger rail services** with a focus on streamlining, clarifying, and improving existing processes or procedures."[8] The Working Group's recommendation to add a sweeping exemption to CEQA is not "necessary" or even germane to achieve any of these goals, it simply eviscerates the statute in relation to rail construction projects involving rail facilities and auxiliary tracks and transfers decisions over San Diego's environment and transportation to a remote federal agency.

The Coalition requests that the Legislature promptly and soundly reject Recommendation 3 of Section 4.1 of the draft recommendations of the Working Group.

Thank you for the opportunity to comment on the Working Group's recommendations on policy areas affecting the LOSSAN corridor and the hosting communities affected by it.

Respectfully submitted on behalf of the Coalition for Safer Trains, by

Angelina Neglia
Shirli Weiss, Esq.
Dr. Michael Deftos
Dr. Camilla Rang
Amy Cheshire

[8] CA Senate Bill 1098 (Blakespear 2024), (adding) Government Code Section 14072.6 subsection (c)(1)(C).

June 22, 2026

Senator Catherine Blakespear (North Coast San Diego County; South Coast Orange County)
(SB1098 sponsoring senator); Chair, Senate Committee on Environmental Quality
Senator.Blakespear@senate.ca.gov
Senator Robert Archuleta (Pico Rivera)
Senator.Archuleta@senate.ca.gov
Senator Benjamin Allen (24th Dist. Los Angeles cities)
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Senator Sabrina Cervantes (Riverside)
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Assemblymember.Dixon@assembly.ca.gov

Southern California Rail Revitalization Act Working Group
Attention: Anthony J. Serna, Senior Advisor and Policy Lead, Rail and Transit
LOSSAN.SB1098@calsta.ca.gov
anthony.serna@calsta.ca.gov

Re: Comments to Southern California Rail Revitalization Act (SB 1098) Working Group's "Public Comment Draft" Dated June 10, 2026

Dear Senator Blakespear, other distinguished members of the Senate and Assembly, and members of the Southern California Rail Revitalization Act Working Group:

Save Our Beaches SC (SOB-SC) is a grassroots organization of citizens dedicated to preserving, restoring, and protecting the San Clemente coastline. Established in 2021, we are a 501(c)3 organization representing thousands of local citizens, taxpayers and voters.

We reviewed the initial **draft** recommendations published on **May 11, 2026** of the Working Group created by the Southern California Rail Revitalization Act sponsored by Senator Blakespear, enacted on September 24, 2024 (the "Legislation").

What follows are comments and concerns regarding the **"Public Comment Draft"** of the Working Group recommendations to the Legislature published **June 11, 2026.** The final version of the draft recommendations is to be submitted by the Working Group to the Legislature on the specific topics outlined in the Legislation.

We support Senator Blakespear's proposed legislation (SB 1324) that would provide a year's extension to the original February 2026 deadline for the required report because the public will not have had sufficient time to digest and comment on the June 11, 2026 Draft by July 3, 2026 and because, as discussed in the attached letter from the Coalition for Safer Trains, the Working Group should be augmented to comply with the Legislation.

We fully support the comments provided by the "Coalition for Safer Trains" dated June 22, 2026 and attached hereto, and provide our additional comments below.

ADDITIONAL COMMENTS FROM SOB-SC

Over the past five years, LOSSAN, through its member agency Orange County Transportation Authority (OCTA), has placed about 30,000 tons of riprap on the beaches of San Clemente, resulting in the complete loss of the sandy beach across about 1 mile of our 5-mile coastline. **Most of this hard armoring has been placed under Emergency Permits issued by the California Coastal Commission:** a significant amount of riprap has been placed without permit authority at all. LOSSAN and OCTA have thus **destroyed about 20% of our coastline** with no Environmental Impact Assessment, and now seeks the authority to never conduct appropriate assessment of this environmentally devastating behavior.

OCTA continues to seek Emergency Permits for placement of unnecessary hard armoring on our coastline, instead of conducting proper planning and environmental impact assessment. The public has made its interests clear: we do not want any additional hard armoring on our beaches. **The public, and local academic experts, all believe that sand is the preferred alternative**, however OCTA continues to seek the placement of tens of thousands of tons of riprap on our beaches.

In August 2025, OCTA applied for emergency permits to place 35,000 tons of riprap on two areas of our beaches: 1. The City-owned beach locally known as Mariposa Promontory; and 2. San Clemente State Beach. The Coastal Commission issued an emergency permit for the Mariposa work, under the stipulation that the rocks be placed on existing revetment, with no expansion of the rock revetment. The placement of rock on the San Clemente beach, however, would necessitate the widening of the existing revetment over 50 feet width of beach – representing the entire dry sandy beach width. **Thus, they were proposing the wholesale destruction of one of our State's most popular beaches.**

The Coastal Commission denied OCTA an Emergency Permit for the 35,000 tons of riprap on State Beach, citing that no emergency existed. Since then, OCTA has spent additional taxpayer money in trying to obtain this authority to issue their own Emergency Permit rather than progressing with regular permits for the sand placement as is the preference of the public.

The Coastal Commission did issue Emergency Permits for placement of 540,000 CY of sand on the beaches of San Clemente. OCTA has to date placed about 2,500 CY of sand and has **failed to submit any permit application to any federal agency to place larger quantities of sand.**

OCTA has also presented its plans to continue hard armoring in the future, across almost the entire San Clemente shoreline. **This legislation would assure the complete destruction of one of California's most treasured shorelines.**

It should be noted that beyond Emergency Permitting, the creation of a non-existent "Emergency" also allows OCTA to proceed with **Emergency Procurement practices, including a sole-source, lump-sum, no-bid contract for up to $300M of taxpayer monies.**

WORKING GROUP MEMBERSHIP

The Legislation mandates that the Secretary of Transportation create a Working Group whose member entities are described in Government Code section 14072.6(b). The Working Group entities are to include track owners and certain governmental agencies as well as **"business, community, transportation, environmental, labor, and civic organizations**."
The members of the WG do not include representatives from: "business, community, … environmental, labor, and civic organizations" as the Legislation requires.

SOB-SC is the premier organization representing the environmental interests of the local community and we respectfully request membership and/or meaningful participation in the Working Group.

PRESERVE CEQA

The proposed new CEQA exemption needlessly abdicates the State of California's power over rail development projects in California. The exemption transfers environmental oversight of our coast and inland cities through which LOSSAN passes to the **Surface Transportation Board, a remote federal agency whose primary purpose is the economic regulation of freight transport, with no inherent interest in protecting the environment or passenger rail lines.**

The recommendation is not a "clarification" of CEQA as characterized in the draft; it is a **dramatic change** to current California law. It would profoundly affect the San Clemente coastal environment by weakening environmental protections on coastal and inland railroad projects, including construction of all rail "facilities" and auxiliary and other track projects on bluffs, beaches, bridges, lagoons or anywhere.

The Working Group has **failed to explain why this statutory exemption is required to boost ridership** and improve passenger rail lines in the LOSSAN corridor. OCTA continues to cite past disruptions in service, however none of those disruptions was caused by coastal erosion, only landslides on the east side of the rail. **Rail service has never been halted due to coastal erosion**. Furthermore, during each of those disruptions, passenger service was fully maintained by using bus services. **The only transportation that was actually affected was freight**.

California environmental laws are intentionally stronger than federal laws. The recommendation is the latest attempt by some railroad interests to preempt or eviscerate California' environmental laws and substitute a remote federal agency governing freight as the decision-maker over California's environment. The STB is a remote Washington D.C.-based administrative agency of unelected appointees focused on advancing the economic interests of freight carriers.

The Legislation asked the Working Group for recommendations regarding "(C) Changes to state statutes, rules, or funding necessary to improve the **quality, performance, usage, management, or frequency of passenger rail services** with a focus on streamlining, clarifying, and improving existing processes or procedures."[8] The Working Group's recommendation to add a **sweeping exemption to CEQA is not "necessary" or even germane** to achieve any of these goals, it simply eviscerates the statute in relation to rail construction projects involving rail facilities and auxiliary tracks and transfers decisions over San Clemente's environment and transportation to a remote federal agency.

REJECT RECOMMENDATION 3

SOB-SC requests that the Legislature promptly and soundly reject Recommendation 3 of Section 4.1 of the draft recommendations of the Working Group.

Thank you for the opportunity to comment on the Working Group's recommendations on policy areas affecting the LOSSAN corridor and the hosting communities affected by it.

Respectfully submitted on behalf of SOB-SC by

Suzanne Whitelaw, PhD
President

Gary Walsh
Chairman

Joe Wilson
Board Member

John Dow
Board Member

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June 24, 2026

Sent via electronic mail: LOSSAN.SB1098@calsta.ca.gov

California State Transportation Agency
C/O Anthony Serna
400 Capitol Mall, Suite 2340
Sacramento, CA 95814

Re: Comment Letter - LOSSAN Rail Corridor Working Group Draft Report

Dear Mr. Serna:

On behalf of Orange County Coastkeeper ("Coastkeeper") and its members, please accept the following comment regarding the LOSSAN Rail Corridor Working Group Draft Report pursuant to California State Senate Bill 1098 ("SB 1098").

I. Coastkeeper advocates on behalf of water quality throughout Orange County.

Coastkeeper is a nonprofit clean water organization that serves as a proactive steward of our fresh and saltwater ecosystems. The mission of Coastkeeper is to protect swimmable, drinkable, fishable water and promote watershed resilience throughout our region. Coastkeeper represents thousands of members; we work collaboratively with diverse groups in the public and private sectors to achieve healthy, accessible, and sustainable water resources for the region. We implement innovative, effective programs in education, advocacy, restoration, research, litigation, and conservation. Coastkeeper sincerely appreciates the opportunity for public comment and involvement and would welcome any questions from the California State Transportation Agency ("CalSTA").

The LOSSAN Corridor encompasses 351 miles down the coast of California, servicing 11 cities within Orange County. With more than 41 miles of the LOSSAN Corridor running through Orange County, and the rail running along the beach in San Clemente, any redevelopment efforts would directly affect hundreds of Coastkeeper's members. Coastkeeper actively works to protect water quality in the San Clemente Watershed through a variety of programs, including community beach cleanups and advocacy for improved ocean water quality, surface water quality, and coastal resilience. For these reasons, the welfare of both the residents and the habitat surrounding the LOSSAN Corridor is of great importance to Coastkeeper and its members.

As further explained below, Coastkeeper is concerned that the current report does not adequately account for the perspectives of environmental organizations and stakeholder groups, nor does it appropriately detail proactive coastal resiliency measures. Coastkeeper looks forward to CalSTA's response to Coastkeeper's comments, and to taking part in any further opportunities to collaborate with CalSTA on this matter.

II. Coastkeeper conceptually supports the objectives of a Working Group that address possible solutions to the environmental and economic challenges the LOSSAN corridor presents but does not agree with the current process.

The dangers of the eroding coastline are prominent. To reduce these risks, Coastkeeper supports the objectives of the CalSTA LOSSAN Project Working Group generally. We support the restructuring of the current LOSSAN Corridor to account for instability and erosion of the coastline, future planning of potential track realignment, and mitigation of passenger and freight impacts that may arise from the project. We understand the urgency behind improving the LOSSAN Corridor and therefore encourage CalSTA to shift their current process to: (1) solidify a permanent Working Group of all essential organizations, (2) provide regular notice of Working Group meetings to all potential participants, and (3) begin to thoroughly highlight and address key issues on long-term coastal resiliency.

III. Background of Senate Bill 1098 and LOSSAN Working Group formation and efforts to date.

SB 1098, authored by Sen. Blakespear in 2024, was enacted due to growing concerns over the long-term resilliency of the LOSSAN Corridor. Repeated service disruptions due to environmental hazards and inconsistent planning between agencies led to the need for an interagency and community forum. SB 1098 mandated CalSTA to create a Working Group that would submit consensus recommendations and feedback on improving the long-term performance of the LOSSAN Corridor. The entities that must be present are as follows:

(1) LOSSAN Rail Corridor track owners.
(2) LOSSAN Rail Corridor passenger and freight rail operators, including managing agencies, joint powers authorities, and transit districts responsible for rail services.
(3) The county transportation commissions for the Counties of Los Angeles, Orange, Riverside, San Bernardino, and Ventura established pursuant to Division 12 (commencing with Section 130000) of the Public Utilities Code.
(4) The metropolitan planning organizations for the Counties of Los Angeles, Orange, San Diego, San Luis Obispo, Santa Barbara, and Ventura.
(5) Business, community, transportation, environmental, labor, and civic organizations.
(6) The California Coastal Commission.
(7) The Division of Rail and Mass Transportation in the department.[1]

SB 1098 seeks to address a wide range of critical issues affecting the LOSSAN Corridor by: (1) improving coordination between state agencies, (2) enhancing the reliability of the passenger rail, (3)

[1] Cal. Gov't Code § 14072.6 (2024).

helping meet California climate and emission reduction goals, and (4) strengthening rail infrastructure and coastal resilliency along the LOSSAN Corridor.

By addressing these relevant challenges, the legislation is expected to improve long-term coastal resiliency and protection of natural public resources, guarantee long-term stability of rail infrastructure, and ensure a more efficient and sustainable future for the LOSSAN Corridor.

A. Brief history of the existing LOSSAN working group meetings and outreach.

SB 1098 required CalSTA to deliver a comprehensive report on the project's goals to the California State Legislature. The report was due by February 1, 2026, and was meant to be developed by all mandatory Working Group parties. The deadline was not met even though CalSTA was reminded of it by Sen. Blakespear in August of 2025.

Instead, CalSTA has only held four Working Group meetings in the past two years, which have yet to adequately represent all mandatory parties. These meetings did not occur until after Sen. Blakespear's call to action in late February of 2026, after CalSTA missed their deadline to produce the early report to the legislature.

The February 19, 2026 and March 27, 2026 meetings excluded non-governmental stakeholders, including Coastkeeper, from both participation and public observation. There was no communication or outreach to these community stakeholder groups, and the meeting agendas and minutes were not posted on the CalSTA website until far beyond a reasonable timeframe to provide adequate notice to the interested parties. The CalSTA website did not provide a direct link to information on the LOSSAN Working Group until early April of 2026. While noticed on the website, the April 28, 2026 and May 11, 2026 meetings were not shared through any other method of communication that would have allowed vital community groups to become involved. Participation in the meetings thus far has been limited to representatives from California state and federal agencies, many of whom are solely focused on addressing transportation objectives.

After the May 11, 2026 meeting, CalSTA began to meet in private with smaller stakeholder groups who have expressed their interest in being a part of the Working Group. Coastkeeper met with CalSTA on May 20, 2026 to discuss the issues regarding CalSTA's oversight of Working Group requirements.

IV. The draft report fails to properly comply with Senate Bill 1098.

Any report to the legislature on the performance of the LOSSAN Corridor is required to be formulated on Working Group consensus recommendations and feedback in accordance with SB 1098. We are concerned with the lack of participation, notice, and outreach to local groups to meet the requirements of mandatory Working Group members.

A. Invitees

Although CalSTA has stated that they are solely focused on addressing the points that do not require "technical and subject matter assistance"[2] prior to legislative appropriation of the early report, this does not excuse the disorganized procedure that has gone into Working Group formation and forum so far.

Under California Senate Bill 1098 Section 2(c), the early report recommendations:

> "Shall consider the known and expected impacts of recommendations on the coastal environment and local communities and consider opportunities to support the coastal zone and local communities when making recommendations."[3]
>
> "Shall be developed with meaningful public engagement led by the working group." [4]

The lack of a Working Group currently prepared to address these concerns negates the intent behind SB 1098 to have environmental experts and community groups involved in the long-term resilience of the coast along the LOSSAN Corridor. CalSTA's "small group listening sessions"[5] outside of official Working Group meetings have sidelined stakeholder voices from the mandated SB 1098 full Working Group consensus. It is vital for there to have been an established Working Group from the outset, regardless of which objectives were being addressed at that moment. This would reduce discrepancy and opposition down the line between Working Group members through consistent communication between all organizations. We encourage CalSTA to provide a platform for immediate transparency and stakeholder participation to further strategic solutions that will benefit the LOSSAN Corridor in the long run.

V. The Draft Report must provide a comprehensive evaluation of coastal resiliency along the rail line in order to understand the significance of its environmental impacts.

California's coastline is under increasing threat from coastal erosion and sea level rise. The rapid acceleration of these issues because of climate change creates growing risks for local communities and infrastructure, such as the LOSSAN Corridor. While emergency measures provide temporary relief to the area, there must be meaningful evaluation of sustainable, long-term solutions that will protect our environmental resources.

