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Subject: Comments on the Draft Senate Bill (SB) 1098: LOSSAN Rail Corridor Revitalization Report
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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.

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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.

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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.

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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.

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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.

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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 as applicable to SCRRRA and NCTD).

Sincerely,

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