



<b>To:</b>	BCAG Interagency Consultation Partners
<b>From:</b>	Joza Burnam, Senior Environmental Planner, ICF
<b>Cc:</b>	Tracy R. Bettencourt, Regulatory and Grants Manager City of Chico Public Works – Engineering  Kelsey Cowin, ICF
<b>Date:</b>	March 2, 2021
<b>Subject:</b>	<b>Consultation on PM2.5 and PM10 Hot-Spot Conformity Assessment for the Guynn Avenue Bridge Replacement Project in the City of Chico</b>

## Introduction

The City of Chico is providing the following Project-level PM2.5 and PM10 Conformity Analysis for the Guynn Avenue Bridge Replacement Project. It is requested that the Interagency Consultation (IAC) Partners concur that this project is not a “Project of Air Quality Concern” (POAQC) via “reply to all.” Comments regarding this analysis are requested by **March 19, 2021 at 5:00 p.m.** An interagency conference call may be held upon request.

This is a Section 326 project; and as such, United States Environmental Protection Agency (EPA) and California Department of Transportation (Caltrans) concurrence with this determination is requested.

## Project Description

The City of Chico (City), in cooperation with Caltrans District 3, is proposing to construct a new bridge crossing Lindo Channel at Guynn Avenue, just west and downstream of the existing bridge. Caltrans is the lead agency for the project under the National Environmental Policy Act (NEPA) and the City of Chico is the lead agency under the California Environmental Quality Act (CEQA).

Butte County is in the Northern Sacramento Valley Air Basin (NSVAB), and within the jurisdiction of the Butte County Air Quality Management District (BCAQMD). The Butte County Association of Governments (BCAG) is the Metropolitan Planning Organization (MPO) and the Regional Transportation Planning Agency for the project area. **Figure 1** shows the project location within the larger region.

This project as currently proposed is included in the BCAG 2019 Federal Transportation Improvement Program (FTIP) under project number BRLO-5037(023) and is proposed for funding from Toll Credits for PE, R/W and CON. Fed Proj: BRLO-5037(023). The project is also included in the BCAG 2016 and Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The purpose of this project is to provide increased safety to travelers crossing Lindo Channel via Guynn Avenue. A replacement bridge is needed because the existing bridge has a 30.0 sufficiency rating and structurally deficient status. The structure has a substantially reduced load carrying capacity, is posted for load and speed restrictions, contains transverse and longitudinal cracks through the AC overlap, has significant paint loss and rust, and has a failing wingwall.

Under existing conditions, Guynn Avenue Bridge is a single-lane bridge structure. The Build Alternative would construct a new two-lane bridge structure on Guynn Avenue just west of the existing single-lane bridge. The new bridge would have two 12-foot travel lanes, eight-foot shoulders, and a six-foot sidewalk. The existing bridge at the site will remain but will be closed to vehicle traffic and will serve cyclists and pedestrians (see **Figure 2**).

## Traffic Conditions

Although the replacement bridge structure would increase roadway capacity from one lane to two lanes, no traffic volume increases are anticipated to occur under the Build Alternative when compared to the No-Build Alternative. This is because Guynn Avenue Bridge serves local neighborhood traffic. Traffic volume data is provided below in **Table 1**.

**Table 1. Summary of Build Alternative and No-Build Alternative Traffic Conditions**

Analysis Year/Scenario	AADT	Truck AADT	Truck Percent AADT
Opening Year 2023 Build Alternative and No-Build Alternative	743	14	1.9
Horizon Year 2040 Build Alternative and No-Build Alternative	774	14	1.8

Source: Headway Transportation, 2020

AADT = annual average daily traffic

## PM2.5 Hot-Spot Conformity Assessment

This project is located in Butte County in the Northern Sacramento Valley Air Basin, which is federal maintenance area for PM2.5. According to the United States EPA Transportation Conformity Guidance, PM2.5 and PM10 hot-spot analysis is required for Projects of Air Quality Concern (POAQC) in nonattainment areas [40 CFR 93.123 (b)(1)]. Projects that are exempt or not POAQC do not require hot-spot analysis. The following types of projects are considered POAQC:

1. New or expanded highway projects that have a significant number of or significant increase in diesel vehicles (significant number is defined as greater than 125,000 Annual Average Daily Traffic (ADT) and 8% or more of such ADT is diesel truck traffic, or in practice 10,000 truck ADT or more regardless of total ADT; significant increase is defined in practice as a 10% increase in heavy duty truck traffic);
2. Projects affecting intersections that are at a Level of Service (LOS) D, E, F, with a significant number of diesel vehicles, or that that will change to Level of Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;
3. New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
4. Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; or
5. Projects in or affecting locations, areas, or categories of sites which are identified in the PM2.5 or PM10 implementation plan or implementation plan submission, as appropriate, as sites of possible violation.

