

# **Orange County Transportation Authority**



## **Regional Planning and Highways Committee Meeting Agenda**

**Thursday, January 5, 2017 at 10:30 a.m.**

550 South Main Street, Board Room - Conf. Room 07, Orange, California

### **Committee Members**

Lisa A. Bartlett, Vice Chair  
Andrew Do  
Lori Donchak  
Jeffrey Lalloway  
Shawn Nelson  
Todd Spitzer

Any person with a disability who requires a modification or accommodation in order to participate in this meeting should contact the OCTA Clerk of the Board, telephone (714) 560-5676, no less than two (2) business days prior to this meeting to enable OCTA to make reasonable arrangements to assure accessibility to this meeting.

Agenda descriptions are intended to give members of the public a general summary of items of business to be transacted or discussed. The posting of the recommended actions does not indicate what action will be taken. The Committee may take any action which it deems to be appropriate on the agenda item and is not limited in any way by the notice of the recommended action.

All documents relative to the items referenced in this agenda are available for public inspection at [www.octa.net](http://www.octa.net) or through the Clerk of the Board's office at the OCTA Headquarters, 600 South Main Street, Orange, California.

### **Call to Order**

### **Pledge of Allegiance - Director Nelson**

# **Regional Planning and Highways Committee Meeting Agenda**

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## **1. Public Comments**

## **Special Calendar**

There are no Special Calendar matters.

## **Consent Calendar (Items 2 through 4)**

All items on the Consent Calendar are to be approved in one motion unless a Committee Member or a member of the public requests separate action or discussion on a specific item.

## **2. Approval of Minutes**

Approval of the minutes of the Regional Planning and Highways Committee meeting of December 5, 2016.

## **3. Active Transportation Program Cycle 3 Project Prioritization**

### **Author/Executive Director**

Louis Zhao/Kia Mortazavi

### **Overview**

On March 16, 2016, the California Transportation Commission adopted the Active Transportation Program Guidelines and issued a two-tiered call for projects, making state and federal funds available for a bicycle and pedestrian call for projects from the State of California or the Southern California Association of Governments. A list of Orange County project point assignments for the Southern California Association of Governments regional project selection is presented for the Board of Directors' approval.

### **Recommendations**

- A. Approve the additional points assigned to the Orange County Active Transportation Program Cycle 3, Regional Projects, consistent with the Orange County Transportation Authority-adopted Active Transportation Program project prioritization and submittal to the Southern California Association of Governments.
- B. Authorize the Chief Executive Officer to approve and adopt any future technical changes, substitutions, and additions to the final recommended project list.
- C. Authorize staff to process all necessary amendments to the Federal Transportation Improvement Program to facilitate the above actions.

## **Regional Planning and Highways Committee Meeting Agenda**

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### **4. Consultant Selection for the Active Transportation Plan**

#### **Author/Executive Director**

Paul Martin/Kia Mortazavi

#### **Overview**

Consultant services are needed to develop the first countywide Active Transportation Plan. This plan will consolidate local and regional bikeway master planning efforts, and will identify and prioritize potential pedestrian improvements countywide. Proposals have been received and evaluated in accordance with the Orange County Transportation Authority's procurement procedures for professional and technical services. Board of Directors approval is requested to select a firm to perform the required work, and to authorize the Chief Executive Officer to negotiate and execute an agreement.

#### **Recommendations**

- A. Approve the selection of IBI Group as the firm to develop the Orange County Active Transportation Plan.
- B. Authorize the Chief Executive Officer to negotiate and execute Agreement No. C-6-1417, between the Orange County Transportation Authority and IBI Group, in the amount of \$350,000, for an 18-month term through July 31, 2018, to develop the Orange County Active Transportation Plan.

## **Regular Calendar**

### **5. Regional Planning Update**

#### **Author/Executive Director**

Gregory Nord/Kia Mortazavi

#### **Overview**

The Orange County Transportation Authority's future planning efforts need to acknowledge and respond, as appropriate, to state and regional planning activities. An update on state and regional activities regarding environmental and air quality rule-making is provided for information purposes.

#### **Recommendation**

Receive and file as an information item.

## Regional Planning and Highways Committee Meeting Agenda

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### Discussion Items

6. Chief Executive Officer's Report

7. Committee Members' Reports

8. Closed Session

There are no Closed Session items scheduled.

9. Adjournment

The next regularly scheduled meeting of this Committee will be held at **9:00 a.m. on Monday, February 6, 2017**, at the Orange County Transportation Authority Headquarters, 550 South Main Street, Board Room - Conference Room 07, Orange, California.



# MINUTES

## Regional Planning and Highways Committee Meeting

### **Committee Members Present**

Frank Ury, Chairman  
Lisa A. Bartlett, Vice Chair  
Andrew Do  
Lori Donchak  
Gary A. Miller  
Shawn Nelson  
Todd Spitzer

### **Staff Present**

Darrell Johnson, Chief Executive Officer  
Ken Phipps, Deputy Chief Executive Officer  
Laurena Weinert, Clerk of the Board  
Olga Prado, Assistant Clerk of the Board  
James Donich, General Counsel  
OCTA Staff and Members of the General Public

### **Committee Members Absent**

Jeffrey Lalloway

## **Call to Order**

The December 5, 2016 regular meeting of the Regional Planning and Highways Committee was called to order by Committee Chairman Ury at 10:33 a.m.

## **Pledge of Allegiance**

Director Miller led in the Pledge of Allegiance.

### **1. Public Comments**

No public comments were received.

## **Special Calendar**

There were no Special Calendar matters.

## **Consent Calendar (Items 2 through 8)**

### **2. Approval of Minutes**

A motion was made by Director Nelson, seconded by Board Chair Donchak, and declared passed by those present, to approve minutes of the November 7, 2016 meeting.

Director Bartlett was not present to vote on this item.



# MINUTES

## *Regional Planning and Highways Committee Meeting*

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### **3. Grant Award for Countywide Systemic Safety Analysis Report**

A motion was made by Director Nelson, seconded by Board Chair Donchak, and declared passed by those present, to authorize the Chief Executive Officer, or designee, to accept the grant award and execute grant-related agreements with the California Department of Transportation to develop a Systemic Safety Analysis Report for Orange County.

Director Bartlett was not present to vote on this item.

### **4. 2017 Technical Steering Committee Membership**

A motion was made by Director Nelson, seconded by Board Chair Donchak, and declared passed by those present, to approve the 2017 Technical Steering Committee membership list.

Director Bartlett was not present to vote on this item.

### **5. Amendment to the Master Plan of Arterial Highways**

A motion was made by Director Nelson, seconded by Board Chair Donchak, and declared passed by those present, to:

A. Approve amendment to the Master Plan of Arterial Highways for facilities listed below in the City of Garden Grove:

- Reclassify Gilbert Street between Chapman Avenue and Katella Avenue from a secondary (four-lane, undivided) to a divided collector (two-lane, divided) arterial.
- Reclassify West Street between Garden Grove Boulevard and Orangewood Avenue from a secondary (four-lane, undivided) to a divided collector (two-lane, divided) arterial.

The proposed amendment will become final contingent upon the Orange County Transportation Authority receiving documentation that the City of Garden Grove has amended its general plan and has complied with the requirements of the California Environmental Quality Act. If the originally proposed Master Plan of Arterial Highways amendment is modified as a result of the California Environmental Quality Act and/or general plan amendments process, the modified Master Plan of Arterial Highways amendment shall be returned to the Orange County Transportation Authority Board of Directors for consideration.



# MINUTES

## *Regional Planning and Highways Committee Meeting*

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### 5. (Continued)

- B. Direct the Executive Director of Planning, or his designee, to file a Notice of Exemption from the California Environmental Quality Act in support of the amendment to the Master Plan of Arterial Highways.

Director Bartlett was not present to vote on this item.

### 6. **Comprehensive Transportation Funding Programs Semi-Annual Review – September 2016**

A motion was made by Director Nelson, seconded by Board Chair Donchak, and declared passed by those present, to approve adjustments to the Comprehensive Transportation Funding Program projects and Local Fair Share funds.

Director Bartlett was not present to vote on this item.

### 7. **Cooperative Agreement with the Department of California Highway Patrol for the Interstate 405 Improvement Project**

A motion was made by Director Nelson, seconded by Board Chair Donchak, and declared passed by those present, to authorize the Chief Executive Officer to negotiate and execute Cooperative Agreement No. C-6-1437 between the Orange County Transportation Authority and the Department of California Highway Patrol, in the amount of \$7,000,000, for the Construction Zone Enhanced Enforcement Program required during the design-build implementation of the Interstate 405 Improvement Project.

Director Bartlett was not present to vote on this item.

### 8. **Fiscal Year 2016-17 Freeway Service Patrol Program Fund Transfer Agreement**

A motion was made by Director Nelson, seconded by Board Chair Donchak, and declared passed by those present, to authorize the Chief Executive Officer to negotiate and execute Cooperative Agreement No. C-6-1527 between the Orange County Transportation Authority and the California Department of Transportation for fiscal year 2016-17 Freeway Service Patrol program funding.

Director Bartlett was not present to vote on this item.



# MINUTES

## *Regional Planning and Highways Committee Meeting*

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### **Regular Calendar**

#### **9. California Department of Transportation Draft Managed Lanes Network Study**

Darrell Johnson, Chief Executive Officer (CEO), provided opening remarks and introduced Kurt Brotcke, Director of Strategic Planning.

Mr. Brotcke provided a brief overview on the California Department of Transportation (Caltrans) Draft Managed Lanes Network Study, and introduced Lan Zhou, Deputy District Director, Planning and Local Assistance, Caltrans District 12, and Loren Bloomberg, North American Director of Traffic Engineering, CH2M Hill, Inc.

Ms. Zhou and Mr. Bloomberg provided a PowerPoint presentation as follows:

- Project Overview;
- Managed Lanes Studies;
- Evaluation;
- Scenarios;
- Results:
  - Delay Improvements;
  - Toll Revenues;
  - Revenue and Mobility Benefits;
- Recommended Corridors; and
- Next Steps.

A very lengthy discussion ensued regarding:

- High, medium, and low toll revenue expectations;
- Traffic mobility or generating revenue; and if the latter, how does revenue come into play;
- If the Transportation Corridor Agencies (TCA) moved to dynamic pricing model, how will that affect toll revenue assumptions;
- Difference between OCTA toll lanes and TCA private toll roads and related pricing models;
- What consideration was given to adjacent counties;
- Clarification of the various scenarios and questions regarding a feasibility study;
- Los Angeles County Measure M bonding, as well as other agencies' plans for priced managed lanes; and
- When does local control come into play in this process.





# MINUTES

## *Regional Planning and Highways Committee Meeting*

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### 9. (Continued)

Mr. Brotcke discussed Attachments B and C of the Staff Report, as well as Caltrans' next steps.

Mr. Johnson, CEO, provided closing remarks and no action was taken on this receive and file information item.

### 10. **Relocation of West Orange County Water Board Water Line for the Interstate 405 Improvement Project**

Darrell Johnson, CEO, provided opening remarks and reported that Director Miller previously requested an agenda item be presented to the Regional Planning and Highways (RP&H) Committee, and introduced Jeff Mills, Program Manager, Highway Programs.

Mr. Mills outlined the current status, cost liability, and recommendations for the relocation of a 33-inch water line owned and operated by West Orange County Water (WOCW) Board, which crosses the Interstate 405 (I-405) and is in conflict with the I-405 Improvement Project.

Director Miller stated that he had requested an agenda item on project costs for all water lines that cross the I-405 Improvement Project and are owned or operated by the WOCW Board, Huntington Beach, Seal Beach, and the Mesa Water District. Director Miller inquired about the public utility code and if funding the relocation of a utility line is considered a gift of public funds to the state.

A lengthy discussion ensued, and James Donich, General Counsel, addressed Director Miller's questions/concerns.

A motion was made by Committee Chairman Ury, seconded by Board Director Donchak, and declared passed by those present, to direct staff to continue to work cooperatively with the West Orange County Water Board and the California Department of Transportation, in accordance with state and federal laws, to relocate a 33-inch water line in conflict with the Interstate 405 Improvement Project.



# MINUTES

## *Regional Planning and Highways Committee Meeting*

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### **Discussion Items**

#### **11. Chief Executive Officer's Report**

Darrell Johnson, CEO, reported that:

- The 91 Express Lanes Pavement Rehabilitation Project work is completed as of yesterday afternoon. Staff is now working on finishing touches to the project, which include six changeable message signs, restriping, replacement of channelizers, etcetera. These will be completed during short overnight closures through the months of December and January.
- Last week, President-elect Trump's transition team announced the nomination of Elaine Chao as Secretary of the United States Department of Transportation. Mr. Johnson stated that Ms. Chao has a lot of experience as the Secretary of Labor, and both the American Association of State of Highway Transportation Officials and the American Public Transportation Association organizations have signaled a strong support for her nomination.
- Today is Committee Chairman Ury's last RP&H Committee meeting, and Mr. Johnson thanked Committee Chairman Ury, on behalf of staff, for his leadership on the RP&H Committee over the past two years. In addition, Mr. Johnson thanked Director Miller on behalf of the staff for his participation, focus, and efforts on the RP&H Committee as today is also his last meeting.

#### **12. Committee Members' Reports**

Director Miller stated that this has been an exciting Committee to participate on and expressed his appreciation for staff's hard work and for General Counsel's input during the meetings. He also thanked everyone for allowing him to participate on the Committee and thanked all for the comradery.

Committee Chairman Ury reported that this has been a lot of fun being the Chairman of the RP&H Committee. He thanked staff and the Board for all their work and comradery. He also stated that he appreciated the experience and wished everyone the best of luck on all the projects staff is working on.

#### **13. Closed Session**

A Closed Session was not conducted at this meeting.



# MINUTES

## *Regional Planning and Highways Committee Meeting*

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### **14. Adjournment**

The meeting adjourned at 11:53 a.m.

The next regularly scheduled meeting of this Committee will be held at **10:30 a.m. on Thursday, January 5, 2017**, at the Orange County Transportation Authority Headquarters, 550 South Main Street, Board Room – Conference Room 07, Orange, California.

