



May 29, 2025

Senator Catherine Blakespear <Via Email Only - Alex.Davis@sen.ca.gov>
Chair
Subcommittee on LOSSAN Rail Corridor Resiliency
California State Senate

RE: Tracks to the Future: Strengthening the LOSSAN Corridor for California's Global Stage

Honorable Chair Blakespear,

Californians for Electric Rail (CER), which represents members around the state including in all LOSSAN counties, and Streets For All, write to provide comment for the May 30, 2025 hearing of the Subcommittee on LOSSAN Rail Corridor Resiliency.

The LOSSAN Rail Corridor is critical for linking the Southern California regional economy, providing connectivity to residents and reducing VMT.

The LOSSAN Service Optimization Study (2022) and State Rail Plan (2024) lay out a clear vision for increasing service, reliability and trip speeds to attract more riders. If California can implement this plan, LOSSAN's Surfliner and NCTD's Coaster service has the potential to run bidirectional service at 4 trains per hour from early morning to late at night.

Unfortunately right now LOSSAN faces serious headwinds in implementing these plans.

Limitations in Governance

LOSSAN's governance structure relies on counties to deliver electronic and infrastructure improvements necessary for service improvements. County governments have prioritized implementing LOSSAN Service Optimization to varying degrees. SANDAG has been aggressively implementing double tracking as well as planning mega-projects like track relocation at Del Mar and Miramar. Other counties have declined to move forward with relatively simple but critical capacity improvements like the Serra siding project, much less some of the larger projects critical to corridor capacity and resilience. Understandably, these laggard counties often have other priorities. LOSSAN riders and the general public do not, however, have a clear mechanism to be heard on this issue by respective county boards of supervisors.

If one county along the LOSSAN corridor moves aggressively to implement LOSSAN Service Optimization and others do not, then service improvements to riders will be extremely limited and subject to bottlenecks.

To the extent LOSSAN counties do not wish to prioritize LOSSAN Service Optimization in their planning and capital programs, an entity such as Caltrans or a regional entity should take the lead.

Need for State Capacity

LOSSAN and its constitutive counties currently lack significant in-house state capacity to plan, design, procure and deliver electronics and infrastructure necessary for LOSSAN Service Optimization. Instead these agencies rely on costly third-party program management consultants, design consultants, construction management consultants, and construction contractors.

The NYU Transit Costs Project has identified in-house state capacity as a key cost-saver for rail service development in low cost-of-construction countries. In-house state capacity provides agencies with the ability to develop and retain talent, right size scope of work, manage risk and oversee construction.

Of course there are tradeoffs with in-house state capacity for intercity rail – including the costs of deferred compensation and sufficient workload. It is probably unreasonable to expect smaller counties to carry this overhead. That is why Caltrans or a regional entity should be the holder of such state capacity so as to ensure the best value for money.

Consultants certainly have a place in the delivery of public infrastructure – especially where there are one-off or complex projects like tunneling. The LOSSAN Service Optimization and State Rail Plan, however, envision decades of routine work for works such as signaling, double tracking, level boarding and rail electrification that can and should be led by public employees with experience and institutional authority.

Programmatic Funding

With the exception of SANDAG's double tracking program, LOSSAN Service Optimization relies on discretionary, competitive sources of funding for capital construction funding. Such programs like TIRCP provide opportunities for LOSSAN but they come at a significant cost. Because programs are competitive there is no guarantee that LOSSAN Service Optimization projects will ever be funded. That insecurity increases the program delivery schedule. As a consequence, component project budgets are subject to annual construction costs escalation (from material and labor inflation) of anywhere from 3%-7%. If a double tracking project fails to get full funding from TIRCP or another competitive grant program, then its budget must increase to account for the delay of another competitive grant cycle and attendant construction cost escalation. This turns into a vicious cycle of delay and cost escalation that saps the ability of LOSSAN to achieve its service goals.

Low and medium costs countries with extensive and ambitious rail programs do not rely on competitive grant programs like California. CER's forthcoming policy brief "Against Patchwork Funding: How Multi Year Investment Frameworks Can Deliver Rail Service Infrastructure Cheaper and Faster" will show how consistent, multi-year investment frameworks are used almost universally in Western Europe to implement regional and intercity rail expansion and modernization.

Consider that the SCORE program developed by Metrolink in 2017 was originally envisioned to be implemented in time for the 2028 Los Angeles Olympics. With 2.5 years until the games begin only one SCORE project – Burbank Junction – has been delivered and only a handful have been fully funded out of 20+ original SCORE projects. The reason for this delay is primarily due to the lack of either state or regional programmatic funding to deliver the program. Unless the State of California or Southern California region change course and commit to programmatic funding of LOSSAN specifically or intercity/regional rail generally then LOSSAN Service Optimization will suffer the same fate as SCORE.

Plan for Electrification



Figure 4: Expected statewide network electrification by 2050.

As the second busiest intercity rail corridor in the country carrying nearly 4 million passengers annually, the LOSSAN Rail Corridor south of Burbank is a prime candidate for electrification via overhead wire. The State Rail Plan, unfortunately, only identifies electrification of the corridor from Burbank to Anaheim. Given the level of service, capacity, and high speeds planned for the corridor

via LOSSAN Service Optimization this is an extremely glaring and questionable omission. Caltrain's 2024 electrification has resulted in large ridership increases (up to 90% on weekends) as service has become faster, more frequent and reliable and more comfortable for riders.

CER understands one of the key challenges for rail electrification south of Anaheim is the perceived opposition by coastal homeowners as instrumentalized through the Coastal Commission. The discretionary appeals process for development in the Coastal Zone certainly poses risk for electrification. This, however, is not a reason to preemptively cede the best service pattern and motive power choice for LOSSAN service for decades to come.

Already CER is seeing this omission of the LOSSAN corridor south of Anaheim for electrification posing risks. The program consultants for SANDAG's Del Mar relocation project have thus far refused to commit to electrification clearances for potential tunnels, instead proposing tunnel diameters too narrow to allow future installation of overhead wires. The Del Mar Tunnel alone may cost up to \$5 Billion, and such tunnels will have a 100 year design life. Such large investments should deliver real service and speed improvements such as those associated with electrification, not the status quo. We should not be preemptively foreclosing the possibility of electrification in southern Orange County and San Diego County for 100 years.

CER recommends that legislators interested in extending electrification south of Anaheim – to ensure a statewide electrified rail spine – consider legislation to facilitate rail electrification planning in the Coastal Zone by the Coastal Commission.

We thank you for your consideration and look forward to working with you on modernizing California's LOSSAN rail corridor.

Sincerely,
Adriana Rizzo,
Californians for Electric Rail

Marc Vukceovich
Director of State Policy
Streets For All