

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](#)
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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).

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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.

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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

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