

## **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 2025 FTIP implements the transportation projects and programs of the 2024 Regional Transportation Plan/Sustainable Communities Strategy (2024 RTP/SCS or Connect SoCal 2024) in the fiscal years (FFY) 2024/25 through FFY 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 2025 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 #25-15 relies on the regional emissions analysis for the 2025 FTIP, which is identical to the regional emissions analysis for the 2024 RTP/SCS Amendment #1 [Section 93.122(g) is the relevant part of the *Transportation Conformity Regulations* for this amendment].

#### *2025 FTIP Amendment #25-15 Project Description*

2025 FTIP Amendment #25-15 includes 30 projects for which transportation conformity needs to be reaffirmed (see the Conformity Determination Project Listing). Twenty-six (26) projects are located in the South Coast Air Basin (SCAB) and four projects are located in the South Coast Central Air Basin (SCCAB).

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

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

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<sup>1</sup> SCAG, *Final 2025 Federal Transportation Improvement Program Guidelines*, November 2023, page 211. Available at: <https://scag.ca.gov/sites/main/files/file-attachments/final-2025-ftip-guidelines.pdf>

SCAG's Regional Council adopted the 2025 FTIP, the 2024 RTP/SCS Amendment #1, and the associated transportation conformity determinations on September 5, 2024.

The transportation conformity determinations for both the 2025 FTIP and the 2024 RTP/SCS Amendment #1 received federal approval on the same day, December 16, 2024.

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

SCAG reaffirms the latest applicable transportation conformity findings for the 2024 RTP/SCS as amended (<https://scag.ca.gov/sites/main/files/file-attachments/24-2987-final-amendment-01-connect-socal-2024.pdf>) and the 2025 FTIP (<https://scag.ca.gov/2025-ftip>) as previously amended.

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 2025 FTIP and 2024 RTP/SCS as amended, and reaffirming the process of interagency consultation and public participation.

SCAG has completed its analysis of the proposed changes to the 2025 FTIP as amended. SCAG's findings for the approval of this amendment are as follows:

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

The 30 projects needing transportation conformity reaffirmation in 2025 FTIP Amendment #25-15 are from 2024 RTP/SCS as amended, which is a conforming Plan. The 2025 FTIP Amendment #25-15 does not include any new regionally significant projects beyond those currently included in the 2024 RTP/SCS as amended, nor does it move a project across any modeling years currently assumed in the 2024 RTP/SCS as amended and the 2025 FTIP as amended; Furthermore, the design, concept, and scope of these 30 projects do not differ significantly from what were described in the 2024 RTP/SCS as amended and the 2025 FTIP as amended.

**Finding:** The 2025 FTIP Amendment #25-15 is consistent with the 2024 RTP/SCS as amended and the 2025 FTIP as amended.

#### **Regional Emissions Analysis**

This transportation conformity analysis relies on the regional emissions analysis for the 2025 FTIP which is identical to the regional emissions analysis for the 2024 RTP/SCS Amendment #1. The regional emissions analysis was performed with the SCAG Activity-Based Regional Travel Demand Model and utilized the latest planning assumptions, socioeconomic, transportation modeling, and emissions modeling, and regional emissions analysis for the 2025 FTIP as amended and the 2024 RTP/SCS Amendment #1. The 2025 FTIP Amendment #25-15 does not result in any modeling changes.

The regional emissions analysis methodology for the 2025 FTIP Amendment #25-15 uses applicable budgets to determine transportation conformity for all criteria pollutants. Specifically,

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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.

this conformity reaffirmation is being made for all criteria pollutants and precursors in the Mojave Desert Air Basin (MDAB), the SCCAB, the SCAB, and the Salton Sea Air Basin (SSAB).

**Finding:** The 2025 FTIP Amendment #25-15 regional emissions analysis for ozone precursors (NO<sub>x</sub>, ROG/VOC) [2008 and 2015 National Ambient Air Quality Standards (NAAQS)] are consistent with all applicable emission budget tests 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, 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 2025 FTIP Amendment #25-15 regional emissions analysis for CO are consistent with all applicable emissions budget tests for all milestone, maintenance, and planning horizon years in the SCAB.

**Finding:** The 2025 FTIP Amendment #25-15 regional emissions analysis for direct PM<sub>2.5</sub> (1997, 2006, and 2012 NAAQS) and its precursors are consistent with all applicable emissions budget tests for all milestone, attainment, and planning horizon years in the SCAB (Pechanga excluded under 2012 NAAQS).

**Finding:** The 2025 FTIP Amendment #25-15 regional emissions analysis for PM<sub>10</sub> and its precursors are consistent with all applicable emissions budget tests for all milestone, attainment, and planning horizon years in the SCAB and the SSAB (Riverside County Coachella Valley and Imperial County portions).

**Finding:** The 2025 FTIP Amendment #25-15 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 2025 FTIP Amendment #25-15 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 27 committed TCM projects and two TCM projects in the 2025 FTIP Amendment #25-15. The 2025 FTIP Amendment #25-15 does not change timely implementation of all applicable committed TCM projects in the SCAG region.

#### Fiscal Constraint Analysis

**Finding:** The 2025 FTIP Amendment #25-15 includes the most recent financial plan for the 2025 FTIP as amended. All projects listed in the 2025 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 2025 FTIP and 2024 RTP/SCS Amendment #1 complies with all federal and state requirements for interagency consultation and public involvement as documented in the Final 2025 FTIP Technical Appendix, Volume II of III (<https://scag.ca.gov/sites/main/files/file-attachments/23-3082-final-2025-ftip-technical-appendix.pdf>) and the Transportation Conformity Chapter of the 2024 RTP/SCS Amendment #1 (<https://scag.ca.gov/sites/main/files/file-attachments/24-2987-final-amendment-01-connect-socal-2024.pdf>). For the 2025 FTIP Amendment #25-15, SCAG will undergo additional public involvement including solicitation via email for comments from the Transportation Conformity Working Group. Furthermore, the 2025 FTIP Amendment #25-15 will be posted on SCAG's website ([www.scag.ca.gov/2025-ftip](http://www.scag.ca.gov/2025-ftip)) for a 10-day public review and comment period.

**Finding:** The 2025 FTIP Amendment #25-15 complies with all federal and state requirements for interagency consultation and public involvement.

### Overall

**Finding:** SCAG has determined that the 2025 FTIP Amendment #25-15 complies with all applicable federal transportation conformity requirements and regulations.