ATTEST

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Olga Prado  
Assistant Clerk of the Board


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Frank Ury  
Committee Chairman



**January 5, 2017**

**To:** Regional Planning and Highways Committee

**From:** Darrell Johnson, Chief Executive Officer 

**Subject:** Active Transportation Program Cycle 3 Project Prioritization

### **Overview**

On March 16, 2016, the California Transportation Commission adopted the Active Transportation Program Guidelines and issued a two-tiered call for projects, making state and federal funds available for a bicycle and pedestrian call for projects from the State of California or the Southern California Association of Governments. A list of Orange County project point assignments for the Southern California Association of Governments regional project selection is presented for the Board of Directors' approval.

### **Recommendations**

- A. Approve the additional points assigned to the Orange County Active Transportation Program Cycle 3, Regional Projects, consistent with the Orange County Transportation Authority-adopted Active Transportation Program project prioritization and submittal to the Southern California Association of Governments.
- B. Authorize the Chief Executive Officer to approve and adopt any future technical changes, substitutions, and additions to the final recommended project list.
- C. Authorize staff to process all necessary amendments to the Federal Transportation Improvement Program to facilitate the above actions.

### **Background**

The Active Transportation Program (ATP) was approved as part of SB 99 (Chapter 359, Statutes of 2013) on September 26, 2013, and includes federal and state funds for a bicycle and pedestrian call for projects (call) statewide. The 2017 ATP call will provide funding for projects in fiscal years 2019-20 and 2020-21.

On March 16, 2016, the California Transportation Commission (CTC) adopted the ATP Cycle 3 Guidelines (Guidelines) and issued a call. A fact sheet outlining the CTC Guidelines is provided in Attachment A.

On June 15, 2016, 456 ATP applications were received by the California Department of Transportation, 19 of which were from Orange County, requesting \$60.63 million in ATP funds. A list of all Orange County project submittals is provided in Attachment B.

On October 10, 2016, the Orange County Transportation Authority (OCTA) Board of Directors (Board) reaffirmed the project prioritization methodology to distribute up to ten points to projects eligible through the Southern California Association of Governments (SCAG) regional project selection metropolitan planning organizations (MPO) call (Attachment C).

### ***Discussion***

On December 6, 2016, the CTC approved \$158.09 million for 54 ATP projects across the state. One Orange County project from the City of Santa Ana, for \$4.57 million, was awarded funding through the statewide call. The remaining applications will be transferred to the SCAG regional project selection MPO call.

Consistent with the Board-approved ATP local project prioritization methodology, staff assigned points to 17 infrastructure and Safe-Routes to School (SRTS) Project applications for the regional ATP funding considerations (Attachment B). One City of Santa Ana infrastructure project, the Ross Street Protected Bicycle Lanes, was withdrawn from the ATP call by the City of Santa Ana in order to coordinate with other projects in the area. Another City of Santa Ana non-infrastructure project, the Pedestrian and Bicyclist Education Campaign, was automatically submitted for consideration through a separate SCAG Sustainability Planning Grants call, which funds planning and non-infrastructure ATP projects. Consistent with SCAG policy, no points were assigned to this project.

Based on the prioritization list, SCAG will be able to fully fund two ATP projects with Orange County's share of the regional ATP funds. The two projects will provide bicycle and pedestrian safety improvements in the City of Santa Ana, along West Willits Street (\$2.97 million) and Davis Elementary School (\$5.75 million). Any remaining ATP funds, currently estimated to be \$0.22 million, will be used towards the next highest scoring project that can provide the supplemental match to deliver the original scope of work. Currently, the next highest scoring projects are the County of Orange's (County) Hazard Avenue Bikeway Project for \$3.56 million, the City of Buena Park's SRTS improvements

for \$1.64 million, and the County's OC Loop Coyote Creek Bikeway (Segments O, P, Q) for \$11.12 million. The local agency will be required to submit a resolution from their city council or Board of Supervisors committing the required supplemental match to fully fund the project.

The ATP has an expedited delivery time frame and it is possible that some projects may not be able to meet those dates. In recognition of this risk, the SCAG regional programming framework requires OCTA to submit a contingency list of projects from those projects not selected for funding. The contingency list will allow OCTA to substitute any of the unfunded projects that are ready to proceed, in case awarded projects are not able to proceed.

Funds made available through project cancellations or savings, depending on the timing, will first be directed to the threshold project. Any remaining funds would go to projects on the contingency list, subject to CTC approval.

### **Summary**

On October 10, 2016, the OCTA Board adopted the ATP local project prioritization methodology. On December 8, 2016, the CTC awarded ATP funds to statewide projects. Staff has assigned points to the Orange County projects that were not funded through the statewide call, consistent with the Board-approved ATP local project prioritization methodology. The project scores will be submitted to SCAG for consideration of funds through the MPO call.

### **Attachments**

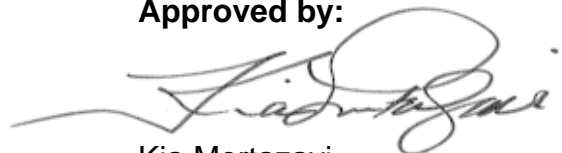
- A. Active Transportation Program Fact Sheet
- B. ATP Cycle 3 – Orange County Regional Projects (in 000's)
- C. Orange County Transportation Authority-Adopted – Active Transportation Program Project Prioritization Methodology

**Prepared by:**



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Section Manager, Transit and Local  
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**Approved by:**



Kia Mortazavi  
Executive Director, Planning  
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## Active Transportation Program Fact Sheet

### Background

The Active Transportation Program (ATP) was created by SB 99 (Chapter 359, Statutes of 2013) and AB 101 (Chapter 354, Statutes of 2013) to encourage increased use of active modes of transportation, such as biking and walking. Fifty percent of funds will be awarded on a statewide basis. Forty percent of funds will be awarded to large metropolitan planning organizations (MPO) with populations greater than 200,000. Ten percent of funds will be awarded to small and rural regions with populations less than 200,000.

The purpose of the ATP is to encourage increased use of active modes of transportation by achieving the following goals:

- Increase the proportion of trips accomplished by biking and walking,
- Increase safety and mobility for non-motorized users,
- Advance the active transportation efforts of regional agencies to achieve greenhouse gas reduction goals,
- Enhance public health,
- Ensure that disadvantaged communities fully share in the benefits of the program, and
- Provide a broad spectrum of projects to benefit many types of active transportation users.

### Summary of Requirements

Eligible Applicants	<ul style="list-style-type: none"><li>• Orange County cities</li><li>• County of Orange</li><li>• Orange County Transportation Authority (OCTA)</li><li>• California Department of Transportation (Caltrans)</li><li>• Transit agencies</li><li>• Schools and school districts</li><li>• Public land and natural resource agencies</li><li>• Tribal governments</li><li>• Non-profits</li></ul>
Projected Funding Estimate <sup>1</sup>	<ul style="list-style-type: none"><li>• State and federal fund source</li><li>• \$131.8 million – State of California call for projects (call)</li><li>• \$53 million – Southern California Association of Governments (SCAG) call (estimated \$8.9 million to Orange County projects)</li><li>• Funds must be programmed in fiscal years 2019-20 and 2020-21</li><li>• \$250,000 minimum request (infrastructure projects)</li><li>• 25 percent of funds to disadvantaged communities<sup>2</sup></li></ul>

<sup>1</sup> Projected fund estimate is based on SCAG funding targets.

<sup>2</sup> Disadvantaged community eligibility is determined based on one of the following criteria: census tract median income, Cal Enviro Screen score, and the National School Lunch Program.

## Active Transportation Program Fact Sheet

Eligible Projects	<p>Federally eligible projects selected through a competitive process:</p> <ul style="list-style-type: none"> <li>• Bicycle and pedestrian infrastructure projects, including environmental, design, right-of-way (ROW) and construction</li> <li>• Bicycle and pedestrian non-infrastructure projects, including education, enforcement, planning activities, Safe Route to Schools outreach.</li> <li>• Active transportation plans in disadvantaged communities</li> </ul>
Additional Requirements/ Considerations	<ul style="list-style-type: none"> <li>• 25 percent of funds towards disadvantaged communities</li> <li>• Qualified conservation corps partnership</li> <li>• Semi-annual reporting</li> <li>• Compliance with the National Environmental Policy Act, Caltrans ROW certification, and Federal Highways Administration authorization to proceed</li> <li>• Up to four points will be awarded to projects that provide a match</li> </ul>
Timeline	<ul style="list-style-type: none"> <li>• March 17, 2016 – California Transportation Commission (CTC) ATP Cycle 3 Guidelines</li> <li>• April 15, 2016 – CTC issues call</li> <li>• June 15, 2016 – ATP Cycle 3 applications are due to CTC</li> <li>• October 3, 2016 - Local project prioritization methodology to assign regional points (ten points) to the Regional Planning and Highways Committee for consideration</li> <li>• October 10, 2016 - Local project prioritization methodology to assign regional points (ten points) to the Board of Directors (Board) for consideration</li> <li>• October 28, 2016 – CTC staff releases project funding recommendations for the statewide program</li> <li>• December 7-8, 2016 – CTC adopts statewide and rural/small urban component</li> <li>• December 7-8, 2016 – CTC distributes projects not programmed in statewide and rural/small urban component to SCAG</li> <li>• January 2, 2017 – OCTA regional project list is presented to the Regional Planning and Highways Committee for consideration</li> <li>• January 9, 2016 - OCTA regional project list is presented to the Board for consideration</li> <li>• January 27, 2017 – CTC deadline to submit MPO regional program of projects</li> <li>• March 2017 – CTC adopts MPO selected projects</li> </ul>

### Additional Information

Caltrans ATP

<http://www.dot.ca.gov/hq/LocalPrograms/atp/>

SCAG ATP

<http://www.scag.ca.gov/programs/Pages/ActiveTransportation.aspx?opentab=1>



**ATP Cycle 3  
Orange County Regional Projects  
(in 000's)**

#	Implementing Agency	Project Title	Phase of Work	Total ATP Request	Total Project Cost	Project Type	OCTA Prioritization Points	Statewide Score	Total Score (with OCTA points)
1	Santa Ana	City of Santa Ana - First Street Pedestrian Improvements	PA&ED, PS&E, CON	\$ 4,572	\$ 4,572	SRTS	NA	88	88
<b>TOTAL</b>				<b>\$ 4,572</b>	<b>\$ 4,572</b>				

<b>Southern California Association of Governments Regional Infrastructure Call for Projects</b>									
2	Santa Ana	City of Santa Ana - West Willits Street Protected Bicycle Lanes	PA&ED, PS&E, CON	\$ 2,970	\$ 2,970	SRTS, SRTS-NI	8	80	88
3	Santa Ana	City of Santa Ana - SRTS Davis Elementary ADA Compliance	PA&ED, PS&E, CON	\$ 5,754	\$ 5,754	SRTS	7	80	87
<b>Contingency List Projects</b>									
4	Orange County	Hazard Avenue Bikeway Project <sup>1</sup>	CON	\$ 3,566	\$ 3,566	Infrastructure	5	77	82
5	Buena Park	Buena Park School District Safe Routes to School Improvements	PA&ED, PS&E, ROW, CON	\$ 1,644	\$ 1,654	SRTS, SRTS-NI	2	79	81
6	Orange County	OC Loop Coyote Creek Bikeway (Segments O,P,Q)	PS&E, CON	\$ 11,121	\$ 26,257	Infrastructure	10	68	78
7	Tustin	Armstrong Avenue Bicycle and Pedestrian Bridge	CON	\$ 3,000	\$ 3,000	Infrastructure	10	66	76
8	La Habra	La Habra Union Pacific Rail Line Bikeway (Walnut to Cypress)	ROW	\$ 863	\$ 975	SRTS	10	61	71
9	Fountain Valley	Fountain Valley Pedestrian Pathway Improvement within School Zones	CON	\$ 266	\$ 296	SRTS	2	68	70
10	Anaheim	Anaheim Canyon Metrolink Station Access Project	PA&ED, PS&E, CON	\$ 3,005	\$ 16,025	Infrastructure	10	56	66
11	Irvine	Jeffrey Open Space Trail at Interstate 5 Bicycle and Pedestrian Bridge Project	PA&ED, PS&E, ROW, CON	\$ 9,050	\$ 10,609	Infrastructure	10	55	65

**ATP Cycle 3  
Orange County Regional Projects  
(in 000's)**

#	Implementing Agency	Project Title	Phase of Work	Total ATP Request	Total Project Cost	Project Type	OCTA Prioritization Points	Statewide Score	Total Score (with OCTA points)
12	Seal Beach	Lampson Avenue Bike Lane Gap Closure Project 2016	PA&ED, PS&E, CON	\$ 1,012	\$ 1,265	Infrastructure	1	50	51
13	Orange County	Surfside Inn Pedestrian Overcrossing Phase II	CON	\$ 5,395	\$ 5,395	Infrastructure	5	43	48
14	Anaheim	Santa Ana Canyon Road Multi-Use Trail Project	PA&ED, PS&E, CON	\$ 2,005	\$ 3,148	Infrastructure	3	43	46
15	Anaheim	Nohl Ranch Open Space Trail	PA&ED, PS&E, ROW, CON	\$ 1,143	\$ 1,343	Infrastructure	6	37	43
16	Laguna Hills	La Paz Road Southerly Sidewalk Widening	ROW, CON	\$ 1,010	\$ 1,010	SRTS	3	38.5	41.5
17	Lake Forest	Lake Forest Foothill Ranch Elementary School Zone and Crosswalk	PA&ED, PS&E, CON	\$ 174	\$ 174	SRTS	0	36	36
<b>TOTAL</b>				<b>\$ 51,978</b>	<b>\$ 83,441</b>				

<b>Southern California Association of Governments Regional Non-Infrastructure Call for Projects (Sustainability Planning Grant)</b>									
18	Santa Ana	City of Santa Ana - Pedestrian and Bicyclist Education Campaign	NA	\$ 500	\$ 500	SRTS-NI	NA	77	77
<b>TOTAL</b>				<b>\$ 500</b>	<b>\$ 500</b>				

**ATP Cycle 3  
Orange County Regional Projects  
(in 000's)**

#	Implementing Agency	Project Title	Phase of Work	Total ATP Request	Total Project Cost	Project Type	OCTA Prioritization Points	Statewide Score	Total Score (with OCTA points)
<b>Projects Withdrawn or Cancelled</b>									
19	Santa Ana	City of Santa Ana - Ross Street Protected Bicycle Lanes <sup>2</sup>	PA&ED, PS&E, CON	\$ 3,576	\$ 3,576	SRTS	NA	81	81
<b>TOTAL</b>				<b>\$ 3,576</b>	<b>\$ 3,576</b>				

1. Project may not be eligible to receive ATP funds due to the approved ATP Guidelines disallowing the supplanting of funds. The project was awarded \$3.000 million through the 2016 Bicycle Corridor Improvement Program call for projects.
2. The City of Santa Ana withdrew the Ross Street Protected Bicycle Lanes from the ATP Regional call for projects. The construction of the County of Orange Building 16 and the opening of the Nova Academy along the project corridor has changed the existing conditions of Ross Street. The scope of the proposed project would be substantially impacted.

