



**U. S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION**

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FEDERAL TRANSIT ADMINISTRATION

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Date: January 5, 2021

Reply To: HPR-ID/710.1

Mr. Brian Ness, Director
Idaho Transportation Department
P. O. Box 7129
Boise, Idaho 83707

Dear Mr. Ness:

**Subject: 2021-2024 Idaho Statewide Transportation Improvement Program
and TIP Air Quality Conformity Determinations**

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have reviewed the Idaho Transportation Department's (ITDs) 2021-2024 Statewide Transportation Improvement Program (STIP), submitted on November 25, 2020 for federal approval. In conjunction with the STIP approval, the FHWA and FTA have conducted a Federal Planning Finding review to determine that the proposed STIP is based on a transportation planning process which meets the requirements of 23 CFR Part 450 Subpart A, B and C, 49 U.S.C. Sections 5303-5305, and 23 U.S.C. Sections 134 and 135.

Prior to STIP approval, FHWA and FTA must determine that areas currently designated as nonattainment for national air quality standards, or which are operating under a Federally approved air quality maintenance plan can demonstrate that their transportation improvement programs (TIPs) conform to the state's air quality state implementation plan (SIP). Consistent with this requirement, FHWA and FTA have jointly determined that the 2021-2024 TIPs for the Community Planning Association of Southwest Idaho (COMPASS) and the Bannock Transportation Planning Organization (BTPO) conform to Idaho's SIP. In addition, it has been determined that there are no projects in Idaho's two rural nonattainment areas of Pinehurst and Franklin County which are subject to the Federal conformity requirements.

Based on a joint FHWA/FTA review of Idaho's 2021-2024 STIP we find that the program:

- identifies all proposed highway and transit projects in the State funded under Title 23 and the Federal Transit Act, including Federal Lands projects;

- is consistent with the State's adopted long-range statewide transportation plan;
- includes, without modification, the metropolitan transportation improvement programs approved by the respective metropolitan planning organizations and by ITD acting on behalf of the Governor or as delegated;
- includes in air quality non-attainment areas only projects determined to conform with the SIP;
- demonstrates adequate fiscal constraint;
- meets the requirements of 23 CFR 450.220 (project selection) for the projects listed in FY's 2021, 2022, 2023, and 2024;
- has been developed with adequate public involvement.

Conditions and clarifications for this STIP approval include the following:

- the Idaho STIP consists the program of projects identified in the Idaho Transportation Department's STIP document and the TIP documents of Idaho's five metropolitan planning organizations (MPOs).
- individual projects located within air quality non-attainment areas but outside of metropolitan planning areas and not air quality exempt or neutral are subject to conformity determination requirements;
- only the projects listed for FY's 2021 through 2024 of the ITD STIP and the MPOs' TIPs are included in this STIP approval;
- this action does not serve as an eligibility determination for Federal participation nor does it serve as a Federal approval action for programs or projects for which FHWA and FTA have no approval authority, including the State's rail and aeronautics programs;
- this STIP approval expires in four years or upon approval of a new STIP, whichever occurs first;
- this STIP may be amended consistent with the provisions of 23 CFR 450.

Based on our Federal Planning Finding Review, FHWA and FTA find that the projects in the 2021-2024 STIP are based on a transportation planning process that meets the federal planning requirements of Title 23 and 49 and, therefore, give joint approval of Idaho's 2021-2024 STIP.

There are two corrective actions and a recommendation associated with this year's Planning Finding and this approval is subject to the conditions specified in the Planning

Finding (See Attachment A).

For questions on this approval, please contact Mr. Scott Frey, FHWA – Idaho at (208) 334-9180, extension 115; scott.frey@dot.gov or Ned Conroy, FTA Region 10 at (206) 220-4318; ned.conroy@dot.gov.

Sincerely yours,

Peter J. Hartman
Division Administrator
Federal Highway Administration

Linda M. Gehrke
Regional Administrator
Federal Transit Administration

ATTACHMENT A

A Federal Planning Finding For The Idaho Transportation Department's 2021-2024 STIP

A Federal Planning Finding is a formal action taken by the FHWA and FTA to ensure that STIPs and TIPs are developed according to Statewide and metropolitan transportation planning processes that are consistent with statutory and regulatory planning and related provisions. A planning finding is a determination that the projects in the STIP (including projects from TIPs) are based on a planning process that substantially meets the requirements of Title 23 and Title 49. The finding serves as an opportunity to highlight areas that need improvement in a Statewide or metropolitan transportation planning process and is a prerequisite to FTA/FHWA approval of the STIP.

The FHWA and FTA review of the STIP and planning processes is based on overseeing and participating in the State and MPOs' transportation planning programs. FHWA and FTA reviewed the various planning activities and programs with a focus on areas in need of improvement. This allows us to assess the progress made by the State on recommendations and correction actions from the previous Federal Planning Finding and our observations and experiences during FY2020 in the oversight and administration of Idaho's transportation planning program.

