

## **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 2023 FTIP implements the transportation projects and programs of the 2024 Regional Transportation Plan/Sustainable Communities Strategy (2024 RTP/SCS or Connect SoCal) in the fiscal years 2024/25 – 2027/28.

#### *Federal Transportation 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 2023 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 #23-33 relies on the regional emissions analysis for the 2023 FTIP Amendment #23-27, which is identical to the regional emissions analysis for the 2024 RTP/SCS [Section 93.122(g) is the relevant part of the *Transportation Conformity Regulations* for this amendment].

#### *2023 FTIP Amendment #23-33 Project Description*

2023 FTIP Amendment #23-33 includes two projects for which transportation conformity needs to be reaffirmed (see the Conformity Determination Project Listing). Both projects are located in the South Coast Air Basin (SCAB).

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

The transportation conformity determination for both the 2024 RTP/SCS and the 2023 FTIP Amendment #23-27 received federal approval on the same day, May 10, 2024.

The transportation conformity determinations for the 2023 FTIP received federal approval on December 16, 2022.

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<sup>1</sup> SCAG, *Final 2023 Federal Transportation Improvement Program Guidelines*, October 2021, page 161. Available at: <https://scag.ca.gov/sites/main/files/file-attachments/proposed-f2023-ftip-guidelines.pdf>

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

SCAG reaffirms the latest applicable transportation conformity findings for the 2024 RTP/SCS and the 2023 FTIP as amended (<https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-transportation-conformity-analysis-final-040424.pdf?1712262301>).

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 2023 FTIP as amended and the 2024 RTP/SCS, and reaffirming the process of interagency consultation and public participation.

SCAG has completed its analysis of the proposed changes to the 2023 FTIP as amended. SCAG's findings for the approval of this amendment are as follows:

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

The two projects needing transportation conformity reaffirmation in 2023 FTIP Amendment #23-33 are from the 2024 RTP/SCS, which is a conforming Plan; 2023 FTIP Amendment #23-33 does not include any new regionally significant project beyond those currently included in the 2024 RTP/SCS, nor does it move a project across any modeling years currently assumed in the 2024 RTP/SCS and the 2023 FTIP as amended; Furthermore, the design, concept, and scope of these two projects do not differ significantly from what were described in the 2024 RTP/SCS and the 2023 FTIP as amended.

**Finding:** The 2023 FTIP Amendment #23-33 is consistent with the 2024 RTP/SCS and the 2023 FTIP as amended.

### **Regional Emissions Analysis**

This transportation conformity analysis relies on the regional emissions analysis for the 2023 FTIP Consistency Amendment #23-27 which is identical to the regional emissions analysis for the 2024 RTP/SCS. The emissions analysis was performed with the SCAG Activity-Based Regional Travel Demand Model and utilized the planning, socioeconomic, and modeling assumptions for the 2024 RTP/SCS and the 2023 FTIP as amended. The 2023 FTIP Amendment #23-33 does not result in any modeling changes.

The regional emissions analysis methodology for the 2023 FTIP Amendment #23-33 uses applicable budgets to determine transportation conformity for all criteria pollutants. Specifically, this conformity reaffirmation is being made for all criteria pollutants and precursors in the Mojave Desert Air Basin (MDAB), the South Central Coast Air Basin (SCCAB), the SCAB, and the Salton Sea Air Basin (SSAB).

**Finding:** The 2023 FTIP Amendment #23-33 regional emissions for Ozone precursors (NO<sub>x</sub>, ROG/VOC) [2008 and 2015 National Ambient Air Quality Standards (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

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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.*

Pechanga Reservation (Pechanga), SCAB excluding Morongo and Pechanga, SCCAB (Ventura County portion), MDAB (Los Angeles County Antelope Valley portion and San Bernardino County western portion of MDAB), and the SSAB (Riverside County Coachella Valley and Imperial County portions of SSAB).

**Finding:** The 2023 FTIP Amendment #23-33 regional emissions for CO are consistent with all applicable emissions budgets for all milestone, maintenance, and planning horizon years in the SCAB.

**Finding:** The 2023 FTIP Amendment #23-33 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 2023 FTIP Amendment #23-33 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 2023 FTIP Amendment #23-33 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 (urbanized area of Imperial County portion).

**Finding:** The 2023 FTIP Amendment #23-33 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 are no committed TCM projects in the 2023 FTIP Amendment #23-33. The 2023 FTIP Amendment #23-33 does not change timely implementation of all applicable committed TCM projects in the SCAG region.

#### Fiscal Constraint Analysis

**Finding:** The 2023 FTIP Amendment #23-33 includes the most recent financial plan for the 2023 FTIP as amended. All projects listed in the 2023 FTIP (including the proposed amendment) are financially constrained for all fiscal years.

#### Interagency Consultation and Public Involvement Analysis

The regional transportation conformity analysis leading to the FHWA and FTA's final approval of the 2024 RTP/SCS and 2023 FTIP Amendment #23-27 complies with all federal and state requirements for interagency consultation and public involvement as documented in the Transportation Conformity Analysis Technical Report of the 2024 RTP/SCS (<https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-transportation-conformity-analysis-final-040424.pdf?1712262301>). For the 2023 FTIP Amendment #23-33, SCAG will undergo additional public involvement including solicitation via email for comments from the

Transportation Conformity Working Group. Furthermore, the 2023 FTIP Amendment #23-33 will be posted on SCAG's website ([www.scag.ca.gov](http://www.scag.ca.gov)) for a 10-day public review and comment period.

**Finding:** The 2023 FTIP Amendment #23-33 complies with all federal and state requirements for interagency consultation and public involvement.

Overall

**Finding:** SCAG has determined that the 2023 FTIP Amendment #23-33 complies with all applicable federal transportation conformity requirements and regulations.