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April 17, 2018

Mr. David Speirs
Project Director
Corridor Management Group
Transportation Corridor Agencies
South County Traffic Relief Effort
125 Pacifica, Suite 120
Irvine, CA 92618

Dear Mr. Speirs:

Thank you for leading the Project Development Team (PDT) for the Transportation Corridor Agencies' (TCA) South County Traffic Relief Project Study Report/Project Development Support (PSR/PDS). The Orange County Transportation Authority (OCTA) appreciates the opportunity to meet and discuss the PSR/PDS with other stakeholders. However, OCTA believes this PDT does not meet the intended role of a PDT as outlined in the California Department of Transportation (Caltrans) Project Development Procedures Manual (PDPM).

In accordance with the PDPM, the role of the PDT is framed as the decision-making body, used to develop a general consensus on key elements, such as the purpose and need, and the alternatives under consideration. OCTA understands that the PSR/PDS effort began over a year ago, but TCA and Caltrans did not engage OCTA and the other PDT agencies until February 2018. Further, it was announced at the first PDT meeting that the draft PSR/PDS was nearing completion and would be submitted to Caltrans for review in March 2018. It was also made clear that the PDT would only get a chance to review the draft PSR/PDS after Caltrans completed their review. This approach is inconsistent with the intent of the project development procedures and limits the PDT's ability to provide meaningful input.

Since TCA made it clear that Caltrans has already agreed to the purpose and need, and that Caltrans would provide comments prior to the PDT on the draft document, comments coming from PDT members could be viewed as being too late in the process, rather than as valued input. The role of the PDT is to provide stakeholder input early in the process so that setbacks can be avoided in the later stages. Further, TCA has not provided sufficient time to review materials prior to the meeting day. TCA must make a more concerted effort to collaborate with its partner agencies and stakeholders.

With regards to the draft Preliminary Purpose and Need Statement that was distributed at the February PDT meeting, OCTA has the following comments for your consideration:

1. OCTA believes weekend and nonrecurring congestion are insufficient Purpose statements to justify a capital investment of this magnitude.

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2. Consider removing "...CEQA Project Objectives" from the title. This can be discussed elsewhere in the document.
3. If the "...and CEQA project objectives" is removed in the title, then also remove "...fundamental objectives..." in the first paragraph.
4. The statement in the first paragraph "...in a manner that promotes the supporting objectives related to mobility in South Orange County..." should either be expanded here or discussed in more detail elsewhere in the PSR.
5. Consider consolidating the second and third bullets under Purpose as follows: "Provide additional north-south connectivity to accommodate traffic incidents or other emergencies along I-5."
6. Fourth bullet under Purpose: what are the "...environmentally sustainable design elements..."?
7. Last paragraph under Purpose: suggest rewording to "The project also intends to avoid impacts on recreational resources of statewide significance and Camp Pendleton training facilities, while minimizing impacts on regional natural resources, habitat facilities with regional wildlife connectivity, and historic and cultural resources."
8. The second and third bullets under the Need should be consolidated consistent with comment 5 above.
9. The bullets under the Need statement should somewhat mirror the bullet justifications under the purpose statement. It appears only the first three bullets under the two sections mirrored each other. There is nothing in the Need section that addresses the Purpose bullets regarding environmental sustainability and multi-modal mobility.

If you have any questions, please contact me at (714) 560-5885.

Sincerely,



Greg Nord
Section Manager
Long-Range Planning and Corridor Studies

c: Valarie McFall, TCA
Mike Chesney, TCA