The draft report discusses mitigation efforts; however, it fails to describe mitigation of the environmental impacts of coastal erosion in adequate detail. Instead, the draft report focuses on the most economically efficient method to address coastal erosion by way of overdevelopment that only works to protect infrastructure. The current coastal development permit streamlining process pushes short-term solutions such as reinforcing ripraps, revetments, and adding seawalls to counteract the rising water levels that are deteriorating the bluffs. However, these efforts can cause largescale harm

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[2] *Id.* § (a)(1), (c)
[3] § 14072.6 (c)(2)
[4] § 14072.6 (c)(4)
[5] *California State Transportation Agency.* LOSSAN Rail Corridor Working Group Draft Report. 2026.

to the wellbeing of our coastal ecosystems, exacerbate erosion, and cause irreparable damage to biodiversity in the area that cannot be restored by sand renourishment alone. Additionally, the emergency coastal development permits allow CalSTA to skip routine Environmental Impact Report submission and bypass a public comment period; this is why stakeholder involvement is essential in the Working Group's current process so as to act as procedural safeguards and allow for informed community decision making.

As climate change accelerates and sea levels rise, continuously rebuffing the coastline with cement and rock will lead to costly and never-ending repairs. Redeveloping the LOSSAN Corridor will take time regardless, therefore it's vital to be forward thinking when it comes to sustainable long-term solutions. For the LOSSAN Corridor to take on increased service of passengers and freight in the coming years, there must be reliable underlying infrastructure. While emergency coastal development permits target temporary fixes, they cannot be a continuous crutch for the LOSSAN Corridor. Acting now to ensure an alternative route for the LOSSAN Corridor could make all the difference in reducing future costs, protecting irreplaceable coastal biodiversity, and opening the door to an indelible future for the railroad.

In Orange County, the City of San Clemente faces the worst effects of the eroding coastline where the LOSSAN Corridor passes through. If the LOSSAN Corridor remains on the current track, San Clemente's sandy beaches will disappear. There must be a thought-out plan to restore dynamic coastlines and seek permanent stabilization of the LOSSAN Corridor that does not interfere with San Clemente public trust resources, which guarantee the public a right to access all navigable waterways under the California Constitution. A riprap coastline will be a great detriment not only to the public trust, but to the local economy and future generations. We encourage CalSTA to modify their short-term efforts to work towards meaningful resiliency of natural resources and transit infrastructure. We recommend CalSTA continue to marshal long-term relocation planning and further evaluate the mitigation measure of realigning the rail in Orange County to run along the I-5.[6]

VI. The current process fails to account for critical environmental and business perspectives.

The current process amplifies the voices of state and local transportation agencies to an untenable extent. Although the Draft Report is meant to amalgamate varying viewpoints, the input is overwhelmingly rail oriented. It is pertinent to remember that the results of the revitalized LOSSAN Corridor will have significant implications for the future of the region in all respects and that the recession of our coastline will directly affect the general wellbeing of the residents of Orange County.

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[6] *See* Orange County Transportation Authority. Lossan Rail Corridor Agency (June, 2025) https://www.octa.net/pdf/FactSheet_LOSSAN.pdf?n=202510

Due to the lack of outreach, local environmental groups, businesses, and community stakeholders have not had the ability to provide their comprehensive input on the revitalization plan. Which is why the Draft Report fails to touch on the most important issues and solutions.

San Clemente is home to a vibrant business community whose economy is heavily driven by coastal tourism. The city hosts a multitude of surfing, sailing, cultural, music, and arts events on the shoreline, and is aware that the only way to maintain the current lifestyle is by stabilizing the coast and keeping the beaches accessible to the public. San Clemente will be a representative city in the 2028 Olympics as hosts to the surfing competition. Not only are the sandy beaches a key economic driver, but they also represent the most important and cherished aspect of the community. The residents and business owners of Orange County delicately balance community engagement with environmental stewardship, making every effort to preserve the cleanliness and sanctity of the coastline. Thus, Coastkeeper believes that others must provide the same care and respect to protect the coastline for future generations.

Coastkeeper is concerned that the currently proposed plan to reinforce the coast with artificial barriers will be at the cost of our community and our coastline. Even general communication with stakeholders is not enough. The perspectives of the public must be integrated into the prospective plan to ensure the environment and economy are considered.

VII. Conclusion

Coastkeeper has significant concerns with the planning and procedure behind the LOSSAN Working Group thus far. The revitalization of the LOSSAN Corridor is an extensive undertaking that impacts thousands of Orange County residents, and it must be approached with the appropriate level of care. Having a well-rounded and structured plan is imperative to the safety and wellbeing of California's citizens, economy, and natural resources.

To ensure all parties are satisfied with the outcome of the future LOSSAN Corridor, we urge CalSTA not to submit the Draft Report to the legislature because:

- CalSTA does not have the authority to bypass the requirements of SB 1098 and unilaterally cut out mandatory groups that were required to be present for the Working Group meetings. These guidelines must be followed strictly.
- The Draft Report does not adequately consider the perspectives of community, business, and environmental organizations. The vitality of the economy and resilience of the coastline depend on not sidelining these voices in the drafting process.
- Without the equal footing and participation of business stakeholders and environmental organizations, CalSTA cannot claim proper consensus amongst all mandatory parties of the Working Group.

Coastkeeper recommends that CalSTA expend more time and energy into facilitating suitable Working Group meeting opportunities so that real consensus can be established. Meeting times can be posted on the CalSTA website up to two weeks in advance, and information can also be sent out to stakeholders through electronic mail.

Coastkeeper supports CalSTA's plan to provide consistent transportation options to all, and we recognize the significant role that access to transit plays in giving individuals an opportunity to the coastal environment. We appreciate your dedication to providing the public an opportunity to experience the vital and irreplaceable California coast and hope you will consider our comments concerning the process of satisfying the SB 1098 requirements.

Sincerely,

Sarah J. Spinuzzi

Sarah J. Spinuzzi
Legal Director
Orange County Coastkeeper

CITY OF DEL MAR

June 26, 2026

The Honorable Toks Omishakin
Secretary, California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814
LOSSAN.SB1098@calsta.ca.gov

RE: LOSSAN Rail Corridor Working Group (SB 1098) Report — NOTICE OF OPPOSITION TO CEQA STREAMLINING RECOMMENDATIONS

Dear Secretary Omishakin:

The City of Del Mar opposes the California Environmental Quality Act (CEQA) streamlining recommendations contained in the California State Transportation Agency's (CalSTA) LOSSAN Rail Corridor Working Group (Working Group) Report to the Legislature, issued under SB 1098 (Gov. Code § 14072.6). The City submits these comments within the Report's public review period, which closes July 3, 2026, and urges CalSTA to remove the CEQA streamlining recommendations before the Report is transmitted to the Legislature.

The Report makes three CEQA streamlining recommendations for passenger rail projects (Report, pp. 3, 17):

- A new statutory CEQA exemption for rail-carrier activities under Surface Transportation Board authority, covering the “construction, acquisition, operation, abandonment, or discontinuance” of tracks and facilities.
- Define review deadlines for agency comments and approvals, paired with a formal conflict-resolution protocol for multi-jurisdictional disputes. The Report sets no figure; it directs that deadlines be established. Currently, the comment period on an Environmental Impact Report is 30 days under 14 CCR § 15087(d), commonly extended to 45 days, for documents that run to thousands of technical pages. Imposing fixed, unspecified deadlines on that already-short window, with an escalation process that can override a local agency's concerns, is the compression at issue.
- Make permanent the expedited CEQA judicial review of SB 149 (Statutes of 2023), under which a court is directed to resolve a challenge within 270 days.

Each change would significantly weaken CEQA review for major rail projects.

These recommendations rest on no factual predicate. The Report identifies no incident in which CEQA review delayed or obstructed rail operations or emergency repairs. For more than two decades, the City, the San Diego Association of Governments (SANDAG), the North County Transit District (NCTD), and the California Coastal Commission have cooperatively delivered bluff stabilization on the Del Mar Bluffs, where roughly 1.7 miles of track sit atop an actively eroding coastline. Four phases of bluff stabilization have been completed, and the current $88 million Phase 5 is nearing completion, with more than $110 million invested overall. Throughout, emergency repairs have been made promptly and without administrative obstruction.

The relief the Working Group proposes has already been rejected for this corridor. In May 2023, the Surface Transportation Board (STB) denied NCTD's petition for a broad declaratory order seeking the same kind of categorical exemption, finding that environmental consistency review can generally be harmonized with federal law, that such relief should not override voluntary agreements, and that future disputes are better resolved case by case. Railroads also retain a federal remedy under the ICC Termination Act (49 U.S.C. § 10501(b)), which preempts state action that genuinely interferes with rail operations under a demanding, fact-specific standard the Report does not attempt to meet. A categorical CEQA exemption is unnecessary.

The exemption is also contrary to California law and sweeping in reach. In *Friends of the Eel River v. North Coast Railroad Authority (2017)*, the California Supreme Court held that applying CEQA to a state-created public railroad such as NCTD is an exercise of state self-governance, not preempted regulation; the recommendation would effectively seek to overturn that holding. Because NCTD, BNSF, and Union Pacific are all common carriers under STB jurisdiction, the exemption would remove virtually every project along the LOSSAN corridor from CEQA, and by its terms would reach railroad activity anywhere in California, where roughly 27 freight railroads operate over nearly 5,000 miles of track. It could also extend to work on City and State property beyond NCTD's 100-foot right-of-way, such as the beach toe walls already built on City and State land. And it is self-defeating: if these projects are exempt from CEQA entirely, the companion comment deadlines and 270-day litigation limit serve no purpose.

These proposed CEQA revisions strike at the core of Del Mar's interests, along with the interest of other communities along the LOSSAN rail corridor. The San Diego LOSSAN Rail Realignment Project is among the most consequential projects the Del Mar community has ever faced, and a complete CEQA review is the City's principal safeguard for its coastal bluffs, the San Dieguito Lagoon, public beach access, scenic resources, and community character. If the proposed exemption becomes law, SANDAG could abandon the Environmental Impact Report and exempt the project's core construction components from CEQA entirely, stripping the City of any meaningful avenue to identify or mitigate significant environmental impacts. The compressed comment periods and conflict-resolution process compound the harm, leaving the City too little time to review voluminous EIRs and too little voice when its concerns conflict with the project sponsor's schedule.

Exempting environmental review of an actively eroding coastal bluff is also dangerous. Without adequate review and public input, the recommendations would increase, not reduce, the risk of geologic failure and harm to passengers, rail workers, beachgoers, and the public, while threatening the fragile bluffs, public beach access, and coastal resources the City is charged with protecting.

Also, importantly, these recommendations are inconsistent with the Legislative intent of SB 1098, which directed the Working Group to address rail-service coordination, operations, management, and funding, not to rewrite CEQA. Recasting a rail-coordination mandate as a vehicle to dismantle environmental review is precisely the kind of overreach the City will continue to oppose. CEQA review must not be weakened or replaced by a lesser process for major rail projects.

The City does not oppose the Report as a whole. It supports the Report's recognition of the corridor's coastal resiliency challenges and the need for close coordination among state agencies, local jurisdictions, and rail operators. However, the City of Del Mar urges CalSTA to remove the three CEQA streamlining recommendations from the Report before it is transmitted to the Legislature, and to ensure that any future rail-streamlining proposal preserves full CEQA review and local agencies' ability to protect their communities.

Consistent with the California Coastal Commission's comments, the City urges CalSTA to use the additional time available under the proposed one-year deadline extension (SB 1324) to conduct the fuller public engagement that SB 1098 requires, and to add a recommendation that accelerates studies of long-term corridor solutions, including relocation of the rail line inland, away from the vulnerable bluffs.

The City stands ready to serve as a resource. Please contact Clem Brown, Assistant City Manager, at (858) 375-9524 or cbrown@delmar.ca.us.

Sincerely,

Tracy Martinez

Tracy Martinez
Mayor

Cc: Del Mar City Council
The Honorable Alex Padilla, United States Senator
The Honorable Adam Schiff, United States Senator
The Honorable Mike Levin, U.S. House of Representatives (49th District)
The Honorable Catherine Blakespear, California State Senate (38th District)
The Honorable Tasha Boerner, California State Assembly (77th District)
The Honorable Terra Lawson-Remer, San Diego County Board of Supervisors (D3)
League of California Cities (Cal Cities)
California Coastal Commission
San Diego Association of Governments (SANDAG)
Ashley Jones, City Manager
Christina M. Cameron, City Attorney

RailPAC
Rail Passenger Association
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LOSSAN Rail Corridor Revitalization Working Group June 26, 2026
Senate Bill 1098
Attention: Anthony Serna, Senior Advisor
California State Transportation Agency
400 Capital Mall, Suite 2340
Sacramento, CA 95814

Re: LOSSAN Rail Corridor Revitalization Working Group Draft Recommendations

Dear Mr. Serna and members of the Southern California Revitalization Act Working Group,

I am writing on behalf of members of the all-volunteer Rail Passenger Association of California and Nevada (RailPAC) living, working, and traveling throughout Southern California. RailPAC is disappointed with the recommendations of the LOSSAN Working Group Report. Overall, it represents a missed opportunity and most especially it does not even hint at a vision or reimaging of service.

The LOSSAN Working Group Report is full of modest plans, process, and communication improvement recommendations, but nothing that remotely addresses the underlying challenges or the potential of the LOSSAN Corridor. While the adoption of these focused improvements will improve the current service, the fact is that the current reality, even improved, is failing and losing mode share to the automobile. One major shortfall is that there are no commitments, timeline, or consequences if these recommendations are not implemented.

First, RailPAC wants to thank and recognize the effort and persistence of the member agencies in steadfastly working on the challenging task of seeking approval and funding to address the significant life-expired assets along the LOSSAN Corridor. And RailPAC recognizes that the agencies also incorporated rail line betterment in these projects; increased bridge elevation to mitigate sea-level rise, provision of double-track, improved signal systems, etc. Their work in preserving and improving this regional asset is much appreciated.

Another positive, potentially transformative initiative (Section 2.2, Coastal Resiliency, Recommendations 1 and 2) is coordination with the Coastal Commission to streamline the delivery of coastal infrastructure projects. As part of this coordination RailPAC recommends creative compromises with efforts undertaken to utilize enhanced rail passenger service, with its ability to reduce VMT and CGG emissions, as a key tool to further the Coastal Commission's macro coastal protection goals (slowing climate change).

A second beneficial initiative (Section 4.1, Changes to State Statutes or Rules, Recommendations 1, 2 and 3) is the proposal for streamlining the CEQA process with clear timelines, and a defined pathway, continued streamlined judicial review and conflict resolution. Finally, given rail passenger service's ability to reduce VMT and GHG emissions, RailPAC recommends that the Legislature should consider categorically exempting passenger rail projects from CEQA requirements and lawsuits where construction is contained entirely within the current rail right-of-way.

Another area not explored by the report is the utilization of the California Integrated Travel Project (Cal- ITP) to reduce or eliminate barriers – i.e., trip planning, schedule availability ticketing, delays, etc.- to service integration among the several carriers along the corridor.

While the proposed coordination with the Federal Corridor Identification and Development Program has merit from the planning perspective (Section 5.0 Area D), there is the danger that if Federal programs like Federal and State Partnerships or CRISI are not funded or underfunded, vital projects could stall due to restrictions around Federal grant programs.

As was noted above, RailPAC believes this report, as written, represents a significant missed opportunity. This is especially true in the governance area (Section 3.1 Alternative Management and Operations Models or Structures), where other than noting the complexity and long-standing structural conditions of the corridor, specific examples and potential mitigations were not outlined. Section 3.1, Recommendation 1 mentions the issue of adding the Working Group as a new layer of coordination, but shouldn't the goal of the SB 1098 Working Group have been to recommend the elimination of layers of oversight? Of greater concern is that despite there being multiple governance options being utilized by passenger rail operators throughout the US, these options and their advantages and disadvantages, were not outlined to the Legislature in the report.

There was also no attempt to outline the advantages, accomplishments, and potential of the current Southern California passenger rail governance structure. Instead, stakeholders are left with the original governance promise that local control, with deep ties with local communities, would provide a superior, quicker acting and more efficient structure than other options. From RailPAC's perspective, the promise of local control has turned into a complex "Rube Goldberg" mechanism of interrelated activities never able to operate as a cohesive whole and giving the appearance of duplication of effort.

Specifically looking at project development, the last three decades have seen the promised local community connections resulted in agencies gridlocked by the overweighting of local concerns paired with the underweighting of regional benefits with no will or mechanism to address this imbalance. Left to wither are a group of capacity projects that would leverage the capacity investments of the completed State of Good Repair projects to begin to tap into the ridership and ticket revenue potential of the LOSSAN Corridor.

Also, instead of the promises of efficiency from the joint use of local government resources, there are allocations in operating and capital grants for overheads to cover resources expended by the agency. There is no analysis as to whether the sum total of the overheads accruing to all these multiple agencies is less expensive than potential alternatives.

