

## **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 2021 FTIP implements the transportation projects and programs of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS or Connect SoCal) in the fiscal years 2020/21 – 2025/26.

#### *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 2021 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 #21-09 relies on the regional emissions analysis for the 2020 RTP/SCS and the 2021 FTIP as previously amended [Section 93.122(g) is the relevant part of the *Transportation Conformity Regulations* for this amendment].

#### *FTIP Amendment #21-09 Project Description*

FTIP Amendment #21-09 includes only one project for which conformity needs to be reaffirmed (see the Conformity Determination Project Listing). This project is located in the South Coast Air Basin (SCAB).

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

The conformity determination for the 2020 RTP/SCS received federal approval on June 5, 2020. The 2021 FTIP and the 2021 FTIP Amendment #2101 received concurrent federal approval on April 16, 2021.

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<sup>1</sup> SCAG, *Final 2021 Federal Transportation Improvement Program Guidelines*, September 2019, page 157.

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

SCAG reaffirms the latest applicable conformity findings for the 2020 RTP/SCS ([https://www.connectsoal.org/Documents/Adopted/fConnectSoCal\\_Transportation-Conformity-Analysis.pdf](https://www.connectsoal.org/Documents/Adopted/fConnectSoCal_Transportation-Conformity-Analysis.pdf)) and the 2021 FTIP as previously amended (<https://scag.ca.gov/sites/main/files/file-attachments/f2021-ftip-executive-summary.pdf?1614887891>).

This reaffirmation covers the findings for all applicable pollutants<sup>2</sup>, 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 2021 FTIP and the 2020 RTP/SCS, and reaffirming the process of interagency consultation and public participation.

SCAG has completed its analysis of the proposed changes to the 2021 FTIP. SCAG's findings for the approval of this amendment are as follows:

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

The one project needing conformity reaffirmation in 2021 FTIP Amendment #21-09 is from the 2020 RTP/SCS, which is a conforming Plan approved by the FHWA/FTA; Amendment #21-09 does not include any new regionally significant project beyond those currently included in the 2020 RTP/SCS, nor does it move a project across any modeling years currently assumed in the 2020 RTP/SCS and the 2021 FTIP as previously amended; Furthermore, the design, concept and scope of this project does not differ significantly from what were described in the 2020 RTP/SCS and the 2021 FTIP as previously amended.

**Finding:** The 2021 FTIP Amendment #21-09 is consistent with the 2020 RTP/SCS and the 2021 FTIP as previously amended.

### **Regional Emissions Analysis**

This conformity analysis relies on the regional emissions analysis from the 2021 FTIP which update the 2020 RTP/SCS regional emissions analysis. The emissions analysis was performed with the SCAG Activity-Based Regional Travel Demand Model and utilized the planning, socioeconomic and model assumptions for the 2020 RTP/SCS. FTIP Amendment #21-09 does not result in any modeling changes.

The regional emissions analysis methodology for this amendment to the 2021 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 2021 FTIP Amendment #21-09 regional emissions for Ozone precursors (NO<sub>x</sub>, ROG/VOC) (2008 and 2015 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

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<sup>2</sup> Transportation conformity for NO<sub>2</sub> is no longer required in the South Coast Air Basin effective on September 22, 2018.

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 2021 FTIP Amendment #21-09 regional emissions for CO are consistent with all applicable emissions budgets for all milestone, maintenance, and planning horizon years in the SCAB.

**Finding:** The 2021 FTIP Amendment #21-09 regional emissions for direct PM<sub>2.5</sub> (1997, 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 (Pechanga excluded under 2012 NAAQS).

**Finding:** The 2021 FTIP Amendment #21-09 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 and Imperial County portions).

**Finding:** The 2021 FTIP Amendment #21-09 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 2021 FTIP Amendment #21-09 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 (San Bernardino County portion excluding Searles Valley and Searles Valley portion of San Bernardino County).

#### Timely Implementation of TCMs

**Finding:** There is no committed TCM project in the 2021 FTIP Amendment #21-09. Moreover, the 2021 FTIP Amendment #21-09 does not change timely implementation of the SCCAB and SCAB TCM projects.

#### Fiscal Constraint Analysis

**Finding:** 2021 FTIP Amendment #21-09 includes the most recent financial plan for the 2021 FTIP. All projects listed in the 2021 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 2021 FTIP complies with all federal and state requirements for interagency consultation and public involvement as documented in the 2021 FTIP Technical Appendix Volume II of III (<https://scag.ca.gov/sites/main/files/file-attachments/f2021-ftip-technical-appendix.pdf?1614909606>). For 2021 FTIP Amendment #21-09, SCAG will undergo additional public involvement including solicitation via email for comments from the Transportation Conformity Working Group. In addition, Amendment #21-09 will be posted on SCAG's website ([www.scag.ca.gov](http://www.scag.ca.gov)) for a 10-day public comment period.

**Finding:** The 2021 FTIP Amendment #21-09 complies with all federal and state requirements for interagency consultation and public involvement.

Overall

**Finding:** SCAG has determined that the 2021 FTIP Amendment #21-09 is consistent with all federal conformity requirements and regulations.