

COMMENTS RECEIVED AND RESPONSES

Ivan Garcia

From: Kahrs, Jacqueline J@DOT <jacqueline.kahrs@dot.ca.gov>
Sent: Thursday, July 6, 2023 12:17 PM
To: Ivan Garcia
Cc: D3 FTIP@DOT; Brian Lasagna
Subject: RE: ICR Review – Confirmation of Proposed Action for 2023 FTIP Amendment #3 and 2020 RTP Amendment #1

Hi Ivan,

Thank you for the opportunity to review BCAG's 2023 Draft FTIP Amendment #3. Please include these comments and BCAG's responses in the final amendment package with any other comments received from the public.

- CTIPS ID #20200000236 – Please utilize the Fund ID “Community Project Funding Congressionally Directed Spending (CPFCDs)” in CTIPS for this project and remove the reference to HIP in the description. Please indicate the total project cost and location of the project in the RTP in the description and program the non-federal match. More information regarding CPFCDs projects can be found here - <https://dot.ca.gov/programs/local-assistance/fed-and-state-programs/earmark-programs> **RESPONSE: Change made**
- CTIPS ID# 20200000233 – Please utilize the Fund ID “Community Project Funding Congressionally Directed Spending (CPFCDs)” in CTIPS for this project. Please indicate the total project cost and location of the project in the RTP in the description and program the non-federal match. **RESPONSE: Change made**
- On the Financial Summary Tables, please reflect the projects above utilizing the Federal Highway Other row, instead of the HIP row. These funds should be listed as CPFCDs on the Appendix tables. **RESPONSE: Change made**

I am also including the following comments which pertain to the Air Quality Conformity Analysis. These comments correspond with the checklist. **RESPONSE: Comments and changes confirmed**

General - Please use the most up-to-date Conformity Analysis Documentation Checklist from 2017,

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/f0009312-20>

93.104 (b, c) - Please include a copy of the MPO Resolution and the adoption date of the 2020 RTP

93.106 (a)(2)(ii) - Please confirm that regionally significant additions or modifications are captured

93.109 (a, b) - Please confirm that documentation that the TIP/RTP complies with any applicable court orders (SIPs) and court orders is located on Page 13 rather than Page 16.

93.109 (c-k) - Please confirm that documentation of which emissions budgets have been found applicable for what analysis years is located on Pages 12-13 rather than Pages 12-15.

93.110 (a, b) - Note that documentation inaccurately indicates the use of the most recent available EMFAC2017 rather than EMFAC2021. Please note, EMFAC2021 must be used for all new regional emissions analyses for on or after November 15, 2024 (two-year grace period to use EMFAC2017)

USDOT/EPA Guidance - Please confirm that documentation of the use of planning assumptions less justification for the use of older data) is located on Pages 5,7, & 8 rather than Pages 5 & 8 alone.

93.122(b)(1)(v) - Please confirm the specific page numbers of this documentation.

93.119 Please confirm if the region has an applicable SIP budget. If it does, this section does not ne

93.122(b)(1)(vi) - Please confirm the specific page numbers of this documentation.

93.122 (a)(1) Please correct the page numbers for this criteria. It is found on pg 10-11.

Please let me know if you have any questions.

Thank you,

Jacqueline Kahrs
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From: Brian Lasagna <BLasagna@bcag.org>

Sent: Tuesday, June 20, 2023 10:47 AM

To: Brian Lasagna <BLasagna@bcag.org>; Carroll, Chris S@DOT <chris.carroll@dot.ca.gov>; Chris Devine <CDevine@bcag.org>; Houlemard, Chris@DOT <Chris.Houlemard@dot.ca.gov>; Fong, Alexander Y@DOT <alexander.fong@dot.ca.gov>; Jason Mandly <jmandly@bcaqmd.org>; Jeffrey Buss <Buss.Jeffrey@epamail.epa.gov>; Johnson, Antonio (FHWA) <antonio.johnson@dot.gov>; Kahrs, Jacqueline J@DOT <jacqueline.kahrs@dot.ca.gov>; Karina Oconnor <OConnor.Karina@epamail.epa.gov>; Matt Cadrett <Matthew@Cadrett@dot.ca.gov>; Kalandiyur, Nesamani@ARB <nesamani.kalandiyur@arb.ca.gov>; Perez, Idalia <Perez.Idalia@epa.gov>; Tavitas, Rodney A@DOT <rodney.tavitas@dot.ca.gov>; Chowdhury, Shaila K@DOT <shaila.chowdhury@dot.ca.gov>; Culbertson, Shannon@DOT <shannon.culbertson@dot.ca.gov>; YOUNT, KEVIN J@DOT <KEVIN.YOUNT@dot.ca.gov>

Cc: igarcia <igarcia@bcag.org>

Subject: ICR Review – Confirmation of Proposed Action for 2023 FTIP Amendment #3 and 2020 RTP Amendment #1

EXTERNAL EMAIL. Links/attachments may not be safe.