Vision/ Reimagining

The assumption among many LOSSAN Corridor stakeholders was that the LOSSAN Working Group would provide a platform for Southern California rail agencies to develop recommendations to jumpstart a reimagining, a vision to move forward to leverage the ridership and ticket revenue potential of the LOSSAN Corridor travel market. Stakeholder disappointment is especially great since a simple literature search would have yielded multiple options for corridor development.

For example, in the 1980's the Los Angeles – San Diego Corridor was identified by the private sector as the rail line having the most upside potential for development in addition to the Northeast Corridor. Several subsequent ridership and ticket revenue forecasts by Caltrans have outlined the large ridership and revenue potential of the corridor, provided an auto competitive rail service is provided.

The service plans associated with these forecasts outline involve high-capacity high-performance auto-competitive railway with multiple schedules each hour, offering both long-distance Intercity service and low-fare Regional Rail. With focused investment the current rail line can offer such a product unlocking, by several magnitudes, the ridership and ticket revenue potential of the Southern California market, reducing the pressure for more freeway expansion by addressing current and future transportation demand.

As was noted above, while the recommendations of SB 1098, if implemented, will improve the present corridor performance, the current LOSSAN Corridor service is simply not competitive for anyone with an automobile available. Without a fundamental reset, an expansive vision, the LOSSAN Corridor will remain a scenic curiosity.
As Daniel Burnham, a renowned American architect, said "Make no little plans: they have no magic to stir men's blood and probably themselves will not be realized. Make big plans: aim high in hope and work, remembering that a noble, logical diagram once recorded will never die, . . ."

The LOSSAN Corridor needs a big plan, a vision, one yielding transformative regional benefits to "sell" itself to the public and local leaders. A public which sees the promise of an auto-competitive alternative to an ever expanding but still congested I-5, will be more likely to support the increased investment in the corridor. With increased public financial support and the potential of a much higher new revenue baseline, P3 public/private projects can be identified especially those that increase capacity, reduce travel times, and include managed retreat of the rail line away from vulnerable cliffs and shorelines.

What will be the LOSSAN Corridor's vision?

This?

(Katy Freeway, Texas)

Or This?

(Caltrain)

Thank you for the opportunity to address the Working Group on this important issue.

Sincerely,

Steve Roberts

Steve Roberts,
President Rail Passenger Association of California and Nevada

From:	mark rittenbaum
To:	LOSSAN.SB1098; Senator.Blakespear@senate.ca.go; mlevin.press@mail.house.gov; Salome.Tash@mail.house.gov; Senator.Blakespear@senate.ca.gov; Serna, Anthony@CalSTA; governor@governor.ca.gov; Garcia, Yana@EPA; Huckelbridge, Kate@Coastal; SanDiegoCoast@Coastal; alex.davis@sen.ca.gov; Diana.Kutlow@sen.ca.gov; SouthCentralCoast@Coastal; CentralCoast@Coastal; behlers@encinitasca.gov; jduncan@coronado.ca.us; keith.blackburn@carlsbadca.gov; eshanchez@oceansideca.org; loefflerR@sanclemente.org; lheebner@cosb.org; Tmartinez@delmar.ca.us; ExecutiveStaff@Coastal
Subject:	Opposition to Exemption from CEQA for Railroad related Activities
Date:	Sunday, June 28, 2026 12:07:46 PM

Dear Governor Newsom, Senator Catherine Blakespear and other members of the California State And Local Legislatures, California Coastal Commission, and other interested parties:

I am strongly opposed to the LOSSAN Working Group's recommendation to create a new statutory exemption from CEQA for railroad-related activities and infrastructure projects (Recommendation 4.1 (3)). CEQA environmental review of such projects is critical to protecting the numerous environmentally sensitive areas in California that the railroad tracks traverse, including the 351-mile LOSSAN Corridor from San Luis Obispo to San Diego. This recommendation is an attempt at an end run to critical environmental oversight. I am very concerned that such an exemption would lead to substantial adverse environmental impacts, particularly to the coastal environment of Southern California, which has already been substantially adversely impacted by the LOSSAN Corridor. Please promptly and resolutely reject this recommendation from the Working Group.

Respectfully,
Mark Rittenbaum

Del Mar CA

June 28, 2026

Senator Catherine Blakespear (North Coast San Diego County; South Coast Orange County)
(SB 1098 sponsoring senator); Chair, Senate Committee on Environmental Quality
Senator.Blakespear@senate.ca.gov
Senator Robert Archuleta (Pico Rivera)
Senator.Archuleta@senate.ca.gov
Senator Benjamin Allen (24th Dist. Los Angeles cities)
Senator.Allen@senate.ca.gov
Senator Sabrina Cervantes (Riverside)
Senator.Cervantes@senate.ca.gov
Senator John Laird (Santa Cruz)
Senator.Laird@senate.ca.gov
Senator Monique Limón (Santa Barbara).
Senator.Limom@Senate.ca.gov
Senator Tom Umberg (Santa Ana)
Senator.Umberg@senate.ca.gov
Assembly Member Tasha Boerner (Solana Beach)
Assemblymember.BoernerHorvath@assembly.ca.gov
Assembly Member Laurie Davis
Assemblymember.Davis@assembly.ca.gov
Assembly Member Diane Dixon (Newport Beach)
Assemblymember.Dixon@assembly.ca.gov

Southern California Rail Revitalization Act Working Group
Attention: Anthony J. Serna, Senior Advisor and Policy Lead, Rail and Transit
LOSSAN.SB1098@calsta.ca.gov
anthony.serna@calsta.ca.gov

Re: Comments on the Southern California Rail Revitalization Act (SB 1098) Working Group Public Comment Draft (June 10, 2026)

Capo Cares is a community-based 501(c)(4) organization dedicated to preserving and enhancing the Capistrano Beach community and its namesake beach. Since its founding in 2014 our organization has advocated for science-based coastal management and the protection of California's public beaches. Capistrano Beach has become an unfortunate example of the devastating effects that climate change, coastal erosion, and shoreline armoring can have on California's irreplaceable coastal resources.

I fully support the comments submitted by the Coalition for Safer Trains and Save Our Beaches SC in their June 22, 2026 letters and respectfully offer the following additional comments.

The recommendation to exempt railroad infrastructure projects from the California Environmental Quality Act (CEQA) raises concerns that extend well beyond environmental permitting. It implicates California's longstanding obligation to protect coastal resources held in trust for the benefit of all Californians and future generations.

I strongly oppose the LOSSAN Working Group's recommendation to create a new statutory exemption from CEQA for railroad-related activities and infrastructure projects (Recommendation 4.1(3)). CEQA review is one of California's most important safeguards for ensuring that public agencies fully evaluate environmental impacts, consider reasonable alternatives, disclose potential environmental consequences, and provide meaningful opportunities for public participation before undertaking projects that may permanently alter sensitive natural resources.

More importantly, this recommendation appears inconsistent with the stated objectives of SB 1098 itself. The Legislature established this Working Group to develop thoughtful, balanced recommendations that improve rail reliability while addressing environmental impacts, enhancing coastal resilience, and engaging affected communities. **Eliminating environmental review for projects affecting California's coastline undermines those very objectives by reducing transparency, limiting public participation, and removing the careful environmental analysis that informed decision-making requires.**

This is not a choice between rail transportation and environmental protection. California depends on both. The question before the Working Group is whether maintaining rail service should come at the unnecessary expense of irreplaceable public beaches and coastal resources when less damaging alternatives deserve careful consideration. CEQA exists to ensure those alternatives are fully evaluated before irreversible decisions are made.

The 351-mile LOSSAN Corridor traverses some of California's most environmentally significant coastal areas. These beaches belong to all Californians, and, I would argue, to all humankind. **Exempting railroad infrastructure projects from CEQA would remove an essential layer of public accountability at precisely the time when our coastline faces unprecedented threats from erosion, sea level rise, and increasingly severe storms**.

In Orange County, railroad protection efforts have relied heavily on shoreline armoring through the placement of massive riprap boulders and increasingly extensive retaining structures. The cumulative effect has been the steady loss and narrowing of public beaches. The California Coastal Commission, coastal engineers, and numerous scientific studies have documented that shoreline armoring can accelerate beach erosion by preventing the natural movement of sand, disrupting coastal processes, and reducing the beach's ability to migrate inland as sea levels rise. As a result, local coastal expert Dr. Brett Sanders has repeatedly warned that continued reliance on shoreline armoring has been proven to worsen the very coastal hazards these projects seek to address.

Rather than prioritizing comprehensive, long-term resilience strategies—including beach nourishment, bluff stabilization, sediment management, and other science-based approaches—the Orange County Transportation Authority (OCTA) has repeatedly relied on emergency permits to install additional shoreline armoring. While emergency actions are sometimes necessary, emergency permitting should not become the default mechanism for implementing permanent infrastructure projects without full environmental review. CEQA exists precisely to ensure that long-term projects receive careful environmental analysis, and that less damaging alternatives are fully considered.

Recent history also calls into question the assertion that these projects require expedited approvals or extraordinary exemptions from existing law. The San Clemente rail corridor has experienced extended closures in recent years without catastrophic consequences to regional transportation. Passenger service was successfully accommodated through alternative transportation, freight traffic remained at the same limited level it has maintained for decades, and the regional transportation system continued to function. Meanwhile, discussions regarding long-term alternatives—including rerouting portions of the corridor—have existed for decades without meaningful progress. These realities underscore the importance of evaluating durable, long-term solutions rather than continuing to expand shoreline armoring under successive emergency authorizations. The Agency continues to state that it "plans" to study relocation, but such studies are not funded and no progress has been made to date.

It is difficult to reconcile a recommendation eliminating CEQA review with California's longstanding commitment to environmental stewardship or with SB 1098's own directive that environmental impacts and coastal resilience be carefully considered. A blanket statutory exemption would encourage more of the very practices that have already contributed to the degradation of Southern California's coastline while limiting scientific review, public transparency, and meaningful community participation.

Infrastructure can be repaired, relocated, or redesigned. Public beaches, once permanently lost, cannot simply be rebuilt. That reality makes careful environmental review not an obstacle to progress, but an essential safeguard for future generations.

California should not be forced to choose between reliable rail service and healthy beaches. Both are vital public resources, and both can be protected through thoughtful planning, sound engineering, rigorous environmental review, and science-based coastal resilience strategies. The State's goal should not be to preserve rail infrastructure at any cost, but to preserve both transportation and the natural coastal resources that define California. Weakening CEQA is not modernization—it simply removes one of California's most effective safeguards for achieving that balance.

Accordingly, I respectfully urge the Working Group to reject Recommendation 4.1(3) and preserve CEQA review for railroad-related projects.

I also urge the Working Group to expand its membership to include promised representation of environmental organizations, including Save Our Beaches SC. **Any recommendations affecting California's coastline should include the perspectives of organizations dedicated to protecting the public trust resources that belong to every Californian.**

Thank you for your thoughtful consideration of these comments.

Respectfully,

Toni Nelson
Founder and President
capocares@gmail.com/714-654-2345

INNOVATING FOR A BETTER TOMORROW

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
(213) 236-1800
www.scag.ca.gov

June 29, 2026

Secretary Toks Omishakin
California State Transportation Agency
400 Capitol Mall, Suite 2340
Sacramento, CA 95814

Subject: Comments on Draft SB 1098 LOSSAN Corridor Working Group Report to the Legislature

Dear Secretary Omishakin:

The Southern California Association of Governments (SCAG) appreciates the opportunity to provide comments on the Draft SB 1098 Los Angeles – San Diego – San Luis Obispo (LOSSAN) Rail Corridor Working Group Report. We appreciate CalSTA's leadership in convening corridor partners and advancing a discussion around the long-term reliability, resilience, and performance of the LOSSAN rail corridor. The corridor is a critical component of Southern California's passenger rail network and plays an important role in supporting regional mobility, intercity travel, economic activity, and state climate and transportation goals.

Overall, the draft report provides a useful overview of the challenges facing the corridor and identifies several areas where enhanced coordination, planning, and investment could improve passenger rail service. However, SCAG encourages CalSTA to strengthen the final report by more clearly defining accountability, implementation responsibility, and realistic performance expectations. As the corridor continues to recover from the impacts of the pandemic and manage service disruptions associated with slope stabilization efforts, shoreline landslides, and related track closures, it is important that recommendations be grounded in current and anticipated travel demand, ridership trends, fiscal conditions, and the operating realities facing corridor agencies.

To that end, the final report would benefit from a stronger accountability framework that identifies clear lead agencies, supporting partners, expected outcomes, and realistic timeframes for implementation. Many of the recommendations will require sustained coordination across multiple agencies, including state, regional, local, and operating partners. Clearly identifying which entity is responsible for advancing each task will help ensure that recommendations move beyond general coordination and can be implemented in a transparent and measurable way.

SCAG also recommends that the report more directly acknowledge changes in post-pandemic travel demand and service needs. Passenger rail markets have evolved since 2020, and future corridor planning should reflect how travel patterns, commute behavior, leisure travel, special event travel, interregional mobility needs, and farebox recovery challenges have changed. Establishing goals that are ambitious but realistic in the current operating environment will better position the corridor for long-term success and help agencies align service planning, capital investment, and customer expectations.

In addition, while the report identifies important capital, resiliency, and coordination needs, it does not sufficiently address the ongoing operational funding challenges facing passenger rail operators along the corridor. Reliable operations are foundational to achieving the broader goals identified in the report. Without a sustainable and dependable source of operating funding, capital investments and planning efforts may not fully translate into improved service outcomes for riders. SCAG encourages CalSTA to include a stronger discussion of operational funding needs and the role the state can play in supporting long-term service stability, particularly for operating agencies facing significant fiscal constraints.

SCAG remains supportive of continued collaboration with CalSTA, corridor agencies, and regional partners to improve the reliability, resilience, and effectiveness of the LOSSAN corridor. We appreciate the work that has gone into the draft report and encourage CalSTA to refine the final recommendations to include clearer accountability, realistic post-pandemic goals, consideration of current and future travel demand, and a more direct discussion of operational funding needs. If you have any questions, please do not hesitate to contact Courtney Aguirre, Manager of Mobility Planning and Goods Movement at SCAG, at (213) 236-1990 or aguirre@scag.ca.gov.

Sincerely,

Kome Ajise
Executive Director

From:	Udo Wahn
To:	LOSSAN.SB1098
Subject:	NOTICE OF OPPOSITION TO CEQA STREAMLINING RECOMMENDATIONS
Date:	Monday, June 29, 2026 9:25:38 AM

June 29, 2026

To:
The Honorable Toks Omishakin
Secretary, California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814
LOSSAN.SB1098@calsta.ca.gov

RE: LOSSAN Rail Corridor Working Group (SB 1098) Report — NOTICE OF OPPOSITION TO CEQA STREAMLINING RECOMMENDATIONS

Dear Secretary Omishakin:

The California State Transportation Agency (CalSTA)

As a Del Mar resident for 43 years I urge CalSTA to remove the three CEQA streamlining recommendations from the SB 1098 Working Group Report before it is sent to the Legislature, and to ensure that any future rail-streamlining proposal preserves full CEQA review and local agencies' ability to protect their communities.

These proposed CEQA revisions strike at the core of Del Mar's interests, along with the interest of other communities along the LOSSAN rail corridor. The San Diego LOSSAN Rail Realignment Project is among the most consequential projects the Del Mar community has ever faced, and a complete CEQA review is the City's principal safeguard for its coastal bluffs, the San Dieguito Lagoon, public beach access, scenic resources, and community character. If the proposed exemption becomes law, SANDAG could abandon the Environmental Impact Report and exempt the project's core construction components from CEQA entirely, stripping the City of any meaningful avenue to identify or mitigate significant environmental impacts.

Exempting environmental review of an actively eroding coastal bluff is dangerous.

Also, importantly, these recommendations are inconsistent with the Legislative intent of SB 1098.

Recasting a rail-coordination mandate as a vehicle to dismantle environmental review is overreach. I oppose this. CEQA review must not be weakened or replaced by a lesser process for major rail projects.

I urge CalSTA to use the additional time available under the proposed one-year deadline extension (SB 1324) to conduct the greater public engagement that SB 1098 requires, and to add a recommendation that accelerates studies of long-term corridor solutions, including relocation of the rail line inland, away from the vulnerable bluffs.

Udo Wahn, M.D.
Del Mar, California

CC:
The Honorable Adam Schiff, United States Senator
The Honorable Mike Levin, U.S. House of Representatives (49th District)
The Honorable Catherine Blakespear, California State Senate (38th District)
The Honorable Tasha Boerner, California State Assembly (77th District)
The Honorable Terra Lawson-Remer, San Diego County Board of Supervisors (D3)
California Coastal Commission
San Diego Association of Governments (SANDAG)
Del Mar City Council

From:	Anna Millar
To:	LOSSAN.SB1098
Cc:	IGR
Subject:	RE: SANDAG Comments on Senate Bill (SB) 1098: LOSSAN Rail Corridor Revitalization (Public Comment Draft, 2026)
Date:	Tuesday, June 30, 2026 2:15:39 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image007.png

Hello –

Thank you for the opportunity to review and provide comments on Senate Bill (SB) 1098: LOSSAN Rail Corridor Revitalization (Public Comment Draft, 2026). SANDAG staff has provided three (3) additional comments on the document, for a total of four (4) comments.

