



**U. S. DEPARTMENT OF TRANSPORTATION**

**FEDERAL HIGHWAY ADMINISTRATION  
IDAHO DIVISION**

3050 LAKEHARBOR LANE, SUITE 126  
BOISE, IDAHO 83703-6217

**FEDERAL TRANSIT ADMINISTRATION**

915 SECOND AVENUE, SUITE 3192  
SEATTLE, WA 98174

January 30, 2024

Reply To: HPR-ID

Mr. Scott Stokes, Director  
Idaho Transportation Department  
P. O. Box 7129  
Boise, ID 83707

Dear Mr. Stokes:

**Subject: 2024-2027 Idaho Statewide Transportation Improvement Program and TIP Air Quality Conformity Determinations**

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) reviewed the Idaho Transportation Department's (ITDs) 2024-2027 Statewide Transportation Improvement Program (STIP), submitted on December 22, 2023, for federal approval in accordance with 23 CFR 450 Subpart A, B and C, 49 U.S.C. Sections 5303-5305 and 23 U.S.C. Sections 134 and 135.

In conjunction with the STIP approval, the FHWA and FTA conducts a Federal Statewide Planning Finding, which is a formal action taken by the FHWA and FTA to ensure that STIP is developed according to statewide and metropolitan transportation planning processes consistent with statutory and regulatory planning provisions outlined in Title 23 and Title 49. The Finding serves as an opportunity to highlight areas that need improvement in statewide and metropolitan transportation planning processes and is a prerequisite to FTA/FHWA approval of the STIP.

In addition, this review also includes a determination on whether 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 2024-2027 TIP for the Bannock Transportation Planning Organization (BTPO) conforms to Idaho's SIP. Please note that transportation conformity rules may apply to any projects in non-attainment or maintenance areas

that are not exempt projects per 40 CFR § 93.126 and 40 CFR § 93.128. Requirements regarding project-level conformity may be found in 40 CFR § 93.104(d).

Based on a joint FHWA/FTA review of Idaho's 2024-2027 STIP and the overall statewide and metropolitan transportation planning process, 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 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,
- in air quality non-attainment areas, only includes projects determined to conform with the SIP,
- meets the requirements of 23 CFR 450.220 (project selection) for the projects listed in each program year, and
- was developed with adequate public involvement.

Based on our review, FHWA and FTA find that the 2024-2027 STIP is based on a transportation planning process that substantially meets the federal planning requirements of Title 23 and 49 and, therefore, give joint approval, subject to the corrective actions identified in the attached 2024 Idaho Statewide Planning Finding.

For questions on this approval, please contact Maureen H. Gresham, FHWA Idaho at (208) 617-2140; [mgresham@dot.gov](mailto:mgresham@dot.gov) or Ned Conroy, FTA Region 10 at (206) 220-4318; [ned.conroy@dot.gov](mailto:ned.conroy@dot.gov).

Sincerely,

DUSTIN PATRICK  
WOODS

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SUSAN KAY  
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For Peter J. Hartman  
Idaho Division Administrator  
Federal Highway Administration

Susan Fletcher  
Regional Administrator, Region 10  
Federal Transit Administration

Attachment

cc: KMPO, LCVMPPO, COMPASS, BMPO, BTPO, MVMPO

## Attachment

# 2024 Idaho Statewide Planning Finding

### Introduction

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) are required under 23 CFR 450.220(b), to document and issue a Federal Planning Finding in conjunction with the approval of the Statewide Transportation Improvement Program (STIP). The Federal Planning Finding verifies that the development of the STIP is consistent with the provisions of both the Statewide and Metropolitan transportation planning requirements of 23 U.S.C. 134, 135; 49 U.S.C. 5303-5305; 23 CFR parts 450 and 500, and 49 CFR part 613. This report substantiates the issuance of the FHWA/FTA Federal Planning Finding to support FHWA/FTA approval of the STIP based on the review of STIP and TIP documents, statewide and metropolitan planning self-certification statements (23 CFR 450.220; 23 CFR 450.336), and related supporting documentation.

