

## CONFORMITY ANALYSIS

### Introduction

#### *Federal Transportation Improvement Program*

The Federal Transportation Improvement Program (FTIP) is the federally required multimodal list of capital improvement projects to be implemented over a six year period. The biennial FTIP update, produced on a two year cycle, implements the long-range Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2019 FTIP implements the transportation projects and programs of the 2016-2040 RTP/SCS (2016 RTP/SCS) in the fiscal years 2018/19 – 2023/24.

#### *Federal Conformity Requirements*

Federal and state regulations provide that the Southern California Association of Governments (SCAG), as the designated Metropolitan Planning Organization, may rely on a previous regional emissions analysis when processing amendments, in the event that certain conditions are met. The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) and SCAG have identified the following type of 2019 FTIP amendments for which SCAG may rely on the existing regional emissions analysis:

*“Category 3. Formal Amendment – Relying on the Existing Conformity Determination. This amendment may include adding a project or a project phase to the program. This amendment category consists of projects that are modeled and are included in the regional emissions analysis.”<sup>1</sup>*

Amendment #19-01 relies on the regional emissions analysis for the 2019 FTIP and the 2016 RTP/SCS Consistency Amendment #3 pending approval by the FHWA/FTA [Section 93.122(g) is the relevant part of the *Transportation Conformity Regulations* for this amendment].

#### *FTIP Amendment #19-01 Project Description*

FTIP Amendment #19-01 includes 14 projects for which conformity needs to be reaffirmed (see the Conformity Determination Project Listing). These 14 project are located in the South Coast Air Basin (SCAB), South Central Coast Air Basin (SCCAB), Mojave Desert Air Basin (MDAB), and Salton Sea Air Basin (SSAB) respectively.

#### *Conformity Status of Current RTP and FTIP*

The conformity determination for the 2016 RTP/SCS received federal approval on June 1, 2016. The FHWA/FTA also approved the conformity determinations for the 2016 RTP/SCS Amendments #1 and #2 on May 12 and August 1 2017 respectively.

Adopted by the SCAG’s Regional Council on September 6, 2019, the 2019 FTIP and 2016 RTP/SCS Consistency Amendment #3 are under review for approval by the FHWA/FTA.

---

<sup>1</sup> SCAG, *Final 2019 Federal Transportation Improvement Program Guidelines*, September 2017, page 163.

## **Summary of Conformity Analysis and Findings**

SCAG reaffirms the latest applicable conformity findings for both the 2019 FTIP ([http://ftip.scag.ca.gov/Documents/F2019-FTIP\\_ExecutiveSummary.pdf](http://ftip.scag.ca.gov/Documents/F2019-FTIP_ExecutiveSummary.pdf)) and the 2016 RTP/SCS Amendment #3 (<http://scagrtpscscs.net/Documents/2016/proposed/pf2016RTPSCSamend03.pdf>).

This reaffirmation covers the findings for all applicable pollutants, including regional emissions analyses, financial constraint test, timely implementation of Transportation Control Measures (TCMs), applying the use of the latest planning assumptions and the latest approved emissions model, reaffirming consistency between the 2019 FTIP and the 2016 RTP/SCS, and reaffirming the process for interagency consultation and public participation.

SCAG has completed its analysis of the proposed changes to the 2019 FTIP. SCAG's findings for the approval of this amendment are as follows:

### **Consistency with Current RTP/SCS and FTIP**

The 14 projects needing conformity reaffirmation in Amendment #19-01 are from the 2016 RTP/SCS Amendment #3, which would be a conforming Plan upon FHWA/FTA approval. Amendment #19-01 does not include any new regionally significant project beyond those currently included in the 2016 RTP/SCS, nor does it move a project across any modeling years currently assumed in the 2016 RTP/SCS and the 2019 FTIP. Furthermore, the design, concept and scope of these 14 projects do not differ significantly from what were described in the 2016 RTP/SCS and the 2019 FTIP.

**Finding:** The 2019 FTIP Amendment #19-01 is consistent with the 2019 FTIP and the 2016 RTP/SCS as previously amended.

### **Regional Emissions Analysis**

This conformity analysis relies on the regional emissions analysis from the 2019 FTIP and the 2016 RTP/SCS Amendment #3. The emissions analysis was performed with the SCAG Regional Travel Demand Model and utilizes the planning, socioeconomic and model assumptions for the 2016 RTP/SCS. FTIP Amendment #19-01 does not result in any modeling changes.

