**ATTACHMENT A**

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

Service Authority for Abandoned Vehicles

March 2, 2017

Mr. Michael Kraman
Chief Executive Officer
Transportation Corridor Agencies
P.O. Box 57011
Irvine, CA 92619-7011

Dear Mr. Kraman:

The Orange County Transportation Authority (OCTA) appreciates the Transportation Corridor Agencies' (TCA) recent efforts to identify 16 transportation ideas that emerged from the South Orange County Mobility cooperative process conducted by TCA in association with south Orange County stakeholders. OCTA understands that the TCA anticipates advancing these ideas into more detailed planning and environmental work. OCTA recommends that some of these ideas be withdrawn from further consideration given the findings of past studies that point to cost and/or quality-of-life implications. Other ideas that emerged from the TCA alternatives are included in the current Orange County Long Range Transportation Plan (LRTP) either wholly or in part. Accordingly, these projects should be included in the baseline/ no build case rather than as an alternative. Below are recommendations consistent with this overall approach.

Greater Train Frequency

Previous planning efforts, including the South Orange County Major Investment Study and the Los Angeles-San Diego-San Louis Obispo (LOSSAN) Rail Corridor Program Environmental Impact Report/Environmental Impact Study, concluded that double tracking south of Laguna Niguel has insurmountable challenges. These include severe financial limitations, right-of-way (ROW) constraints, and significant community impacts. This concept will impact Dana Point, San Juan Capistrano, and San Clemente. OCTA has no plans to pursue a project of this type. Moreover, shifting the railroad further inland, via a tunnel, is also unrealistic given the $8 billion cost estimate.

As such, OCTA is recommending that this concept not move forward in the planning process. However, OCTA is supportive of commuter rail improvements south of Laguna Niguel utilizing lower cost options, such as improved railroad signal systems.

Moreover, studies of this type should be led by railroad owners and operators, including OCTA, the Southern California Regional Rail Authority, the North County Transit District, and the LOSSAN Rail Corridor Agency. These agencies of jurisdiction should identify specific improvements that correspond with existing and long-range plans, travel demand, public support, available financial capacity, and their respective Board of Directors' direction.

Consistency with Regional Planning Documents

OCTA understands that the Study's recommended improvement ideas emerged from an unconstrained process. Nevertheless, OCTA recommends that the TCA perform a consistency review with currently approved long-range planning documents. Both OCTA's LRTP and the federally-approved Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) include a number of the ideas that are recommended in the Study. These ideas are listed below.

- **Idea 3:** Synchronize lights on additional arterials
- **Idea 5:** Build-out of District 5 bike facilities
- **Idea 6:** Widen Ortega Highway to four lanes (within San Juan Capistrano)
- **Idea 7:** Widen arterials to the Master Plan of Arterial Highways maximum
- **Idea 10:** Add Interstate 5 (I-5) high-occupancy vehicle (HOV) lane (Avenida Pico to San Diego County)

Each of these efforts has completed varying degrees of planning and/or project development. The inclusion of these proposed ideas in TCA's list of potential future planning activities implies that these efforts will be re-evaluated in studies that are outside of and duplicative of current regional planning (LRTP and RTP/SCS) documents.

In addition, the proposed ideas listed below appear to compete with projects already included in regional planning documents.

- **Idea 11:** Add I-5 general purpose lane from Interstate 405 (I-405) to the San Diego County line
- **Idea 12:** Add I-5 high-occupancy toll lanes from I-405 to the San Diego County line
- **Idea 14:** Connect State Route 241 (SR-241) to I-5 via alignment crossing La Pata Avenue (specifically, portions of SR-241 on I-5 between Avenida Pico and Cristianitos Road)

As such, these concepts may establish project expectations in areas where ROW may have already been "committed" and/or planned for other purposes.

