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September 29, 2025

Rose Casey
Orange County Transportation Authority
Executive Director, Planning
550 South Main Street
P.O. Box 14184
Orange, CA 92863-1584

Subject: Draft 2025 Congestion Management Program

Dear Ms. Casey:

The Southern California Association of Governments (SCAG) appreciates the opportunity to comment on the Draft 2025 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 2025 CMP was prepared in response to State CMP requirements. 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 countywide 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 2025 CMP and discusses its findings below.

- The Draft 2025 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 2025 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 2025, the average AM ICU improved from 0.67 to 0.54 (a 19.4 percent improvement), and the PM ICU improved from 0.71 to 0.57 (a 19.7 percent improvement). The ICU improvements indicate that Orange County agencies are effectively operating, maintaining, and improving the CMP Highway System.

- The Draft 2025 CMP includes no intersections that are deficient.
- The Draft 2025 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 of their initial detection, using improvements that have been previously planned and programmed in the CMP Capital Improvement Program (CIP), or are exempt due to other factors per CMP statute.
- The Draft 2025 CMP contains the implementation and monitoring programs for the recommended CMP strategies.
- Chapter 6 of the Draft 2025 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) "Connect SoCal" and included in the Federal Transportation Improvement Program (FTIP).
- Appendix D of the Draft 2025 CMP contains a set of checklists to guide local jurisdictions in conforming with CMP requirements, goals and objectives.
- The Draft 2025 CMP is consistent with SCAG's RTP/SCS goals, objectives, and policies, including use of the related socio-economic data.
- The Draft 2025 CMP modeling, both for methodology and database applications, is consistent with the SCAG regional model used for development of the RTP/SCS.
- Suggest incorporating Transportation Systems Management and Operations (TSMO) into evaluation, project analysis, and operational assessment.

We look forward to receiving the Final 2025 CMP for final review and finding of consistency. If you have any questions on SCAG's comments, please contact me at (213) 236-1827, or Steven Mateer, Planning Supervisor at (213) 630-1581.

Sincerely,



Annie Nam
Deputy Director, Transportation Planning