The regional emissions analysis methodology for this amendment to the 2019 FTIP uses currently applicable budgets to determine conformity for all criteria pollutants. Specifically, this conformity reaffirmation is being made for all criteria pollutants and precursors in the MDAB, the SCCAB, the SCAB, and the SSAB.

**Finding:** The 2019 FTIP Amendment #19-01 regional emissions for Ozone precursors (NO<sub>x</sub>, ROG/VOC) (1997 and 2008 NAAQS) are consistent with all applicable emission budgets for all milestone, attainment, and planning horizon years in the Morongo Band of Mission Indians (Morongo), Pechanga Band of Luiseno Mission Indians of the Pechanga Reservation (Pechanga), SCAB excluding Morongo and Pechanga, South Central Coast Air Basin ([SCCAB], Ventura County portion), Western Mojave Desert Air Basin ([MDAB], Los Angeles County Antelope Valley portion and San Bernardino County western portion of MDAB), and the Salton Sea Air Basin ([SSAB], Riverside County Coachella Valley and Imperial County portions).

**Finding:** The 2019 FTIP Amendment #19-01 regional emissions for CO are consistent with all applicable emissions budgets for all milestone, maintenance, and planning horizon years in the SCAB.

**Finding:** The 2019 FTIP Amendment #19-01 regional emissions for NO<sub>2</sub> are consistent with all applicable emissions budgets for all milestone, maintenance, and planning horizon years in the SCAB.

**Finding:** The 2019 FTIP Amendment #19-01 regional emissions for direct PM<sub>2.5</sub> (2006 and 2012 NAAQS) and its precursors are consistent with all applicable emissions budgets for all milestone, attainment, and planning horizon years in the SCAB.

**Finding:** The 2019 FTIP Amendment #19-01 regional emissions for PM<sub>10</sub> and its precursors are consistent with all applicable emissions budgets for all milestone, attainment, and planning horizon years in the SCAB and the SSAB (Riverside County Coachella Valley portion).

**Finding:** The 2019 FTIP Amendment #19-01 regional emissions analysis for PM<sub>2.5</sub> (2006 and 2012 NAAQS) meet the interim emission test (build/no-build test) for all milestone, attainment and planning horizon years in the SSAB (Imperial County portion).

**Finding:** The 2019 FTIP Amendment #19-01 regional emissions for PM<sub>10</sub> meet the interim emission test (build/no-build test) for all milestone, attainment and planning horizon years in the MDAB (two nonattainment areas: San Bernardino County portion excluding Searles Valley portion and Searles Valley portion of San Bernardino County) and the SSAB (Imperial County portion).

#### Timely Implementation of TCMs

**Finding:** There are three committed TCM projects in the 2019 FTIP Amendment #19-01. However, the project scope and final completion date of these TCM projects remain the same. The 2019 FTIP Amendment #19-01 does not change timely implementation of the SCCAB and SCAB TCM projects.

#### Fiscal Constraint Analysis

**Finding:** 2019 FTIP Amendment #19-01 includes the most recent financial plan for the 2019 FTIP. All projects listed in the 2019 FTIP (including the proposed amendment) are financially constrained for all fiscal years.

#### Interagency Consultation and Public Involvement Analysis

The regional conformity analysis leading to the FHWA and FTA's approval of the 2019 FTIP and the 2016 RTP/SCS Amendment #3 complies with all federal and state requirements for interagency consultation and public involvement as documented in Section V of Technical Appendix, Volume II of the 2019 FTIP ([http://ftip.scag.ca.gov/Documents/F2019-TA\\_Sec05.pdf](http://ftip.scag.ca.gov/Documents/F2019-TA_Sec05.pdf)) and the Transportation Conformity Chapter of the 2016 RTP/SCS Amendment #3 (<http://scagrtpsc.net/Documents/2016/proposed/pf2016RTPSCSamend03.pdf>).

For 2019 FTIP Amendment #19-01, SCAG underwent additional public involvement including solicitation via email for comments from the Transportation Conformity Working Group. In addition, Amendment #19-01 was posted on SCAG's website ([www.scag.ca.gov](http://www.scag.ca.gov)) for a 10-day public comment period. No public comments were received.

**Finding:** The 2019 FTIP Amendment #19-01 complies with all federal and state requirements for interagency consultation and public involvement.

Overall

**Finding:** SCAG has determined that the 2019 FTIP Amendment #19-01 is consistent with all federal conformity requirements and regulations.