The proposed project would replace an existing single-lane bridge with a two-lane bridge; and as such, does not meet the criteria for an exempt project under 40 CFR 93.126, nor for exemption from regional analysis under 40 CFR 93.127. Nonetheless, the City does not believe the project is a POAQC. This determination is made based on an evaluation of the proposed project against the above-referenced criteria:

1. **New or expanded highway projects that have a significant number of or significant increase in diesel vehicles.**

The proposed project replaces a single-lane bridge structure with a two-lane bridge structure. The Guynn Avenue Bridge is anticipated to truck AADT volumes of less than two percent at Opening Year 2023 and Horizon Year 2040 under the Build Alternative and No-Build Alternative conditions. As shown above in **Table 1**, AADT volumes would not exceed 800. As such, there would be no significant number or significant increase in truck volumes.

2. **Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project.**

Shown above in **Table 1**, truck volumes would not exceed two percent at Opening Year 2023 or Horizon Year 2040. Additionally, no truck or non-truck AADT increases are expected to occur under the Build Alternative when compared to the No Build Alternative at Opening Year 2023 or Horizon Year 2040.

3. **New bus and rail terminals and transfer points than have a significant number of diesel vehicles congregating at a single location.**

The project does not include new bus or rail terminals and transfer points.

4. **Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location.**

The project does not include expanded bus or rail terminals and transfer points.

5. **Projects in or affecting locations, areas, or categories of sites which are identified in the PM10 or PM2.5 applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.**

The project site is not in or affecting an area or location identified in any PM10 or PM2.5 implementation plan. The immediate project area is not considered to be a site of violation or possible violation.

## Summary of Assessment

The Guynn Avenue Bridge Replacement Project would improve local traffic and pedestrian operations in the vicinity, without attracting a significant amount of truck traffic volumes. The proposed project therefore meets the Clean Air Act, 40 CFR Part 93.116 requirements without any explicit hot-spot analysis. The proposed project would not create a new, or worsen an existing, PM2.5 and PM10 violation; therefore, the project is not a "Project of Air Quality Concern".

## Construction Emissions

Construction of the project will require less than 5 years, so construction emission analysis for conformity is not required. Construction procedures will follow current BCAQMD rules, and the enforceable commitment to those mitigation measures remains as part of the NEPA document.

## Public Involvement Process

The NEPA document for this project is a Categorical Exclusion with technical studies. No public noticing or hearing is required.