Page 8
Section 2.1 – State of Good Repair
SANDAG recommends clarifying the reference to "the corridor," as it is unclear which agency or entity is being referenced. If the intent is to identify the appropriate coordinating body for corridor-wide issues, consider referencing the LOSSAN Rail Corridor Agency (LOSSAN JPA).

Page 13
Section 2.3 – Track Closures
Consider adding a recommendation to provide bus bridge service during Absolute Work Windows (AWWs) to minimize disruptions to passengers when track closures are required.

Page 14
Section 3.1 – Alternative Management and Operations Models or Structures
SANDAG supports the recommendation to utilize the Rail Leadership Group and the LOSSAN Technical Advisory Committee (TAC); however, the document would benefit from more clearly defining the TAC's role, function, and purpose. Consider revising the governance structure so that TAC members lead discussions, establish agendas, and develop recommendations for the LOSSAN Board of Directors, while taking direction from the Rail Leadership Group. Under this approach, LOSSAN Agency staff would support and facilitate the TAC rather than drive

agendas and discussions.

Page 17 – Section 4.1: Changes to State Statutes or Rules

Consider clarifying at the outset of this section that the discussion applies only to rail projects that are subject to CEQA. Some rail projects—such as many double-tracking projects—may be preempted from CEQA under the Interstate Commerce Commission Termination Act of 1995 (ICCTA), which grants the Surface Transportation Board (STB) exclusive jurisdiction over railroad operations. Framing CEQA review as a baseline requirement could create challenges for rail projects currently underway that have not filed CEQA exemptions and could be interpreted as limiting the ability to rely on ICCTA preemption where applicable. This issue also relates to Recommendation #1 under Section 2.2 (Coastal Resiliency) on page 10, because stating that rail projects are subject to CEQA could also support an interpretation that such projects require a Coastal Development Permit, rather than a federal Consistency Certification.

Anna Millar (she/her/hers)
Associate Environmental Planner
1011 Union Street, Suite 400, San Diego, CA 92101

From: Anna Millar
Sent: Wednesday, June 24, 2026 11:53 AM
To: LOSSAN.SB1098@calsta.ca.gov
Cc: IGR <IGR@sandag.org>
Subject: SANDAG Comments on Senate Bill (SB) 1098: LOSSAN Rail Corridor Revitalization (Public Comment Draft, 2026)

Thank you for the opportunity to review and provide comments on Senate Bill (SB) 1098: LOSSAN Rail Corridor Revitalization (Public Comment Draft, 2026).

SANDAG staff has provided one (1) comment on the document.

Page 17 – Section 4.1: Changes to State Statutes or Rules

Consider clarifying at the outset of this section that the discussion applies only to rail projects that are subject to CEQA. Some rail projects—such as many double-tracking projects—may be preempted from CEQA under the Interstate Commerce Commission Termination Act of 1995 (ICCTA), which grants the Surface Transportation Board (STB) exclusive jurisdiction over railroad operations. Framing CEQA review as a baseline requirement could create challenges for rail projects currently underway that have not filed CEQA exemptions and could be interpreted as limiting the ability to rely on ICCTA preemption where applicable. This issue also relates to Recommendation #1 under Section 2.2 (Coastal Resiliency) on page 10, because stating that rail projects are subject to CEQA could also support an interpretation that such projects require a Coastal Development Permit, rather than a federal Consistency Certification.

Anna Millar (she/her/hers)
Associate Environmental Planner
1011 Union Street, Suite 400, San Diego, CA 92101

From:	Aaron Bonfilio
To:	LOSSAN.SB1098
Cc:	MARJIE KIRN; Lauren Bianchi Klemann
Subject:	Comments on the Draft Senate Bill (SB) 1098: LOSSAN Rail Corridor Revitalization Report
Date:	Thursday, July 2, 2026 7:21:36 PM
Attachments:	Image.png Image.png Image.png Image.png

Dear CalSTA LOSSAN Working Group Team:

Thank you for the opportunity to review and provide comments on Senate Bill (SB) 1098: LOSSAN Rail Corridor Revitalization Report (Public Comment Draft, 2026). SBCAG staff has provided five (5) comments on the document.

Page 8

Section 2.1 – State of Good Repair

Staff asks that the report clarify the reference to the "corridor". It is not clear which agency is being referred to. Based on discussions at the SB 1098 Corridor Working Group, we suspect the intent is that this is in reference to the LOSSAN Rail Corridor Agency. If so, please consider making this distinction.

On *page 12, section 2.3*, Similar clarification and definition of which agencies make up the "LOSSAN Working Group" and "member agencies" noted in recommendations 1-3 would help define future roles and responsibilities.

Page 13

Section 2.3 – Track Closures

We appreciate the recommendation to better coordinate Absolute Work Windows. Consider further strengthening this recommendation, that, when necessary, Bus Bridge Services be provided.

Page 14

Section 3.1 – Alternative Management and Operations Models or Structures

SBCAG appreciates the recommendation to utilize the informal Rail Leadership Group and the LOSSAN Technical Advisory Committee (LOSSAN TAC), which serve as potential inclusive venues for meaningful coordination and discussion.

SBCAG recommends that the report should clearly define and memorialize the Rail Leadership Group and LOSSAN TAC memberships, roles and functions. Additionally, consider recommending formalization of the Rail Leadership Group as a subcommittee of the LOSSAN Agency.

Regarding the LOSSAN TAC, SBCAG recommends that the governance structure of the LOSSAN

TAC be modified so that it has an elected Chair and Vice Chair, and is empowered to lead discussions, set the agendas, and develop recommendations to the LOSSAN Board of Directors in coordination with direction from the Rail Leadership Group.

Page 17

Section 4.2 – Changes to Funding

While the draft report makes recommendations to certain capital funding programs and it is noted that rail operators on the corridor face significant fiscal pressure, the report does not provide detail on the operational funding augmentation levels needed to prevent future service cuts. SBCAG respectfully asks the authors to consider including the specific operating shortfalls of each of the rail agencies, including LOSSAN for the Legislature's awareness and to recognize the substantial risk rail operators face without further intervention.

Page 18

Section 4.2 – Changes to Funding – Farebox Recovery

SBCAG recommends extending or clarifying the recommendation regarding modernizing the Farebox Recovery Ratio (FRR) requirements to be inclusive of those FRR requirements that pertain to LOSSAN Pacific Surfliner, as well as those noted under TDA (such applicable to SCRRA and NCTD).

Sincerely,

Aaron B. Bonfilio
Director of Multimodal Programs
Santa Barbara County Association of Governments (SBCAG)
260 N. San Antonio Road, Suite B • Santa Barbara, CA 93110

Phone | (805) 600-4855
Email | abonfilio@sbcag.org
Website | www.sbcag.org

SBCAG SANTA BARBARA COUNTY ASSOCIATION OF GOVERNMENTS

From: Lance Okuno
To: LOSSAN.SB1098
Cc: Pete Rodgers
Subject: Draft SB 1098 Report Comment
Date: Thursday, July 2, 2026 4:56:36 PM
Attachments: image001.png

Good afternoon,

I am commenting on the draft SB 1098 report on behalf of the San Luis Obispo Council of Governments and as a member of the LOSSAN technical advisory committee. Below is my comment:

- The draft report lacks any mention of thruway bus service and recommendations to improve thruway bus transit connection efficiency, collaboration between the state passenger rail JPAs, schedule planning, timetable accessibility, and interconnectedness with the current Pacific Surfliner service. Thruway bus connections fill important gaps in passenger rail, whether due to a lack of frequency options, track closures, trainset equipment issues, or other factors. The report should review this service and provide recommendations if necessary.

Thank you for your consideration,

Lance Okuno
Transportation Planner
1114 Marsh St., San Luis Obispo, CA 93401
805.597.8021
SLOCOG
SAN LUIS OBISPO COUNCIL OF GOVERNMENTS

OCTA

July 2, 2026

CalSTA
LOSSAN Rail Corridor Working Group Team
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Via email: LOSSAN.SB1098@calsta.ca.gov

Subject: **OCTA Comments on the SB 1098 LOSSAN Rail Corridor Working Group Report (June 2026)**

Dear CalSTA LOSSAN Rail Corridor Working Group Team:

The Orange County Transportation Authority (OCTA) extends its gratitude for the continued opportunity to participate in and provide input on the development of the Los Angeles – San Diego – San Luis Obispo (LOSSAN) Rail Corridor Working Group Public Comment Draft Report (Report), dated June 10, 2026. This Report was prepared pursuant to SB 1098 (Chapter 777, Statutes of 2024). OCTA recognizes the California State Transportation Agency's (CalSTA) commitment to engaging the LOSSAN Rail Corridor partners throughout this effort and appreciates the collaborative approach taken to identify strategies that strengthen reliability, resiliency, and long-term service delivery throughout the LOSSAN Rail Corridor.

OCTA values the extensive stakeholder outreach conducted to date and is encouraged to see that many of the themes previously discussed have been reflected in the current draft. OCTA appreciates the report's emphasis on coastal resiliency, streamlined emergency response procedures, coordination with the California Coastal Commission, corridor-wide asset management, and improved interagency collaboration. These recommendations represent important progress toward strengthening the long-term reliability and resiliency of the LOSSAN Rail Corridor.

OCTA would like to offer the following comments to strengthen the partnership between CalSTA and the LOSSAN Rail Corridor agencies:

- **Clarify Roles and Responsibilities:** Refine the report to more clearly distinguish the respective roles of the state, corridor owners, passenger rail operators, and freight railroads. While OCTA owns portions of the LOSSAN right-of-way in Orange County, passenger and freight rail operators are responsible for operational decisions, including service suspension, restoration, and day-to-day rail operations. Clearly defining these responsibilities will improve the Report's discussion of emergency response authorities and decision-making responsibilities.

- **Enhance Permitting Recommendations:** Strengthen recommendations to streamline permitting and environmental review for projects that preserve and enhance existing rail infrastructure, particularly coastal resiliency and emergency stabilization projects.
- **Support Coastal Resiliency Initiatives:** OCTA supports the Report’s recommendations related to coastal resiliency, emergency response, and coordination with state and federal agencies. Continued refinement should focus on expediting project delivery, streamlining emergency procedures, and ensuring the long-term protection of this critical transportation corridor.
- **Leverage Existing Governance Structures:** Emphasize opportunities to continue corridor coordination and service delivery within the existing governance framework before pursuing significant institutional restructuring.
- **Recognize Funding as the Primary Constraint:** Acknowledge that funding limitations remain a primary obstacle to advancing corridor priorities and capital improvements.

OCTA appreciates CalSTA's interest on this important effort and looks forward to continued collaboration as recommendations are further refined and advanced. OCTA remains committed to working with CalSTA, LOSSAN member agencies, passenger rail operators, freight railroads, and other stakeholders to improve corridor resiliency, maintain safe and reliable rail operations, and support the long-term viability of the LOSSAN Rail Corridor and the success of passenger rail service it provides.

Sincerely,

Dan Phu
Director, Transportation Planning and Analysis

DP:rs

RIVERSIDE COUNTY TRANSPORTATION COMMISSION
4080 Lemon St. 3rd Fl. Riverside, CA 92501
Mailing Address: P.O. Box 12008 Riverside, CA 92502-2208
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July 2, 2026

Secretary Toks Omishakin
California State Transportation Agency
400 Capitol Mall, Suite 2340
Sacramento, CA 95814

Subject: RCTC Comments on the SB 1098 LOSSAN Rail Corridor Working Group Report

Dear Secretary Omishakin:

On behalf of the Riverside County Transportation Commission (RCTC), I write with comments on the draft Senate Bill (SB) 1098 the Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Corridor Working Group Report for your consideration and inclusion in its transmission to the Legislature. RCTC fully supports continued coordination between LOSSAN, the California State Transportation Agency (CalSTA), and members of the Working Group to collaboratively bolster regional rail service, operations, and capital investments across the LOSSAN corridor. The success of the LOSSAN corridor is an indispensable component of RCTC's mission to improve mobility for the people of Riverside County.

RCTC's primary interests in the LOSSAN corridor manifest as follows:

1. RCTC holds exclusive passenger rail rights in the BNSF San Bernardino Subdivision within the LOSSAN corridor;
2. RCTC is a member agency of LOSSAN and the Southern California Regional Rail Authority—the operator of Metrolink service;
3. RCTC subsidizes Metrolink commuter rail service in Riverside County which runs in the LOSSAN corridor; and
4. RCTC in partnership with CalSTA and the Federal Railroad Administration is conducting planning, environmental review, and preliminary engineering of the Coachella Valley Rail Project, a proposed 144-mile intercity passenger rail service mirroring that of the Pacific Surfliner, between Los Angeles and Coachella.

With these interests in mind, RCTC offers the following comments:

- **Aligning state grant programs with the Federal Corridor Identification and development Program (CIDP) project development pipeline to strengthen the corridor's competitiveness for federal capital funding.** (Page 3) – RCTC supports efforts for the state to leverage its planning capacity and grant programs to maximize federal funding for capital improvements in the LOSSAN corridor that would benefit the Pacific Surfliner service and deliver the Coachella Valley Rail Project, which was awarded CIDP.

- **Streamlining the California Environmental Quality Act (CEQA) review for passenger rail projects by establishing agency comment deadlines, a conflict resolution protocol for multi-jurisdictional projects, and a pathway to make permanent the judicial review provisions introduced under Chapter 60, Statutes of 2023 SB 149 (Chapter 60, Statutes of 2023).** (Page 3) – RCTC supports all efforts to reduce project delivery timelines and provide flexibility to meet planning requirements, while maintaining important environmental protections. In particular, passenger rail projects are deserving of targeted CEQA exemptions and judicial streamlining because expanding reliable, interconnected alternatives to driving are vital for state and regional efforts to achieve greenhouse gas emissions reduction goals and air quality conformity.

- **Rather than creating a new layer of coordination by formalizing the SB 1098 Working Group, use existing avenues to formalize this coordination. Specifically, the working group recommends using the Rail Leadership Group for strategic leadership engagement and the LOSSAN Technical Advisory Committee as a staff led forum to advance priorities established by the Leadership Group.** (Page 14) – For the Rail Leadership Group to be utilized in this manner, RCTC strongly believes that its membership should include all passenger rail operators and their respective member agencies, as well as all passenger rail rights holders in the LOSSAN corridor. This inclusion will ensure that the diverse voices of the region are at the table.

- **In coordination with CalSTA and the Caltrans Division of Rail, designate a primary host railroad liaison and negotiator. This role may lead a coordinated freight railroad sub working group so that the LOSSAN corridor can speak with one voice on freight issues relevant to all member agencies, with a specific focus on Amtrak's federal statutory rights and how those rights can be more effectively leveraged across the corridor and statewide.** (Page 16) – RCTC agrees there should be greater coordination between the region, state, and host railroads. However, RCTC urges thoughtful development of the strategy for host railroad liaison and negotiators roles. Specifically, passenger rail rights holders must maintain the lead role in negotiations with a strong team approach supported by the state and regional agencies.

- **As noted in the background section of this report, the Working Group's deliberations unfolded against a backdrop of significant fiscal pressure across the corridor's three primary passenger operators. Decreases in ridership and revenues, coupled with expensive capital projects (with costs rising faster than inflation), have led to a near-term funding crisis for some systems. Without intervention, agencies risk cutting service to balance operating and capital budgets, a move that would undermine ridership, reliability, and public confidence, and lead to further budget, service and ridership reductions. Costs are rising due to a number of factors outside of typical transit agency control, from broader inflation, lack of control of underlying infrastructure, and land-use patterns. Looking ahead, broader rail and transit funding also faces risks tied to shifting economic conditions and the transition to zero-emission vehicles, underscoring the urgency of finding solutions that stabilize operations both now and in the future.** (Pages 17-18) – The financial stakes facing passenger rail operators described in the report cannot be overstated. Metrolink requires $35 million in state operating assistance to prevent substantial reductions in passenger rail service this fall and the Pacific Surfliner may face service cuts after augmentations to state operating subsidies lapse after 2028. RCTC believes that decisive state funding investments are required to stabilize the operational needs of passenger rail operators in the LOSSAN corridor to avoid service cuts and grow their respective operational and capital improvement capacity.

RCTC appreciates CalSTA and the respective members of the LOSSAN Rail Corridor Working Group for their work in developing this report, and the legislative convening role Senator Catherine Blakespear has played, and looks forward to working collaboratively with each to strengthen the responsiveness of the LOSSAN corridor to the diverse mobility needs across southern California. Should you have any questions, please do not hesitate to contact me or Sheldon Peterson, Rail Manager, at (951) 787-7141.

