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July 26, 2018

Mr. David Speirs
Project Manager
Corridor Management Group
Transportation Corridor Agencies
125 Pacifica, Suite 120
Irvine, CA 92618

**RE: South County Traffic Relief Effort Draft Project Study Report-
Project Development Support**

Dear Mr. Speirs:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to review and provide comments on the South County Traffic Relief Effort (SCTRE) draft Project Study Report-Project Development Support (PSR-PDS). As noted in the letter dated April 17, 2018, the Transportation Corridor Agencies (TCA) should have involved the Project Development Team (PDT) much earlier in the process to provide technical input on the development of the PSR-PDS. If this had occurred, many of the comments herein may have been avoided. Additionally, the lack of familiarity with the assumptions and methodologies makes it very difficult for the PDT to review this robust document within the allotted review time. Regardless, OCTA staff reviewed the draft as thoroughly as possible, resulting in identification of issues regarding:

- Purpose and need;
- Weekend traffic analysis methodologies;
- Conflicts with Measure M projects;
- Analysis of capacity on existing facilities; and,
- Clarifications regarding data and assumptions.

Each of these are discussed in more detail below.

1. The purpose and need states that a lack of north-south capacity is causing congestion during traffic incidents and impairs evacuation and emergency response needs. This appears to predetermine that only capacity expansion strategies can address the mobility needs.

CHIEF EXECUTIVE OFFICE

Darrell E. Johnson
Chief Executive Officer

- a. If non-recurring traffic incidents are higher than statewide averages, that should be stated in the need, rather than lack of redundant north-south capacity during incidents.
 - i. If traffic incidents are higher than statewide averages, the corresponding purpose should be to improve safety and incident management within the corridor, rather than "Provide additional north-south capacity in case of traffic incidents on I-5."
 - b. The need also states that there is not "sufficient" north-south capacity for evacuation and emergency response.
 - i. Please clarify what threshold was used to determine sufficient capacity for these events.
 - ii. If there is a deficiency identified for evacuation and emergency response events, this should be described in the Deficiencies section, and the purpose should be to improve corridor throughput for evacuation and emergency response events, rather than "Provide additional north-south capacity in case of emergencies."
2. The purpose and need also states that demand exceeds capacity on Interstate 5 (I-5) during peak commuting hours and weekends. Based on OCTA's analysis of weekday peak hour volumes, the forecasted traffic volumes on I-5, south of Avenida Pico, are not high enough to independently justify new capacity on I-5.
- a. OCTA is currently studying potential improvements to this section of I-5; however, the purpose and need for OCTA's study focuses primarily on completing the high-occupancy vehicle (HOV) network within Orange County, rather than relieving congestion.
 - i. By continuing the HOV lanes to the San Diego border, the current lane drop at Avenida Pico will be eliminated and the HOV network would be ready to tie into proposed improvements in San Diego.
 - ii. It should also be noted that adding capacity on southbound I-5 would not address the chokepoint that occurs in the City of Oceanside that is the cause of reoccurring congestion experienced by southbound travelers.
 - iii. As for northbound traffic analysis, the recent completion of the Measure M HOV lane additions on I-5, from Avenida Pico to San Juan Creek Road, has provided substantial relief for northbound traffic flow. Therefore, the post-construction conditions on I-5 must be carefully analyzed in any future planning or project development efforts.

3. Several alternatives add priced managed lanes to I-5 in the same project area as Measure M projects, including the HOV lane additions between Avenida Pico and San Juan Creek Road that opened to traffic in 2018. The PSR-PDS alternatives suggest converting these Measure M projects to tolled facilities. This assumption would potentially conflict with requirements for publicly-funded infrastructure to maintain a minimum 20-year useful life. There should be a discussion of this risk in the PSR-PDS.
4. OCTA supports minimizing right-of-way (ROW) impacts when planning and implementing transportation system improvements. The California Department of Transportation (Caltrans) also states in their 2015 Strategic Management Plan (SMP) that their focus has shifted from adding capacity to improving operations and achieving greater efficiency. To accomplish this, the 2015 SMP states that transportation system management is to be implemented on existing infrastructure to improve travel times and maximize safety, "particularly resulting from incidents and events".
 - a. As part of this focus, Caltrans has been pursuing cooperative efforts with local jurisdictions to better manage freeway traffic during incidents, events, and emergencies through Integrated Corridor Management (ICM) plans.
 - i. Strategies such as ICM should be considered in a transportation system management (TSM) alternative as part of this PSR-PDS and future phases of project development.
 1. As TCA does not have authority to plan or implement TSM strategies on existing public facilities, it would be appropriate for either OCTA or Caltrans to lead a study of TSM strategies, and other strategies that improve efficiency within existing right-of-way, prior to further consideration of new transportation corridors in southern Orange County.
 - b. Related to the need to improve existing infrastructure first, the draft PSR-PDS has insufficient discussion addressing the level to which existing facilities in the study area have available capacity.
 - i. Additionally, the study area should evaluate available capacity on State Route 73 (SR-73), which provides an existing alternative to I-5.
 1. Evaluating available capacity on SR-73 and analysis of strategies to improve utilization may serve the corridor more effectively than adding new capacity to the east.
 - c. The current Regional Transportation Plan and Federal Transportation Improvement Program identify TCA commitments to add capacity on the existing toll road network. Although these are largely outside the study area, they would impact traffic flows within the study area.