ATP - Active Transportation Program  
 OCTA - Orange County Transportation Authority  
 PA&ED - Project Approval and Environmental Documents  
 PS&E - Plan, Specifications & Estimates  
 CON - Construction  
 SRTS - Safe-Routes to School  
 SRTS-NI - Safe-Routes to School Non-Infrastructure  
 ADA - American Disabilities Act  
 ROW - Right-of-Way

Orange County Transportation Authority-Adopted  
Active Transportation Program Project Prioritization Methodology

Approved Methodology

On October 10, 2016, the Orange County Transportation Authority (OCTA) Board of Directors (Board) approved a local prioritization methodology to prioritize projects submitted for active transportation funding. Prioritization of these projects is also consistent with Board direction through the State and Federal Programming Guidelines for bicycle projects that list a project's readiness as a priority for funding.

A summary of the proposed prioritization methodology is provided below.

Plan	Points* (Maximum of Ten Points)
A planned bikeway in the Orange County Commuter Bikeways Strategic Plan	5
Project is included in the Orange County district bikeway strategies	5
Project is included in the OCTA non-motorized Metrolink Accessibility Strategy	5
Project is a sidewalk on the Master Plan of Arterial Highways	5
Project is included in a local agency bicycle or pedestrian master plan or active transportation plan	3
Project is included in a local Safe Routes to Schools Plan	2
Project is included in a specific plan or corridor plan	2
Project is included in local agency general plan or circulation element	1

\*Per the Southern California Association of Governments guidelines, the maximum points that can be assigned by the county transportation commission are ten points. These local prioritization points will be added to the score provided by the state. The maximum score possible through the statewide process is 100 points.

These plans were developed consistent with OCTA's mission to develop and implement transportation solutions to enhance the quality of life and keep Orange County moving. The projects included in the plans tend to focus on gap closure and regional bike corridors. Further, they are the most directly relevant plans that have been developed in Orange County which meet the goals of the Active Transportation Program.


Orange County Transportation Authority-Adopted  
Active Transportation Program Project Prioritization Methodology

Disadvantaged Communities Methodology

In order to maximize funding for Orange County projects, staff has evaluated the points assigned to each project to confirm that 25 percent of the regional funding goes to projects that will benefit disadvantaged communities as required by SB 99 (Chapter 359, Statutes of 2013). Staff will consider reprioritization of points to projects if the highest scoring projects in Orange County do not meet the requirement.



**January 5, 2017**

**To:** Regional Planning and Highways Committee  
**From:** Darrell Johnson, Chief Executive Officer   
**Subject:** Consultant Selection for the Active Transportation Plan

### **Overview**

Consultant services are needed to develop the first countywide Active Transportation Plan. This plan will consolidate local and regional bikeway master planning efforts, and will identify and prioritize potential pedestrian improvements countywide. Proposals have been received and evaluated in accordance with the Orange County Transportation Authority's procurement procedures for professional and technical services. Board of Directors approval is requested to select a firm to perform the required work, and to authorize the Chief Executive Officer to negotiate and execute an agreement.

### **Recommendations**

- A. Approve the selection of IBI Group as the firm to develop the Orange County Active Transportation Plan.
- B. Authorize the Chief Executive Officer to negotiate and execute Agreement No. C-6-1417, between the Orange County Transportation Authority and IBI Group, in the amount of \$350,000, for an 18-month term through July 31, 2018, to develop the Orange County Active Transportation Plan.

### **Discussion**

The Active Transportation Plan (AT Plan) will continue to foster the collaboration between the Orange County Transportation Authority (OCTA), Orange County cities, the Orange County Council of Governments (OCCOG), the County of Orange, and the California Department of Transportation (Caltrans) to identify needs and plan for improvements to the countywide active transportation network.

As of May 2015, few cities have started or completed a pedestrian plan. The AT Plan will perform analysis to identify pedestrian improvement areas and will incorporate regional and local bikeway planning work conducted to date by OCTA and local jurisdictions.

Once completed, the AT Plan will provide a broad-based strategic planning tool to help ensure local and regional bicycle and pedestrian improvement efforts are considered and coordinated. This will alleviate the need for each city to develop individual AT Plans, unless desired locally. The development of the countywide AT Plan will also allow all 35 jurisdictions in Orange County to be eligible for future statewide Active Transportation Program funding.

Community participation and input will be a key factor during the preparation of the AT Plan to help move projects toward implementation. Staff will provide regular updates to the Board of Directors (Board) during the plan development, which is anticipated to take 18 months.

### ***Procurement Approach***

This procurement was handled in accordance with OCTA's Board-approved procedures for professional and technical services. In addition to cost, many other factors are considered in an award for professional and technical services. The award is recommended to the firm offering the most comprehensive overall proposal, considering factors such as staffing and project organization, prior experience with similar projects, the work plan, and a fair and reasonable cost and price.

On September 15, 2016, the Request for Proposals (RFP) 6-1417 was issued electronically on CAMM NET. The project was advertised in a newspaper of general circulation on September 15 and 19, 2016. A pre-proposal conference took place on September 22, 2016, with 27 attendees representing 24 firms. Addendum No. 1 was issued to provide a copy of the pre-proposal presentation and registration sheet. Addendum No. 2 was issued to respond to questions related to the RFP.

On October 12, 2016, nine proposals were received. An evaluation committee consisting of OCTA staff from the Contracts Administration and Materials Management and the Strategic Planning departments, as well as external representatives from the City of Santa Ana and Caltrans met to review all proposals received. The proposals were evaluated based on the following evaluation criteria and weights:

- |                                     |            |
|-------------------------------------|------------|
| • Qualifications of the Firm        | 25 percent |
| • Staffing and Project Organization | 25 percent |
| • Work Plan                         | 30 percent |
| • Cost and Price                    | 20 percent |

Several factors were considered in developing the evaluation criteria weights. The work plan was assigned the greatest importance, as it was imperative for the selected firm to demonstrate a clear project approach and understanding of the project through a detailed work plan. The study will rely on an effective work plan that engages the community and provides high-quality, meaningful deliverables by detailing the best approach to performing each task effectively. The qualifications of the firm, as well as staffing and project organization criteria, were weighted equally at 25 percent. The proposing firm needed to clearly demonstrate the proposed project team's relevant experience and the requisite personnel to perform the various assignments set forth in the scope of work. Additionally, the proposed project team needed to demonstrate the ability to identify pedestrian focus areas to produce a document for future use by local agencies.

Cost and price was weighted at 20 percent to ensure the program will be delivered efficiently and that OCTA receives value for the services provided.

Based on the evaluation criteria, on October 12, 2016, the evaluation committee reviewed all proposals received and short-listed the four firms listed below in alphabetical order:

Firm and Location

Alta Planning + Design (Alta)  
San Diego, California

IBI Group (IBI)  
Fresno, California

STC Traffic, Inc. (STC)  
Diamond Bar, California

Steer Davies Gleave (SDG)  
Los Angeles, California

The interviews with the four firms were conducted on November 14, 2016, and consisted of a presentation to demonstrate the firms' understanding of OCTA's requirements for this project. The firms' project managers and key team members had an opportunity to present each team's qualifications and respond to the evaluation committee's questions. Questions were asked relative to the proposed project team's experience developing outreach events, soliciting community input for non-technical audiences, approach to developing pedestrian focus areas, as well as key challenges to completing the AT Plan. Finally, each team was asked specific clarification questions related to their proposal.



After considering the presentations and responses to the questions asked during the interviews, the evaluation committee reviewed the preliminary ranking and made adjustments to individual scores. As a result, the ranking changed.

Based on the evaluation of the written proposals, the firms' qualifications, the proposed firm-fixed rates, and the information obtained from the interviews, the evaluation committee recommends IBI for consideration of the award. The following is a brief summary of the proposal evaluation results.

#### Qualifications of the Firm

Each of the four firms demonstrated experience developing active transportation plans.

IBI has more than 40 years of experience providing transportation planning services for a wide range of public and private organizations. IBI's proposal and interview demonstrated comprehensive knowledge and experience in the design, planning, and programming of bicycle pedestrian facilities and plans. IBI has over 2,700 employees in 80 offices domestically and internationally.

IBI's proposed project team has spearheaded multiple community transportation planning projects with numerous federal, state, and local public agencies, such as the East Wilshire Avenue Bicycle Boulevard Study with the City of Fullerton, and various OCTA projects, such as the Fourth District Bikeways Collaborative and Strategic Plan, and the 2010 Long Range Transportation Plan. The firm's proposed landscaping subcontractor, KTU+A, has provided landscaping and transportation planning services for various projects, such as the City of Dana Point's Connectivity Study, and the City of Santa Ana's Downtown Complete Streets Plan. The firm's proposed planning and design subcontractor, PlaceWorks, prepared multiple grant applications to obtain millions of dollars to fund bicycle and multimodal infrastructure improvements and programs for the Glendale Bicycle Program. Lastly, the firm proposed communication outreach subcontractor, Arellano Associates, has conducted various outreach tasks and events to support a variety of similar projects including: developing a public participation plan for the OC Loop Segments D, F, and H; developing a community-based planning process for the City of Fontana's AT Plan; and is currently conducting strategic regional bikeways plans for OCTA's District 3 Bikeways Collaborative Project.

Alta, STC, and SDG demonstrated experience providing various community transportation planning projects. Their lists of past projects demonstrated a good sampling of the types of services each firm provides. Alta has significant experience through various projects which include aspects of bicycle and pedestrian planning and community outreach for many municipalities.

Furthermore, Alta demonstrated the highest number of relevant bicycle and pedestrian projects throughout Orange County. SDG demonstrated relevant experience on international transportation projects and one large local project to prepare the OCCOG Complete Streets Initiative.

STC's proposal and interview did not provide the same level of detail as the other proposals with respect to the level of involvement by the proposed project team on work cited as related past experience.

#### Staffing and Project Organization

All four firms proposed project teams with experience in delivering transportation planning projects. Many of the key staff proposed by each firm have worked with OCTA on previous projects, either as prime contractors or subcontractors.

IBI proposed a project team of personnel with up to 25 years of experience providing active transportation services. The proposed project manager has 16 years of experience in transportation planning and traffic engineering. In addition, the proposed project manager has local active transportation planning experience, including preparation of bicycle master plans for the City of Fullerton and complete streets plans for Orange County, as well as conceptual and design efforts for bicycle facilities in the cities of Bakersfield, Moreno Valley, and Yucaipa. The proposed project manager has also participated in public outreach activities.

IBI proposed several experienced individuals for the main aspects of this project including active transportation planning, project and community planning, pedestrian and bicycle opportunities, as well as public outreach. Several proposed key individuals have more than 20 years of experience in the industry, as well as multilingual capabilities and familiarity with Orange County. During the interview, the firm was asked to describe the key personnel's experience working as a team. The response clearly identified that the proposed project manager has worked with a majority of the proposed key personnel through various projects such as the East Wilshire Avenue Bicycle Boulevard Study in the City of Fullerton, and the Master Bicycle Plan in the City of Moreno Valley. Through their written proposal and interview, the team best demonstrated their technical understanding of individual responsibilities and expected levels of outreach responsibility for all key personnel. Furthermore, responses to questions asked during the interview were thorough and concise, with all individuals present participating, which validated the team's experience and familiarity performing the services.

Both STC and SDG proposed experienced project teams. SDG's project manager brings over ten years of experience, and STC's project manager has over 20 years of experience. SDG's proposed project team is going through a rebuilding period, and many of their key personnel have minimal experience working as a team. The majority of STC's key staff have a large amount of transportation experience; however, only a few members have experience with transportation planning in California.

Alta proposed a project manager with two years of experience, and a principle-in-charge with 16 years' experience in active transportation and bike plan projects. However, during the interview, there was minimal involvement from many representatives present, and the responses from the lead analyst/senior planner demonstrated very limited experience in the engineering component of active transportation planning.

#### Work Plan

The work plans proposed by each firm met the requirements of the RFP. Each firm proposed a work plan reflecting its understanding of the project requirements and accurately outlined a timeline for each task with estimated labor hours per person. All four firms addressed various methods of approaching non-technical audiences, such as, but not limited to, engaging disadvantaged and underserved communities, coordinating public outreach events such as pop-up tents, market place surveys, and attending existing health-related events. The four firms addressed the primary elements of the scope of work.

IBI's work plan was detailed and very comprehensive in all aspects of the RFP. IBI proposed to tailor communications with different communities. The outreach approach included bike tours, walking audits, and measureable goals to ensure a sufficient amount of surveys are received. The preferences and demographics of an area will determine if the prominent form of communication will be outdoor community events, a mobile application, or a different option to spread the awareness. Finally, IBI demonstrated understanding of Orange County's diversity, assumed a standard survey approach may not be ideal for every area, and proposed to adapt their plan appropriately to ensure a successful outcome. IBI demonstrated a clear understanding of the scope of work and the degree of involvement necessary to deliver all of the elements of a successful active transportation plan.

STC's work plan was also very comprehensive and provided a high level of detail. Alta provided a comprehensive written work plan addressing all elements of the scope of work. However, during the interview, responses to several questions

regarding the work plan were general, and questions were not thoroughly addressed. Furthermore, during the interview Alta did not demonstrate an individualized approach to completing the public outreach component of the work plan, obtaining public feedback for transportation surveys, and identifying how the firm will approach the cities for buy-in of the plan.

#### Cost and Price

Pricing scores were based on a formula that assigns the highest score to the lowest total firm-fixed price for the tasks to be completed, and scores the other proposals' total firm-fixed prices based on their relation to the lowest total firm-fixed price. IBI's firm-fixed price was competitive among all proposing firms.

#### Procurement Summary

Based on the evaluation of the written proposals, the firms' qualifications, and the information obtained from the interviews, the evaluation committee recommends the selection of IBI as the top-ranked firm to develop a countywide AT Plan. IBI demonstrated strong relevant experience and submitted a thorough and comprehensive proposal that was responsive to all requirements of the RFP. The firm presented a highly qualified staff and subconsultants that demonstrated a thorough understanding of the dynamics of active transportation planning.