Sincerely,

Aaron Hake

Aaron Hake
Executive Director

July 3, 2026

The Honorable Toks Omishakin
Secretary, California State Transportation Agency
915 Capital Mall, Suite 350B
Sacrament, California 95814
LOSSAN.SB1098@calsta.ca.gov

Subject: Public Comment LOSSAN Rail Corridor Working Group (SB 1098) Report

Dear Secretary Omishakin,

Thank you for providing the 22nd District Agricultural Association (22nd DAA) an opportunity to comment on the LOSSAN Rail Corridor Working Group Report for SB 1098. As an interested party that is potentially affected by the LOSSAN rail line, we felt it appropriate to request clarification on the proposed recommendations within the working group's report.

The 22nd DAA — a self-funding state institution that was established in 1891 — owns and operates the Del Mar Fairgrounds (Fairgrounds), the Surf & Turf Recreation Center, and the Del Mar Horsepark properties. The Fairgrounds, which opened in 1936 (more than two decades prior to the incorporation of the City of Del Mar), and other 22nd DAA properties serve as iconic cultural and community gathering places that host the beloved annual San Diego County Fair, summer and fall live horse race meets, and hundreds of other events and activities throughout the year. The Fairgrounds also serves as a mega-evacuation center for San Diego County.

The 22nd DAA's comments, questions and requests for clarification are limited to the CEQA streamlining recommendations within the working groups report.

The first recommendation would define review deadlines for agency comments and approvals on passenger rail projects subject to CEQA and create a formal conflict resolution protocol applicable when jurisdictions impose conflicting requirements. It is unclear if the recommendation for defined review deadlines and approvals is limited to only those instances when jurisdictions impose conflicting requirements? The 22nd DAA is opposed to shortening existing CEQA review periods. However, if the recommendation is specifically addressing instances of conflicting jurisdictional requirements, the recommendation should be rewritten to clearly state this. The recommendation should also be revised to include suggested deadline durations.

The second recommendation proposes making permanent the CEQA streamlining judicial review provision for certain transportation-related projects introduced through SB 149. It is the 22nd DAA's understanding that the streamlining provision sets resolution of CEQA litigation to 270 days, to the extent feasible. The recommendation provided within the report should be rewritten to provide this clarification.

Lastly, the report recommends language be added to an existing statutory exemption. However, the report fails to mention which exemption the language should be added to. The 22nd DAA assumes that the exemption being referenced is CEQA Guidelines Section 15275: Specified Mass Transit. If this is accurate, the recommendation should be rewritten to be clear that the proposed language would be added to an existing exemption and would not be a proposal to create a new exemption.

Provided that the 22nd DAA's questions/clarifications are addressed and the report is revised to reflect these clarifications, the 22nd DAA is not opposed to forwarding the CEQA streamlining recommendations of the Working Group to the State Legislature. The 22nd DAA looks forward to reviewing the response to our comment letter. It should be noted that if the response to the 22nd DAA's comments concludes that our assumptions or understanding of the recommendations is incorrect, then the 22nd DAA would oppose the recommended CEQA streamlining recommendations.

Again, the 22nd DAA appreciates the opportunity to comment on the LOSSAN Rail Corridor Working Group Report for SB 1098. If you have any questions about the comments contained in this letter, please do not hesitate to contact 22nd DAA Supervising Environmental Planner Dustin Fuller at 858.792.4212 or via email at dfuller@sdfair.com.

Sincerely,

Becky Bartling
Chief Executive Officer
22nd DAA Agricultural Association

Cc: Dustin Fuller, Supervising Environmental Planner

METROLINK

July 3, 2026

Mr. Toks Omishakin
Secretary
California State Transportation Agency
400 Capitol Mall, Suite 2340
Sacramento, CA 95814

RE: SB 1098 LOSSAN Rail Corridor Draft Report Comment Letter

Dear Secretary Omishakin:

On behalf of the Southern California Regional Rail Authority (Metrolink), I submit this letter in response to the request for comments relating to the draft Senate Bill (SB) 1098 LOSSAN Rail Corridor public report prepared by the California State Transportation Agency (CalSTA)

As noted in the report, the 351-mile Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Corridor is among California's most critical transportation assets, conveying significant freight rail traffic as well as millions of passengers annually to destinations aboard Pacific Surfliner intercity trains and Metrolink and the North County Transportation District (NCTD) regional trains.

The draft report calls out that Metrolink, NCTD and Pacific Surfliner each face projected recurring operating deficits in coming fiscal years, likely to force precipitous reductions in service. These service reductions will be acutely impactful as preparations are needed to meet an expected surge in corridor demand during the 2028 Summer Olympic and Paralympic Games. In addition, operating deficits are anticipated as passenger rail service has become critical to meeting California's mobility and climate goals of reducing highway congestion and greenhouse gas emissions while providing affordable and convenient access to transit alternatives to driving. Despite these challenges, the draft report does not include recommended new revenue or funding proposals.

Metrolink urges the state to modernize existing funding frameworks like the Transportation Development Act, as identified in the report, and to implement real, actionable solutions needed to provide the stabilized, robust funding necessary for passenger rail operations on the LOSSAN corridor and statewide. Sustainable funding is needed to ensure operational viability for passenger rail in securing California's economic and environmental future.

In closing, I reaffirm my letter of comment sent to CalSTA in October 2025 concerning the report of the Transit Transformation Task Force. A transformational vision for transit is only possible with a parallel commitment to real, sustained funding. Without new funding, agencies will remain trapped in a cycle of managing scarcity rather than building a sustainable and equitable future for transit in California.

Sincerely,

Darren M. Kettle
Chief Executive Officer

cc: James Hacker, Undersecretary, California State Transportation Agency
Anthony Serna, Deputy Secretary for Rail and Transit

SURFRIDER FOUNDATION.

July 3, 2026

Delivered via email to LOSSAN.SB1098@calsta.ca.gov

California State Transportation Agency SB 1098 LOSSAN Rail Corridor Working Group

To: Anthony J. Serna, Senior Advisor & Policy Lead, Rail and Transit

RE: Comments on the SB 1098 LOSSAN Rail Corridor Working Group Public Comment Draft (June 10, 2026)

Dear Secretary Omishakin, Mr. Serna, and members of the Working Group:

The Surfrider Foundation is a nonprofit dedicated to the protection and enjoyment of the ocean, waves, and beaches. We are an active stakeholder in the future of the LOSSAN corridor, where shoreline armoring to protect the rail line is steadily eliminating public beaches in San Clemente and in Del Mar. In San Clemente, rock revetments placed under emergency permits have eliminated public beach and large-scale armoring is now proposed at San Clemente State Beach. And in Del Mar, two decades of bluff armoring have accompanied a still-unrealized plan to move the tracks. We appreciate the opportunity to comment on the June 10 Public Comment Draft, and we support Senator Blakespear's proposed one-year extension (SB 1324) so the corridor's communities and the public have adequate time to engage.

Our comments come down to one principle: the public's interest in its beaches and coastal access is at stake alongside its interest in a functioning rail line, and the California Coastal Act is how the state protects the first. The draft does not yet reflect that.

A rail line can be moved, but a beach cannot be replaced. The Coastal Act is how the state keeps that straight.

The beaches along this corridor generate substantial economic activity and serve millions of visitors each year. They are not amenities the state can replace. When the rail line is disrupted, bus bridges carry passengers through. But when a beach is armored away, there is no substitute; the public simply loses it. The Coastal Act is the tool the state uses to weigh shoreline armoring against the public beach it consumes, and the report should state plainly that protecting the rail corridor cannot come at the uncompensated expense of the beaches the same public owns. We were glad to see the Coastal Commission make this same point in its June 4 comments.

Add a recommendation to accelerate relocation planning.

P.O. Box 73550, San Clemente, CA 92673 | info@surfrider.org | 949.492.8170 | surfrider.org

The draft frames coastal "resiliency" almost entirely as protecting the existing alignment in place. It is silent on the only durable answer: moving the tracks away from beaches and bluffs that are subject to coastal hazards, i.e. erosion and sea level rise. Armoring is, at best, a time-limited bridge. Sea-level rise will outpace it, and every dollar spent entrenching the line on the shore is a dollar not spent moving it. A report on this corridor's future that omits relocation is incomplete. We support accelerated long-term planning and moving the tracks off the beach and bluff. We are not alone in this request. Both the Coastal Commission (June 4) and the City of Del Mar (June 26) asked the working group to add a recommendation accelerating studies of long-term corridor solutions, including managed retreat of the rail away from the shoreline.

Preserve the Coastal Development Permit process (Section 2.2, Recommendation 1).

The draft proposes an MOU to "streamline" coastal-zone rail projects and floats running them through CZMA federal consistency review in lieu of a Coastal Development Permit (CDP). We do not oppose federal consistency review when it is the legally appropriate path. But it should not be substituted for a CDP simply to save time. In Surfrider's experience, the CDP process produces better and more enforceable outcomes. CDPs are enforced under the Coastal Act in state court, and their conditions are not subject to a federal override. The Commission itself told the working group on June 4 that the CDP is the superior approach for these projects. We ask that the report drop the 'in lieu of a CDP' framing. Any MOU or agreement should also make clear that it will not lock in streamlining decisions ahead of public, project-by-project review. That review is essential whenever a project involves shoreline armoring, or any other element that could harm beaches or public access and therefore require mitigation.

Keep emergency and streamlining measures consistent with the Coastal Act, with enforceable follow-through (Section 2.2, Recommendation 2, and the emergency-response recommendations).

Recommendation 2 offers a streamlined pathway to "repair, replace, or enhance" existing protective structures such as seawalls, while saying nothing about streamlining the alternatives. This has it backwards. Surfrider supports faster pathways for nature-based adaptation, which protects rail infrastructure without consuming the public beach. We oppose making the repair and replacement of seawalls routine, and we oppose any streamlined treatment of their *enhancement*. Enlarging an existing structure is new development, with new impacts to the beach and public access, and it must undergo full Coastal Act review, not a maintenance fast-track.

A streamlined pathway to “repair, replace, or enhance” protective infrastructure risks turning temporary emergency armoring into permanent, expanding armoring. This pattern is already playing out in San Clemente: emergency rock goes in, and the follow-up regular permit that is supposed to evaluate it, mitigate it, or require its removal never arrives. Any process that trades the permanent loss of a public beach for the temporary protection of the rail line has its priorities backwards.

Whatever streamlined or emergency pathway the report endorses should therefore be conditioned on full Coastal Act consistency and carry an enforceable, time-bound requirement to complete the follow-up CDP, with mitigation. Where armoring is allowed as a bridge to relocation, it should come with a removal commitment tied to that relocation, as the Commission required for the Del Mar Bluffs project when it conditioned approval on eventual removal of the seawalls once the line is moved to a sustainable location.

Remove the proposed CEQA exemption (Section 4.1, Recommendation 3).

Surfrider opposes the new CEQA exemption in Section 4.1, Recommendation 3, and urges its removal before the report goes to the Legislature. The exemption would remove rail-carrier activities "under the authority of the Surface Transportation Board" from CEQA altogether, handing California's review of projects built by its own agencies to a federal body whose mandate is freight commerce. It would write into state law a version of the same categorical relief that North County Transit District (NCTD) sought, and failed to obtain, at the federal level over a three-year proceeding. In May 2023, the Surface Transportation Board found NCTD's preemption arguments unpersuasive, rejected the argument that its corridor work is categorically beyond state environmental review, and directed that such questions be resolved case by case (Finance Docket No. 36433). The exemption is also written around federal rail authority that does not extend to much of the work at issue. The seawalls and riprap on this corridor are routinely built on public state and city beaches and tidelands, outside any rail right-of-way. That work is not "transportation by rail carrier" under the ICCTA, and it is not within the Board's jurisdiction. Surfrider made this point on the record in that proceeding. This recommendation should be struck.

Honor the statute's requirement that environmental and community voices be at the table.

SB 1098 requires the working group to include business, community, environmental, labor, and civic organizations, and to consider the known and expected impacts of its recommendations on the coastal environment and local communities (Gov. Code § 14072.6(b), (c)(2)). The current membership does not reflect that requirement. The perspectives most affected by shoreline armoring — environmental and local community organizations — are not represented. We support using the SB 1324 extension to correct this and to conduct the fuller public engagement the statute calls for, so the working group's recommendations carry the broad understanding and support the Legislature intended.

Surfrider supports the goals of SB 1098 and a reliable, well-coordinated rail corridor. The corridor's beaches and its rail line both serve the public, and both can be protected: by keeping full Coastal Act and CEQA review intact, by treating armoring as a bridge rather than a destination, and by accelerating the relocation that is this corridor's only durable future. We appreciate your consideration and are glad to serve as a resource.

Sincerely,

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A Response to the SB 1098 Working Group Report

Executive Summary

The 351-mile LOSSAN Corridor, connecting San Diego, Los Angeles, and San Luis Obispo, is one of the nation's busiest passenger rail corridors, but it faces serious threats from coastal erosion and service disruptions, flagging ridership recovery, and increasingly strained funding that existing governance has failed to adequately address. This as Southern California prepares to host the Olympics.

In 2024, the California legislature passed SB 1098 with a clear mandate to provide concrete recommendations for legislation to improve the LOSSAN corridor's service, resilience, and governance by the beginning of 2026. While the law required consultation with key stakeholders, opportunity for participation from rider groups and transit experts has been minimal. Related to the way in which stakeholder input was collected, the report as drafted does not address governance, project delivery, funding, and other reforms that are the root of the problems in the corridor.

In our response, Californians for Electric Rail and our coalition partners highlight many of the key reforms to governance and funding needed to deliver world-class regional transit throughout Southern California.

Coastal rail resilience is an urgent problem, and while the report suggests some improved procedures for handling emergency closures, there is little vision for a long term solution. Rerouting rail service off of erosion-prone bluffs and beaches in San Clemente and Del Mar must be treated with greater urgency, with CalSTA taking the lead on environmental review, geotechnical work, and design to expedite a permanent solution. To prevent future equipment-related disruptions, CalSTA should also consider adopting a financing model for rolling stock procurement and standardize rolling stock statewide. Bus bridges must be provided when service disruptions do occur - a practice that will be facilitated by proposed changes to governance.

Regional Rail in Southern California has a problem of too many cooks. With nine right of way owners and eleven different public agencies managing[1] service, coordination problems are common and parochial issues take precedence over frequent and reliable rail service that functions as a regional network. To address this, we propose transforming the governance of Metrolink, Surfliner, and Coaster from several partially overlapping joint powers authorities (JPAs) to a single agency with a single infrastructure manager, a dedicated operations funding source, and a board staffed with dedicated public servants, that balances regional perspective with local representation.

A structural reorganization that establishes a single governing body (the Southern California Rail Agency) for all three corridors will enable better project delivery, with more efficient use of state funds and better outcomes for riders. Agency consolidation has the potential to reduce redundancy and create economies of scale that enable increased utilization of in-house staff to deliver capital projects, a cost-saving measure. The new reorganization allows local resources to be reallocated into service planning and better focus on cross-agency service coordination, which would be strengthened by our recommendation to mandate use of service-led planning in regional transportation plans. We also recommend that Caltrans, via CalITP, set a timeline to implement a single payment card and cross-system transfer discounts along the lines of Clipper 2.0.

Funding is another essential item missing from the SB 1098 report. The newly consolidated Southern California Rail Agency must be able to authorize regional taxes to support operations, and receive a reliable state operations subsidy. Further, the state should restructure capital funding away from competitive grant programs, which encourage complex capital stacks, overreliance on consultants, and cost escalations and delays, and shift to a multi-year investment framework model that provides stable funding and state oversight on 4-6 year timescales.

Regarding Corridor ID, we support additional state intervention to deliver these projects. As such, we recommend that Caltrans Division of Rail be the primary program manager, deliverer, and host railroad liaison for all Corridor ID projects, and that Caltrans work to develop design standards that can be applied to all rail projects in the state.

We encourage the legislature to take seriously the need for reform and commit to action on recommendations to improve LOSSAN governance.

[1] SCRRA (Metrolink) JPA, LOSSAN JPA, Orange County Transportation Authority (OCTA), Ventura County Transportation Commission (VCTC), Riverside County Transportation Commission (RCTC), LA Metro, San Bernardino County Transportation Authority (SBCTA), San Diego Area Governments (SANDAG), San Diego Metropolitan Transportation System (NTS), North County Transportation District (NCTD), Santa Barbara Council of Governments (SBCOG) are all involved in service planning, budgeting, or capital project management to some degree.

