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October 8, 2019

Mr. Kia Mortazavi
Orange County Transportation Authority
Executive Director, Planning
550 South Main Street
P.O. Box 14184
Orange, CA 92863-1584

Subject: Draft 2019 Congestion Management Program

Dear Mr. Mortazavi:

The Southern California Association of Governments (SCAG) appreciates the opportunity to comment on the Draft 2019 Congestion Management Program (CMP) for Orange County. Under California Government Code Section 65089, SCAG, as the Metropolitan Planning Organization (MPO) and the Regional Transportation Planning Agency (RTPA) for our region is required to perform an evaluation of CMPs developed by the Congestion Management Agencies (CMAs) in the SCAG region.

The Orange County Transportation Authority (OCTA) is the designated CMA for Orange County and is responsible for preparation of the biennial CMP. The Draft 2019 CMP was prepared in response to State CMP requirements. The following evaluations of CMPs are required by the state of California and are based on SCAG's Regional Consistency and Compatibility Criteria for CMPs:

- Consistency between countywide modeling methodology/databases and SCAG's model and database [Section 65089(c)];
- Consistency with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), including the related socio-economic data [Section 65089.2(a)];
- Compatibility with other CMPs developed within the SCAG region [Section 65089.2(a)]; and
- Incorporation of the CMP into the Federal Transportation Improvement Program (FTIP) [Section 65089.2(b)].

SCAG has reviewed the Draft 2019 CMP and discusses its findings and comments below.

Findings

- The Draft 2019 CMP addresses congestion relief in Orange County through the following strategies: CMP Highway System monitoring and performance measurement, transit system performance monitoring, land use impact analysis, transportation demand management (TDM), a defined Deficiency Plan including monitoring and conformance, and a Capital Improvement Program (CIP).
- The Draft 2019 CMP is compatible and consistent with other county CMPs in the SCAG region.
- The Draft 2019 CMP addresses monitored Level of Service (LOS) for Orange County's CMP Highway System as part of State requirements. OCTA uses the Interchange Capacity Utilization (ICU) method for determining LOS at the intersections. Between 1991 and 2019, the average AM ICU improved from 0.67 to 0.60 (a 10.4 percent improvement), and the PM ICU improved from 0.72 to 0.63 (a 12.5 percent improvement). The ICU improvements indicate that Orange County agencies are effectively operating, maintaining, and improving the CMP Highway System.
- The Draft 2019 CMP includes one intersection that is deficient, performing at LOS F in the AM peak hour, in the City of Laguna Beach: Laguna Canyon Road at State Route (SR) 73 northbound on-ramps in the City of Laguna Beach. It has an ICU of 1.01 (LOS F) in the AM peak hour and an ICU of 0.94 (LOS E) in the PM peak hour. This intersection however is operated and controlled by Caltrans and therefore is statutorily exempt from the Deficiency Plan process. Caltrans added an additional lane to the SR-73 northbound ramps from Laguna Canyon Road in 2017, which has resulted in an improvement over the 2017 ICU figures.
- The Draft 2019 CMP addresses the Orange County Deficiency Plan process. Cities with deficient intersections must prepare deficiency plans. The LOS Deficiency Plans are not required if the deficient intersections are brought into compliance within 18 months of their initial detection, using improvements that have been previously planned and programmed in the CMP Capital Improvement Program (CIP), or are exempt due to other factors per CMP statute.
- The Draft 2019 CMP contains the implementation and monitoring programs for the recommended CMP strategies.
- Chapter 6 of the Draft 2019 CMP addresses the CMP CIP, a seven-year program of projects. OCTA certifies that all projects in the CIP that are funded by federal or state funds, as well as locally funded projects of regional significance, are consistent with SCAG's adopted Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and included in the Federal Transportation Improvement Program (FTIP).
- Appendix D of the Draft 2019 CMP contains a set of checklists to guide local jurisdictions in conforming with CMP requirements, goals and objectives. (Checklists themselves say "Appendix C").
- The Draft 2019 CMP is consistent with SCAG's RTP/SCS goals, objectives, and policies, including use of the related socio-economic data.
- The Draft 2019 CMP modeling, both for methodology and database applications, is consistent with the SCAG regional model used for development of the RTP/SCS.

Comments

- On Page 14, the AM peak period ICU improvement should be 10.4% (0.60/0.67).

- On Page 27, Metrolink operates on 538 miles of track, not 535.
- On Page 38 and 41, suggest changing "Regional Transportation Plan (RTP)" to "Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)."
- The federal government regulates the monitoring of projects that significantly increase SOV capacity in the region through 23 CFR§450.320 subsections d and e. In Appendix D, CMP Monitoring Checklists, the Capital Improvement Program Checklist should include the following two questions:
 1. Does any federally funded project in the CIP result in a significant increase in SOV capacity?
 2. If so, was the project developed as part of the federal Congestion Management Process, in other words, was there an appropriate analysis of reasonable travel demand reduction and operational management strategies?

We look forward to receiving the Final 2019 CMP for final review and certification. If you have any questions on SCAG's comments, please contact me at (213) 236-1995 or Steve Fox, Senior Regional Planner at (213) 236-1855.

Sincerely,



Sarah Jepson
Acting Director of Planning

cc: Sam Sharvini

Hard copy sent via U.S. Mail.