

California Department of Transportation

DISTRICT 12
1750 EAST 4TH STREET, SUITE 100
SANTA ANA, CA 92705
PHONE (657) 328-6000
FAX (657) 328-6522
TTY 711
www.dot.ca.gov/caltrans-near-me/district_12



September 30, 2025

SCH #: N/A
GTS #: 12-ORA-2025-02924
Route/PM: Countywide

Mr. Angel Garfio
Orange County Transportation Authority
550 South Main Street
Orange, CA 92868

Re: 2025 OCTA Congestion Management Program

Dear Mr. Garfio:

Thank you for including the California Department of Transportation (Caltrans) in the review process of the Orange County Transportation Authority (OCTA) Congestion Management Program (CMP). We are committed to ensuring that impacts to the State's multimodal transportation system and our environment are identified and mitigated to support a safe, sustainable, integrated, and efficient transportation system. The following comments are based on our review of the September 2025 Draft Orange County Congestion Management Program Report.

The goals of Orange County's CMP are to support regional mobility objectives by reducing traffic congestion, to provide a mechanism for coordinating land-use and development decisions that support the regional economy, and to support gas tax funding eligibility. To meet these goals, the CMP contains a number of policies designed to monitor and address system performance issues. The CMP is a county-wide program affecting all State Routes in the District. Caltrans is a commenting agency and has the following comments:

General Comments

1. Caltrans supports OCTA's efforts towards improving the County's Active Transportation and Complete Streets infrastructure. Please coordinate with Caltrans on any efforts and projects, especially those that intersect or are adjacent to State Right-of-Way.

2. Caltrans supports OCTA's operation and improvement of the County's transit system. Caltrans supports the additional vanpool and micro transit services that OCTA provides. Ensure that current and future transit services are equitable to the local population they serve. Please continue to coordinate with District staff on future transit programs and efforts.
3. Caltrans supports first-/last-mile connections, including active transportation connections to transit. Continue to coordinate with Caltrans to add and improve first-/last-mile connections, as this encourages people to utilize alternative modes of transportation and improves regional connectivity.

Transit/First-Last Mile/Park & Ride

4. Caltrans recommends OCTA include the State's transit planning initiatives in the Program update to include the State Rail Plan, California Integrated Bus Study (CIBS), California Integrated Travel Project (Cal-ITP), and other related studies to achieve coordinated statewide efforts.
5. On Pages 22-23 – Recommend addressing system-level transit reliability enhancements such as Transit Signal Priority, dedicated lane, or Bus Rapid Transit (BRT) elements that can improve on-time performance.
6. On Pages 24-25 - Recommend clarifying how transit performance data will be utilized to identify congestion bottlenecks and prioritize improvements to ensure transit supportive improvements are directly tied to CMP goals.
7. On Pages 23-28 - Recommend including performance targets or projections that measure how planned capital investments like the OC Streetcar and State Commitment to Realizing Equity (SCORE) improvements are expected to reduce VMT or relieve congestion to align transit investment with CMP goals more clearly.
8. On Pages 24-25 – Recommend improving the service accessibility metric to include qualitative first- and last-mile conditions like sidewalks, lighting, Americans with Disabilities Act (ADA) compliance, and bike facilities near transit hubs.
9. On Page 26 - Recommend incorporating OC Streetcar specific performance indicators to track how the project supports congestion management goals.
10. On Page 28 – In a recent update from OCTA it was agreed that beach nourishment with sand would become a larger component for Coastal Rail

Resiliency after meeting with the public. Caltrans recommends adding discussion on this.

Freight/Goods Movement

11. Caltrans recommends including freight-specific congestion metrics in CMP performance monitoring such as truck-specific speed profiles, delay, and reliability metrics for primary freight corridors, and identification of freight bottlenecks that affect last-mile deliveries and regional goods movement.
12. Caltrans recommends creating an overlay within the CMP that highlights freight-designated corridors (from Caltrans Freight Mobility Plan 2020 and Southern California Association of Government's (SCAG) Connect SoCal 2024). These overlays should help prioritize congestion mitigation efforts that also improve goods movement efficiency.
13. Caltrans recommends adding freight-oriented congestion relief strategies such as off-peak delivery programs, freight signal priority (FSP), designated curb space for delivery vehicles, and real-time delivery routing tools integrated into CMP Intelligent Transportation System (ITS) investments.
14. Caltrans recommends using CalEnviroScreen or SCAG's Equity in Goods Movement Framework to identify freight-adjacent equity priority areas.
15. The CMP omits any policy consistency checks with key documents such as California Freight Mobility Plan (CFMP 2020), National Freight Strategic Plan (NFSP 2020), and SCAG Regional Freight Strategy (2024). Caltrans recommends including a freight policy alignment appendix or matrix to demonstrate how CMP supports or complements freight goals such as enhanced corridor throughput, freight system resilience, and multimodal freight integration (rail/truck/port).
16. Caltrans recommends including the Park & Ride facilities that Caltrans owns, leases, and/or operates as only OCTA's are currently mentioned.

LOS/VMT Analysis

17. While OCTA uses Level of Service (LOS) for monitoring CMP Highway System (CMPHS) intersections, Caltrans applies a different set of performance measures for State facilities. These include metrics such as vehicle hours of delay, average speed, queue length, ramp metering effectiveness, and throughput. Caltrans also evaluates signal phasing and progression at ramp intersections that influence freeway performance. Therefore, Caltrans recommends that OCTA provide corresponding LOS measurements using Highway Capacity Manual

(HCM) methodologies.

18. Caltrans recommends adding traffic volume and capacity data columns for the LOS calculations shown Figure 4.
19. Caltrans recommends that OCTA add Vehicle Miles Traveled (VMT) evaluation and assessment methodology.
20. Caltrans recommends creating an appendix that lists the total VMT for each freeway in Orange County for planning to establish a baseline for adding/enhancing managed lane facilities throughout the county.

Data Sources & Methodology

21. In Chapter 3 - Recommend adding a section on transitioning from manual traffic counts to continuous, big-data monitoring methods (e.g., connected vehicle data, automated sensors, probe data).
22. In Chapter 4 - Recommend including clear before/after performance metrics or measurable goals to evaluate the effectiveness of transportation demand management (TDM) strategies.
23. In Chapter 5 - Current thresholds are repeated from 1991 guidance in Appendix B. Recommend revisiting these thresholds using updated Institute of Transportation Engineers (ITE) trip generation data and the latest Orange County Transportation Analysis Model (OCTAM) modeling outputs.
24. In Appendix G, Overall - The guidelines are comprehensive and provide a strong framework for ensuring consistency between OCTAM (regional model) and local subarea models. However, much of the methodology reflects practices from the early 2000s, this creates a gap relative to current state mandates (Senate Bill (SB) 743 VMT, SB 375, Assembly Bill (AB) 1358) and emerging data science/managed lanes-based forecasting.
25. In Appendix G, on Page 1-10 to 1-11 - Trip Distribution: Reliance on 1991 SCAG Origin-Destination survey is outdated. Suggest integrating SCAG 2019 Household Travel Survey or newer big-data sources (StreetLight, Replica).
26. In Appendix G, Chapter 4 - Consider including activity-based models (ABM), which SCAG has adopted, as an optional modeling methodology.

Caltrans' mission is to improve lives and communities through transportation to create a thriving and connected California. Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If

Mr. Garfio

September 30, 2025

Page 5

you have any questions, please do not hesitate to contact Kevin Nord at
Kevin.Nord@dot.ca.gov.

Sincerely,

Kevin Nord

Kevin Nord

District Branch Chief

State & Regional Planning / Special Studies

Caltrans, District 12