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LOSSAN Rail Corridor Revitalization Working Group
Senate Bill 1098
Attention: Anthony Serna, Senior Advisor
California State Transportation Agency
400 Capital Mall, Suite 2340
Sacramento, CA 95814

June 26, 2026

Re: LOSSAN Rail Corridor Revitalization Working Group Draft Recommendations

Dear Mr. Serna and members of the Southern California Revitalization Act Working Group,

I am writing on behalf of members of the all-volunteer Rail Passenger Association of California and Nevada (RailPAC) living, working, and traveling throughout Southern California. RailPAC is disappointed with the recommendations of the LOSSAN Working Group Report. Overall, it represents a missed opportunity and most especially it does not even hint at a vision or reimaging of service.

The LOSSAN Working Group Report is full of modest plans, process, and communication improvement recommendations, but nothing that remotely addresses the underlying challenges or the potential of the LOSSAN Corridor. While the adoption of these focused improvements will improve the current service, the fact is that the current reality, even improved, is failing and losing mode share to the automobile. One major shortfall is that there are no commitments, timeline, or consequences if these recommendations are not implemented.

First, RailPAC wants to thank and recognize the effort and persistence of the member agencies in steadfastly working on the challenging task of seeking approval and funding to address the significant life-expired assets along the LOSSAN Corridor. And RailPAC recognizes that the agencies also incorporated rail line betterment in these projects; increased bridge elevation to mitigate sea-level rise, provision of double-track, improved signal systems, etc. Their work in preserving and improving this regional asset is much appreciated.

Another positive, potentially transformative initiative (Section 2.2, Coastal Resiliency, Recommendations 1 and 2) is coordination with the Coastal Commission to streamline the delivery of coastal infrastructure projects. As part of this coordination RailPAC recommends creative compromises with efforts undertaken to utilize enhanced rail passenger service, with its ability to reduce VMT and CGG emissions, as a key tool to further the Coastal Commission’s macro coastal protection goals (slowing climate change).

A second beneficial initiative (Section 4.1, Changes to State Statutes or Rules, Recommendations 1, 2 and 3) is the proposal for streamlining the CEQA process with clear timelines, and a defined pathway, continued streamlined judicial review and conflict resolution. Finally, given rail passenger service's ability to reduce VMT and GHG emissions, RailPAC recommends that the Legislature should consider categorically exempting passenger rail projects from CEQA requirements and lawsuits where construction is contained entirely within the current rail right-of-way.

Another area not explored by the report is the utilization of the California Integrated Travel Project (Cal- ITP) to reduce or eliminate barriers – i.e., trip planning, schedule availability ticketing, delays, etc.- to service integration among the several carriers along the corridor.

While the proposed coordination with the Federal Corridor Identification and Development Program has merit from the planning perspective (Section 5.0 Area D), there is the danger that if Federal programs like Federal and State Partnerships or CRISI are not funded or underfunded, vital projects could stall due to restrictions around Federal grant programs.

As was noted above, RailPAC believes this report, as written, represents a significant missed opportunity. This is especially true in the governance area (Section 3.1 Alternative Management and Operations Models or Structures), where other than noting the complexity and long-standing structural conditions of the corridor, specific examples and potential mitigations were not outlined. Section 3.1, Recommendation 1 mentions the issue of adding the Working Group as a new layer of coordination, but shouldn't the goal of the SB 1098 Working Group have been to recommend the elimination of layers of oversight? Of greater concern is that despite there being multiple governance options being utilized by passenger rail operators throughout the US, these options and their advantages and disadvantages, were not outlined to the Legislature in the report.

There was also no attempt to outline the advantages, accomplishments, and potential of the current Southern California passenger rail governance structure. Instead, stakeholders are left with the original governance promise that local control, with deep ties with local communities, would provide a superior, quicker acting and more efficient structure than other options. From RailPAC's perspective, the promise of local control has turned into a complex "Rube Goldberg" mechanism of interrelated activities never able to operate as a cohesive whole and giving the appearance of duplication of effort.

Specifically looking at project development, the last three decades have seen the promised local community connections resulted in agencies gridlocked by the overweighting of local concerns paired with the underweighting of regional benefits with no will or mechanism to address this imbalance. Left to wither are a group of capacity projects that would leverage the capacity investments of the completed State of Good Repair projects to begin to tap into the ridership and ticket revenue potential of the LOSSAN Corridor.

Also, instead of the promises of efficiency from the joint use of local government resources, there are allocations in operating and capital grants for overheads to cover resources expended by the agency. There is no analysis as to whether the sum total of the overheads accruing to all these multiple agencies is less expensive than potential alternatives.

Vision/ Reimagining

The assumption among many LOSSAN Corridor stakeholders was that the LOSSAN Working Group would provide a platform for Southern California rail agencies to develop recommendations to jumpstart a reimagining, a vision to move forward to leverage the ridership and ticket revenue potential of the LOSSAN Corridor travel market. Stakeholder disappointment is especially great since a simple literature search would have yielded multiple options for corridor development.

For example, in the 1980's the Los Angeles – San Diego Corridor was identified by the private sector as the rail line having the most upside potential for development in addition to the Northeast Corridor. Several subsequent ridership and ticket revenue forecasts by Caltrans have outlined the large ridership and revenue potential of the corridor, provided an auto competitive rail service is provided.

The service plans associated with these forecasts outline involve high-capacity high-performance auto-competitive railway with multiple schedules each hour, offering both long-distance Intercity service and low-fare Regional Rail. With focused investment the current rail line can offer such a product unlocking, by several magnitudes, the ridership and ticket revenue potential of the Southern California market, reducing the pressure for more freeway expansion by addressing current and future transportation demand.

As was noted above, while the recommendations of SB 1098, if implemented, will improve the present corridor performance, the current LOSSAN Corridor service is simply not competitive for anyone with an automobile available. Without a fundamental reset, an expansive vision, the LOSSAN Corridor will remain a scenic curiosity.
As Daniel Burnham, a renowned American architect, said "Make no little plans: they have no magic to stir men's blood and probably themselves will not be realized. Make big plans: aim high in hope and work, remembering that a noble, logical diagram once recorded will never die, . . ."

The LOSSAN Corridor needs a big plan, a vision, one yielding transformative regional benefits to "sell" itself to the public and local leaders. A public which sees the promise of an auto-competitive alternative to an ever expanding but still congested I-5, will be more likely to support the increased investment in the corridor. With increased public financial support and the potential of a much higher new revenue baseline, P3 public/private projects can be identified especially those that increase capacity, reduce travel times, and include managed retreat of the rail line away from vulnerable cliffs and shorelines.

What will be the LOSSAN Corridor's vision?

This?

(Katy Freeway, Texas)

Or This?

(Caltrain)

Thank you for the opportunity to address the Working Group on this important issue.

Sincerely,

Steve Roberts,
President Rail Passenger Association of California and Nevada