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1. Introduction: The Importance of Ambitious Work on the LOSSAN Corridor

The LOSSAN corridor is the second highest ridership rail corridor in the US, after the Northeast Corridor. It connects California's two biggest cities and serves more than half of the population of California. The corridor contains three main services: the Surfliner, Amtrak branded, state-supported regional rail, Metrolink, the regional rail system for greater Los Angeles, and the Coaster, regional rail for San Diego County that overlaps with Metrolink in Oceanside. With 545 miles of track, Metrolink is one of the largest commuter rail agencies in the US by area, but its ridership lags that of systems covering fewer miles such as Caltrain and MBTA.[2]

In 2022, the California Air Resources Board (CARB) set goals for vehicle miles traveled (VMT) reduction of 25% from 2019 levels by 2030 - but as of 2025, the state was only 5% below[3] 2019, not on track to meet the goal. California has the largest share of "super commuters", those who drive at least an hour every day to work, in the country.[4] Regional rail is a critical part of the solution to both problems, as 75% of VMT is from long trips best replaced by rail.

Recognizing the importance of regional rail to other goals, the 2024 California State Rail Plan envisions substantially increased rail service, including new rail lines, in Southern California. Unfortunately, the service and reliability improvements associated with these investments have been slow to materialize. Metrolink's SCORE program, a $10B capital program funded through the state Transit and Intercity Rail Program (TIRCP) and intended to deliver systemwide 30 minute service by the 2028 Olympics, will now not deliver full 30 minute service on any line until 2029, with full buildout not complete until 2037.[5]

The LOSSAN corridor is also highly at risk to coastal erosion and sea level rise. Coastal erosion near San Clemente closed the Los Angeles to San Diego connection for more than a year between 2022 and 2024. Rerouting the corridor off the erosion-prone beaches and bluffs in south Orange County is a necessity for continued operation of the service, yet more than four years after initial closures potential routes have yet to be identified. The Del Mar tunnel in San Diego County is likewise essential for continued operation of the corridor, and is farther along, but environmental review is not set to complete for until 2028 - five years after the process initiated - with project completion still far in the future.

Southern California transit agencies also suffer from more basic challenges with coordination. Despite sharing the same infrastructure, code-sharing between Surfliner and other services is

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[2] https://multimodalmcmullen.com/us-commuter-rail-ridership-analysis-first-half-2025/

[3] https://tripnet.org/wp-content/uploads/2025/09/TRIP_Keeping_California_Mobile_Report_September_2025.pdf

[4] https://www.ppic.org/blog/super-commuters-in-california/

[5] https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/3927862/SGDP_Presentation_Feb_2026.pdf

limited in both time and space. Metrolink lacks fare parity or free transfers with other services, each of which uses a different payment system, with local transit in LA County using TAP, Orange County using WAVE, San Diego County using Pronto, while Metrolink, Surfliner, and other county bus systems accept none of these. This lack of common fare payment systems is emblematic of broader coordination issues and makes transit confusing and overly costly for potential new riders. By contrast, dozens of agencies across nine counties in the Bay Area use the same transit card, with discounted transfers across services. Lack of schedule coordination across counties is also an issue, with poorly aligned schedules for transfers between Metrolink, Surfliner, and Coaster in particular posing an obstacle to travel between Riverside and San Diego Counties.

Regional rail agencies also face more imminent crises. As of early June 2026, Metrolink was facing a $35M budget deficit that has led to the agency proposing devastating 40% service cuts. This crisis is directly related to the agency's fragile and problematic governance, with arbitrary budget cuts by Los Angeles and Orange Counties driving about ⅓ of the deficit. The Coaster is facing similar fiscal challenges in the future, driven by national trends in lower farebox recovery and inflation that strain budgets. Multiple agencies are also struggling with equipment issues, with Metrolink having to cut 20% of service in 2026 due to a flaw across their new Tier 4 F125 locomotives, and Sprinter needing to replace their fleet fifteen years early.[6] Across the LOSSAN corridor, agencies are failing to maintain basic service and reliability - let alone deliver the service expansions needed to meet California's climate and affordability goals.

Recognizing these challenges, the California Senate launched the LOSSAN Rail Corridor Resiliency Subcommittee and passed SB 1098 to find a solution. SB 1098 calls on the state to deliver a report with actionable political solutions for the legislature. But few solutions are to be found in the public comment draft.

2. Why the SB 1098 Working Group and Draft Report fall short

2A. Failure of CalSTA to Provide Transparent, Open Meetings

The text of SB 1098 (14072.6. (b)) calls on CalSTA to convene a working group to deliver a report by February 1st, 2026. In addition to the various LOSSAN operators and right of way owners, the text of the legislation explicitly calls for the inclusion of "Business, community, transportation, environmental, labor, and civic organizations" in the working group. Contrary to the law, the working group was convened for the first time on February 19th, 2026 - after the

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https://www.transittalent.com/articles/index.cfm?story=NCTD_Needs_To_Replace_Sprinter_Fleet_Early_3-2-2025

deadline for the report. Attendees included only Caltrans Division of Rail, Ventura CTC, LA Metro, FTA, SBCAG, OCTA, SANDAG, NCTD, LOSSAN, Metrolink, RCTC, and Senate Staff[7], excluding advocates as well as the Coastal Commission.[8] No public information is available about the participants of the subsequent March and April meetings.

Not only were civic organizations excluded from membership in the working group, the public was excluded altogether, in likely violation of the Bagley-Keene Act. Californians for Electric Rail reached out to CalSTA staff about public access to the March and April meetings, but did not receive a timely response, and agendas and locations for both meetings were not posted until a week after the meetings occurred, excluding any public oversight. Meeting notes from these meetings merely summarize what was discussed without attribution, providing no information about the process or political dynamics. The May 11th meeting was open to the public, but consisted of CalSTA staff discussing an already-settled report outline, with seemingly little opportunity to alter the outcome nor light shed upon the decision-making process.

The short timeline and limited participation limit the scope and ambition of the report. There appears to have been no discussion of international or domestic best practices, and the report lacks technical rigor, driven by a lack of participation from engineering and management experts in the private sector or academia. There is no consideration given to the needs or perspectives of rail riders or workers. Instead, report recommendations are based on the consensus of the very entities who have failed to come to a consensus on basic service and operational issues for decades. Unsurprisingly, the recommendations fall short of the bold solutions needed to resolve the crisis.

It should come as no surprise that this working group came to little consensus on transformative solutions. LOSSAN is in crisis because of a governance structure heavily dependent on voluntary cooperation and consensus that is falling apart. Currently, OCTA leadership thinks that Metrolink is running too many trains[9] and is pushing to cut Metrolink funding by 10% to induce service cuts. This is at odds with the State Rail Plan, Metrolink's service planning and their $10B SCORE capital program, and the SB 1098 mandate to increase service, but also at odds with inland counties, who have expressed interest in increased service but depend on OCTA's cooperation. Entities who cannot agree on whether to run more service in line with established plans cannot be expected to come to consensus on more substantive and transformational reforms that might undercut their own power. The desire for maximal consensus is crippling the ability of LOSSAN and Metrolink to rationally plan and improve rider experience.

2B. How the Flawed Process Produced Tepid Findings

[7] https://calsta.ca.gov/-/media/calsta-media/documents/lossan_wg_notes_feb2026-a11y.pdf
[8] A Coastal Commission representative claimed at the May 11th meeting that they had been included in subsequent meetings, though this is not verifiable as notes or a recording from the May meeting have not been made public.

[9] https://www.sbsun.com/2026/05/15/ridership-drop-service-cuts-plague-metrolink-as-it-struggles-to-define-its-future/?share=02sgwrtorcotclieonou

Due to the flawed process, the LOSSAN working group draft report falls short of the crisis at hand.

SB 1098 calls on the report to discuss “Alternative management and operations models or structures that improve intercity and regional rail services.“ Yet the draft policy recommendations in area B provide no alternative management and operations models or structures. Instead, it explicitly recommends a continuation of the status quo: “use existing avenues to formalize this coordination” (B3.1.1.1). The mild recommendation that agencies align schedule changes on the same date (B3.1.2.1) explicitly states that it is not an “inflexible mandate” and thus can be ignored by agencies at their leisure. These recommendations also fall short of SB 1098’s mandate to “improve rail service coordination” by failing to set goals for fare and schedule coordination.

The recommendation to identify a primary freight railroad liaison (B3.1.3.1) is a good start, but the lack of urgency and adherence to the law seen throughout this process leaves open the question of whether such a liaison will actually be identified, and whether they will communicate effectively with relevant agencies. Ideally, a report generated under more inclusive and less rushed circumstances would have identified a specific freight liaison and recommended a process to ensure coordination.

Similarly, SB 1098 includes “Changes to state statutes, rules, or ***funding*** necessary to improve the quality, performance, usage, management, or frequency of passenger rail services with a focus on streamlining, clarifying, and improving existing processes or procedures.“ While the draft report acknowledges funding challenges, Area C (Section 4.0) contains no recommendations for new sources of state funding, despite the urgent need for more operations funding to fulfill state and local service goals. California underfunds transit operations compared to other states.[10]

Likewise, the report’s recommendations around changing the amount or structure of capital funding are weak, despite the urgent need to invest in coastal resiliency and lackluster results for the last ten years of capital investment. The recommendations assume the continued existence of TIRCP and other state grant programs - despite recent modifications to the Cap and Invest market mechanisms that essentially defund TIRCP, LCTOP, and other greenhouse gas reduction fund transit programs.

Recommendation A2.1.2.1 would negatively impact already oversubscribed competitive grant programs by expanding them from new capital projects to state of good repair. Making basic maintenance subject to the delays and scrutiny of competitive grant programs is not best practice; formula funding is. Similarly, recommendation A4 to prioritize projects with local funding encourages overly complex patchwork funding that inflates project budgets and timelines.

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https://www.seamlessbayarea.org/blog/2025/12/30/state-task-force-issues-report-setting-stage-for-progress-on-funding-coordination-capital-reforms

Recommendation A2.3.1.2 would task member agencies with compiling a list of grade crossing locations prioritized by risk to guide investment. This is duplicative of work already done by CPUC under PUC Code section 190. It also doesn't address the core reasons grade separations are challenging: 1) grade separation projects are planned as one-offs, instead of as corridors; 2) grade separation projects are designed and led by local governments that lack standards or capacities to deliver them cost effectively; 3) annual state investment in the Section 190 Program has not grown with inflation for at least forty years.

In addition to weak policy and governance recommendations, the report also lacks specificity on strategies to accelerate capital investments that could "reduce disruptions or delays" and improve the frequency and performance of rail. Overhead electrification would increase rail speed and frequency and reduce equipment-related delays associated with complex diesel engines, yet commitment to electrification remains lacking both in general and in the draft report. Capacity projects such as the Serra Siding are essential to service goals elaborated in SCORE and the LOSSAN optimization plan, yet this report fails to address political, governance, or technical barriers to their completion. Finally, while the report includes some recommendations around emergency repairs, the report fails to propose strategies to accelerate the construction of the Del Mar and San Clemente bypasses.

3. Rail Advocate Recommendations

3A. Need for Governance Reform and a Stronger Organizational Form

Governance reform for the LOSSAN corridor is necessary to overcome structural issues that prevent necessary improvements to transit and rail service between Los Angeles and San Diego.

Rail transit in Southern California is currently split between several different agencies, as is the responsibility and ownership between them over right-of-way and tracks. The consequence has been the division of resources, the creation of redundant administrative and bureaucratic organization, as well as a lack of coordination on equipment, scheduling and improvements to service.

The recommendation that Californians for Electric Rail presents is a merger of the different authorities that have governance over rail infrastructure in Southern California into a single entity which is empowered to provide regional public transit service by rail, and road (e.g. regional express buses). This recommendation is not without historic precedent, would follow best practices as set by other agencies in the United States, and would also be in the best interest of county transportation commissions across the Southern California region, including Greater Los Angeles, and San Diego Counties.

Current governance over rail resources splits responsibilities between individual county transportation commissions. This is a historic system that was instituted by California Assembly Bill 1246, passed in 1975 which created county transportation commissions. While AB1246 was intended to resolve perceived issues over regional transit service provided in Southern California by the SCRTD, the bill has had more detriments than benefits.

The current governance structure with LOSSAN inheriting a devolved service from Caltrans Division of Rail stems from efforts in the 1990s. In the wake of the failure of state intercity rail bonds in 1994, SB 457 was passed in 1996 to allow devolution of intercity rail to joint powers agencies. Southern California explored but could not move forward on this project due to disagreement between counties on how such an agency would be governed and managed. In 2012 a bill forcing the devolution of the Surfliner down to LOSSAN was introduced. At the time. opponents there were prescient warnings[11] that:

1. The Department of Finance predicted that this would worsen coordination with intercity buses and rail service as well as local transit;
2. The local government-led JPA would not improve efficiency of administrative, operational, planning or capital project delivery; and
3. The local government JPA could not agree on basic governance questions itself.

Fourteen years later, it's clear that the opponents were largely correct.

Currently, county transportation commissions are trapped in an adversarial relationship, competing with one another for state grants and resources that instead could be pooled in a regional authority that benefits the whole region. Commuters who commute from one county from another, for example from Riverside to San Diego County, or from San Bernardino County to Los Angeles County, are forced to either commute by car, or are reliant upon two different county transportation commissions which may have conflicting goals or ideas and which inhibit important intermodal connections for commuters.

Current legislation and governance also mean that many commission board members hold office by virtue of ex-officio status, holding their position within transportation commissions because of another office that they may hold. This requires them to split their time and responsibility and prevents them from focusing full-time on the demands of transit planning. Such members may or may not be experts in transportation, engineering, or other disciplines relevant to the oversight of a major railroad. This is neither a reasonable nor sustainable expectation for such officials.

The effect is a flawed process of governance that is inherently unrepresentative of California's transit needs and at worst even potentially undemocratic. Residents in Riverside County may work in Orange or Los Angeles County, and the economies of these counties are interdependent on one another, but do not have representation or say in the transit policies of these areas. This is a relatively recent aberration, with transit in Southern California historically being a shared resource. The effect of transportation commissions has effectively created a

[11] https://la.streetsblog.org/gabbard-history-of-the-surfliner-lossan-and-a-look-at-pending-legislation

much more confusing and difficult landscape for residents of Southern California to understand, and has not meaningfully improved the transit situation since the 1970s when they were created. **This is not a fault of the commissions, but is a structural consequence of the legislation that created them, and must be corrected through governance reform.**

A regional governing body created by state enabling legislation would resolve these problematic relations, free up additional resources for county commissions and enable greater coordination of resources and greater efficiencies for public transportation as a whole. Several other transit agencies throughout the country operate under these principles. The Massachusetts Bay Transit Authority and New York Metropolitan Transit Authority both operate as regionally empowered authorities that are responsible for governing transportation resources and planning across the greater New York and Boston-Providence areas. Chicago has passed legislation that will reorganize the different transit modalities in the greater Chicagoland area under one agency and California should do the same.

The historic SCRTD which was effectively dismantled by AB 1246 was approaching this by the mid 1970s before the creation of the new commissions prevented this. A lack of funding, as well as a hostile public due to historic baggage inherited by the agency prevented what could have been a leader in American public transportation. The SCRTD shows that there is historic precedent for the state legislature to pass legislation that reorganizes regional transit within Southern California and offers perspectives why such possibilities exist, but are also necessary.

The benefits of such consolidation would be to reduce the overlapping and redundant forms of bureaucratic administration over transit, to pool resources and funding, to create a greater collection of engineering talent and reduce friction between counties while also freeing up additional resources for the existing commissions to focus on local needs, while also coordinating with the regional picture. Studies of transit planning, including those by the New York University Marron Institute of Public Policy[12] and the University of California[13], have consistently shown that public transit projects are cheaper and become cheaper the longer such pools of talent and institutional knowledge exist, eliminating reliance on consulting, and creating experience that translates to smoother delivery on future projects. A larger regional authority would also have greater powers and authorities to negotiate rates, and have a stronger bargaining position with equipment manufacturers, builders of rolling stock and bus fleets and would eliminate costly incompatibilities between different fuel and electrical charging equipment. Currently, different commissions are exploring electric, and hydrogen options that are incompatible with one another, making transportation costs higher overall for the whole of Southern California.