Progress on 2020 Corrective Actions:

The Planning Finding for the 2020 STIP identified the following two corrective actions:

1. Kootenai Metropolitan Planning Organization (KMPO) Update to its Metropolitan Transportation Plan (MTP): During 2020 KMPO satisfactorily completed an update and adoption of its 2020-2040 MTP.
2. Transportation Performance Management (TPM) Coverage in the KMPO and Bonneville Metropolitan Planning Organization (BMPO) TIPs: The TIPs for the KMPO and the BMPO address the Federal Transportation Performance Management (TPM) requirements in their TIPs. *The KMPO coverage of this topic is excellent. The BMPO coverage, however, requires further efforts towards addressing this requirement in the 2022 TIP.*

2021 Corrective Actions and Recommendation:

The Planning Finding for the 2021 STIP identifies the following two corrective actions and recommendation:

Corrective Actions

1. TPM Coverage in the BMPO TIP: The TIP for the Bonneville Metropolitan Planning Organization does not fully address the Federal Transportation Performance Management (TPM) requirements and expectations of 23 CFR 450.326(d). Improvement upon this will be expected for the next TIP submittal (See Attachment B for guidance on TPM).
2. Pavement Performance Data – National Highway System (NHS) Non-Interstate Highways: The 2020 Highway Performance Monitoring System (HPMS) submittal was determined to have more than the maximum allowable missing, incomplete, or unresolved (MIU) data entries for the pavement condition on the non-Interstate portion of the State’s National Highway System. Corrective measures to address this FHWA data reporting requirement will be necessary in advance of the end of the next TPM reporting submittal in October 2022.

Recommendation

1. Oversight of the Statewide and Metropolitan Planning Programs: ITD should continue its efforts in 2021 to further its support of the MPOs’ planning program activities including the Unified Planning Work Program (UPWP) development, air quality conformity, transportation performance management, TIP/STIP coordination, and other metropolitan planning requirements.

ATTACHMENT B

Guidance For Addressing FHWA's TPM Requirements In The STIP, TIPs, AND MTPs

By: R. Scott Frey, FHWA-Idaho
Date: September 3, 2019

BACKGROUND:

STIPs, TIPs, and Metropolitan Transportation Plans (MTPs) adopted after May 19, 2019 must include information which satisfactorily addresses FHWA's Transportation Performance Management (TPM) requirements, detailed in 23 CFR 450.218, 450.324, and 450.326, as follows:

23 CFR 450.218 – Development and content of the statewide transportation improvement program (STIP):

(q) A STIP shall include, to the maximum extent practicable, a discussion of the anticipated effect of the STIP toward achieving the performance targets identified by the State in the statewide transportation plan or other State performance-based plan(s), linking investment priorities to those performance targets.

23 CFR 450.326 - Development and content of the transportation improvement program (TIP):

(d) The TIP shall include, to the maximum extent practicable, a description of the anticipated effect of the TIP toward achieving the performance targets identified in the metropolitan transportation plan, linking investment priorities to those performance targets.

23 CFR 450.324 Development and content of the metropolitan transportation plan

(f) The metropolitan transportation plan shall, at a minimum, include:

(3) A description of the performance measures and performance targets used in assessing the performance of the transportation system in accordance with §450.306(d).

(4) A system performance report and subsequent updates evaluating the condition and performance of the transportation system with respect to the performance targets described in §450.306(d), including—

(i) Progress achieved by the metropolitan planning organization in meeting the performance targets in comparison with system performance recorded in previous reports, including baseline data; and

(ii) For metropolitan planning organizations that voluntarily elect to develop multiple scenarios, an analysis of how the preferred scenario has improved the conditions and performance of the transportation system and how changes in local policies and investments have impacted the costs necessary to achieve the identified performance targets.

Additional guidance concerning FHWA's intentions and expectations with respect to the above is provided in the following excerpts from FHWA's Transportation Performance Management

(TPM) website (<https://www.fhwa.dot.gov/tpm/faq.cfm>):

Q. How much detail must the State or MPO include in the STIP/TIP to discuss "to the maximum extent practical" the effect of the STIP/TIP on the achievement of targets to meet the requirements of 23 CFR 450.218(q) for States and 23 CFR 450.326(d) for MPOs?