#### Fiscal Impact

The project is included in the approved fiscal year 2016-17 budget for the Planning Division (Account 1535-7519-A4530-0A6). A state Active Transportation Program Cycle 2 grant is funding 80 percent, and the remaining 20 percent is funded through State Transportation Improvement Program Planning, Programming, and Monitoring funds, previously approved by the Board.

#### ***Summary***

Staff recommends that the Board authorize the Chief Executive Officer to negotiate and execute Agreement No. C-6-1417, between OCTA and IBI, in the amount of \$350,000, for an 18-month term to develop a countywide AT Plan.

***Attachments***

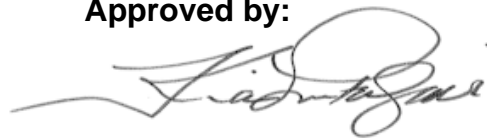
- A. Review of Proposals - RFP 6-1417 Orange County Active Transportation Plan
- B. Proposal Evaluation Criteria Matrix (Short-Listed Firms) - RFP 6-1417 Orange County Active Transportation Plan
- C. Contract History for the Past Two Years - RFP 6-1417 Orange County Active Transportation Plan

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Review of Proposals  
RFP 6-1417 Orange County Active Transportation Plan

Presented to the Regional Planning and Highways Committee, January 5, 2017.  
Nine proposals were received, four firms were interviewed, one firm is being recommended.

Overall Ranking	Proposal Score	Firm and Location	Sub-Contractors	Evaluation Committee Comments	Fixed-Firm Price
1	86	IBI Group Fresno, California	KTU+A Arellano Associates PlaceWorks	Excellent qualifications and experience with active transportation projects. Firm and subcontractors have similar transportation-related projects in Orange County. Firm has been in business since 1974 and has over 2,700 employees. Project manager has 16 years of experience in transportation planning and traffic engineering. Strong project team with extensive experience in various aspects of active transportation in Orange County. Many key personnel have 25 years experience in active transportation. Proposed very detailed outreach approach and measureable goals for transportation surveys. References provided excellent comments and feedback. Comprehensive interview.	\$350,000
2	82	STC Traffic, Inc. Diamond Bar, California	Michael Baker International, Inc. KTU+A RSM Design	Good qualifications and experience with active transportation projects. Subcontractors have similar projects in transportation strategic planning and outreach. Firm has been in business since 2007 and has 20 employees. Strong project team with various experience and backgrounds. Proposal and interview did not extensively detail the team level of involvement. Project manager has 20 years of experience preparing transportation planning studies and traffic engineering design plans. Some of the relevant projects had reference errors and few Orange County examples. Interview introduced specific details for all key aspects of the scope of work including project planning and outreach activities/events. References provided excellent comments and feedback.	\$350,000
3	80	Alta Planning + Design San Diego, California	None	Excellent qualifications and experience with active transportation projects. Firm has many similar transportation-related projects in Orange County. Firm has been in business since 1996 and has over 180 employees. Project manager has two years of experience and is in his first year with the firm. Principle-in-charge has 16 years of experience in active transportation planning and in his second year with firm. Key personnel has very little experience working together as a group. Interview responses did not detail the public outreach component, additional ways to obtain public feedback, or how the firm will approach the cities. References provided excellent comments and feedback.	\$349,870
4	79	Steer Davies Gleave Los Angeles, California	Fehr and Peers, Inc. Leslie Scott Consulting	Good qualifications and experience on transportation projects. Relevant transportation projects referenced in their proposal. Firm has been in business since 1978 and has over 70 employees. Key personnel has very little transportation-related experience in Orange County. Key personnel have limited experience working as a group. Project manager has ten years of experience in urban planning and transportation planning, mostly in Canada and the United Kingdom. Interview introduced specific details for all key aspects of the scope of work, including project planning and outreach activities/events. References provided excellent comments and feedback.	\$349,475

RFP - Request for Proposals

**Evaluation Panel:**

**Internal:**

Contracts Administration and Materials Management (1)  
Strategic Planning (2)

**External:**

California Department of Transportation (1)  
City of Santa Ana (1)

**Proposal Criteria**

Qualification of the Firm  
Staffing and Project Organization  
Work Plan  
Cost and Price

**Weight Factors**

25 percent  
25 percent  
30 percent  
20 percent

PROPOSAL EVALUATION CRITERIA MATRIX (Short-Listed Firms)  
RFP 6-1417 ORANGE COUNTY ACTIVE TRANSPORTATION PLAN

IBI Group						Weights	Overall Score
Evaluator Number	1	2	3	4	5		
Qualifications of Firm	4.0	4.5	4.0	5.0	4.0	5	21.5
Staffing/Project Organization	4.0	4.5	4.5	4.0	4.0	5	21.0
Work Plan	4.0	4.5	4.0	4.0	4.0	6	24.6
Cost and Price	4.7	4.7	4.7	4.7	4.7	4	18.8
Overall Score	82.8	90.8	85.3	87.8	82.8		86
STC Traffic, Inc.						Weights	Overall Score
Evaluator Number	1	2	3	4	5		
Qualifications of Firm	4.0	3.5	3.5	4.0	3.5	5	18.5
Staffing/Project Organization	3.5	4.0	4.0	4.0	3.5	5	19.0
Work Plan	4.0	4.0	4.5	4.5	4.0	6	25.2
Cost and Price	4.7	4.7	4.7	4.7	4.7	4	18.8
Overall Score	80.3	80.3	83.3	85.8	77.8		82
Alta Planning and Design						Weights	Overall Score
Evaluator Number	1	2	3	4	5		
Qualifications of Firm	4.0	4.5	4.5	5.0	4.5	5	22.5
Staffing/Project Organization	3.5	3.0	4.0	3.0	3.5	5	17.0
Work Plan	3.5	3.5	4.0	3.0	4.0	6	21.6
Cost and Price	4.7	4.7	4.7	4.7	4.7	4	18.8
Overall Score	77.3	77.3	85.3	76.8	82.8		80
Steer Davies Gleave						Weights	Overall Score
Evaluator Number	1	2	3	4	5		
Qualifications of Firm	4.0	4.0	3.5	4.0	3.5	5	19.0
Staffing/Project Organization	3.5	3.5	3.5	3.5	3.5	5	17.5
Work Plan	3.5	4.0	4.0	3.5	4.0	6	22.8
Cost and Price	4.8	4.8	4.8	4.8	4.8	4	19.2
Overall Score	77.7	80.7	78.2	77.7	78.2		79

The range of scores for the non-short-listed firms was 71-76.

RFP - Request for Proposals

**CONTRACT HISTORY FOR THE PAST TWO YEARS**  
**RFP 6-1417 ORANGE COUNTY ACTIVE TRANSPORTATION PLAN**

Prime and Subconsultants	Contract No.	Description	Contract Start Date	Contract End Date	Subconsultant Amount	Total Contract Amount
<b>IBI Group</b>						
Contract Type: Firm-Fixed	C-2-1964	On-Call Transportation Planning and Support Services	September 3, 2013	June 30, 2016	N/A	\$ 600,000
Subconsultants:						
Transportation Management Services						
Bay Area Economics						
ITS Consensus						
Civil Works Engineers						
Alta Planning + Design						
Contract Type: Firm-Fixed	C-4-1710	Review Reporting/Policies/Procedures for the Bike Share Program	November 5, 2014	December 31, 2015	N/A	\$ 30,000
Subconsultants: N/A						
Contract Type: Firm-Fixed	C-6-1044	Transit Centers Modernization and Parking Management Study	June 21, 2016	February 28, 2017	N/A	\$ 174,850
Subconsultants: N/A						
			<b>Sub Total</b>			<b>\$ 804,850</b>
<b>STC Traffic, Inc.</b>						
Contract Type: N/A	None	N/A	N/A	N/A	N/A	\$ -
Subconsultants: N/A						
			<b>Sub Total</b>			<b>\$ -</b>
<b>Alta Planning + Design</b>						
Contract Type: Firm-Fixed	C-4-1486	Bikeways Strategy/Feasibility Studies	November 26, 2014	September 30, 2016		\$ 157,540
Subconsultants:						
FEHR & PEERS					\$ 97,700.00	
Arellano Associates					\$ 19,200.00	
			<b>Sub Total</b>			<b>\$ 157,540</b>
<b>Steer Davies Gleave</b>						
Contract Type: N/A	None	N/A	N/A	N/A	N/A	\$ -
Subconsultants: N/A						
			<b>Sub Total</b>			<b>\$ -</b>

RFP - Request for proposals  
N/A - Not applicable





**January 5, 2017**

**To:** Regional Planning and Highways Committee

**From:** Darrell Johnson, Chief Executive Officer

**Subject:** Regional Planning Update

### **Overview**

The Orange County Transportation Authority's future planning efforts need to acknowledge and respond, as appropriate, to state and regional planning activities. An update on state and regional activities regarding environmental and air quality rule-making is provided for information purposes.

### **Recommendation**

Receive and file as an information item.

### **Background**

The Orange County Transportation Authority (OCTA) coordinates regularly with other planning and regulatory agencies within the Southern California region. This regional coordination is conducted at many levels, involving the OCTA Board of Directors (Board), executives, and technical staff. Some examples of the regional planning forums in which OCTA participates include:

- Southern California Association of Governments (SCAG) Regional Council and policy committees,
- State Route 91 Advisory Committee,
- Regional Chief Executive Officers' (CEO) meeting,
- Regional CEOs' Sustainability Working Group,
- South Coast Air Quality Management Plan Advisory Group,
- Interregional planning coordinators (OCTA, SCAG, San Diego Association of Governments, and the California Department of Transportation [Caltrans] Districts 7, 11, and 12), and,
- SCAG technical working groups.

Since the last update in May 2016, there have been a number of important developments regarding ongoing and recently completed regional and statewide planning activities led by the Governor's Office of Planning and Research (OPR), Caltrans, and the South Coast Air Quality Management District (SCAQMD). A discussion of these developments is provided below. A summary of additional regional planning activities monitored by OCTA staff is provided in Attachment A.

### ***Discussion***

#### OPR – Proposed Updates to the California Environmental Quality Act (CEQA) Guidelines

SB 743 (Chapter 386, Statutes of 2013) generally states that automobile delay will no longer be considered a significant impact under CEQA for infill developments. The statute directs OPR to propose revisions to CEQA guidance that identify criteria for determining the significance of transportation impacts that promote the reduction of greenhouse gas (GHG) emissions, the development of multimodal transportation networks, and a diversity of land uses. The proposed CEQA revisions from OPR, released on January 20, 2016, suggest that the best metric available to accomplish this is vehicle miles traveled (VMT). OPR also intends to exercise a provision in SB 743 statute that allows the CEQA revisions to apply to projects outside of the higher-frequency transit areas that were the focus of the bill.

The OPR proposal also includes a technical advisory component that sets expectations for significance thresholds. For example, it suggests for housing and office developments that per capita VMT should be reduced 15 percent below existing conditions with the addition of the proposed project. For transportation projects, OPR noted that the statewide total annual VMT could increase no more than four percent by 2030, over 2014 levels, without obstructing the state's emission reduction goals. Therefore, OPR proposed to allocate this growth equally to each project expected to be completed by 2030 in an approved Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Based on this method, most capacity projects planned for regional facilities in Orange County would likely trigger significant impacts. This includes Measure M projects that have not yet received environmental clearance.

OCTA submitted a comment letter to OPR (Attachment B), as well as a joint letter with SCAG and other county transportation commissions (Attachment C). Both letters address concerns with the proposed thresholds, as well as encourage OPR to consider exempting projects that are part of an RTP/SCS that achieves the GHG emission reduction goals established through SB 375.

Additionally, SCAG and the Sacramento Area Council of Governments (SACOG) have been working with OPR to provide data and insights from the regional level as revisions are being made to the proposal.

On September 2, 2016, Caltrans released an “Interim Guidance” for their Intergovernmental Review Program, which is their process for reviewing and commenting on planning and environmental documents that are out for public review. This reflects Caltrans’ interpretation of OPR’s proposed CEQA revisions and OPR’s associated draft technical guidance. The Interim Guidance directs Caltrans staff to submit comments that identify opportunities for reduced VMT for land use and infrastructure plans and projects. Since there are still many questions about the proposed CEQA revisions by OPR, the Caltrans Interim Guidance has raised additional concerns for lead agencies regarding potential legal challenges based on incomplete CEQA guidance.

Subsequently, SCAG hosted a meeting with OPR on November 14, 2016. At this meeting, OPR stated that they are encouraging Caltrans to rescind their Interim Guidance until the CEQA revisions are finalized. However, it appears that Caltrans is moving forward with implementing the Interim Guidance, given the direction of the recently completed California Transportation Plan 2040. Other discussions at the meeting focused on revisions to OPR’s proposal and technical guidance. Through coordination with SCAG and SACOG, and in consideration of comments submitted on OPR’s proposed CEQA revisions and technical guidance, OPR is exploring modifications that are in line with OCTA’s comment letters. The modifications under consideration include:

- Revisiting the recommended VMT thresholds; particularly, the methodology for determining the threshold for transportation projects;
- Exempting or streamlining for projects identified in an approved RTP/SCS that meets the SB 375 (Chapter 2008, Statutes of 2008) GHG emission reduction targets; and
- Regional and/or subregional mitigation bank programs (similar to the Measure M2 Freeway Environmental Mitigation Program).

OPR continues to make revisions, and will submit their final proposal to the Natural Resources Agency (NRA) in early 2017. The NRA will begin formal rulemaking once they receive the OPR proposal. This will include additional opportunities for public comment. OPR indicated that the final rule and technical guidance could be in place by late 2017.