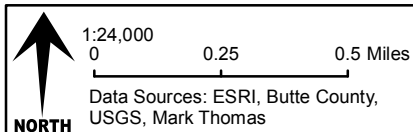
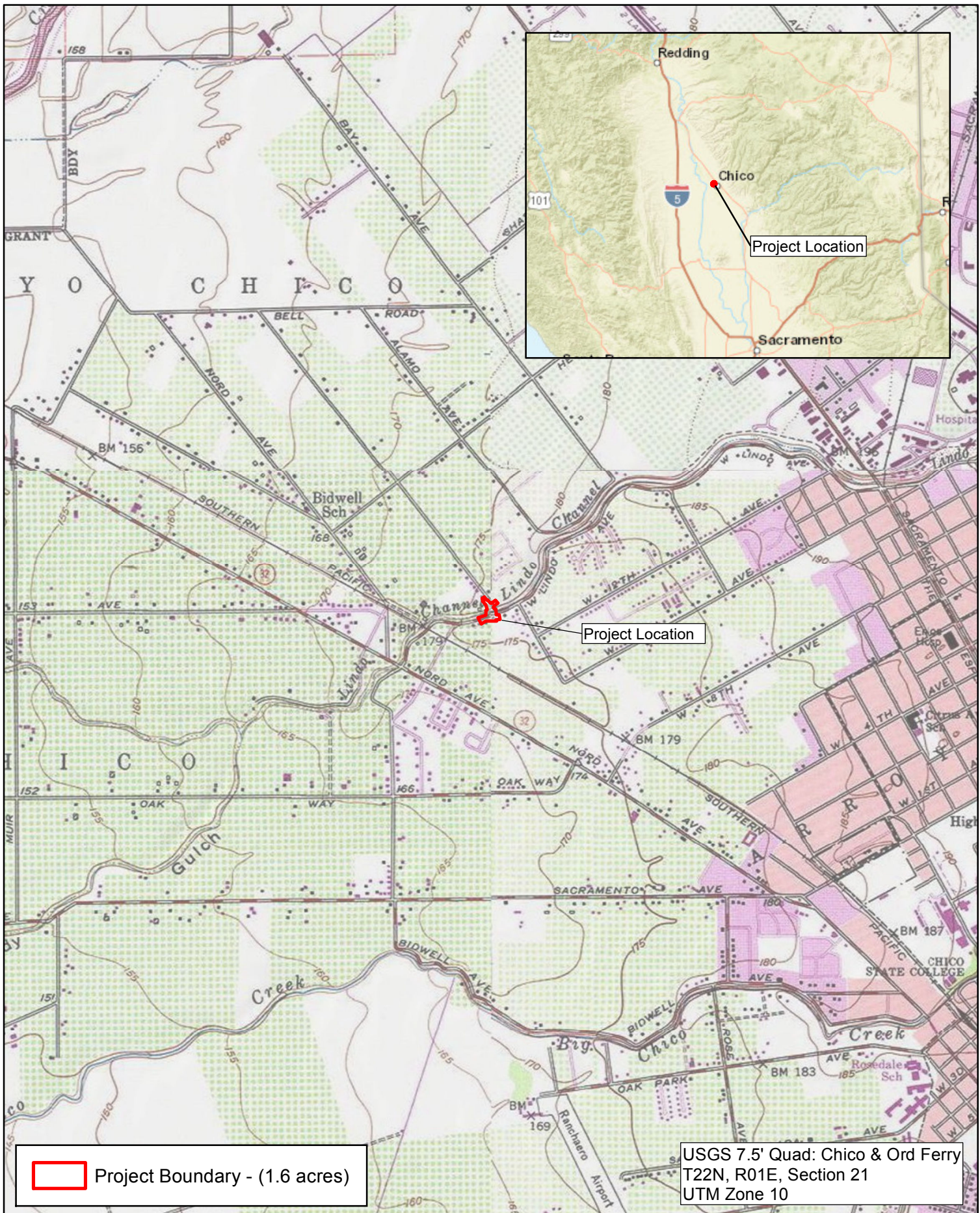
If you have any questions or need additional information, please contact Tracy Bettencourt, City of Chico, at [tracy.bettencourt@chicoca.gov](mailto:tracy.bettencourt@chicoca.gov) or Joza Burnam of ICF at [joza.burnam@icf.com](mailto:joza.burnam@icf.com).