E – MEMORANDUM

DATE: June 20, 2023

TO: Interagency Consultation Review (ICR) Group

FROM: Brian Lasagna, BCAG Regional Analyst

SUBJECT: ICR Review – Confirmation of Proposed Action for 2023 FTIP Amendment #3 and 2020 RTP Amendment #1

The purpose of this memo is to provide the ICR with the opportunity to comment regarding BCAG's proposed action for a formal amendment to the 2023 Federal Transportation Improvement Program (FTIP) and 2020 Regional Transportation Plan (RTP). The ICR is also being asked to concur with BCAG's proposal regarding the status of two (2) new projects.

The purpose of the amendment is to add two (2) new projects and amend an one (1) existing project. One (1) new project is capacity increasing and requires a new air quality emissions analysis and conformity determination. Details regarding the amendment and projects are included below:

NEW NON-EXEMPT FTIP PROJECT:

1. **Town of Paradise - Roe Rd Extension Project.** This amendment programs \$60.4 million of which \$1.8 million is Highway Infrastructure Program (HIP) funds and \$58.6 million is from Housing and Urban Development Community Development Block Grant Disaster Recovery Funds (CDBG-DR). The scope of the project is to complete Phase 1 to close gaps to four (4) north-south roadways which serve disconnected residential areas with new roadway links serving long dead-end streets including South Libby, Edgewood and Sawmill Roads to Pentz. Project includes environmental for the future planned 5-mile section between Pentz Road and Skyway. 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:

1. **Butte County – Cohasset Road Widening and Fire Safety Project.** This amendment programs \$1.4 million in HIP funds to prepare a feasibility study and preliminary engineering studies. The feasibility study will investigate alternatives for improving traffic flow during evacuation events such as pull-outs, shoulder widening, or any other efficient use of the existing roadway cross-section to improve the emergency evacuation economy, including intelligent transportation solutions, sign messaging and a fire warning system. Upon completion of this phase, the Butte County anticipates producing a chosen alternative and engineer’s estimate that may be used to seek future state and federal funding. The project does not add thru lanes or capacity. The project is exempt from a regional emissions analysis per the Environmental Protection Agency’s Transportation Conformity Rule Section 93.126 Exempt Projects, Table 2 “Safety” indicating that projects that correct, improve, or eliminate a hazardous location or feature are exempt. In addition, this is a new project not currently in the 2020 RTP, therefore the 2020 RTP is being amended to include the project.

TEHCNICAL CORRECTION TO EXISTING EXEMPT FTIP PROJECT:

1. **Town of Paradise - Go Paradise / Skyway Link Project.** This amendment is a technical correction to change the description of providing Class II bike lanes to providing a Class I Bike/Ped Path as approved by the California Transportation Commission. There is no change in funding or schedule. The project limits are on the Skyway between Bille Rd and Wagstaff Road. This is an existing project programmed in the FTIP. The project does not add thru lanes or capacity. The project is exempt from a regional emissions analysis per the Environmental Protection Agency’s Transportation Conformity Rule Section 93.126 Exempt Projects, Table 2 “Air Quality” indicating that bicycle and pedestrian facilities are exempt.

Since the 2023 FTIP Amendment #03 includes a new non-exempt project, the amendment includes a new conformity determination and regional emission analysis for the 2020 RTP and 2023 FTIP.

For the purpose of the proposed amendment, BCAG states for the record:

1. **Non-Exempt Project:** A new conformity determination and regional emissions analysis is necessary for this proposed 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 2023 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 2023 FTIP Amendment #03, BCAG initially consulted on this amendment with its Interagency Consultation Review (ICR) group on June 20, 2023. BCAG staff provided a 15-day public review and comment period in compliance with BCAG's adopted Public Participation Plan (PPP). On June 20, 2023, 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.*

BCAG staff is requesting that ICR members respond with any comments regarding the proposed amendment prior to Friday, July 7, 2023. In addition, BCAG is requesting concurrence of the proposed action by email response from the following agencies: FHWA/FTA, EPA, and Caltrans.

If members prefer a separate conference call to discuss, please let me know and I will begin to schedule. If no significant requests or comments are received by the ICR, BCAG will then move forward with completing public outreach and having the BCAG Board of Director's approval.

Included for the ICRs information is the draft air quality emissions analysis and conformity determination, latest project exemption table, regionally significant project listing, and public notice to the amendment.

If you have any questions, please give me a call, or send me an email.

Brian Lasagna
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Butte County Association of Governments
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