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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 resiliency 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 resiliency 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

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.

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,

A handwritten signature in black ink, reading "Sarah J. Spinuzzi". The signature is fluid and cursive, with the first name "Sarah" and last name "Spinuzzi" clearly legible.

Sarah J. Spinuzzi
Legal Director
Orange County Coastkeeper