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## MEMORANDUM

DATE: August 19, 2024

TO: Interagency Consultation Review Group

FROM: Brian Lasagna, Regional Analyst

**SUBJECT: ICR Review of BCAG's Draft 2025 FTIP Air Quality Conformity Determination and 2020 RTP Amendment #3**

**DISCUSSION:** The purpose of this memo is to provide the ICR with the opportunity to comment on BCAG's Draft 2025 Federal Transportation Improvement Program (FTIP) Air Quality Emissions Analysis and Conformity Determination and 2020 Regional Transportation Plan (RTP) Amendment #3, in accordance with the BCAG public participation plan and the federal consultation requirements of 40 CFR 93.105.

Butte County is designated marginal non-attainment under the 2008 federal 8-hour ozone National Ambient Air Quality Standards (NAAQS). Further, Butte County was designated marginal non-attainment under the federal 2015 8-hour ozone NAAQS. Because of these designations, the Butte County Association of Governments (BCAG) is required to perform an air quality conformity determination for the 2025 FTIP and 2020 RTP Amendment #3.

## REQUESTED ACTION

The ICR is being provided with the opportunity to comment regarding BCAG's Draft 2025 FTIP Air Quality Emissions Analysis and Conformity Determination and to concur with BCAG's proposal regarding the addition of three (3) new projects. One (1) new project is capacity increasing and requires the new air quality emissions analysis. Details regarding the amendment and projects are included below:

### **New Non-Exempt FTIP Projects**

**Town of Paradise – Roe Rd Extension for Phase 2 Project.** This amendment updates the project description to increase the scope to include a new 3 lane road (2 travel lanes) with bicycle and pedestrian facilities from South Libby Rd to State Route 191/ Clark Rd. to address emergency evacuation needs highlighted by the 2018 Paradise Camp Fire. This project is funded with Housing and Urban Development (HUD) funds, Local Transportation Climate Adaptation Program (LTCAP) and Local funds for a total of \$41,000,000. The project is capacity increasing, and therefore non-exempt and requires a new air quality emissions analysis and conformity determination. In addition, this is a new project not currently in the 2020 RTP, therefore the 2020 RTP is being amended to include the project.

## **New Exempt FTIP Project**

Caltrans - Grouped Projects for Safety Improvements - SHOPP Collision Reduction Program. This amendment updates the current Grouped Project listing to add a new project on State Route 191 near Paradise from 0.25 mile north of Durham Pentz Road to 0.25 mile south of Durham Pentz Road (PM 3.278 / 3.778). The scope of the project is to improve the existing intersection/roundabout to address collision patterns. The project is exempt from a regional emissions analysis per the Environmental Protection Agency's Transportation Conformity Rule Section 93.127 Exempt from Regional Emissions Analysis, Table 3 – Projects Exempt from Regional Emissions Analyses indicating that intersection channelization projects are exempt. This project was not previously included in Caltrans' Grouped Listing and therefore an amendment is required.

Butte County – Lumpkin Rd Rehabilitation Project. This amendment adds the Lumpkin Rd Rehabilitation project. The scope of this project is to rehabilitate Lumpkin Rd damaged as a result of the Bear Fire (North Complex West) and the subsequent disaster recovery work from near Forbestown Rd to the end of pavement near CalFire State 51. A total of \$4 million in Community Project Funding/Congressionally Directed funds and \$459,000 in local match is programmed. The project is exempt from a regional emissions analysis per the Environmental Protection Agency's Transportation Conformity Rule Section 93.126 Exempt from Regional Emissions Analysis, Table 2 Safety – indicating that pavement resurfacing and/or rehabilitation are exempt. **Added August 6<sup>th</sup>, 2024**

## **New Regional Emissions Analysis**

Since the 2025 FTIP and 2020 RTP Amendment #03 includes a new non-exempt project, a new regional emission analysis and conformity determination are required.

For the proposed amendment, BCAG states for the record:

1. Non-Exempt Project: A new conformity determination and regional emissions analysis is necessary for 2025 FTIP and 2020 RTP formal amendment.
2. TCM Implementation: There are no Transportation Control Measures in the approved Carbon Monoxide (CO) SIP and there is no approved Ozone or PM2.5 SIP applicable to Butte County. Because there are no TCMs in an approved SIP for Butte County, Butte County currently has no TCMs in place and therefore timely TCM implementation requirements do not apply.
3. Financial Constraint: The 2020 RTP and 2025 FTIP has been financially constrained in accordance with the requirements of 40 CFR 93.108 and consistent with the U.S. DOT metropolitan planning regulations (23 CFR Part 450).
4. Interagency and Public Consultation: The following portion applies after all consultation is complete - *For the 2025 FTIP and 2020 RTP Amendment #03, BCAG initially consulted on this amendment with its Interagency Consultation Review (ICR) group on August 19, 2024. BCAG staff provided a 30-day public review and*

*comment period in compliance with BCAG's adopted Public Participation Plan (PPP). On August 2, 2024, legal notices were posted on the BCAG website. The proposed amendment has been circulated among staff from Federal Highway Administration (FHWA), Environmental Protection Agency (EPA), Federal Transit Agency (FTA), and Caltrans. Appendices contain copies of public notices and responses to public comments.*

## **ADDITIONAL INFORMATION**

### **2025 FTIP Regional Emissions Analysis**

Included for the ICRs information is a copy of the Draft 2025 FTIP Regional Emissions Analysis which includes the listing of all federal and regionally significant projects expected to occur in the non-attainment areas of the BCAG region which have been included in the regional emissions analysis for the 2025 FTIP and 2020 RTP Amendment #3.

### **Schedule**

Included below is the schedule of activities for completing the 2025 FTIP regional emissions analysis and conformity determination.

<b>August 2, 2024,</b>	Release Draft 2025 FTIP for 30-day public comment period and hold Public Workshop
<b>August 19, 2024,</b>	BCAG Interagency Consultation Review (15-day period)
<b>September 3, 2024,</b>	30-day public review period concludes
<b>September 26, 2024,</b>	BCAG Board of Directors considers adoption.

**STAFF REQUEST:** BCAG staff requests the ICR review and provide comments regarding BCAG's proposed action. In addition, BCAG staff requests that EPA, FHWA/FTA, and Caltrans concur with BCAG's proposed action.