## Attachments

Figure 1. Regional Location Map

Figure 2. Build Alternative Map





Guynn Ave Bridge Replacement Project  
Regional Location  
Figure 1

**gallaway**  
ENTERPRISES

GE: #15-034b Map Date: 02/07/20



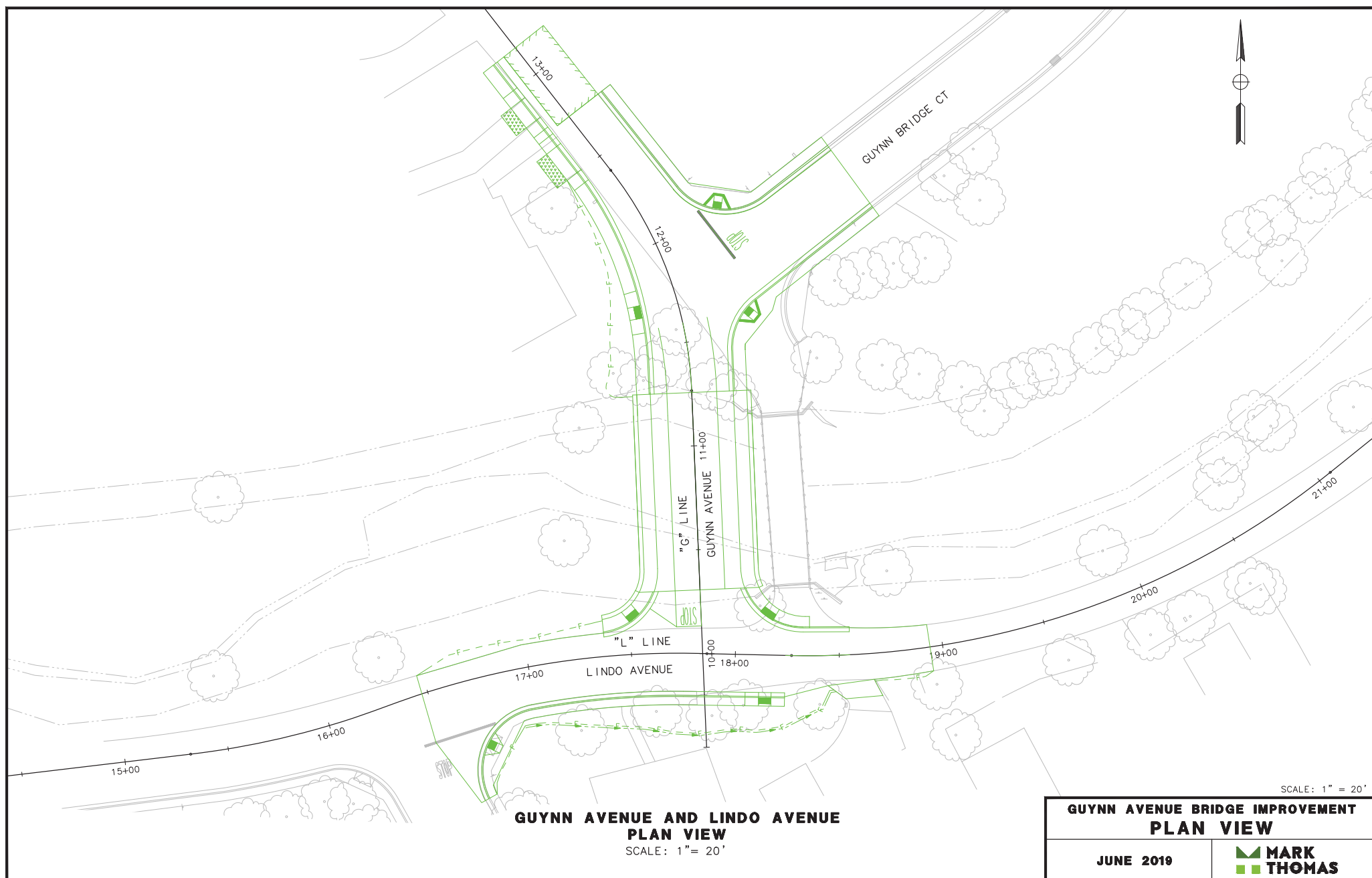


Figure 2. Build Alternative Map

# Project Summary for Interagency Consultation

<b>CTIPS ID#</b> <i>(required)</i> 202-0000-0108				
<b>ICR Consideration Date</b> <i>(requested timeframe)</i> March 2021				
<p><b>Project Description</b> <i>(clearly describe project)</i></p> <p>The City of Chico (City), in cooperation with Caltrans District 3, is proposing to construct a new bridge crossing Lindo Channel at Guynn Avenue, just west and downstream of the existing bridge. Caltrans is the lead agency for the project under the National Environmental Policy Act (NEPA) and the City of Chico is the lead agency under the California Environmental Quality Act (CEQA).</p> <p>Butte County is in the Northern Sacramento Valley Air Basin (NSVAB), and within the jurisdiction of the Butte County Air Quality Management District (BCAQMD). The Butte County Association of Governments (BCAG) is the Metropolitan Planning Organization (MPO) and the Regional Transportation Planning Agency for the project area.</p> <p>This project as currently proposed is included in the BCAG 2019 Federal Transportation Improvement Program (FTIP) under project number BRLO-5037(023) and is proposed for funding from Toll Credits for PE, R/W and CON. Fed Proj: BRLO-5037(023). The project is also included in the BCAG 2016 and Draft 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).</p> <p>The purpose of this project is to provide increased safety to travelers crossing Lindo Channel via Guynn Avenue. A replacement bridge is needed because the existing bridge has a 30.0 sufficiency rating and structurally deficient status. The structure has a substantially reduced load carrying capacity, is posted for load and speed restrictions, contains transverse and longitudinal cracks through the AC overlap, has significant paint loss and rust, and has a failing wingwall.</p> <p>Under existing conditions, Guynn Avenue Bridge is a single-lane bridge structure. The Build Alternative would construct a new two-lane bridge structure on Guynn Avenue just west of the existing single-lane bridge. The new bridge would have two 12-foot travel lanes, eight-foot shoulders, and a six-foot sidewalk. The existing bridge at the site will remain but will be closed to vehicle traffic and will serve cyclists and pedestrians.</p>				
<p><b>Type of Project</b> <i>(use Table 1 on page 2)</i></p> <p>Roadway Realignment/Bridge replacement</p>				
<b>County</b> Butte	<p><b>Narrative Location/Route &amp; Postmiles</b> The project is on Guynn Avenue in the City of Chico in the County of Butte between Guynn Bridge Court and West Lindo Avenue.</p> <p><b>Caltrans Projects – EA#</b> BRLO-5037(023)</p>			
<b>Lead Agency:</b> City of Chico, in cooperation with Caltrans				
<b>Contact Person</b> Tracy Bettencourt	<b>Phone#</b> 530-879-6903	<b>Fax#</b>	<b>Email</b> Tracy.bettencourt@chicoca.gov	
<b>Federal Action for which Project-Level PM Conformity is Needed</b> <i>(check appropriate box)</i>				
<input checked="" type="checkbox"/> <b>Categorical Exclusion (NEPA)</b>	<input type="checkbox"/> <b>EA or Draft EIS</b>	<input type="checkbox"/> <b>FONSI or Final EIS</b>	<input type="checkbox"/> <b>PS&amp;E or Construction</b>	<input type="checkbox"/> <b>Other</b>
<b>Scheduled Date of Federal Action:</b>				
<b>NEPA Delegation – Project Type</b> <i>(check appropriate box)</i>				
<input type="checkbox"/> <b>Exempt</b>	<input checked="" type="checkbox"/> <b>Section 6004 – Categorical Exemption</b>	<input type="checkbox"/> <b>Section 6005 – Non-Categorical Exemption</b>		
<b>Current Programming Dates</b> <i>(as appropriate)</i>				
	<b>PE/Environmental</b>	<b>ENG</b>	<b>ROW</b>	<b>CON</b>