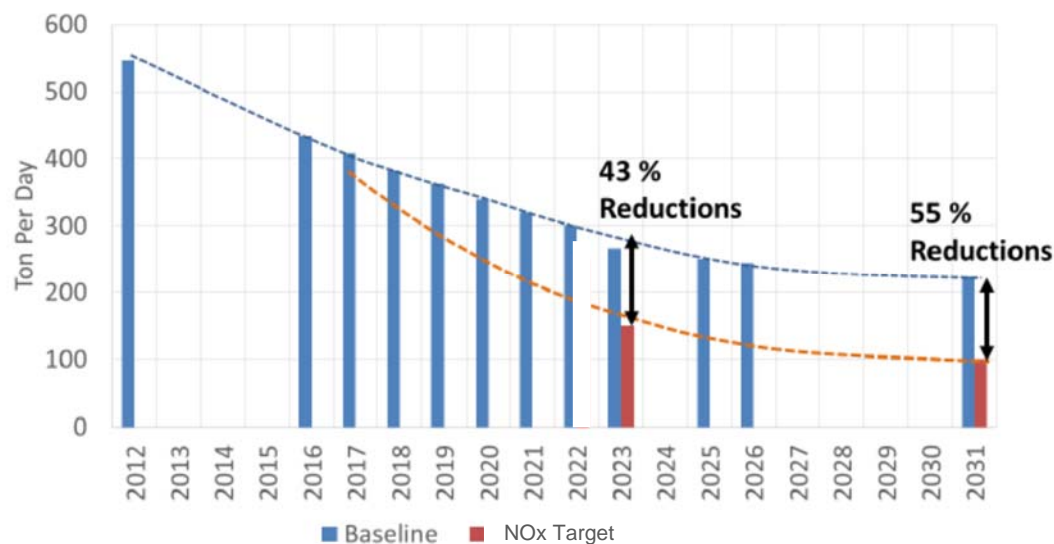
#### SCAQMD – Air Quality Management Plan (AQMP)

SCAQMD is charged with attaining and maintaining healthful air quality levels in the South Coast Air Basin (i.e., the counties of Los Angeles, Orange, Riverside, and San Bernardino). The federal Clean Air Act requires areas not attaining

each of the National Ambient Air Quality Standards (NAAQS) to develop and implement emission reduction strategies that will bring the area into attainment in a timely manner. If attainment is not achieved, the region could face sanctions that limit highway funding, and may require implementation of a Federal Implementation Plan that allows the federal government to identify strategies and prioritize funding.

The AQMP is the mechanism by which SCAQMD identifies the strategies and measures to attain the NAAQS, the most challenging of which are the ozone standards. As displayed in Figure 1, the 1997 eight-hour ozone standard requires that oxides from nitrogen (NO<sub>x</sub>) be reduced 43 percent below the baseline projection for 2023. Furthermore, the 2008 eight-hour ozone standard requires that NO<sub>x</sub> emissions be reduced by 55 percent below the baseline projection for 2031.

Figure 1: NO<sub>x</sub> Reductions Required to Attain NAAQS for Ozone



Source: Revised Draft 2016 AQMP

Mobile sources, such as automobiles and freight vehicles, are currently contributing about 88 percent of the region's total NO<sub>x</sub> emissions. Of these, the leading contributors of NO<sub>x</sub> are heavy-duty diesel trucks, off-road equipment, and ships. However, SCAQMD has limited authority to regulate mobile sources. Therefore, SCAQMD must look to California Air Resources Board (CARB) and the United States Environmental Protection Agency (EPA) to implement strategies addressing mobile sources. Therefore, SCAQMD is working with CARB and EPA to identify strategies to address mobile source emissions within the AQMP.

The draft AQMP includes and supports strategies identified within CARB's Mobile Sources Strategy. Many of these strategies focus on expediting the integration of zero and near-zero emission technologies. These have an immediate impact, but are extremely costly. However, as they become more widely utilized, they could also become more cost-effective. Therefore, SCAQMD is supporting these strategies through development of incentive programs.

The incentive programs have general support from many stakeholders, because of the opt-in flexibility. However, OCTA has submitted comment letters expressing concerns over what funding sources may be targeted by SCAQMD for the incentives, in addition to other technical comments (Attachment D and Attachment E). Specifically, OCTA opposed increases in regulatory fees and any diversion of funds that OCTA depends on to deliver programs and projects.

Another element of the Mobile Source Strategy included in the draft AQMP is the Advanced Clean Transit Program. This program would eventually move 100 percent of public transit fleets in California to zero-emission technologies. However, concerns have been raised due to the fact that most fleets utilize low emission technologies, such as compressed natural gas; therefore, upgrading to zero-emission technology provides little benefit relative to the high cost for new buses and supporting infrastructure.

SCAQMD is also considering strategies that leverage their stationary source regulatory authority. SCAQMD is required to consider strategies that target new or infill development projects that attract trips. For example, a housing development, office park, or any other facility that could be considered a destination or vehicle attractor, would be required to mitigate the associated emissions, through fines or other means. However, the current description for this strategy (EGM-01) is so broad that it will allow SCAQMD to explore application for almost any project. Lead agencies throughout the region will need to closely monitor the development of this strategy.

In December 2016, the Draft Final 2016 AQMP was released for public review. If no major comments are received, SCAQMD staff anticipate approval at the February 3, 2017, SCAQMD Governing Board meeting. OCTA staff intends to reiterate the comments and concerns noted above and in Attachment D. This will include emphasizing the need for adequate funding and flexibility to meet the state's emissions related goals, such as zero emission bus regulations.

### OCTA Look Ahead

The development of the next OCTA Long-Range Transportation Plan (LRTP) will be underway in early 2017. The LRTP is developed every four years, as local input for the SCAG RTP/SCS. The LRTP reflects OCTA's current policies and commitments, and incorporates input from local jurisdictions and stakeholders. The goal of the LRTP is to gauge how well OCTA's planned investments address the future transportation system needs, based on a 20+ year forecast of available revenues and growth in population, employment, and housing.

Studies are underway that will provide key data, policies, and strategies for inclusion in the 2018 LRTP. These include, but are not limited to, the following:

- 2016 Bus Service Plan
- Transit Master Plan
- Central Harbor Boulevard Transit Corridor Study
- Countywide Active Transportation Plan
- Orange County Freeway Study
- Orange County Freight Needs Assessment
- Pacific Coast Highway Corridor Study
- Vanpool/Park-and-Ride Study

Updates on these studies will be provided to the Board and OCTA committees as appropriate. The LRTP will also address studies developed by partner agencies, such as the Caltrans District 12 managed lanes studies and recent planning efforts by the Transportation Corridor Agencies.

The LRTP is currently scheduled for completion in 2018. Because projects must be included in an approved RTP/SCS to be eligible for state and federal funding, it is important that the Board is engaged throughout the development of the LRTP. Therefore, beginning in 2017, a series of items supporting the development of the LRTP to ensure the committees and Board are able to provide direction to staff at key decision points.

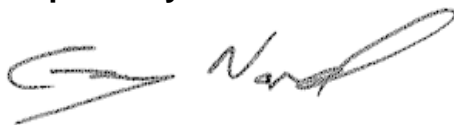
### **Summary**

Staff has been engaged with planning activities being led by OPR, Caltrans, and SCAQMD. Drafts of the planning documents associated with these activities have been reviewed, and staff has submitted comments, as needed, to protect the interests of OCTA. Staff intends to remain engaged throughout the development of the CEQA Guidelines update and associated technical guidance, as well as the AQMP and any rulemaking efforts that may follow. Additionally, OCTA has a number of planning efforts underway that identify and address Orange County's transportation needs, and will provide key input for the development of OCTA's next LRTP.

**Attachments**

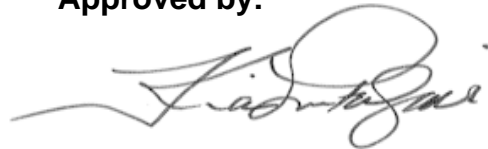
- A. January 2017 – Regional Planning Activities
- B. Letter to Christopher Calfee, Senior Counsel – Governor’s Office of Planning and Research – Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA – Implementing Senate Bill 743 (Chapter 386, Statutes of 2013) – Dated February 26, 2016
- C. Letter to Christopher Calfee, Senior Counsel – Governor’s Office of Planning and Research – Comments on the “Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA” to Implement SB 743 – Dated February 29, 2016
- D. Letter to Dr. Philip Fine, Deputy Executive Officer – South Coast Air Quality Management District – Draft 2016 Air Quality Management Plan – Dated August 9, 2016
- E. Letter to Ms. Jillian Wong, Planning and Rules Manager – South Coast Air Quality Management District – Draft 2016 Air Quality Management Plan Program Environmental Impact Report – Dated November 15, 2016

**Prepared by:**



Gregory Nord  
Principal Transportation Analyst  
(714) 560-5885

**Approved by:**



Kia Mortazavi  
Executive Director, Planning  
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# January 2017 Regional Planning Activities

Summary		Key Dates	Orange County Transportation Authority (OCTA) Interest	OCTA Role
<b>United States Environmental Protection Agency (EPA)</b>				
National Ambient Air Quality Standards Update for Eight-Hour Ozone Emissions	<p>The Clean Air Act requires review of air quality standards every five years to "protect the public health with an adequate margin of safety."</p> <p>In October 2015, EPA established a new ozone standard of 70 parts per billion (ppb), which is more stringent than the previous standard of 75 ppb. The new standard is based on research regarding ozone's effects on human health and the environment.</p> <p>Implementation guidelines are being prepared that consider technical feasibility, cost, and time needed to meet the standards. In this process, EPA is expected to work closely with states and local partners to identify flexible and cost-effective implementation measures and programs.</p>	<p><u>October 2015</u> - Final rule (70 ppb)</p> <p><u>2016-17</u> - Develop implementation guidelines</p> <p><u>October 2017</u> - Nonattainment area designations established</p> <p><u>2037</u> - Deadline to demonstrate attainment in the South Coast Air Basin</p>	<p>Ensure inclusion of flexible and cost-effective implementation measures and programs in the implementation guidelines.</p> <p>Support continued and increased funding for the development and integration of zero and near-zero emission technologies.</p>	Monitoring development of implementation guidelines
<b>Office of Planning and Research (OPR)</b>				
SB 743 (Chapter 386, Statutes of 2013) Updates to the California Environmental Quality Act (CEQA) Guidelines	<p>Automobile delay (level of service) is no longer a criteria for significant impacts within transit priority areas under CEQA.</p> <p>Draft recommends vehicle miles traveled to analyze transportation impacts, and to reduce greenhouse gas (GHG) emissions, develop multimodal networks, and diversify land uses.</p> <p>At OPR's discretion, this can be expanded beyond transit priority areas.</p>	<p><u>January 2016</u> - OPR released a revised draft for additional public review</p> <p><u>February 2016</u> - OCTA submitted comments</p> <p><u>October 2016</u> - OPR discussion of updates</p> <p><u>Early 2017</u> - OPR to submit recommendation to the Natural Resources Agency (NRA) for certification and adoption</p>	<p>Minimize potential for CEQA-related litigation concerns, negative mobility impacts, and increased time and cost for project development and implementation.</p>	Monitor OPR revisions and NRA actions
<b>California Department of Transportation (Caltrans)</b>				
California Transportation Plan (CTP) 2040	A long-range policy framework for addressing future mobility needs and reducing GHG emissions by setting goals, performance-based policies, and strategies.	<p><u>June 2016</u> - Final plan approval</p>	<p>Ensure that the goals, policies, and strategies do not conflict with OCTA plans or projects.</p> <p>Emphasize the need for any CTP strategies to be vetted at the local and regional levels, prior to including in local/regional plans.</p>	Complete



# January 2017 Regional Planning Activities

Summary		Key Dates	Orange County Transportation Authority (OCTA) Interest	OCTA Role
<b>Caltrans (continued)</b>				
Regional Transportation Plan (RTP) Guidelines	<p>Caltrans and the California Transportation Commission (CTC) are coordinating to prepare new guidelines for the development of RTPs.</p> <p>Metropolitan Planning Organizations (MPOs), such as the Southern California Association of Governments (SCAG), will reference these guidelines when preparing their RTPs.</p>	<p><u>Spring 2016</u> - Initial draft prepared</p> <p><u>August 2016</u> - OCTA submitted comments</p> <p><u>Summer 2016</u> - Workgroup meetings</p> <p><u>November 2016</u> - Revised draft</p> <p><u>December 2016</u> - CTC approval</p>	<p>Ensure that the Guidelines are true to the purpose of the RTP, and that no unnecessary requirements are included</p>	<p>Provide comments</p> <p>Participate in workgroup meetings</p> <p>Coordinate with SCAG</p>
District 12 Degradation Determination Report and Degradation Action Plan	Identification of high-occupancy vehicle (HOV) lane segments that do not meet the operational standard set by the Federal Highway Administration, and strategies for correcting degradation on those facilities.	<u>September 2016</u> - 2014 Determination Report prepared	Monitor annual updates for strategies that may conflict with OCTA plans and policies.	Monitoring
District 12 Managed Lanes Feasibility Study	An evaluation of four options for the existing HOV system. These include: the existing network and programmed improvements; a full dual HOV lane network; converting existing HOV lanes to high-occupancy toll (HOT) lanes and adding HOT lanes for a full dual HOT lane network; and converting HOV lanes to HOT lanes with 3+ occupancy.	<p><u>May 2013</u> - Study kick-off</p> <p><u>September 2016</u> - Final draft completed</p> <p><u>November 2016</u> - OCTA submitted comments</p>	Ensure consistency with OCTA plans and programs.	Provide comments
District 12 Managed Lanes Network Study	Evaluating the existing HOV system and implementation options to identify where proposed managed lane(s) strategies are feasible in terms of corridor and system performance, safety, efficiency, and cost and benefit.	<p><u>July 2014</u> - Study kick-off</p> <p><u>August 2016</u> - Draft final transmitted to OCTA for review</p> <p><u>August 2016</u> - OCTA submitted comments</p>	Ensure consistency with OCTA plans and programs.	Provide comments
<b>California Air Resources Board (CARB)</b>				
SB 375 (Chapter 728, Statutes of 2008) Targets Update	<p>Process to update targets for GHG reduction from passenger vehicles, involving coordination between CARB, MPOs, and stakeholders.</p> <p>For the SCAG region, the updated targets will not apply to Sustainable Communities Strategies (SCS) until 2019.</p>	<p><u>Fall 2016</u> - MPOs provide target input</p> <p><u>Spring 2017</u> - Draft targets released for review and comment</p> <p><u>Summer 2017</u> - Finalize targets</p>	Support maintaining feasible GHG targets for the SCAG region.	<p>Participate in stakeholder workshops</p> <p>Coordinate with SCAG</p> <p>Monitor Regional Targets Advisory Committee</p>