For example, OCTA's Measure M2 (M2) Project C (currently in design) will add an additional HOV lane (in each direction) from El Toro Road to Alicia Parkway and additional general purpose lanes (in each direction) from Alicia Parkway to State Route 73 (SR-73), and M2 Project D is adding HOV lanes (in each direction) from San Juan Creek Road to Avenida Pico. OCTA is also planning for the extension of Project D's HOV lanes from Avenida Pico to the San Diego County line. Given these existing commitments and efforts, the latest ideas proposed through the TCA process can lead to some confusion and imply a lack of coordination with approved plans.

It is also our understanding that the Study did not include all LRTP preferred alternative projects in the baseline analysis. Therefore, the model results do not effectively represent future travel patterns. Additional technical comments on the Study's modeling results are provided in the attachment. Further, we recommend a joint technical meeting with OCTA, TCA, and the California Department of Transportation to discuss technical modeling concerns and maintaining consistency with regional planning priorities before the next phase of studies.

While we appreciate the TCA's desire to examine options to further improve transportation in South County it should be made clear to the public which concepts are within TCA's authority to plan, fund, or implement. For example, efforts to develop an east/west connector (from Antonio Parkway and Ortega Highway to SR-73) should be led by local agencies, given their existing authority and responsibility for planning, implementing, and maintaining arterials.

Thank you for the opportunity to review and provide feedback on the Study. We would like to reiterate that OCTA remains committed in its support of the extension of the SR-241 to I-5. This support is based on the transportation need for the connection, and is independent of specific alignments that TCA may study in the future. OCTA appreciates the open and inclusive process initiated by TCA at part of this effort, and we respectfully request that this continue as work proceeds.

Sincerely,

Darrell Johnson
Chief Executive Officer

KM:ja
Attachment

c: Board of Directors
Executive Staff

**ATTACHMENT**

Technical Comments on South Orange County Mobility Study

1. Figure B, Scenario Comparison, Daily Vehicle Miles Traveled (VMT): It would be expected that Package 1 would reduce VMT. The results show that VMT goes up in that case. This seems counter-intuitive.

2. Figure B, Scenario Comparison, Daily Congested Miles Traveled: The Packages 4B, 5A, 5B, and 6 have larger reductions in this metric than expected.

3. Figure C, PM Peak-Hour Volumes: In Package 1, volumes along State Route 241 (SR-241) (north and south of Oso Parkway) go down in the PM Peak-Hour even with dynamic pricing. How was dynamic pricing modeled? What were the Volume to Capacity Ratios (V/C) along the facility before and after dynamic pricing?

4. Figure C, PM Peak-Hour Volumes: In Package 2, volumes along the Ortega Highway (east of Antonio Parkway) go up by 46 percent. However, volumes along Antonio Parkway, La Pata, and Ortega Highway (west of Antonio Parkway) fail to go up as significantly? Please explain this discrepancy. Where is the traffic going to/from Ortega Highway (east of Antonio Parkway)?

5. Page 3: In Package 3A and 3B, volumes along the Ortega Highway (east of Antonio Parkway) go up by 46 percent. However, volumes along Antonio Parkway, La Pata, Ortega Highway (west of Antonio Parkway) fail to go up as significantly? Please explain the traffic patterns. Where is the traffic going to/from Ortega Highway (east of Antonio Parkway)?

6. Page 3 and 4: Please provide traffic pattern maps and other analysis, as it is difficult to understand the changes in travel.

7. Page 4: There is very little impact with the Packages and Oso Parkway and Crown Valley Parkway volumes. Please elaborate.

8. Page 4: Package 1 results in less SR-241 traffic than the baseline. How do these volumes reflect dynamic pricing? How was the dynamic pricing optimization done, and how did it result in lower volumes?

9. Page 4: Package 5A and 5B result in an increase in traffic along the SR-241 that is double or a little less than double. How was the pricing implemented along the extensions of the SR-241?

10. Page 5: For what time period are these V/Cs? What are the capacities for the facilities for the time period?

11. Page 5: The V/Cs for the SR-241 are very low, at 0.28 and 0.27. How do these V/C's reflect dynamic pricing? Is the target V/C 0.8? If so, how was the dynamic pricing optimization done?

12. Page 5: The only V/C > 1 is for Ortega Highway (east of Antonio Parkway) for Package 1. Please elaborate on this finding.