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RE: Draft 2017 Congestion Management Program

Dear Mr. Mortazavi:

The Southern California Association of Governments (SCAG) appreciates the opportunity to comment on the Draft 2017 Congestion Management Program (CMP) for Orange County. Under California Government Code Section 65089, SCAG, as the Metropolitan Planning Organization (MPO) and the Regional Transportation Planning Agency (RTPA) for our region is required to perform an evaluation of CMPs developed by the Congestion Management Agencies (CMAs) in the SCAG region.

The Orange County Transportation Authority (OCTA) is the designated CMA for Orange County and is responsible for preparation of the biennial CMP. The Draft 2017 CMP was prepared in response to State CMP requirement. The following evaluations of CMPs are required by the State of California and are based on SCAG's Regional Consistency and Compatibility Criteria for CMPs:

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

SCAG has reviewed the Draft 2017 CMP and discusses its findings and comments below.

Findings

- The Draft 2017 CMP addresses congestion relief in Orange County through the following strategies: CMP Highway System monitoring and performance measurement, transit system performance monitoring, land use impact analysis, transportation demand management (TDM), a defined Deficiency Plan including monitoring and conformance, and a Capital Improvement Program (CIP).
- The Draft 2017 CMP is compatible and consistent with other county CMPs in the SCAG region.
- The Draft 2017 CMP addresses monitored Level of Service (LOS) for Orange County's CMP Highway System as part of State requirements. OCTA uses the Interchange Capacity Utilization (ICU) method for determining LOS at the intersections. Between 1991 and 2017, the average AM ICU improved from 0.67 to 0.61 (a 9 percent improvement), and the PM ICU improved from 0.72 to 0.64 (an 11.1 percent improvement). Performance on the CMP Highway System decreased just slightly since 2015.
- The Draft 2017 CMP includes one intersection that is deficient, performing at LOS F, in the City of Laguna Beach: Laguna Canyon Road at State Route (SR) 73 northbound on-ramps in the City of Laguna Beach with an ICU of 1.05 (LOS F) in the AM peak hour and an ICU of 0.99 (LOS E) in the PM peak hour. This intersection however, is operated and controlled by Caltrans and therefore is statutorily exempt from the Deficiency Plan process. Furthermore, Caltrans has initiated a project that will add an additional lane to the SR-73 northbound ramps from Laguna Canyon Road which is scheduled for completion in late 2017.
- The Draft 2017 CMP addresses the Orange County Deficiency Plan process. Cities with deficient intersections must prepare deficiency plans. The LOS Deficiency Plans are not required if the deficient intersections are brought into compliance within 18 months, or are exempt due to other factors per CMP statute.
- The Draft 2017 CMP contains the implementation and monitoring programs for the recommended CMP strategies.
- Chapter 6 of the Draft 2017 CMP addresses the CMP CIP, a seven-year program of projects. OCTA certifies that all projects in the CIP that are funded by federal or state funds, as well as locally funded projects of regional significance, are consistent with SCAG's adopted Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and included in the Federal Transportation Improvement Program (FTIP).
- Appendix D of the Draft 2017 CMP contains a set of checklists to guide local jurisdictions in conforming with CMP requirements, goals and objectives. (Checklists themselves say "Appendix C").
- The Draft 2017 CMP is consistent with SCAG's RTP/SCS goals, objectives, and policies, including use of the related socio-economic data.
- The Draft 2017 CMP modeling, both for methodology and database applications, is consistent with the SCAG regional model used for development of the RTP/SCS.

Comments

- On Page 9, last sentence, change "Chapter three" to "Chapter 3" for consistency.
- On Page 17, the PM peak period ICU improvement should be 11.1% (0.64/0.72).
- On Page 29, Figure 5, change "Seat Occupancy Route" to "Seat Occupancy Rate."
- On Page 33, there are currently 60 Metrolink stations in service, not 59.

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- On Page 34, suggest the following edit: 91 / Perris Valley (91/PV) Line: Daily service from South Perris through Riverside and Fullerton to Los Angeles Union Station.
- On Page 34, first paragraph, suggest clarifying that the weekend service terminates at Riverside and does not serve the Perris Valley.
- While no longer statutorily required, the CMP should nevertheless list the local jurisdictions that still have a TDM ordinance. Also, Chapter 4 notes that several jurisdictions have gone above and beyond the CMP model ordinance and SCAG suggests that these jurisdictions be listed as well.
- The federal government regulates the monitoring of projects that significantly increase SOV capacity in the region through 23 CFR§450.320 subsections d and e. In Appendix D, CMP Monitoring Checklists, the Capital Improvement Program Checklist should include the following two questions:
 1. Does any federally funded project in the CIP result in a significant increase in SOV capacity?
 2. If so, was the project developed as part of the federal Congestion Management Process, in other words, was there an appropriate analysis of reasonable travel demand reduction and operational management strategies?

We look forward to receiving the Final 2017 CMP for final review and certification. If you have any questions on SCAG's comments, please contact me at (213) 236-1885 or Steve Fox, Senior Regional Planner at (213) 236-1855.

Sincerely,



FOR NR

Naresh Amatya, Acting Director
Transportation Department

cc: Sam Sharvini

Hard copy sent via U.S. Mail.