# January 2017 Regional Planning Activities

Summary		Key Dates	Orange County Transportation Authority (OCTA) Interest	OCTA Role
<b>CARB (continued)</b>				
Scoping Plan - 2nd Update	Describes the approach California will take to reduce GHGs to achieve the goal of reducing emissions to 1990 levels by 2020, and 40 percent below 1990 levels by 2030.	<p><u>April 2015</u> - Governor Brown signs Executive Order B-30-15, identifying the goal to reduce GHG emissions 40 percent below 1990 levels by 2030</p> <p><u>September 2016</u> - SB 32 (Chapter 249, Statutes of 2016) signed into law, codifying the 2030 target identified by Executive Order B-30-15</p> <p><u>September 2016</u> - Whitepaper released on VMT reduction strategies for consideration in the Scoping Plan</p> <p><u>September 2016</u> - OCTA submitted comments on the whitepaper</p> <p><u>December 2016</u> - Released a Discussion Draft for public review</p> <p><u>January 2017</u> - Revised Draft to be released for public review</p> <p><u>Spring 2017</u> - Finalize Scoping Plan</p>	<p>Ensure assumptions and considerations are reasonable.</p> <p>May influence revisions to regional GHG reduction targets associated with SB 375.</p>	<p>Participate in workshops</p> <p>Provide comments</p>
<b>South Coast Air Quality Management District (SCAQMD)</b>				
Air Quality Management Plan (AQMP)	<p>Identifies strategies for achieving attainment with the National Ambient Air Quality Standards in the South Coast Air Basin.</p> <p>Provides input into the California State Implementation Plan (federally required air quality plan).</p>	<p><u>June 2016</u> - Draft AQMP released for review and comment</p> <p><u>August 2016</u> - OCTA submitted comments</p> <p><u>August 2016</u> - Preliminary draft Socioeconomic Report released for review and comment</p> <p><u>September 2016</u> - Draft CEQA document released for review and comment</p> <p><u>October 2016</u> - Revised Draft AQMP released for review and comment</p> <p><u>November 2016</u> - Public Hearing</p> <p><u>December 2016</u> - Release Draft Final AQMP</p> <p><u>February 2017</u> - Finalize AQMP</p>	<p>Support development of attainment strategies that are within SCAQMDs regulatory authority.</p> <p>Ensure economic impacts are considered.</p> <p>Minimize impacts to mobility.</p> <p>Ensure 2016 RTP input is accurately incorporated.</p>	<p>Participate in Advisory Committee meetings</p> <p>Review and comment on draft documents</p>

# January 2017 Regional Planning Activities

Summary		Key Dates	Orange County Transportation Authority (OCTA) Interest	OCTA Role
<b>SCAG</b>				
Express Travel Choices Study - Phase 2	<p>Identification of a regional HOT network and conceptual operations strategy throughout the SCAG region.</p> <p>Builds off the Phase 1 HOT network that was reflected in the 2012 RTP.</p> <p>Data from this study was incorporated into SCAG's 2016 RTP</p>	<p><u>June 2013</u> - Study kick-off</p> <p><u>June 2016</u> - Finalized study</p>	<p>Ensure consistency with SCAG's 2012 RTP and OCTA's 2014 Long-Range Transportation Plan (LRTP).</p> <p>Support concepts that improve corridor performance over revenue generation.</p>	Complete
Sustainability Program	<p>Grant program that supports implementation of SCS measures by local jurisdictions throughout the SCAG region.</p>	<p><u>October 2016</u> - Call for projects announced</p> <p><u>November 18, 2016</u> - Deadline to submit projects</p> <p><u>February 2017</u> - SCAG Regional Council to approve projects for funding</p>	<p>Identify OCTA projects for submittal</p> <p>Ensure that Orange County jurisdictions receive a fair share of funding.</p> <p>Work with SCAG to understand the extent of benefits achieved from this program.</p>	<p>Preparing applications</p> <p>Providing letters of support</p> <p>Monitoring</p>
Greenline Extension Study	<p>Planning study to identify and evaluate feasible alternatives for extending the Metro Green Line to the Norwalk/Santa Fe Springs Metrolink Station.</p>	<p><u>Fall 2016</u> - Initiated study</p> <p><u>January 2017</u> - Open house meetings</p> <p><u>Spring 2017</u> - Alternatives development and land use planning</p> <p><u>Summer 2017</u> - Open house meeting</p> <p><u>Winter 2018</u> - Finalize study</p>	<p>Support alternatives that provide improved access for Orange County Metrolink riders to Metro rail services and the Los Angeles International Airport</p>	Monitoring
2016-40 RTP Amendment #1	<p>Modifications to near-term projects identified in the RTP to ensure successful and timely project development and programming of funds in the Federal Transportation Improvement Program.</p>	<p><u>September 2016</u> - Submitted modifications</p> <p><u>Winter 2017</u> - Draft amendment to be released for review and comment</p> <p><u>Spring 2017</u> - Finalize amendment</p>	<p>Ensure project data is updated as needed.</p>	Coordinate with SCAG

# January 2017 Regional Planning Activities

Summary		Key Dates	Orange County Transportation Authority (OCTA) Interest	OCTA Role
<b>Transportation Corridor Agencies (TCA)</b>				
Transportation Control Measure (TCM) substitution	<p>Substitution is required for the State Route 241 (SR-241) South TCM designation, due to exceedence of deadlines identified in an agreement letter between TCA and SCAG.</p> <p>The proposed substitute TCM is the SR-241/State Route 91 Express Lane Connector</p>	<p><u>December 2015</u> - OCTA submitted a TCM substitution request on behalf of TCA</p> <p><u>September 2016</u> - Proposed substitution presented to the SCAG Transportation Conformity Working Group</p> <p><u>Winter 2017</u> - Finalize substitution through action at SCAG Committee and Regional Council</p>	Complete the substitution process to avoid impacts to regional transportation funding	Coordinating with TCA and SCAG
South County Mobility Study	TCA lead study to identify and analyze potential alternatives for addressing mobility issues in southern Orange County	<p><u>January 2016</u> - Community Ascertainment Study completed</p> <p><u>June 2016</u> - Public Forum #1</p> <p><u>October 2016</u> - Public Forum #2</p> <p><u>November 2016</u> - Settlement achieved for SR-241 lawsuits</p> <p><u>2017</u> - Develop Project Study Report/ Project Development Support</p> <p><u>2018</u> - Develop project approval and environmental documents</p>	Monitor and ensure consistency with OCTA plans and projects	Coordinating with TCA
<b>OCTA Technical Advisory Committee (TAC)</b>				
Master Plan of Arterial Highways (MPAH) Ad Hoc Committee	Ad hoc committee formed to evaluate current MPAH traffic calming policy and recommend potential revisions to support continued complete streets implementation throughout Orange County.	<p><u>July 2016</u> - Request to form an ad hoc committee</p> <p><u>Fall 2016</u> - Three ad hoc meetings</p> <p><u>February 2017</u> - Present ad hoc recommendations to full TAC</p> <p><u>Spring 2017</u> - Present TAC recommendations to OCTA Board</p>	Ensure continued integrity of regional mobility on the MPAH, while accomodating local jurisdiction requests related to complete street requirements	<p>Facilitate ad hoc meetings</p> <p>Coordinate with TAC members to recommend modifications to MPAH policies</p>

# January 2017 Regional Planning Activities

Summary		Key Dates	Orange County Transportation Authority (OCTA) Interest	OCTA Role
Los Angeles County Metropolitan Transportation Authority (Metro)				
Metro Gold Line Eastside Extension Phase II	Study of two alternatives for extending the Gold Line to more eastern Los Angeles County communities. One alternative traverses the northern side of State Route 60, and the other travels along Washington Boulevard, terminating near Orange County.	<p><u>November 2014</u> - Metro Board direction to study implementation of one or both alternatives, as well as potential connections with the West Santa Ana Branch Corridor project on the Pacific Electric Right-of-Way</p> <p><u>July 2015</u> - Contract amendment approved by the Metro Board to incorporate the additional work requested in November 2014</p> <p><u>Spring 2016</u> - Metro hosted 5 public meetings to obtain input for the draft studies.</p> <p><u>Winter 2017</u> - Metro Board to hear findings from Technical Study</p>	Support alternatives that create potential for future connections into Orange County.	Monitoring
Interstae 605 (I-605)/Interstate 405 (I-405) Feasibility Study	Study to improve access and operations in the vicinity of the I-605/I-405 interchange.	<p><u>June 2013</u> - Study kick-off</p> <p><u>Fall 2015</u> - Finalized study - Recommends lane additions on I-405 and interchange improvements/realignments</p> <p><u>Next Steps</u> - Begin Project Study Report-Project Development Support (To be determined)</p>	Ensure consistency with OCTA plans and programs.	Complete



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*Darrell Johnson*  
Chief Executive Officer

February 26, 2016

Mr. Christopher Calfee  
Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

**RE: Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA - Implementing Senate Bill 743 (Chapter 386, Statutes of 2013)**

Dear Mr. Calfee:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to provide comments on the Office of Planning and Research's (OPR) Revised Proposal on updates to the California Environmental Quality Act (CEQA) Guidelines on Evaluating Transportation Impacts in CEQA (Revised Proposal), dated January 20, 2016.

The Revised Proposal includes many updates consistent with OCTA's comments on previous drafts of the CEQA Guidelines including improved formatting and an allowance for additional time before consideration of statewide implementation. However, OCTA has significant concerns regarding implementation of the Revised Proposal and its potential impacts to planned transportation projects - especially projects approved by voters pursuant to local transportation sales tax measures.

Additionally, the following subject areas need much further technical evaluation prior to implementation:

- Vehicle miles traveled (VMT) thresholds for development and transportation projects are overly optimistic and may not be achievable;
- Processes for determining transportation project impacts - especially a project's "fair share" of VMT require further elaboration, quantification, and documentation; and
- Recommended VMT mitigation measures for transportation project impacts are overly simplistic and may not even be capable of mitigating a project's full VMT impact.

Mr. Christopher Calfee  
February 26, 2016  
Page 2

Based on these significant concerns, OCTA respectfully submits the attached, more detailed comments and recommendations for OPR's consideration. Thank you and OCTA looks forward to continuing dialogue with OPR on SB 743 implementation.

Should you have any questions, please feel free to contact Joe Alcock, Section Manager, at (714) 560-5372.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darrell Johnson', with a long horizontal stroke extending to the right.

Darrell Johnson  
Chief Executive Officer

DJ:ja  
Attachment

c: Jim Biel, OCTA  
James Donich, OCTA  
Kia Mortazavi, OCTA  
Kurt Brotcke, OCTA  
Lance Larson, OCTA

**The Orange County Transportation Authority's Comments and Recommendations  
on the "Revised Proposal on Updates to the CEQA Guidelines on Evaluating  
Transportation Impacts in CEQA - Implementing  
Senate Bill 743 (Chapter 386, Statutes of 2013)"**

**(1) Organization**

The Orange County Transportation Authority (OCTA) supports placement of the technical recommendations and best practices in the Technical Advisory portion of the document. This streamlines the California Environmental Quality Act (CEQA) language portion of the document and allows for more frequent updates to best practices, methodologies, and data sources. This formatting change also allows for additional flexibility for lead agencies to respond to the guidelines as CEQA analysis evolves; rather than having the guidelines specifically prescribe actions a lead agency must take.

**(2) Land Use Projects**

The updated analysis includes an improved approach for vehicle miles traveled (VMT) calculations. However, the 15 percent VMT reduction goal lacks substantiation and further details need to be provided. OCTA agrees that the goal is ambitious, but may not necessarily be achievable.

Further, the proposed screening threshold for small projects should be changed. One hundred vehicle trips per day would equate to approximately ten to 15 trips per peak hour. This is much lower than the thresholds of most jurisdictions. For example, OCTA requires a Congestion Management Program-related transportation impact study if a proposed project generates more than 2,400 daily trips. This threshold is generally consistent with other transportation planning agencies in Southern California, and would be a good threshold for SB 743.

**(3) Transportation Projects**

While substantial revisions have been made over previous versions of the document, fundamental issues regarding the proposed technical approach remain.

- The guidelines recommend use of a statewide "Fair Share" allocation of VMT growth that is assumed to be allowable and still achieve the 2030 greenhouse gas (GHG) reduction target established through Executive Order B-30-15. This approach requires, at minimum, statewide estimates for:
  - Existing VMT;
  - Existing GHG emissions for each sectors;



- Projected GHG emissions for each sector (including assumptions for all technology advancements and integration); and,
- Number of transportation projects planned for implementation by 2030.

This demonstrates that the recommended approach has a number of estimates and assumptions that are constantly evolving, and would require frequent monitoring and maintenance. Furthermore, the allocation is split evenly between all transportation projects, including transit and active transportation projects that do not generate (and may reduce) VMT. Therefore, this “Fair Share” approach does not provide for a fair allocation of the allowable VMT growth estimate.

OCTA has serious reservations with the recommendation of the Fair Share approach for the reasons stated above. In addition, the currently recommended approach raises questions regarding how project-level VMT might be calculated for projects planned for implementation post 2030.

- Considering that many of the recommended thresholds for planning documents and land use were established based on ties to the Sustainable Communities Strategy (SCS) and that the GHG reduction targets related to SB 375, OCTA believes that transportation projects that are found to be consistent with an Regional Transportation Plan/SCS that meets the regional GHG reduction targets and federal conformity, should be considered to have a less than significant transportation impact.
- As discussed in the document, potential mitigation measures for transportation projects include, “tolling new lanes to encourage carpools and fund transit improvements; converting existing general purpose lanes to high-occupancy vehicle (HOV) or high-occupancy toll lanes; implementing funding for travel demand management offsite; and implementing Intelligent Transportation System strategies to improve passenger throughput on existing lanes.” These potential mitigation measures seem overly simplistic, and in some cases may be difficult to implement/quantify. For instance:
  - Toll lanes and HOV lanes only work if they are part of a system. They cannot be implemented on a mile-by-mile basis.
  - Freeway projects (when led by the California Department of Transportation) typically cannot include active transportation improvements on parallel streets, as they are outside of state right-of-way.
  - Adding tolled or HOV lanes to standard freeway projects, where such facilities were not originally planned, would affect other topics covered by CEQA, such as noise, hydrology and water quality, biological, and cultural resources. They would also require a series of additional reports and approvals, which could fundamentally change the intent of the project, add substantial delays, and increase project costs.

- Further, for voter-approved sales tax programs, which have previously committed to funding capacity enhancing projects, as part of a broader plan (like the Measure M2 Program, which includes system preservation, transit, and programmatic environmental preservation programs); these mitigation measures could potentially counteract the ability to develop and deliver a balanced program. Further, they could also circumvent the will of voters and lead to reduced support for future sales tax programs.

