

CALIFORNIA COASTAL COMMISSION

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Anthony J. Serna
Senior Advisor & Policy Lead, Rail and Transit
California State Transportation Agency
400 Capital Mall, Suite 2340
Sacramento, CA 95814

Dear Mr. Serna:

On behalf of Coastal Commission staff, I would like to express our appreciation for your leadership in convening the SB 1098 LOSSAN Working Group. The Commission has coordinated with members of the working group and LOSSAN rail corridor operators for many years. Most recently, this collaboration includes the Commission's timely issuance of numerous approvals for construction, repair, and replacement of shoreline armoring that has been needed to ensure track stabilization in both Del Mar and San Clemente over the past few years. The Commission has also worked diligently with LOSSAN rail corridor operators, other state agencies, local government representatives, and many public stakeholders to maintain public access to the coast, which is vital under the California Coastal Act and for the region and the state.

It is our understanding that the working group intends to complete draft written recommendations pursuant to SB 1098 in the near term. We note that Senator Catherine Blakespear is currently advancing legislation (SB 1324) that would provide a year-long extension to the original February 2026 deadline for the required report. We continue to recommend the working group utilize the forthcoming deadline extension to take the time necessary to more fully discuss the recommendations in a public forum and solicit public input from throughout the LOSSAN region as required by SB 1098. While we appreciate CalSTA's recent public outreach efforts, we believe that additional, meaningful public engagement is needed to ensure that the consensus recommendations generated by the working group reflect the perspectives of key stakeholders which can be implemented with broad public understanding and support. At the same time, given your current timeline and out of respect for CalSTA's leadership and desire to maintain the momentum of the LOSSAN Working Group, we wanted to memorialize some of our comments regarding those potential recommendations prior to the potential release of a completed draft.

Overall, we want to underscore that in addition to the critical public interest served by maintaining service along the LOSSAN corridor, the public also has a co-equal interest in ensuring that projects along the rail line protect and enhance access to our beaches and avoid impacts to coastal resources. Although this is a legal requirement of the Coastal Act, the benefits to the public, the region, and the state of maintaining resilient accessible beaches are enormous. On top of the immense public access benefits provided by the beaches in Del Mar and San Clemente to residents and visitors, beach

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visitorship serves as an essential economic driver for these communities and the surrounding region. Thus, it is critical that we ensure rail corridor safety in a way that also protects our beaches and coastal communities. In that regard, it also remains important that the working group engage with all the various stakeholders here, including coastal environmental and local groups, as is required in the original legislation.

With that overall objective in mind, while the SB 1098 working group has concentrated on recommendations that will improve emergency projects for the corridor in the short and intermediate term, we must also stay focused on completing the larger coastal resiliency and adaptation studies necessary to identify long-term solutions for this rail corridor. Moving forward on long-term solutions could affect if and how short-term and mid-term measures are implemented, potentially avoiding or reducing the need for emergency placement of armoring or similar measures that negatively impact our beaches, incur immense ongoing maintenance and repair costs, and have a limited lifespan. The magnitude of risk to the corridor from coastal erosion is quickly escalating with sea level rise and other climate change impacts. Delaying the initiation of long-term planning will increase the cost and impacts on our beaches and coastal communities. Thus, we request that the working group include a recommendation to accelerate work on studies to evaluate long-term solutions for this corridor, including managed retreat of rail tracks away from the vulnerable bluffs and shorelines.

In addition, we would like to add several more specific comments. First, I noted with appreciation the removal of prior recommendations that discussed legislative amendments to the Coastal Act. We agree with this change and believe that the Coastal Act includes an ample toolbox to address planning and regulatory needs for the LOSSAN corridor. Similarly, we support the removal of another prior recommendation that described the Commission's federal consistency pathway as streamlining the permitting process as compared to the Coastal Development Permit (CDP) process. The Commission strongly believes that the CDP process is a superior approach for rail projects on the LOSSAN corridor as it ensures that Coastal Act polices will be integrated into any final projects, while allowing for prompt action when needed.

We would also like to provide comments on two draft sub-recommendations that directly relate to the Coastal Commission that were provided in presentation materials for the May 11, 2026 working group meeting. The first Coastal Commission relevant draft statement is under potential final Recommendation 7, which would direct CalSTA and the Coastal Commission, in coordination with the LOSSAN Working Group, to *"...develop a cooperative agreement or Memorandum of Understanding 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..."* The Commission looks forward to further coordination with CalSTA and the working group to evaluate options to streamline and deliver rail projects on the LOSSAN corridor. We have developed similar tools in our partnership with Caltrans, and we believe this approach would be both effective and efficient. Such an agreement could establish a consistent coordination and review process, recommend solutions and best practices for given scenarios, and identify streamlining mechanisms that also ensure Coastal Act consistency. We

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therefore support this approach and look forward to further collaboration on an agreement.

The second draft statement potentially directly relevant to the Coastal Commission is under the potential Recommendation 8: *“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 a standardized communication protocols across agencies and to the public to avoid fragmented messaging during closures.”* This goal is similar to the above, and we agree that this is a worthwhile goal. The Commission has developed similar such procedures in our partnership with Caltrans under the AB 1282 Transportation Permitting Task Force. The Commission looks forward to further collaboration with CalSTA and the working group to develop this resource. Our technical and engineering staff can provide valuable expertise to help identify triggers and relevant solutions that could be quickly approved and implemented.

Lastly, there are multiple recommendations in the report that describe efforts to increase and improve passenger rail through the corridor. Although these recommendations do not address the Coastal Commission specifically, we certainly support these. We have a long history of partnering with Caltrans and other transportation agencies to improve transportation to and along the coast and are eager to further this work more directly along the LOSSAN corridor. Working together, we can support this expansion while also ensuring they are undertaken in a manner that also protects coastal resources and enhances resiliency overall in this corridor

Thank you for the opportunity to provide these comments on the potential final recommendations. Once again, we strongly support the goals of SB 1098 and the LOSSAN Working Group to develop stakeholder consensus proposals to improve ridership, utilization, and management of the rail corridor. The Commission is focused on meeting the intent of the legislation by increasing coordination and identifying solutions to ensure the safety and ongoing operation of the corridor, and we believe we can continue to do that leveraging the existing tools in the Coastal Act. We look forward to continued partnership with CalSTA and other members of the working group.

Sincerely,

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Dr. Kate Huckelbridge
Executive Director
California Coastal Commission