ORANGE COUNTY BUSINESS COUNCIL

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November 2, 2026

The Honorable Meagan Harmon
Chair, California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

RE: Support for OCTA's Coastal Rail Infrastructure Resiliency Project – Coastal Development Permit (Item Th11a)

Dear Chair Harmon:

On behalf of the Orange County Business Council (OCBC), I am writing to express our strong support for the Orange County Transportation Authority's (OCTA) Coastal Rail Infrastructure Resiliency Project in San Clemente. OCBC respectfully urges the California Coastal Commission to approve the project with reasonable and achievable permit conditions, incorporating the adjustments requested by OCTA, to ensure the timely protection of this critical transportation corridor while preserving coastal resources and public access.

OCBC is the leading voice of business in Orange County, working to advance economic development and enhance quality of life through its four core initiatives: economic development, housing, infrastructure and workforce. A safe, reliable and resilient transportation network is fundamental to Orange County's economic vitality and long-term competitiveness.

The Los Angeles–San Diego–San Luis Obispo (LOSSAN) rail corridor is a critical transportation asset connecting communities, businesses and regional economies throughout Southern California. Supporting both passenger and freight rail operations, this corridor plays an essential role in workforce mobility, goods movement and regional economic activity. Continued threats from coastal erosion, bluff failures and wave action underscore the urgency of protecting this infrastructure and ensuring its long-term reliability.

OCBC recognizes OCTA's significant efforts to balance necessary rail infrastructure improvements with coastal preservation and public access. Of the approximately $305 million secured for rail protection, OCTA has committed approximately $100 million toward coastal resource improvements and public access enhancements, including the restoration of the San Clemente Beach Trail and plans to place approximately 690,000 cubic yards of sand along the coastline. These substantial investments demonstrate OCTA's commitment to delivering meaningful environmental and community benefits alongside critical infrastructure improvements.

However, OCBC is concerned that the currently proposed permit conditions could impose approximately $227 million in additional costs without identified funding. Such requirements

risk diverting limited transportation resources from essential infrastructure investments while creating unnecessary financial and operational uncertainty. As an organization committed to advancing responsible infrastructure investment and economic growth, OCBC believes permit conditions must be proportionate, financially feasible and consistent with OCTA's authority and responsibilities as a transportation agency.

Of particular importance is extending the permit authorization to 30 years, consistent with the infrastructure's intended design life. A shorter permit term would introduce significant uncertainty for long-term rail operations, infrastructure financing and future maintenance. Providing a predictable regulatory framework is essential to protecting public investments, maintaining reliable service and ensuring the continued movement of people and goods along this vital corridor.

OCBC encourages the Commission to work collaboratively with OCTA to establish practical permit conditions that recognize the agency's substantial coastal mitigation commitments, preserve its ability to respond to urgent safety concerns and avoid imposing obligations beyond its operational authority. Protecting California's coastline and maintaining a safe, reliable rail network are complementary priorities that can and should be advanced together.

OCBC respectfully urges the Commission to approve the Coastal Rail Infrastructure Resiliency Project with OCTA's requested modifications, including a 30-year permit term, to facilitate timely implementation, protect public resources and support the long-term economic vitality of Orange County and the broader Southern California region.

Thank you for your consideration and your continued commitment to balancing critical infrastructure needs with coastal resource protection.

Sincerely,



Amanda Walsh
Vice President, Government Affairs
Orange County Business Council