#### (4) Implementation

OCTA appreciates efforts to allow for limited implementation of the revised guidelines in its initial implementation. However, the guidelines could benefit from some additional clarity. Rather than immediately allowing for statewide implementation after the initial two-year application in transit priority areas, the guidelines should re-evaluate the success of the program prior to statewide implementation. In addition, allowing one lead agency to opt to use these standards immediately, may create a lack of consistency within a region on what standards (i.e. level of service or VMT) are being used to analyze transportation impacts.

Finally, because the proposed guidelines will result in significant changes to the analysis of transportation impacts, the guidelines should clearly grandfather projects which are currently in the environmental review process. Otherwise, a new analysis would lead to increased delays and significant cost increases for existing projects.

#### (5) Case Study

Regarding the case study on pages 55-56, entitled: "Roadway Capacity Expansion Project: Addition of 2.2 Lane Miles", the data sources cited were not readily available, nor was OCTA able to replicate these results. Please cite exact locations (i.e. websites) where the data was collected.



February 29, 2016

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

RE: Comments on the "Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA" to Implement SB 743

Dear Mr. Calfee:

The Southern California Association of Governments (SCAG) and the County Transportation Commissions (CTCs) undersigned would like to express our sincere appreciation for the extensive efforts put forth by the Office of Planning and Research (OPR) staff in developing this latest proposal in support of the draft CEQA Guidelines update, pursuant to SB 743. We thank you for the opportunity to provide comments.

As the Metropolitan Planning Organization representing 6 counties and 191 cities in Southern California, SCAG is responsible for implementing SB 375 in our region. In April 2012, SCAG's Regional Council adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, a transformational plan for Southern California. SCAG is now in the final stages of developing the 2016-2040 RTP/SCS, which is focused on further achieving regional sustainability objectives and reducing greenhouse gas emissions.

SCAG recognizes the importance of SB 743 for the effective implementation of SB 375. The development of an alternative metric to evaluate CEQA transportation impacts that serves to reduce greenhouse gas emissions, supports development of multimodal networks, and encourages mixed-use transit oriented development, will also serve to facilitate implementation of the 2016 RTP/SCS. SCAG recognizes that the proposed transition to a VMT based metric will facilitate implementation of many of the sustainability strategies outlined in the RTP/SCS and will support regional investments, particularly in active transportation and transit.

OPR's extensive outreach efforts, which most recently included a well-attended stakeholder meeting at the SCAG offices on February 18, 2016, have provided our local stakeholders the opportunity to gain a better understanding of the Revised Proposal and to offer timely

and meaningful input. We very much appreciate the exemplary diligence OPR has demonstrated throughout this process to maximize participation by our regional and local stakeholders in developing the revised CEQA Guidelines through the several meetings and workshops conducted by OPR in support of this effort over the past two years. We also commend the responsiveness of OPR staff in engaging our stakeholders in meaningful discussions.

## **OVERALL CONCERNS**

Despite OPR staff's efforts, SCAG still has serious concerns if the current version of the Revised Proposal document is adopted. It is important to note that the ability of our RTP/SCS to meet both state and federal statutory requirements is dependent upon implementation of the Plan as a whole, including the addition of highway and roadway capacity to meet the existing and projected future transportation mobility needs of millions of residents living and working in our region.

The 2016 RTP/SCS presents a balanced and integrated land use and transportation plan for the Southern California region that respects local input from our member cities and counties, and is consistent with respecting local control over land use issues as required by state laws, including SB 375. SB 743 and its implementation through the CEQA Guidelines will greatly facilitate the region's ability to plan for and implement transit supportive development patterns and encourage built environment conditions that support increased active and public transportation. However, the highway capacity improvement projects included in the 2016 RTP/SCS are also an integral component of the Plan, and any VMT impact that individual projects may produce, either direct or induced, is balanced at the regional level by a wide array of other projects and strategies that serve to reduce VMT and meet regional GHG reduction targets. Therefore, it is imperative that OPR's proposal be modified to assure that individual capacity improvement transportation projects that are identified in the RTP/SCS, sales tax measures, or STIP be grandfathered and not be evaluated or required to comply with a new project-specific VMT metric in isolation of the integrated regional plan of which they are a part.

Implementation of the current version of the Revised Proposal, with the proposed new VMT and induced demand impact analysis requirement, creates new litigation risks for transportation projects that have already been included in the approved 2012 RTP/SCS (and evaluated in the accompanying certified Programmatic Environmental Impact Report (PEIR)), and those that are included in the pending 2016 RTP/SCS and PEIR. Imposition of new project-level VMT and traffic inducement CEQA impact analyses jeopardizes the integrity of our transportation plan, and could create unwarranted new legal risks for voter-approved, federally-approved, and state-approved transportation capacity investment projects. For these reasons, we strongly urge OPR to limit the new Guidelines to approving the suggested VMT impact metric aimed at streamlining the CEQA process for infill projects by SB 743 to the Transit Priority Areas at the present time, or at minimum, extend the opt-in period for non-Transit Priority Areas and the grandfathered projects identified in the RTP/SCS, sales tax measures, or STIP.

## **ADDITIONAL SPECIFIC COMMENTS**

Below are additional specific comments as related to the induced demand analysis, mitigation requirements for capacity improvements projects, fair share allocation, RTP/SCS consistency, and grace period.

### **Induced Demand Analysis**

- Induced demand is a major new CEQA impact concept, and the following is a partial list of issues that should be comprehensively addressed in a workshop setting prior to issuing this revision to the CEQA Guidelines. We would like to invite OPR staff to lead the workshop, and we appreciate our continued collaboration with OPR toward achieving successful implementation of the revised Guidelines.
  - Requiring induced demand and related VMT analysis for individual projects will increase the risk of litigation due to the general infeasibility of providing the required mitigation measures in many areas, thereby mandating the preparation of a large number of separate EIRs for a multitude of individual projects.
    - Recalibrate the fair share of VMT threshold so that the fair share is apportioned to capacity only projects.
    - Develop models that adequately assess the regional effects of VMT.
  - OPR should provide clarification regarding what specifically constitutes induced demand with respect to VMT. The addition of a definitions section in the Technical Appendix may allow the opportunity to provide more precise descriptions of some of the terms used in the document.
  - Freight corridors documented in the California Freight Mobility Plan should be exempted from the induced growth analysis requirement. This is consistent with Executive Order B-32-15, which highlights competitiveness as one of the pillars of sustainable freight and a sustainable economy. In addition, special consideration should be given to projects that promote dedicated freight corridors or zero/near-zero vehicle technology.
  - More direction is needed regarding how to determine the CEQA baseline for induced impact analysis.
  - Clarification is needed on the approach to be used for analyzing induced demand by project type.
  - Providing the option for use of a programmatic approach to project-level induced growth evaluation, including the use of tiering from previously adopted EIRs, such as the 2012 or the pending 2016 RTP/SCS PEIR, would relieve local jurisdictions of the significant and costly burden of having to perform separate analyses for each individual transportation project.
  - Grandfather in projects in the 2016 RTP/SCS, sales tax measures, or in the STIP.

### **Mitigation Requirements for Capacity Improvement Projects**

- Many of the mitigation measures suggested in the Technical Advisory are clearly in line with regional and local priorities including active transportation, first/last mile connectivity, transit supportive development patterns, transit expansion, and

complete streets. We particularly appreciate the suggestion of a fee-based mitigation option, though we would welcome more guidance on the suggestion. Nevertheless, many of the recommended VMT mitigation measures included in the Technical Advisory are not feasible options in some areas, particularly suburban, rural, and other non-transit amenable locations. In addition, capacity improvement projects that are not of a scale large enough to impact regional VMT performance should be considered for exemption from this requirement.

- The Draft Guidelines should clearly state that only capacity increasing transportation projects would require mitigation.
- Additional guidance regarding the presentation of feasible mitigation options for projects in suburban and other outlying non-TPA areas is recommended. Many of the options presented in the Technical Advisory are not feasible for highway improvement projects.

### **Fair Share Allocation**

- The 'fair share' VMT allocation methodology presented in the Technical Advisory could prove to be more beneficial as a tool for estimating the VMT threshold of a capacity increasing project by revising the allocation calculation to make it more responsive to the multitude of factors that affect a project's VMT impact.
  - Clarification is needed regarding the appropriate methodology for calculating 'fair share' VMT at the project-level.
  - The 'fair share' allocation methodology should be revised to take into account the scale of a project including, for example, lane miles, costs, and facility type.
  - The 'fair share' allocation methodology should be applicable only to projects that increase highway capacity.
  - The 'fair share' methodology should be crafted not to penalize fast growing areas or roadway projects that provide much needed connectivity and accessibility.
  - However, the data and assumptions required to determine the statewide VMT cap and allocation are fluid, which would result in the need to constantly monitor and adjust the fair share allocations. The development of a programmatic approach to VMT allocation may reduce the uncertainties introduced by the currently recommended project-oriented 'fair share' methodology.

### **RTP/SCS Consistency**

- The land use assumptions and data being used in support of the 2016 RTP/SCS for the SCAG region are to be adopted at the jurisdictional level. Any interpretation of RTP/SCS data at a geographic scale smaller than the jurisdictional level should not be used for purposes of determining consistency with the RTP/SCS.
  - Language is needed in the revised Guidelines that clearly states that RTP/SCS consistency is to be determined at the discretion of the lead agency and is to be based on the aggregation of TAZ data to the jurisdictional level.
  - Cities and counties control local land use decisions under the California constitution and other statutes, such as General Plan laws. SB 375, which creates the statutory framework for reducing GHG from the land use and transportation sectors, specifically calls out and respects local control over land

use decisions. Successful collaborative planning efforts have allowed our region to meet and exceed GHG reduction targets. As a result, we strongly urge the guidelines allow for flexibility among the local region to address and resolve issues as best fits the local context.

### **Grace Period Extension**

- It is beneficial that OPR has included a 2-year opt-in period to allow less prepared jurisdictions the opportunity to gradually develop the resources needed for successful implementation of the revised Guidelines.

To further promote successful implementation in non-TPA areas, an extension of the process to allow for technical and policy workshops, and refinements of the proposal, is required in addition to an eventual proposed grace period to allow more time to absorb lessons learned from the initial implementation is recommended. It is imperative that local jurisdictions have adequate tools and resources in place to implement any new analytical requirements established by the revised Guidelines before Guideline revisions are adopted or implemented.

For example, the VMT averaging approach suggested for unincorporated areas and incorporated cities for various types of land uses requires the availability of VMT data for these sub-areas of a region, and further requires the creation of average VMT for existing land use categories within a region. These VMT methodologies should be developed, and tested, before any Guideline revisions are proposed or adopted.

- OPR should consider granting an extension of the 2 year 'opt-in' period to allow suburban localities and other non-TPA areas adequate time to resolve issues regarding the limited availability of feasible mitigation options in these areas.
- Reconvening stakeholders approximately 18 months after initial implementation of the revised Guidelines in the TPAs is recommended so that OPR will be able to report on lessons learned to stakeholders, and to establish a strong foundation of implementation experience which can be used to evaluate how best to proceed to further improve implementation.
- We strongly encourage OPR to grandfather capacity projects that are approved and/or identified in the 2016 RTP/SCS, sales tax measures, and the STIP, and that OPR focus the CEQA streamlining measures in support of SB 743 in the Transit Priority Areas at the present time, which will help promote transit-oriented infill development in those locations while also providing a strong foundation for achievement of both the regional transportation sustainability goals of the 2016 RTP/SCS and the statewide GHG reduction goals of SB 375. At a minimum, the opt-in period should be extended for implementation in non-Transit Priority Areas.

In summary, it is our contention that the most efficient means for preventing sprawl, and the concomitant greenhouse gas emissions it produces, is to incentivize compact development, and focusing implementation of the revised CEQA Guidelines to the Transit Priority Areas, at least until such a time that a more complete understanding of the implications that may be presented by a more expansive implementation of the revised Guidelines is obtained. We support our region's and our state's mutual goal of sustainable development and

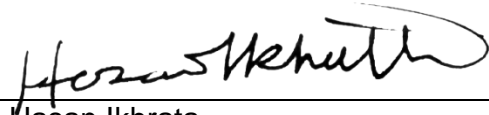
Mr. Christopher Calfee  
February 29, 2016

greenhouse gas reduction, but feel strongly that to succeed we must have the ability to implement the projects that were authorized in the regional transportation plans and sales tax measures. In order to deliver on the commitments made in these plans, it is critical that the opt-in period be extended for non-Transit Priority Areas and that capacity projects identified in these plans be grandfathered.

SCAG and the CTCs undersigned look forward to continuing to assist OPR in the development of the CEQA Guidelines Update pursuant to SB 743 to ensure that the revision does not place undue burdens to our member jurisdictions and delays in project implementation. Please keep us apprised of the status of this initiative, and let us know of any means by which we may be able to further assist OPR staff to ensure the successful implementation of the revised CEQA Guidelines in the SCAG region.

If you have any question, please contact Ms. Huasha Liu, Director, Land Use and Environmental Planning, at (213) 236-1838.

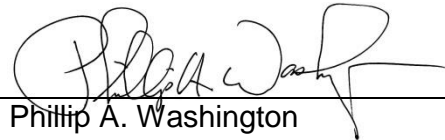
Sincerely,



Hasan Ikhrata  
Executive Director  
Southern California Association of  
Governments



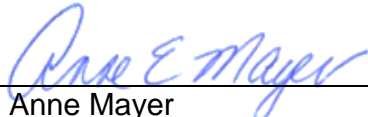
Mark Baza  
Executive Director  
Imperial County Transportation  
Commission



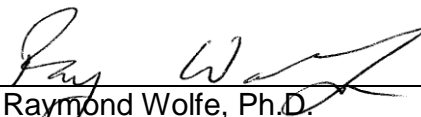
Phillip A. Washington  
Chief Executive Officer  
Los Angeles County Metropolitan  
Transportation Authority



Darrell Johnson  
Chief Executive Officer  
Orange County Transportation Authority



Anne Mayer  
Executive Director  
Riverside County Transportation  
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Darrell Johnson  
Chief Executive Officer

August 9, 2016

Dr. Philip Fine  
Deputy Executive Officer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

**Re: Draft 2016 Air Quality Management Plan**

Dear Dr. Fine:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to provide comments on the Draft 2016 Air Quality Management Plan (AQMP). In addition, OCTA appreciates your diligent efforts to include a wide variety of stakeholders in your process as the final 2016 AQMP is developed.