## Project Summary for Interagency Consultation

<b>Start</b>	2020	2020	2020	2023
<b>End</b>	2021	2021	2021	2023

**Project Purpose and Need (Summary):** *(attach additional sheets as necessary)*  
The purpose of this project is to provide increased safety to travelers crossing the Lindo Channel via Guynn Avenue. A replacement bridge is needed because the existing bridge has a 30.0 sufficiency rating and structurally deficient status. The structure has a substantially reduced load carrying capacity, is posted for load and speed restrictions, contains transverse and longitudinal cracks through the AC overlap, has significant paint loss and rust, and has a failing wingwall.

**Surrounding Land Use/Traffic Generators** *(especially effect on diesel traffic)*  
The project site is surrounded by Medium and low density residential area.

**Opening Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility**  
Although the replacement bridge structure would increase roadway capacity from one lane to two lanes, no traffic volume increases are anticipated to occur under the Build Alternative when compared to the No-Build Alternative. This is because Guynn Avenue Bridge serves local neighborhood traffic. Traffic volume data is provided below in Table 1.

**Table 1. Summary of Build Alternative and No-Build Alternative Traffic Conditions**

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Source: Headway Transportation, 2020

AADT = annual average daily traffic

Table 2 summarizes design features and operational impacts on traffic conditions along Guynn Avenue just north of the existing bridge. As shown, peak hour volumes are expected to increase in future years but would not be different between the Build and No Build Alternative. As mentioned previously, the increase in volumes relative to Existing conditions is due to minor planned growth in the area. There would be no change in volumes between the two Alternatives because the new bridge is not expected to induce trips, as it only serves the immediate neighborhood. While the wider bridge is not expected to affect traffic volumes, it would have a minor impact on speed. As shown in Table 1-4, there would be an increase in speed from 21.6 to 25 mph with implementation of the Build Alternative when compared to Existing and No Build Alternative conditions.

**Table 2. Summary of Long-Term Operational Impacts on Traffic Conditions of Existing, No-Build, and Build Alternatives at the Roadway Segment between Lindo Ave and Guynn Bridge Ct.**

Scenario/ Analysis Year	Volume		Level of Service (LOS)		85 <sup>th</sup> Percentile Speed (mph)
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	
Existing (2020)	62	74	C or better	C or better	21.6
<b>Opening-year (2023)</b>					
No-Build Alternative	63	75	C or better	C or better	21.6
Build Alternative	63	75	C or better	C or better	25
<i>Change</i>	-	-	-	-	3.4
<b>Design-year (2040)</b>					
No-Build Alternative	65	78	C or better	C or better	21.6
Build Alternative	65	78	C or better	C or better	25
<i>Change</i>	-	-	-	-	3.4

Source: Headway Transportation 2020.

