



July 3, 2026

The Honorable Toks Omishakin
Secretary, California State Transportation Agency
915 Capital Mall, Suite 350B
Sacramento, 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