



August 19, 2024

Mr. Vince Lee
California Coastal Commission, Coastal Planner
South Coast District Office
301 E. Ocean Blvd. Suite 300
Long Beach, California 90802

Subject: Submittal of Coastal Development Permit Application for the Critical San Clemente Railroad Protection Project - Area 4 (Mile Post 206.00 to Mile Post 206.67)

Dear Mr. Lee,

The Orange County Transportation Authority (OCTA) and Southern California Regional Rail Authority (SCRRA or Metrolink) are submitting a Coastal Development Permit (CDP) for Area 4 of the Critical San Clemente Railroad Protection Project (Project) in San Clemente, Orange County, California. The Project includes improvements along the coastal rail line corridor that focus on maintenance and fortification of existing facilities as well as sand nourishment. The Project is located along the railroad right-of-way within the Orange Subdivision of the Los Angeles-San Diego-San Luis Obispo Rail Corridor (LOSSAN Corridor) and is utilized by several entities including Metrolink and Amtrak Pacific Surfliner for passenger service, as well as by the BNSF Railway for freight service. The Department of Defense (DOD) has designated this key railroad line as a part of the Strategic Rail Corridor Network (STRACNET).

Over the past three years, the coastal rail line corridor operations have been adversely affected by the processes of coastal bluff erosion, beach loss, revetment loss, and bluff failures. As a result, the purpose of the Project is to reinforce the eroding and exposed slopes below the rail corridor to avoid rail service disruptions and infrastructure damage that can lead to unsafe conditions for rail passengers and freight alike.

OCTA developed the Coastal Rail Resiliency Study Initial Assessment Technical Memorandum for rail facilities in the cities of Dana Point and San Clemente that identifies Area 4 that is addressed in this application (Appendix E: Coastal Rail Initial Assessment Study Technical Memorandum). The Project includes engineered revetments and sand nourishment in Area 4 to stabilize the existing facilities and avoid another emergency action.

Area 4 has been evaluated for biological and cultural resources. Based on the biological resources evaluation, no state or federally regulated special status species would be impacted by the Project. Temporary and permanent impacts to CCC wetlands are anticipated to occur. OCTA is coordinating with the United States Army Corps of Engineers (USACE), San Diego Regional Water Quality Control Board (SDRWQCB), and the California State Lands Commission (SLC) to obtain the applicable permits and agency approvals for the Project. Based on the cultural resources evaluation, no cultural resources would be significantly impacted by the Project.

As the site conditions are precarious and the design is still being finalized, OCTA and Metrolink determined it would be in the best interest of the public to provide existing project information known to date as part of this permit package to continue the necessary permit coordination. Impact calculations will be provided as soon as they are developed. The design of the Project is underway, with an alternatives analysis scheduled to be completed in Fall 2024, and preliminary engineering anticipated to be completed in mid-2025. Construction is expected to begin in Spring 2026.

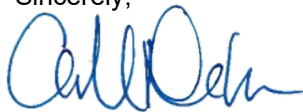
Accompanying this cover letter is the Coastal Development Permit Application Form and the following attachments:

- Attachment A1 – Project Location Area 4
- Attachment A2 – Detail Maps Area 4
- Attachment B – Proof of Applicant's Interest in Property (OCTA's Vesting Map and Grant Deed for the Railroad Right-of-Way)
- Attachment C – Biological Resources Memorandum
- Attachment D – Cultural Resource Technical Memorandum
- Attachment E – OCTA's Coastal Rail Resiliency Study Initial Assessment Technical Memorandum (includes further detail about Area 4 and the preliminary potential solution)
- Attachment F – Assessor Parcel Maps Area 4

OCTA is actively evaluating short, mid, and long-term, corridor-wide coastal resiliency solutions. An alternatives analysis of potential coastal adaptation options (alternatives) outlined in the OCTA's 2021 Rail Defense Against Climate Change Plan is underway, to further reduce risk and improve resiliency along the coastal rail line corridor (approximately Dana Point to San Clemente).

This submittal package is provided electronically with a hard copy to follow. If you have any questions or need additional information, please contact Dan Phu at OCTA (714-560-5907, Dphu@octa.net). For technical questions, please contact Nina Delu at HDR (949-892-9413, nina.delu@hdrinc.com).

Sincerely,



Antonina Delu

HDR Engineering, Inc.

Enclosures: Coastal Development Permit Application Package

cc: Jim Beil, OCTA
Jason Lee, OCTA
Dan Phu, OCTA
Justin Fornelli, Metrolink
Maria Leible, Metrolink
Patrick O'Neill, HDR Engineering
Jenny Vick, HDR Engineering