Project Summary for Interagency Consultation

**RTP Horizon Year / Design Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility**

Horizon year data is provided above.

**Describe potential traffic redistribution effects of congestion relief** *(impact on other facilities)*

No traffic volume increases are anticipated to occur under the Build Alternative when compared to the No Build Alternative. Therefore, proposed project would not result in an increase in operational emissions, and there would be no long-term air quality effects.

**Comments/Explanation/Details** *(attach additional sheets as necessary)*

The proposed project would replace an existing single-lane bridge with a two-lane bridge; and as such, does not meet the criteria for an exempt project under 40 CFR 93.126, nor for exemption from regional analysis under 40 CFR 93.127. Nonetheless, the City does not believe the project is a POAQC. This determination is made based on an evaluation of the proposed project against the above-referenced criteria:

**1. New or expanded highway projects that have a significant number of or significant increase in diesel vehicles.**

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**2. Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project.**

Shown above in **Table 1**, truck volumes would not exceed two percent at Opening Year 2023 or Horizon Year 2040. Additionally, no truck or non-truck AADT increases are expected to occur under the Build Alternative when compared to the No Build Alternative at Opening Year 2023 or Horizon Year 2040.

**3. New bus and rail terminals and transfer points than have a significant number of diesel vehicles congregating at a single location.**

The project does not include new bus or rail terminals and transfer points.

**4. Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location.**

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**5. Projects in or affecting locations, areas, or categories of sites which are identified in the PM10 or PM2.5 applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.**

The project site is not in or affecting an area or location identified in any PM10 or PM2.5 implementation plan. The immediate project area is not considered to be a site of violation or possible violation.

**From:** [Brian Lasagna](#)  
**To:** ["Cowin, Kelsey"](#); ["Halterman, Sarah"](#); ["Burnam, Joza"](#); ["Bromund, Claire"](#); ["Tracy Bettencourt \(tracy.bettencourt@Chicoca.gov\)"](#)  
**Cc:** [Ivan Garcia](#); [Brian Lasagna](#); [Chris Devine](#); ["Fong, Alexander Y@DOT"](#); ["Jason Mandly"](#); ["Jeffrey Buss"](#); ["jerome.wiggins@fta.dot.gov"](#); ["jim.m.elder@dot.ca.gov"](#); ["Johnson, Antonio \(FHWA\)"](#); ["Joseph.Vaughn@dot.gov"](#); ["Karina Oconnor"](#); ["Lee, Jason@DOT"](#); ["Lo.Doris@epa.gov"](#); ["Matt Lakin \(Lakin.Matthew@epa.gov\)"](#); ["nesamani.kalandiyur@arb.ca.gov"](#); ["Nima Kabirinassab"](#); ["rodney.tavitas@dot.ca.gov"](#); ["shaila.chowdhury@dot.ca.gov"](#); ["Shannon Culbertson"](#); ["Ungvasky, John"](#)  
**Subject:** Review Completed - ICR Consultation on Project Level PM2.5 Hot-Spot Conformity Assessment for the City of Chico - Guynn Avenue Bridge Replacement Project (CTIPS ID# 202-000-0108) – NEPA Section 6004 Categorical Exclusion  
**Date:** Friday, March 26, 2021 11:23:30 AM  
**Attachments:** [Caltrans concur CTIPS 2020000108.pdf](#)  
[EPA concur CTIPS 2020000108.pdf](#)

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## **E - MEMORANDUM**

DATE: March 26, 2021

TO: Project Sponsor – City of Chico

FROM: Brian Lasagna, BCAG Regional Analyst

COPY: Interagency Consultation Review (ICR) Group

**SUBJECT: Review Completed - ICR Consultation on Project Level PM2.5 Hot-Spot Conformity Assessment for the City of Chico - Guynn Avenue Bridge Replacement Project (CTIPS ID# 202-000-0108) – NEPA Section 6004 Categorical Exclusion**

The purpose of this memo is to inform the project sponsor (City of Chico) that the Interagency Consultation Review (ICR) Group has completed its review of the Project Level PM2.5 Conformity Assessment of the City of Chico's - Guynn Avenue Bridge Replacement Project (CTIPS ID# 202-000-0108) and concurs with the project sponsors recommendation that the project is not a "Project of Air Quality Concern".

Please see the attached emails provided by Caltrans and EPA stating concurrence with the project sponsors recommendation.

If you have any questions regarding the ICRs review, please feel free to contact me.

Thank you,

Brian Lasagna

Regional Analyst

Butte County Association of Governments

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Chico, CA 95928

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