Consistent with many of the strategies proposed in the AQMP, OCTA is currently taking actions that benefit air quality. These include upgrades to our bus fleet, such as: utilizing renewable natural gas, repowering 199 buses with 0.2 grams per brake horse-power engines (down from 2.0 grams per brake horse-power), ordering 0.02 gram per brake horse-power engines for 98 buses in our fleet, and acquiring a hydrogen fuel-cell bus, with another ten hydrogen fuel-cell buses and five electric buses pending a grant award. Other actions by OCTA that benefit sustainability include implementation of a regional network of bikeways, reallocation of transit resources to more efficiently serve high-demand areas, studying opportunities for transit-oriented development, and improving active transportation connectivity to transit services.

Furthermore, OCTA has a voter-approved sales tax measure to fund a multi-modal set of programs and projects that improve mobility in the region, reduce emissions, and preserve and enhance the environment. These include signal synchronization, system preservation, a new streetcar line, enhanced commuter rail services, freeway congestion management, an advanced-mitigation program that has set aside over 1,300 acres as permanent open space in Orange County, and a competitive funding program to mitigate water runoff beyond required standards.

OCTA does, however, have several concerns that we believe deserve further consideration prior to finalizing the AQMP. These concerns are outlined in the discussion below.

### Advanced Clean Transit

The California Air Resources Board's (CARB's) Advanced Clean Transit Regulation is included in the AQMP. This is intended to ensure that nearly every heavy-duty vehicle operated in California in 2023 will meet the 2010 heavy-duty engine emission standard. However, even a highly aggressive full-fleet penetration of 2010-compliant engines would not provide sufficient nitrous oxide (NOx) reductions to attain the federal ozone standard in the timeframe required. This proposed rulemaking also requires transit operators to replace their entire bus fleets with zero-emission technologies between 2018 and 2040.

The basic requirement to update bus fleets does not appear to be cost-effective, considering a battery electric or hydrogen fuel-cell bus costs between \$900,000 and \$1.5 million, plus the cost of fueling/charging infrastructure. A conventional compressed natural gas bus costs about \$600,000. As such, implementation of the CARB regulation for buses could potentially lead to less funding for bus operations, which would likely result in reduced service levels and discretionary transit uses, which would disproportionately affect transit dependent populations in Orange County and the South Coast Air Quality Management District (SCAQMD) region. Given this, OCTA proposes that the Advanced Clean Transit regulation be performance based and technology neutral. This would help to reduce potential service impacts, and account for emission reduction efforts already underway, such as the current OCTA initiatives noted earlier.

Further, this level of investment by all of the transit operators throughout the region is only estimated to reduce NOx emissions by less than 200 pounds per day by 2023, and about 200 pound per day by 2031. This contributes extremely little to the 115 tons per day (tpd) reduction that is targeted for 2023, or the 124 tpd reduction targeted for 2031.

### EGM-01 – Emission Reductions from New Development and Redevelopment Projects

The purpose of this measure is to mitigate and reduce emissions from new development and redevelopment projects. However, the description of EGM-01 is overly broad, and OCTA suggests that SCAQMD work with stakeholders to narrow this description or eliminate the strategy prior to finalizing the 2016 AQMP. Further, there are no quantifiable emission reductions associated with this measure, nor is there a cost-effectiveness analysis.

An EGM-01 working group consisting of affected stakeholders from local governments, the building industry, developers, realtors, other business representatives, environmental/community organizations, and other stakeholders, was established as part of the 2007 AQMP. OCTA respectfully requests inclusion in the working group when, and if, it is reconstituted.

In addressing indirect sources, the SCAQMD should develop implementation and compliance methods that will not unduly restrict local or regional jurisdictions' prerogatives with respect to land use approvals. During rule development, special consideration should be given to assure that any rule adopted will integrate with, and enhance, the California Environmental Quality Act (CEQA) process, and not impede the project approval process in light of CEQA timelines.

#### Incentive Strategies

The 2016 AQMP contains a number of measures that are designed to provide incentives to accelerate the penetration of zero- and near-zero emission technologies. Many of the measures target mobile sources that are regulated by the CARB and the United States Environmental Protection Agency (U.S. EPA).

It is therefore important to demonstrate within the 2016 AQMP that CARB and U.S. EPA are committed to these strategies, since they will likely be the implementing agencies. If they are not committed, these strategies should not be included in the 2016 AQMP, due to SCAQMD's inability to delegate to these agencies.

The Draft 2016 AQMP also notes that as much as \$14 billion in funding must be identified in order to implement the "incentive strategies." Without identification of funding sources, these measures do not seem to be any more useful than the "black box" strategies that were included in previous AQMPs. OCTA is also concerned about the types of funding sources that could be considered and would appreciate involvement in making these determinations. OCTA's primary concern is related to potential increases in regulatory fees, or potential diversion of funds that OCTA depends on to deliver transit service, and the other programs mentioned earlier that contribute toward sustainability and quality of life.

### Unquantified Measures

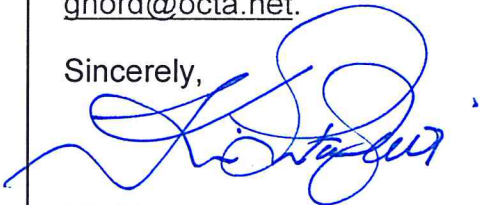
There are a number of measures that have not been quantified in the Draft 2016 AQMP. These are often referred to as "to-be-determined" or "TBD" measures. It may not be appropriate to include these types of measures in the 2016 AQMP, since the inclusion of measures implies some level of commitment toward delivering those measures. This could become problematic, considering an economic analysis cannot be performed without the quantified benefits.

Currently, it appears as though these measures could easily be put in place of the other quantified and committed measures by SCAQMD staff after the 2016 AQMP is approved. This kind of transfer of commitment should not be an action that can be implemented as an administrative change. OCTA also understands that the TBD measures may prove to be more cost effective than some of the other measures, and so it would make sense to pursue them. However, until the time that either a backstop measure is needed or a TBD measure is identified to be more cost effective than one of the currently quantified measures, OCTA requests that the TBD measures either be removed from the plan, or clearly separated from the quantified measures, and called out as uncommitted measures that require further development and evaluation.

Furthermore, should the TBD measures remain in the AQMP, OCTA requests that the 2016 AQMP include a discussion that clearly states the purpose for including these strategies and the process required to incorporate these strategies. This process would preferably include action by the SCAQMD Governing Board and opportunities for public review and comment.

Thank you once again for the opportunity to provide input on the Draft 2016 AQMP. Should you have any questions regarding the comments above, please contact Greg Nord, Principal Transportation Analyst, at 714-569-5885, or [gnord@octa.net](mailto:gnord@octa.net).

Sincerely,



Kia Mortazavi  
Executive Director, Planning

KM:gn

c: Board of Directors  
Executive Staff





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Darrell Johnson  
Chief Executive Officer

November 15, 2016

Ms. Jillian Wong  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

**Re: Draft 2016 Air Quality Management Plan Program Environmental Impact Report**

Dear Ms. Wong:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to provide comments on the Draft 2016 Air Quality Management Plan (AQMP) Program Environmental Impact Report. In addition, OCTA appreciates your diligent efforts to include a wide variety of stakeholders in your process as the 2016 AQMP is developed. In reviewing the Draft Program Environmental Impact Report (PEIR), OCTA identified several environmental impact areas that would benefit from additional clarification or further analysis prior to the certification of the Final AQMP Environmental Impact Report (EIR). These concerns are outlined in the discussion below.

As you know, the direct or indirect effects of a project on the environment should be identified and described, with consideration given to both short- and long-term impacts. The discussion of environmental impacts may include, but is not limited to, the resources involved; physical changes; alterations of ecological systems; health and safety impacts caused by physical changes; and other aspects of the resource base, including water quality, public services, etc. Because the environmental analysis accompanying the AQMP is a Draft PEIR, the analysis is broad and often cannot calculate and quantify environmental impacts to the detail needed to make findings. Therefore, OCTA requests that further California Environmental Quality Act (CEQA) analysis be conducted (whether by the Southern California Air Quality Management District {SCAQMD} or the California Air Resources Board {CARB}) related to the individual control measures as they undergo the rulemaking process. We specifically request a subsequent analysis of ORHD-04 – Advanced Clean Transit and EGM-01 – Emission Reductions from New Development and Redevelopment Projects.

#### ORHD-04 - Advanced Clean Transit

The CARB's Advanced Clean Transit Regulation is included in the AQMP. This regulation is intended to ensure that nearly every heavy-duty vehicle operated in California in 2023 will meet the 2010 heavy-duty engine emission standard. However, even a highly aggressive full-fleet penetration of 2010-compliant engines would not provide sufficient nitrous oxide (NOx) reductions to attain the federal ozone standard in the timeframe required.

This proposed rulemaking also requires transit operators to replace their entire bus fleets with zero-emission technologies between 2018 and 2040. There is a significant investment required as a result of this measures for very little emission reductions (less than 200 pounds of NOx per day). The emission reduction calculations for this measure need to be provided along with the fleet inventory assumed and fleet turnover projected. Without critical inputs, OCTA is unable to replicate the emission reductions associated with this measure.

It appears that the Draft 2016 AQMP assumed that the South Coast region's fleet is comprised of 11,000 buses, each traveling approximately 16,000 miles per year. However, CARB's Mobile Source Strategy appears to assume the same 11,000 buses operating for the entire state. Please verify the fleet assumption for the draft AQMP. The documentation for this inventory, along with the assumed fleet mix, should also be provided and shown in the Final PEIR. Further, please clarify that SCAQMD or CARB intend on conducting a subsequent and more detailed CEQA analysis as part of this rulemaking process in the future.

Finally, please note that implementation of ORHD-04 may result in significant expenses to transit providers that could necessitate fare increase and/or reduced service. This could negatively impact low-income and environmental justice communities. These potential impacts should be addressed in the PEIR.

#### EGM-01 – Emission Reductions from New Development and Redevelopment Projects

This measure appears to be under the jurisdiction of the SCAQMD and has a tentative adoption date of 2017. Implementation would occur between the years 2018-2031. AQMD states that this measure "seeks to capture emission reduction opportunities during the project development phase and opportunities to enable greater deployment of zero and near-zero emission

technologies.”<sup>1</sup> This language is vague, and the measure does not identify emission reductions, cost-effectiveness, affected entities, or legal authority. However, although lacking detail or specificity, the Draft PEIR has identified the following potential environmental impacts: Air quality, energy, hazards, water quality and solid waste.

OCTA requests more information on this measure, so that a thoughtful analysis can occur and comments can be submitted. Specifically, please describe what assumptions were used to make the impact determinations. If a working group is convened for this measure, OCTA respectfully requests inclusion to assist with the rule development process.

Emission reductions with this measure, and many others, are identified as “To Be Determined” (TBD), which makes it difficult to assess benefits and potential adverse environmental impacts. Given the lack of specificity with these TBD measures, please explain whether it is necessary to include them in the PEIR, or if it would be more appropriate to analyze them separately once they are more refined.

#### Air Quality Impacts

Potential air quality and greenhouse gas emissions were projected from the use of additional electricity and alternative fuels. As stated previously, the emissions analysis should be clearly quantified so that this information can be more easily reviewed and verified. OCTA is particularly interested in the details regarding the emissions calculated for ORHD-04 to better understand potential adverse impacts related to increased demand for electricity and alternative fuels.<sup>2</sup>

A significant decrease in fuel usage was accounted for based on the implementation of ORHD-04. Specifically, this decrease was estimated at 88,902,832 gallons per year by 2023 and 77,251,722 by 2031. Please explain or provide the assumptions and calculations that went into these figures. Further, the estimated increase in clean transit vehicles is listed at 11,000 by 2023 and 11,000 by 2031. If the inventory for the four-county Basin is actually estimated to be 11,000 transit buses, it is unclear why the turnover appears to be estimated at exactly double this figure. Please provide the assumptions and calculations that went into Table 4.1-5.<sup>3</sup>

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<sup>1</sup> Draft Program EIR for the 2016 AQMP, page 2-27, October 2016.

<sup>2</sup> Draft Program EIR, Table 4.1-4, page 4.1-48, October 2016.

<sup>3</sup> Draft Program EIR, Table 4.1-5, page 4.1-52, October 2016.

## Energy Impacts

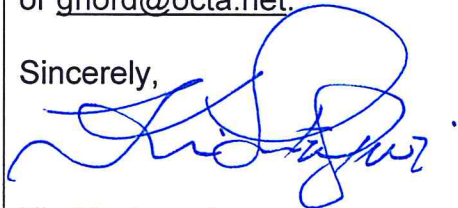
Table 4.2-5 in the Draft PEIR evaluates potential energy impacts from the 2016 AQMP. ORHD-04 is shown as having a fleet of 11,000 buses within the South Coast region, each averaging 16,600 miles per year. It further assumes that this sector will need an additional 183 gigawatts (GW)/hour in 2023 and 183 GW/hour in 2031. Please, again, verify the fleet assumption and provide details for the energy consumption calculation. Also, please explain why this energy usage number is identical in 2023 and 2032. It seems unlikely that the fleet turnover and energy usage would be exactly the same for both years.<sup>4</sup>

ORHD-04 is included in an additional line item in Table 4.2-5. It indicates that ORHD-03, ORHD-04, ORHD-05, ORHD-06 and ORHD-08 will have a combined electricity usage of 1,909 GW/hour in 2023 and 4,067 GW/hour in 2031. Please clarify why ORHD-04 is being counted twice and what the difference is between the two line items for ORHD-04.

The natural gas sector under the Energy Impacts analysis has also identified ORHD-04 as creating an increase in demand. When explaining the fleet mix and assumptions, it would be helpful to know if a certain percentage of buses were assumed to turnover to electric engines versus natural gas.

Thank you once again for the opportunity to provide input on the Draft 2016 AQMP PEIR. Should you have any questions regarding the comments above, please contact Greg Nord, Principal Transportation Analyst, at 714-569-5885, or [gnord@octa.net](mailto:gnord@octa.net).

Sincerely,



Kia Mortazavi  
Executive Director, Planning

KM:gn

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<sup>4</sup> Draft Program EIR, Table 4.2-5, page 4.2-13, October 2016.