A regional authority would still represent the counties. Rather than the counties represented by their own transportation commissions, they would instead have representation in the new, shared regional authority with full time board members appointed by the Governor or Legislative leadership for their expertise and competency in public transit planning and execution. This model would be similar to the model employed by the New York MTA, which

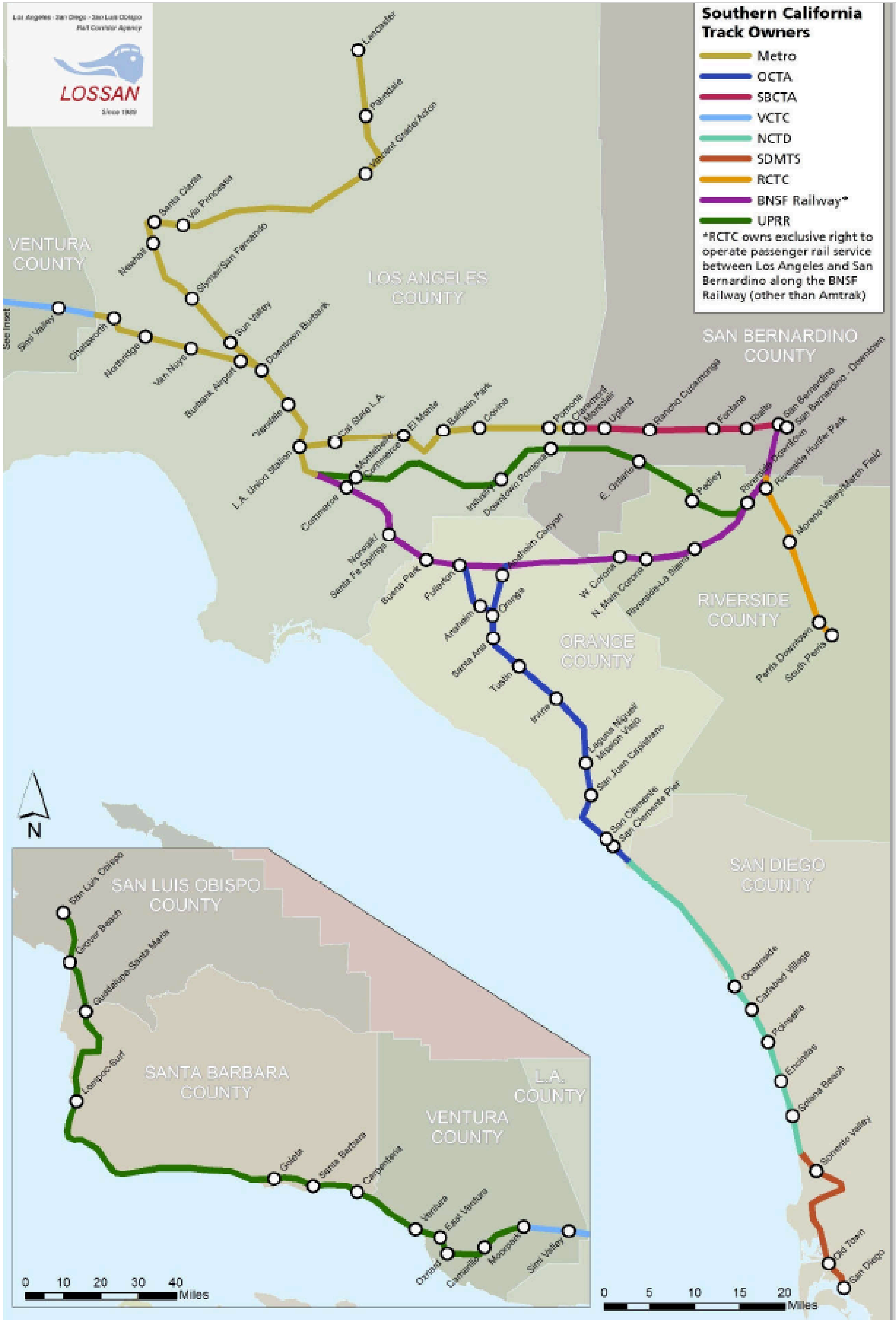
[12] New York Marron Institute, *Transit Costs Project,* New York University, 2025
[13]Ethan Elkind, Katie Segal, Ted Lamm, et al. “How can California Transit Agencies Build Rail Cheaper and Faster?” UC Institute of Transportation Studies. Dec. 2021.

appoints its members through the governor, at the recommendation of the counties (or boroughs in the case of New York City) that it provides service to. Such board members would be the members for their counties, would be clearly identifiable and have clear responsibilities making them more accountable and ensuring that there is a democratic representation in public transport.

3B. Need for a Single Infrastructure Manager

Best practice calls for network management of rail assets. Ownership of mainline rail tracks used by passenger trains in Southern California is split between nine different entities, both private and public, as shown on the map below.[14] These different entities each have conflicting needs, demands, and requirements of their track and these may not be compatible with one another.

[14] The LOSSAN corridor's track has seven (7) owners (from north to south): UP, VCTC, LA Metro, BNSF, OCTA, NCTD and SDMTS. Metrolink member agencies SBCTA and RCTC also own track, but not directly on the LOSSAN corridor. The cities of Los Angeles and Long Beach also own the Alameda Corridor and tracks in the port areas, which are only used by freight trains


LOSSAN
Southern California Track Owners
Metro
OCTA
SBCTA
VCTC
NCTD
SD MTS
RCTC
BNSF Railway*
UPRR
*RCTC owns exclusive right to operate passenger rail service between Los Angeles and San Bernardino along the BNSF Railway (other than Amtrak)
VENTURA COUNTY
LOS ANGELES COUNTY
SAN BERNARDINO COUNTY
RIVERSIDE COUNTY
ORANGE COUNTY
SAN DIEGO COUNTY
SAN LUIS OBISPO COUNTY
SANTA BARBARA COUNTY
L.A. COUNTY
See Inset
Lancaster
Palmdale
Santa Clarita
Via Princessa
Newhall
Sylmar/San Fernando
Simi Valley
Chatsworth
Northridge
Van Nuys
Sun Valley
Burbank Airport
Downtown Burbank
Glendale
L.A. Union Station
Cal State L.A.
El Monte
Baldwin Park
Covina
Pomona
Claremont
Montclair
Upland
Rancho Cucamonga
Fontana
Rialto
San Bernardino
San Bernardino - Downtown
Montebello/Commerce
Commerce
Industry
Downtown Pomona
E. Ontario
Pedley
Riverside-Downtown
Riverside-Hunter Park
Moreno Valley/March Field
Perris Downtown
South Perris
Norwalk/Santa Fe Springs
Buena Park
Fullerton
Anaheim Canyon
W. Corona
N. Main Corona
Riverside-La Sierra
Anaheim
Orange
Santa Ana
Tustin
Irvine
Laguna Niguel/Mission Viejo
San Juan Capistrano
San Clemente
San Clemente Pier
Oceanside
Carlsbad Village
Poinsettia
Encinitas
Solana Beach
Sorrento Valley
Old Town
San Diego
San Luis Obispo
Grover Beach
Guadalupe-Santa Maria
Lompoc-Surf
Goleta
Santa Barbara
Carpinteria
Ventura
East Ventura
Oxnard
Camarillo
Moorpark
N
0 10 20 30 40 Miles
0 5 10 15 20 Miles

San Diego's North County Transit District (NCTD) has been gradually making improvements along its portion of the LOSSAN Surfline corridor, Santa Fe's historic track between Los Angeles and San Diego in order to improve service for the Pacific Surfliner and the NCTD Coaster Commuter. However, such improvements will never be able to meet their full potential without matching improvements to track in Orange County which has not manifested along track owned by OCTA. This has also prevented expansion to Metrolink's IE-OC line, which connects Riverside and San Bernardino Counties with Orange County, despite both counties expressing demand.

A regional rail authority, potentially acting as a single infrastructure manager, would be able to build necessary infrastructure improvements and renewals without being subject to county control over funding. A regional rail authority would also be able to make necessary infrastructure improvements to the greater betterment of the entire region without being subject to inter-county political friction that currently impedes such necessities.

Such an authority would also be able to construct new rights-of-way that improve transit for residents in different counties that would otherwise not be possible under a single transportation commission. San Bernardino and Riverside county have for example considered restoring the former right of way of the California Southern to provide rail service through the Temecula Valley to East San Diego County, a path also under consideration by the California High-Speed Rail Authority, but this is not possible without the power and funding a regional agency could provide. Similarly, the RCTC has expressed an admirable and ambitious goal to provide rail to the Coachella Valley, but has struggled to achieve much because of the difficulties required to make such a goal feasible. Ventura County has wanted to extend Metrolink service through Filmore along the Filmore and Western track that it owns, but is also similarly limited by the resources it has available.

Such ambitious projects, necessary for the continued growth and economic sustainability of Southern California are only possible through the scales enabled by a powerful regional authority, created for the betterment of not just a single county, but several counties.

County transit commissions disproportionately spend their resources on freeway maintenance and infrastructure. In the long term these projects are more, not less expensive than public transit. By investing so heavily in freeways the transit costs of Southern California are higher than they potentially could be with better public transit alternatives. The effect of over-investment in freeway and road infrastructure is that the state has effectively offloaded many of the costs of commuting to individual residents who have to shoulder more of the burdens of transportation.

Creating a new regional authority **purpose created and tailored for regional public transit needs** will allow local commissions to have more money for important local projects, while also giving them greater ability to coordinate and provide options for commuters. This new regional authority can take the responsibility of rail, and regional transit assets, including buses, facilities, etc and pool more expertise for better use. Having an existing pool of intercity buses will facilitate the routine provision of bus bridges when service disruptions do occur.

Challenges to operational integration

We recognize that this proposed major reorganization will not be without challenges. The SB 1098 working group's inability to achieve consensus for meaningful reforms is testament to the difficulties with coordination. Proposed reforms will require changes to local statutes and agency practices requiring approval from multiple boards in addition to state legislation. This will require continued engagement from CalSTA and state legislatures to provide follow-through. Local advocates have an important role to play in creating political support for reforms - another reason why their exclusion from the SB 1098 working group was unwise.

In particular, Metrolink's primary source of operations funding is local sales taxes (as seen in hte table below), whose rates and allocations vary and are ultimately controlled by local county transportation commissions. Metrolink's current funding crisis seems to be driven in part by a desire by counties for additional control and oversight over spending. Control over a new source of regional and/or state funding is an essential power for the new proposed board, but that raises the question of what to do with existing revenue measures. We suggest that once a new revenue source is available, that counties transfer funding currently dedicated to regional rail to local transit using processes and latitude stipulated in existing measures. The State Legislature is empowered, and has previously, given tax-setting authorities to regional institutions for the benefit of a larger area. One example is the historic SCRTD itself, which had tax and tariff powers given to it that could be levied across the Greater Los Angeles area.

County/Measure	Sunset date	Rate	FY25-26 annual revenue	Allocation
Riverside County Measure A	2039 (up for renewal 2026)	½ ¢	$262 M	12% for transit* 5% for Metrolink
San Bernardino County Measure I	2040 (up for renewal 2026)	½ ¢	$265 M	18% for transit* 8% for Metrolink
Orange County Measure M2	2041	½ ¢	$432.1 M	25% for transit
Los Angeles County Measure R	2039	½ ¢	$1070 M	65% for transit 3% to Metrolink capital**
Los Angeles County Measure M	none	½ ¢	$1156 M	81% for transit 1% to Metrolink**
Ventura	n/a	0 ¢	0	n/a

County - nothing				
San Diego County TransNet	2048	½ ¢ (gas only)		33% for transit 0% for Metrolink 2.5% for Coaster operations

* Specific to western sub-regions with rail service.

** Contribution legally specified in expenditure plan

We recognize that many agencies and local electeds prioritize local control, and may oppose these proposed changes on the grounds that they will reduce their power. Local control is often defended on the basis of enhancing public participation, local knowledge, and democratic engagement - all very important values. However, the current system fails to meaningfully enable these principles, while also failing to deliver the transformative service and ridership growth the region needs. Under the status quo of part time governance by local electeds, boards defer decision-making to unelected and frequently anonymous staff, reducing transparency and public input.

Meanwhile, allowing individual counties effective veto power over service improvements is undemocratic and a barrier to public participation by riders outside those counties, who have no representation on other county boards. The overly complex current structure avoids accountability and leaves the public in the dark as to who to contact about key decisions. Under the current Metrolink JPA, the voting structure and lack of minimum funding contributions give disproportionate “veto” power. Consensus is not structured as an agreement of compromises, but a requirement for unanimous consensus of different counties on local, rather than regional needs. Our proposed board structure maintains local representation, while balancing this with statewide needs.

The proposed structure also has many benefits for counties. County transportation departments will no longer be tasked with managing complex capital projects that they have neither the expertise nor interest in managing, and instead can focus on efforts where their local knowledge has the most impact: service planning. Some local stakeholders, such as Orange County Supervisor and OCTA board member Don Wagner, have expressed a desire to reduce their involvement in managing Metrolink, and these wishes will be granted. Counties that want service improvements, meanwhile, will no longer have to deal with frustrating bilateral agreements with multiple actors in which they are often the weakest party[15] - they will instead have a powerful agency they can partner with to advance their priorities and exert real leverage over freight railroads. Local electeds who show leadership in championing a new, more effective governance structure will leave a legacy of successfully delivering transit enhancements that improve the lives of their constituents.

[15] For instance, Riverside County has expressed a desire for more service on the IE-OC and 91 Lines. This has been thwarted by the need for cooperation with Orange County, who want less service, and BNSF, who own a significant share of the right of way and are considerably more powerful than any county. Of the three, Riverside County has the least leverage and has been unable to deliver service.

3C. Need for Dedicated Funding Sources for Regional Rail Operations

Successful regional rail networks have dedicated and stable revenue sources in addition to the fare box and ancillary revenues like TOD and retail rents. Long-term the goal of systems should strive to improve service quality (frequency, speed, comfort, reliability) and operational efficiency to the point that the farebox covers a higher share of the operating costs. With the exception of regional rail lines in Japan, Hong Kong and South Korea that fully cover their costs, regional rail lines in the developed world typically have a farebox recovery ratio between 40-60%. Ample evidence from passenger rail operations around the world has shown that more frequent, faster and more reliable service significantly increases the farebox recovery ratio.

Successful regional rail networks have stable operational funding - typically funded by tax revenues from the regional or sub-national level. Operators grow the ridership and farebox revenue by running quality service, attracting more riders per operating hour and investing in capital projects that improves service quality or adds new markets.

Surfliner, Coaster and Metrolink, by contrast, largely do not control their own funding. In recent years, these services have relied on one-time state funds to sustain operations, but these funding sources have now ended. Metrolink relies on separate approvals from five member counties to fund most of its operations, and does not maintain reserves, returning surpluses to counties. Currently, disagreements between counties on whether to prioritize service improvements have led to about ⅓ of Metrolink's deficit. This uncertainty makes it harder for planners to optimize existing services and plan effectively for capital improvements that improve service.

Metrolink funded a student adventure pass to lower fares for students. This was funded by a state grant. It resulted in increased ridership. When the grant ended, Metrolink member counties declined to provide additional funding to support the extension of the program.

As an example, recently Metrolink abandoned plans to install WiFi on its trains - a perk valued by riders and standard practice for regional rail domestically - because member counties did not agree to the increased costs.

Providing a stable funding source also allows for the equipment and infrastructure that Surfliner, Coaster and Metrolink services rely on to be more efficiently maintained and repaired as necessary. Currently the annual budget contributions towards Metrolink make it difficult for proactive repair and procurement of new, modern rolling stock. On the infrastructure side, the wide divergences in county ROW maintenance and state of good repair regimes is driven by the different funding sources. If one county along the Surfliner route does an excellent job maintaining their infrastructure but the adjacent county has been underfunding maintenance, the slowness and capacity constraints impact all riders.

The SB 1098 WG materials indicate that invited stakeholders identified the problem with inadequate state of good repair funding. Instead of pressing for dedicated revenue, they proposed to expand TIRCP competitive, discretionary grant eligibility to make state of good repair eligible. This is not consistent with global best practice - which funds renewals consistently and on multi-year frameworks. Discretionary grants for state of good repair funding would likely further degrade system-wide infrastructure conditions while occasionally helping a select number of projects. Funding critical maintenance activities like repairing bridges and replacing railroad ties should not be at the whims of discretionary grant selection.

CER recommends that a dedicated, stable revenue source be provided to regional and intercity rail in Southern California.

3D. More Effective Capital Funding

In order to meet the ambitious service and electrification goals in the State Rail Plan 2050, California will need to seriously re-think how funding for capital investments is allocated. High-frequency intercity and regional rail service will require more resources but also more stable and predictable investment.

To this end, Californians for Electric Rail has published the policy brief *Against Patchwork Funding: How Multi-Year Investment Frameworks Can Deliver Rail Infrastructure Cheaper and Faster*.[16]

Against Patchwork Funding discusses the status quo for rail funding in California, best practices in low and medium cost countries and ways California could re-orient its funding practices to better implement the State Rail Plan, the LOSSAN Optimization Plan, SCORE, and San Diego Double Tracking and Rail Re-Alignment.

In brief, California’s current funding program environment is highly unstable and discretionary. Unlike highway funding, there is no guaranteed funding for design and engineering for intercity and regional rail service and infrastructure development. As a consequence, many project sponsors must patch together funding for design over many years. This delay in funding pushes out final project design and capital construction for years. It also encourages project sponsors to apply for and win construction funds at conceptual design when project scope is not fully defined – which provides third parties with leverage to demand costly design changes and often results in much higher costs as design is completed.