A. States must describe in the STIP how the program of projects in the STIP contributes to achievement of the performance targets identified in the LRSTP or other State performance-based plan(s), linking investment priorities to those targets. Similarly, MPOs must describe in the TIP how the program of projects contributes to achieving the MPO's performance targets in the MTP, linking investment priorities to those targets. This assessment should be a written narrative included in the documents. The narrative descriptions in the STIPs and TIPs should include a description of how the other performance based planning and programming documents are being implemented through the STIP and TIPs. For example, the narrative should describe how the objectives, investment strategies, performance measures and targets from the asset management plans, strategic highway safety plan (SHSP), highway safety improvement program (HSIP), freight plan, Congestion Mitigation and Air Quality (CMAQ) Performance Plan(s) [23 U.S.C. 149(l)], Congestion Management Process (CMP), and other performance based plans are being implemented through the program of projects in the STIP or TIP. The narrative should specifically describe these linkages and answer these questions: Are the projects in the STIP and TIPs directly linked to implementation of these other (performance based) plans? How was the program of projects in the STIP/TIP determined? Does the STIP/TIPs support achievement of the performance targets? How does the STIP/TIP support achievement of the performance targets? Are the STIP/TIPs consistent with the other performance based planning documents (asset management plans, SHSP, HSIP, freight plan, CMAQ Performance Plan, CMP, etc.)? How was this assessment conducted? What does the assessment show?

Q. What must be included in the LRSTP and MTP in order to comply with the requirements of 23 CFR 450.216(f) for States and 23 CFR 450.324(f)(3-4) for MPOs? How much of this information is needed at the end of the transition period for each of FHWA's performance measures rules?

A. States and MPOs must include a description of the individual performance measures and targets for those measures for LRSTPs or MTPs adopted on or after the dates described in the response to the first Planning Requirements question. In addition to including performance measures and targets in the LRSTP or MTP, States and MPOs must each include a system performance report at the time of adoption. That report must include an evaluation of system performance with respect to the performance targets. Note that in the systems performance report in the LRSTP, States must also describe progress achieved by the MPOs in meeting the MPO performance targets in comparison with system performance recorded in previous reports. [23 CFR 450.216(f)(2); 23 CFR 450.324(g)] For MPOs that voluntarily elect to develop multiple scenarios when developing the MTP, the MPO must conduct an analysis as part of the systems performance report on how the preferred scenario has improved the conditions

and performance of the transportation system and how changes in local policies and investments have impacted the costs necessary to achieve the identified performance targets. [23 CFR 450.324(f)(4)(ii)]

STRATEGIES FOR FULFILLING THE TPM REQUIREMENTS OF THE STIP, TIPS, AND MTPS:

(Note: The following reflects the situation in Idaho where all MPOs have elected to support the State's targets rather than establishing targets of their own.)

STIP:

1. A summary of the Federal performance measures applicable to the State.
2. A graphical representation of the State's baseline conditions, targets, and progress towards attainment of its targets for each of the applicable Federal performance measures as currently displayed on FHWA's TPM website at the following link: [FHWA's State Performance Dashboard and Reports website](#) . Alternatively, referencing of this information accompanied by a link to FHWA's website is acceptable.
3. A narrative description of how the program of projects was selected and, specifically, how the Federal performance measures we're taken into consideration in the identification, prioritization, and selection of the projects.
4. A comment or other indication in each project description (e.g., by footnote reference) identifying those performance measures positively affected by the implementation of the project.
5. The approximate level of funding, by fiscal year, which the program will be applied towards each of the Federal performance measures applicable to the State (with the understanding that most projects serve multiple measures and, therefore, introduce "double counting" of the funding in this approach).

TIP:

1. A summary of the Federal performance measures applicable to the MPO
2. A graphical representation of the State's baseline conditions, targets, and progress towards attainment of its targets for each of the applicable Federal performance measures as currently displayed on FHWA's TPM website at the following link: [FHWA's State Performance Dashboard and Reports website](#) . Alternatively, a summary description of this information accompanied by a link to FHWA's website is acceptable.
3. A narrative description of how the program of projects was selected and, specifically, how the Federal performance measures, applicable to the MPO, we're taken into consideration in the identification, prioritization, and selection of the projects.
4. A comment or other indication for each project description (e.g., by footnote reference) identifying those performance measures positively affected by the implementation of the project. Alternatively, a summary table (matrix) could be used to indicate, for each project in the TIP, which performance measure(s) will be positively affected.

5. The approximate level of funding, by fiscal year, which the TIP will apply towards each of the Federal performance measures applicable to the MPO (with the understanding that most projects serve multiple measures and, therefore, introduce “double counting” of the funding by this approach).

MTP:

1. A graphical representation of the State’s baseline conditions, targets, and progress towards attainment of its targets for each of the applicable Federal performance measures as currently displayed on FHWA’s TPM website at the following link: [FHWA’s State Performance Dashboard and Reports website](#) . Alternatively, a summary description of this information accompanied by a link to FHWA’s website is acceptable.
2. A summary of the MPO’s current conditions for each of the applicable Federal performance measures.