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June 5, 2023

Ms. Brigitte Driller
Associate Deputy Director, Planning
California Transportation Commission
1120 North Street, MS 52
Sacramento, CA 95814

Subject: **Regional Transportation Plan Guidelines Update –
Orange County Transportation Authority Comments**

Dear Ms. Driller,

Thank you for providing the Orange County Transportation Authority (OCTA) with an opportunity to comment on the Regional Transportation Plan Guidelines Update. The following questions and comments are provided for your consideration.

- Section 2.7 - Page 37 – Smart Mobility Framework – Consider providing more details with the approach of connecting smart mobility with freight.
- Section 2.9 - Page 45 – Housing Planning – 2nd and 3rd bullet points – the content is very similar in both bullet points. Consider condensing into one bullet.
- Section 2.9 - Page 45 – Housing Planning – 5th bullet point – appears as though Vehicle Miles Traveled (VMT) growth is anticipated and expected to grow in the metropolitan area. With the housing plan, should we anticipate reducing VMT growth? If the State is planning new housing near high transit service areas, then is it anticipated that people to use more transit services?
- Section 2.9 “Housing Coordination Plan” - Consider moving this discussion into section 2.7 “Coordination with Other Planning Processes”.
- Section 4.1 – Page 81 – first paragraph – consider adding “disadvantaged communities” in the list of interested parties.
- Section 4.2 - Under "Incorporating Environmental Justice Principles into Decision Making Processes" consider revising language to read, “The public participation plan ensures that community concerns and engagement can inform the identification of programs, policies, and activities, and assist with avoiding disproportionately high and adverse human health or environmental effects on environmental justice populations.”

- Section 6.2 – Page 130 – Item # 5 – description seems repetitive. Are “candidate projects” and “additional projects” intended to be two separate lists? If not, consider combining into one sentence.
- Section 6.5 - Page 133 – Revenue Identification and Forecasting, last paragraph – the existing revenue source includes local, state, federal, and private. Provide discussion on where/how the private revenue source comes from.
- Section 6.9 - Page 137 – “local streets and roads” may be redundant. Consider renaming it to “local roadways.”
- Section 6.10 - Page 139 – Transit, bullet #6 – Is the last word “RT” a typo?
- Section 6.12 - Page 142/143 – Goods Movement – One of the statewide goals is to reduce greenhouse gas emissions. Consider incorporating discussion related to opportunities and constraints on providing heavy-duty vehicle (freight trucks) charging infrastructure.
- Section 6.18 - Page 152 – Transportation Electrification – consider expanding to include high-level discussion on the National Electric Vehicle Infrastructure state plan. This should also include a discussion on how to close the charging infrastructure gap.
- Section 6.19 - Page 153 – Strategic Highway Safety Plan (SHSP)– consider providing a discussion that the SHSP and the Highway Safety Improvement Program (HSIP) strategies and analytical techniques are driven from a systemic approach. Furthermore, this will highlight the benefits of safety improvements driven through a systemic approach.
- Section 6.23 – Modify language to read, “Metropolitan planning organizations shall prepare a sustainable community’s strategy that, if implemented, would achieve these regional targets, if feasible to do so.”
- "Adaptation of the Regional Transportation System to Climate Change" and it's subsection 6.29 Climate Adaptation and Resilience Policy Landscape – Consider moving to section 2.2 and/or 2.6.
- Section 7.0 – Consider including specific examples of performance measures to help distinguish between measures and metrics. Also, consider discussing what distinguishes performance targets from measures and metrics.

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- Section 7.1 - Page 181 – PM1: Safety – “the HSIP is a core Federal-aid program with the purpose to achieve a significant reduction in traffic fatalities and serious injuries on all public roads.” Consider providing a high-level overview of the safety performance assessment, focusing on data-driven performance measures.

If you have any questions, please contact Charlie Larwood, Department Manager, Planning and Analysis, at (714) 560-5683.

Sincerely,

Charles Larwood

Charlie Larwood
Manager, Transportation Planning

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