Similarly California does not guarantee capital funding for intercity and regional rail projects – even if they are identified in the State Rail Plan. Intercity and regional rail projects must compete against a variety of other projects such as rolling stock, renewals, EV charging at stations, mobility hubs and the like through competitive, discretionary grant programs like TIRCP. In order to meet all these demands for discretionary construction dollars, funding agencies make partial

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https://calelectricrail.org/against-patchwork-funding-how-multi-year-investment-frameworks-can-deliver-rail-faster-and-cheaper/

awards. These partial awards force project sponsors to fill remaining gaps with further competitive grant programs – which further pushes out full funding and construction.

Low and medium cost countries handle investment in their rail networks in a different way – more akin to the stability associated with highway programs. First, design is fully-funded through state engineering departments or publicly-owned engineering firms. Second, awards for construction funding aren't committed until designs are near or fully complete. Third, construction funding is planned, tracked, evaluated and granted through 4-6 year investment frameworks. These frameworks provide a stable and transparent pipeline for both project sponsors and funders. Project sponsors know exactly how and when they can be expected to receive full funding. Funders have clear visibility on how projects are being developed and can provide early feedback to manage scope, costs, schedule and risks. Fourth and finally, multi-year investment frameworks provide full construction funding awards for projects.

CER recommends that the State of California adopt multi-year investment frameworks for regional and intercity rail to support improved service for Southern California.

3E. Aligning MPO Planning and Regional Investment

The Legislature and Administration should require serviced-led planning across county and metropolitan planning organization boundaries to encourage the planning and delivery of regional and intercity rail networks.

The LOSSAN corridor runs through region five distinct Metropolitan Planning Organizations. Each Metropolitan Planning Organization in turn is composed of counties and cities. In theory, these disparate units could prioritize intercity and regional rail as part of the Regional Transportation Plan and State Transportation Improvement Program. In reality local governments tend to support projects with local benefits rather than regional or state benefits.

That means projects that typically make into regional plans are collated local priorities and do not correspond to a larger transportation network. As an example, a project to extend a light rail line will be prioritized over improving the existing commuter rail through double tracking and electrification. We see similar disagreements between local interests over rolling stock. Lancaster - home of a hydrogen industry - naturally supports hydrogen trains. Its neighbor Palmdale - slated for electric high-speed rail - is more open to electric rail. But this division creates paralysis in rolling stock selection and purchase.

Regional planning as it currently exists fails to coordinate service. The Surfliner and Metrolink have recently moved to clock face schedules. This is a global best practice where trains depart at the same minute after the hour at a station throughout the day. It makes scheduling, maintenance, operations, transfers and customer utility much better. Nonetheless, we have not seen coordination between Metrolink and Coaster at Oceanside to facilitate transfers using this clock face schedule. Neither in Southern California have we seen local transit operators work - like they have in the Bay Area with clock faced BART, Caltrain and Capitol Corridor - to sync schedules between connecting buses, light rail and ferries with regional rail. Fares have not been integrated between local transit and regional/intercity rail except in a vast quilt of ad hoc arrangements.

Regional planning must be updated to account for intercity and regional rail as well as service coordination and integration. The SB1098 Working Group report makes some recommendations to this end. These include updating guidance and requirements for regional planning to better account for intercity rail. These proposals are helpful but insufficient.

First, any updates to regional planning must include regional rail as well as intercity rail. Consistently local governments acting through Metropolitans Planning Organizations have de-prioritized regional rail projects - especially in Southern California where regional rail crosses county or Metropolitan Planning Organization lines.

Second, regional planning updates should require that local transit and other transportation investments be planned using service-led planning. Currently the State Rail Plan uses service-led planning as a global best planning practice. Rather than starting with a specific technology or infrastructure, service-led planning starts from assessing travel demand and designing a transport network vision that addresses that demand. Only once service concepts from that transport network vision are developed are capital projects like rolling stock and infrastructure.

Unless local transit and transport planning is integrated with service-led planning, intercity and regional rail will continue to be siloed for regional planning and investment. Local governments will continue to focus on delivering discrete bits of infrastructure rather than developing and delivering a transit network.

Third, state and regional funding need to be tied to service-led planning and state rail plan integration.

3F. Need for State Capacity to Support Service and Project Development

The LOSSAN Optimization Plan and SCORE Program envision decades of incremental upgrades to capacity to provide frequent and reliable service for intercity and regional rail riders. Instead of investing in public sector planners, designs, engineers and project managers to do this work, the de facto policy of California has been for every operator or ROW owner to develop these projects within their own silos. These operators or ROW owners do not have the capacity or work flow to retain public sector capacity for rail service improvements on their own payrolls. Inevitably they turn to private consultants to manage programs and projects.

While consultants can be useful, research into transit and infrastructure costs has consistently shown that American and Californians rely too often on consultants to perform core functions that better lay with the public sector. Yale Law School’s Zach Liscow has produced a paper showing that experienced engineers save significant time and money for infrastructure projects relative to consultants.[17]

The lack of state capacity to plan, design and deliver projects is downstream of the lack of consistent funding for transit and rail. Caltrans uses stable contract authority funding from the Federal government to fund state capacity. Until recently, transit and rail have not had similar mechanisms to retain talented workers for the public sector.

Under the Corridor ID program for intercity rail projects proceeding through process receive resources to progressively plan and develop projects. California has seven total Corridor ID projects. Ideally, California would have public sector staff developing projects under Corridor ID at different stages. Instead each operator or ROW owner is independently pursuing the planning and development work through their own consultants.

This is the case with Coachella Valley Rail, which is pursuing a two round trips a day service development plan. RCTC as project owner has already spent six years on a consultant produced service concept and programmatic environmental impact report. In early 2026 RCTC procured a very high priced program management consultant contract with the same consultant. Even worse, that consultant is projecting that simply getting to 30% design will take seven more years.[18]

This means that California is not only paying higher prices for consultants to perform work, it is losing out on opportunities to develop and retain knowledge, standards, policies, processes and interfaces. A retained consultant designer working with Union Pacific must re-learn UP’s processes and requirements each time. They will also be hesitant to escalate issues early so that phone call problems do not become infrastructure problems.

An empowered Caltrans Rail office - funded using Corridor ID or state funding - could effectively work with operators to develop service concepts that meet State Rail Plan goals. Those service concepts could be implemented through organizational coordination and integration. To the extent additional infrastructure is needed, the Caltrans Rail design and engineering section could develop clear standards for working with Host Railroads on capacity constraints and solutions. It could develop processes for identifying and relocating utilities. And it could draw on Caltrans’ existing procurement and project management capabilities to deliver infrastructure for operators.

We didn’t rely on California local governments to plan, design and deliver the State Highway System using private consultants. We tasked a state engineering body with that work. We should use that model to help plan and deliver the intercity and regional rail network.

3G. Prioritizing LOSSAN Electrification

[17] https://ssrn.com/abstract=5045644
[18] https://calelectricrail.org/state-capacity-for-better-projects-coachella-valley-rail-case-study/

In 2025 CER published *Electrolink: Modern Passenger Rail Service for Southern California.*[19] This vision, drawing on work from NYU Transit Costs Project, shows how modernization of the Southern California passenger rail unlocks metropolitan mobility in ways competitive with car travel. By way of history, in 1993 Metrolink studied electrification, but member counties failed to reach the necessary consensus to advance planning. In 2016 Metrolink again considered electrification[20] as preparation for the 2028 Olympics but again failed to reach consensus necessary to advance planning.

In 2024 Caltrain inaugurated its 51 mile electrified service that reduced scheduled trip times by 30% and allowed for more off-peak service. Caltrain has seen significant increases in ridership recovery since that time. Metrolink and LOSSAN have been paralyzed in terms of modernized rolling stock and infrastructure due to their emphasis on consensus-based decision making.

Using the acceleration and speed benefits of electrification, the reduced dwell time of level boarding and through running service at Los Angeles Union Station and the San Diego Santa Fe Depot, Electrolink demonstrates how regional rail trip times can be reduced to levels equal or faster than driving. For example, these improvements would reduce travel times 20% between Santa Clarita and Downtown LA from 1hr10m to 57m, and between Oceanside and Downtown San Diego from 1hr1m to 45m. Critically, these interventions are much more affordable and less disruptive than efforts to increase top speeds for trains.

Under the State Rail Plan, an electrified spine traveling from downtown San Francisco to the Central Valley, San Fernando Valley, Downtown Los Angeles and Anaheim is the center piece of the 2050 California rail network. Conspicuously missing is electrified service south of Anaheim to San Diego. This despite the Surfliner and Orange County lines demonstrating strong ridership - with the former the 3rd most trafficked intercity rail route in the country.

There is a clear business case for electrified infrastructure south of Anaheim based on the potential to improve Surfliner, Orange County and Coaster service trip times and lower operating costs relative to diesel. In addition, it could allow for an extension of future high-speed rail service to southern Orange County and San Diego. Nonetheless Caltrans, OCTA, SANDAG and others have been non-committal or resistant to identifying electrification as even a long-term goal. In any other developed country the Surfliner route would have been electrified 40 years ago.

CER recommends that electrification of the infrastructure south of Anaheim to San Diego be added to the State Rail Plan to improve service for regional and intercity rail.

4. Conclusion: A Call for Structural Reform and Real Investment

[19] https://calelectricrail.org/electrolink-modern-passenger-rail-service-for-southern-california/

[20] https://la.urbanize.city/post/metrolink-awarded-65-million-grant-begin-study-capital-improvements-program

SB 1098, as originally envisioned by Senator Catherine Blakespear, sought to seriously examine the problems facing intercity and regional rail service in Southern California in partnership with operators, local governments and the public.

Unfortunately the process was late, opaque, inadequate and overly solicitous to consensus rather than addressing existential challenges to passenger rail service. The report reflects this process. Its recommendations - while helpful in some instances - do not meet the moment.

Surfliner service is frequently canceled or slowed due to coastal erosion. Service is cancelled without notice or bus bridges to riders. Local governments refuse to work in concert to prioritize service improvements, coordination or capital projects that improve the experience for riders up and down the corridor. Funders are cutting operating budgets based on misinformation or parochial concerns. Governance is not responsive to riders or the public writ large for better and more flexible service. Intercity and regional rail service is largely uncoordinated and unintegrated with local transit in terms of schedules, fares and routes. Staff is handicapped by their inability to plan long-term, achieve operational cost savings or coordinate phased service improvements. Local government ROW or track rights owners negotiate as silos with some of the largest and most unresponsive firms in America over track renewal, improvements and scheduling. Sensible service improvements like electrification south of Anaheim are omitted from the State Rail Plan due to misunderstandings and fear of a heckler's veto by a few actors. Shared capacity improvements like HSR LA-Anaheim, SCORE and LOSSAN Optimization are planned, environmentally reviewed, negotiated, designed, and funded as separate, siloed projects instead of as a coordinated network.

The primary question is whether the inside players in Southern California passenger rail want to actually improve the network, or simply oversee a managed decline. The former requires an honest and open discussion - which has not been forthcoming in the SB 1098 Working Group.

CER believes that such a discussion would lead to the natural conclusions:

Policy Area A: Strategies to increase rail service coordination and reduce disruptions or delays, including those caused by resiliency vulnerabilities, track closures, state of good repair, equipment, and staffing.

1. Operators and other relevant public agencies should work together to ensure that bus bridges are provided in the event of track closures, and provide excellent communication to riders to be able to plan accordingly.
2. For Del Mar and San Clemente bypass tunnels, CalSTA should:
    - Proceed expeditiously on planning and CAHSR-led environmental review
    - Fund geotechnical investigations to inform preliminary design
    - Fully fund preliminary design
    - Adopt global best practices on cross passages spacing contra NFPA 130[21]

[21] https://ifp.org/eliminate-redundant-subway-cross-passages/

3. CalSTA should facilitate intercity and regional rail ROW owners to re-orient their state of good repair programs to global best practice through ongoing asset renewal programs (rather than deferred maintenance bundled into large capital projects). ROW owners would submit a proposed asset renewal plan within a business plan. If approved, renewal plan funding would be bundled with operating assistance.
4. CalSTA and Caltrans should consider shifting equipment procurement and management into a financing-based model and away from a pure grant-based model (which is highly discretionary, subject to political winds and encourages expensive over-customization).
5. CalSTA and Caltrans should encourage greater rolling stock standardization, including through enabling expansion of the existing central rolling stock pool, or establishing a standards advisory body with participation of rolling stock manufacturers and other key industry stakeholders.
6. In order to reduce operations costs, improve reliability, and improve service, all relevant agents should prioritize overhead electrification as a mode of propulsion. Future versions of the State Rail Plan should explicitly include electrification on the LOSSAN corridor from Anaheim-San Diego. Electrification should also be factored into long range rolling stock planning and near term capacity projects.

Policy Area B: Alternative management and operations models or structures that improve intercity and regional rail services.

1. Governance of Southern California passenger rail should be modernized to reflect the current needs around coordination, resilience, phased service delivery, sustainable operations, and cost effective capital planning and delivery. Rail operations currently managed by Metrolink, LOSSAN, and NCTD should be consolidated into a single Southern California Rail Agency with a new governance structure. Governance modernization should include: 1) an independent board (not a JPA); 2) governance members for whom passenger rail is their primary public service role; 3) unified ROW and network management; 4) a dedicated revenue source for operations and phased capital improvements; 5) responsibility for both regional and intercity rail and bus service.

Policy Area C: Changes to state statutes, rules, or funding necessary to improve the quality, performance, usage, management, or frequency of passenger rail services, including a review of how local and regional planning agencies incorporate train service information in planning documents.

1. An ongoing source of state operations subsidy sufficient to provide service levels outlined in the state rail plan.
2. State authorization for the newly reorganized Southern California Rail Agency transit district including authorization to enact regional taxes
3. Intercity rail business plans and operating budgets should be shifted to two year periods (from current one year periods) to allow for more stable service planning and phased service improvements. Regional rail operators should also be required to submit business plans on a two year basis.

4. Caltrans should build its capacity to support service-led planning including developing clear standards, software, and resources to support regional efforts that are consistent with the state rail plan. MPOs should lead regional processes in cooperation with Caltrans to align rail operators and counties around common service goals and prioritize capital project required to deliver service concepts. Caltrans and MPOs should work with counties to enable service led-planning to be integrated into local transportation and congestion management planning.
5. Capital project state funding should be modernized to reflect global best practice of multi-year framework agreements. Projects should be prioritized based on 1) State Rail Plan conformance 2) network state readiness; 3) cost benefit score. Projects should be afforded full funding as much as possible to reduce capital stack complexity and timelines.
6. Greater coordination on schedules, routes and fares between regional and intercity rail and local transit services. Set timeline for single payment card and discounted transfers. On fare integration, CAL ITP could play a leading role in allowing Southern California riders to receive the same benefits of Clipper 2.0 in the Bay Area.

Policy Area D: Coordination of planning and project development through the federal Corridor Identification and Development Program.

1. Caltrans Division of Rail should be the primary program manager for Corridor ID activities for California - excluding California High-Speed Rail Authority.
2. Caltrans Division of Rail has already expressed intent to continue with the Corridor ID process for intercity rail irrespective of Federal continuation of that program. The Corridor ID service planning and development processes should be expanded to regional rail. Caltrans Division of Rail should offer but not require service planning and development processes to regional rail operators and ROW owners.
3. Caltrans Division of Rail should be the primary host railroad interface for regional and intercity rail operators.
4. Caltrans Division of Design, Standards Branch, should develop standard designs for capacity, level boarding, signaling, electrification, level crossing removal, and renewal projects.
5. Capital projects identified and planned in intercity or regional rail Corridor ID processes should be developed and delivered using Caltrans standard designs. Intercity rail projects should be developed and delivered by Caltrans. Regional rail capital projects should have a clear optional process for project development and delivery by Caltrans.

The Pacific Surfliner, Metrolink and Coaster have a governance structure built for the 20th century and it worked then. The local governance allowed local leaders to act expeditiously to revive passenger rail in Southern California. New regional rail service was started. Existing intercity service was extended.

But history reveals that many of the founders of Metrolink and proto-LOSSAN did not expect at the time for the siloed intercity and regional rail governance to be a long-term solution. As early as 1995 leaders in Southern California were discussing integrating intercity and regional rail into a dedicated body.[22]

In 2026 the problems are different and in some ways harder than instituting a start-up service. Climate resilience, capacity, long-term service sustainability have fewer ribbon cuttings and require more coordination and planning.

It's time for passenger rail in Southern California to take the next step to confront these challenges.

Sincerely,

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Chris Roberts
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[22] https://la.streetsblog.org/gabbard-history-of-the-surfliner-lossan-and-a-look-at-pending-legislation