These improvements would also serve the purpose and need, while minimizing ROW impacts. Please clarify if these are accounted for in the PSR-PDS modeling results.

5. Any instances of weekend traffic analysis discussions within the PSR-PDS must note that all findings are based on uncommon methodologies and use count data collected during construction of the newly opened HOV lanes funded by Measure M.
 - a. Further, OCTA disagrees with applying future weekday traffic growth from Orange County Transportation Analysis Model (OCTAM) to weekend count data, as OCTAM is not calibrated or validated for weekend analysis.
 - i. OCTA develops OCTAM based on a long history of weekday travel patterns that are largely based on more predictable work and school commutes, rather than the relatively high volume of discretionary trips that occur on weekends.
 1. Considering most weekend trips are discretionary, it is unusual and somewhat contradictory to use these trips in defining the purpose and need.
 - b. The PSR-PDS also uses a methodology that applies an unspecified factor to weekend counts based on queueing data to identify "unserved demand". This is an unorthodox method that increases the 2017 weekend volumes, which then compounds significantly as growth factors are applied for 2050 forecasts. This methodology used to calculate the weekend "unserved demand" must be explicitly described.
 - i. For toll revenue analysis, the weekend traffic volumes would need to be "annualized" and converted to annual toll revenue. Annualized weekend toll revenues derived from such an unorthodox methodology are unlikely to justify the construction of a new toll facility. Additionally, applying this methodology and growth factors to the limited weekend count data would likely be seen as a financial risk for prospective investors.
6. Tolling assumptions on the recently constructed Los Patrones Parkway need to be explicitly identified in the alternative descriptions. Alternatives 13, 14, and 17 in the draft PSR-PDS state that the newly constructed section would be widened to Highway Design Manual standards, and that it would be extended with a tolled highway to I-5. However, it does not mention that the section from Oso Parkway to Cow Camp Road would also be converted from a non-tolled facility to a tolled facility. This must be explicitly stated in the description for all applicable alternatives.

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- a. Additionally, the Los Patrones Parkway volume diagrams in the Traffic Engineering Performance Assessment depict Los Patrones as "managed lanes", even for alternatives that do not assume tolls on Los Patrones. Please update the diagrams to appropriately reflect the operating assumptions on Los Patrones Parkway.
- b. Similarly, many of the maps depicting the improvement areas for the alternatives highlight Los Patrones Parkway as an "Improvement Proposed by Others", but there is no corresponding description of the improvement in the alternative descriptions. Either the maps or the descriptions should be updated appropriately.
- c. Finally, the impact from converting Los Patrones Parkway to a tolled facility seems to have little or no impact on surrounding non-tolled arterials. This is counterintuitive, and there is no discussion of the impacts. Please address in detail and reevaluate impacts to surrounding arterials, including Antonio Parkway, which provides a nearby parallel and non-tolled route.

Additional technical comments are attached. OCTA looks forward to improved coordination between our agencies moving forward. Should you have any questions, please contact me at (714) 560-5885.

Sincerely,



Greg Nord
Section Manager
Long-Range Planning and Corridor Studies

Attachment

c: Virginia Gomez, TCA
Michael Chesney, TCA
Kimberly Jaskot, WSP
Lan Zhou, Caltrans
Kia Mortazavi, OCTA

South County Traffic Relief Effort
Draft PSR-PDS
Additional OCTA Technical Comments

1. General comment: there is no mention of a required Project Management Plan (for projects greater than \$500 million). Shouldn't one be required?
2. General comment: there is no mention of Value Analysis (VA) which is required of projects with a total cost of \$50 million or more. Federal law only requires a VA study for Federally aided projects. If federal funds are requested later in the design stage or for construction, FHWA will require the VA study if it meets the mandate.
3. The Executive Summary section should include a table outlining the proposed alternatives.
4. Page 1-2, third paragraph: why does it indicate Caltrans may be the CEQA lead? Is Caltrans planning on delegating the CEQA lead to the TCA?
5. Page 7-2: with any new connection, is FHWA still the approval authority? If so, it should be noted in the PSR/PDS and early on in the discussion.
6. Page 7-32: include a new connection report and freeway agreements, as applicable, under the Studies/Actions Required for All Alternatives section.
7. Page 12-1: please review the environmental schedule as it is probably not reasonable to expect an EIR/EIS-level document to be completed in three years.
8. Page 14-2: should SCRRA or OCTA be listed in this table for project impacts to railroads?
9. Page 14-3: remove Leo Chen as list of reviewers as he is retired from Caltrans.
10. PEAR general comments
 - a. how does Caltrans or TCA intend to address proposed project alternatives that have impacts to mitigation or conservation lands?
 - b. there is no mention of anticipated coordination with local Native American tribes (i.e., AB52 compliance or NAHC consultation). Shouldn't this be discussed in the PEAR?
 - c. there was no mention of FEMA FIRM maps or flood zone information, no mention of whether any of the proposed alternatives have properties on the Cortese list. Shouldn't these items be addressed?
11. PEAR, page 11: the PEAR indicates the PA/ED schedule is 42 months, which page 12-1 indicated 36 months.
12. PEAR, page 11: there is not mention of Section 6(f), shouldn't it be addressed as part of the PA/ED process?