This Planning Finding includes an assessment of progress on the Corrective Actions identified in the 2023 Planning Finding as well as new Recommendations. Corrective Actions are items that do not meet statutory and regulatory requirements and require action by the State and/or MPOs. Recommendations are items that generally meet the statutory and regulatory requirements but represent opportunities to improve the transportation planning processes to meet federal requirements more fully.

FHWA and FTA commends the ITD staff on progress made toward addressing the 2023 Federal Findings. FHWA/FTA acknowledges that ITD has generally addressed a number of 2023 Corrective Actions, however further action is needed in several areas.

FHWA and FTA will continue to work with ITD and other relevant partner planning agencies on a regular basis to monitor progress and provide technical guidance and support to address the corrective actions and recommendations identified below. This coordination will include monthly meetings during the development of the draft STIP and other planning related activities. This assistance may include the delivery of training and/or educational opportunities for the state, if warranted.

***Based on our review documented on the following pages, the FHWA and FTA find that the STIP meets, subject to corrective actions, the requirements of U.S.C. 134, 135; 49 U.S.C. 5303-5305; 23 CFR part 450 and 500, and 49 CFR part 613. In addition, FHWA and FTA offer recommendations for improvement to support the State and MPO planning processes.***

## **2024 Federal Planning Findings**

### **Corrective Actions**

The following corrective actions are carried over from the previous year. Although progress was made on each corrective action, more work is needed to fully meet federal planning requirements.

#### **MPO Agreements**

A corrective action from the 2023 Finding required ITD to update the Metropolitan Planning Organization (MPO) Agreements to correct outdated information and clearly outline roles and responsibilities in carrying out the metropolitan transportation planning process per 23 CFR 450.314 and 450.332(b). Progress has been made on the development of the MPO Agreements, but agreements have not been completed and ITD has requested an extension. FHWA/FTA approves the requested extension to complete the agreements by March 1, 2024.

#### **Federal Land Management Agencies /Tribal Governments**

To address a 2023 corrective action, ITD initiated further coordination to build on existing mechanisms to coordinate with Federal Land Management Agencies (FLMA) and Tribal Governments. However, these processes are not well documented, and it is not clear that the coordination process meets regulations per 23 CFR 450.218(d)). ITD needs to clearly outline their process for engaging Federal Land Management Agencies and Tribal Nations beyond activities with the Federal Land Access Program and the process for incorporating the Federal Lands and the Tribal TIPs into the STIP prior to the development of the next draft STIP.

#### **Civil Rights/Americans with Disability Act (ADA)**

As part of the 2023 Planning Finding, FHWA/FTA required that ITD develop a process to maintain accessible features for curb ramps and sidewalks in operable working condition to address ADA requirements. ITD has included provisions for the maintenance of accessible features into a draft ADA Transition Plan. However, that plan is not officially adopted/approved and additional comments still need to be addressed. ITD must adopt the ADA Transition Plan by July 1, 2024, in compliance with 28 CFR 35.150(d), after addressing the comments provided previously by FHWA.

### **Recommendations**

Below are recommendations identified by FHWA and FTA to improve the federally required transportation planning process conducted in Idaho. A number of these recommendations are new and others are carried forward from 2023 to further expand on on-going improvements.

#### **STIP Development and Content**

Although progress has been made, improvements to the STIP development, content, and submittal process are still needed. FHWA/FTA recommends that ITD conduct a review of all processes related to the STIP to ensure conformance with federal regulations, including but not limited to public involvement, project listings and descriptions, development timeframe, equity

analysis, financial constraint, project identification, and performance-based planning. FHWA/FTA offers to meet regularly with ITD in this review to evaluate current practices and identify improvements. New practices should be documented to ensure that refined STIP development practices are followed in the future.

### **Public Involvement**

As part of the update to the Public Involvement Plan, ITD should clarify and update the public involvement processes that support the STIP development, per 23 CFR 450.210. The process should ensure that the STIP documentation available for public review is consistent with the final documentation submitted to FHWA/ FTA for approval. ITD should also consider revisions to the Local Non-Metropolitan Elected Officials Consultation Guide to clarify the discrete role of rural local governments provided for by regulation. ITD should clearly identify their process for seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority populations. Finally, for future STIP updates, ITD needs to provide FHWA/FTA documentation of input is received, how meetings were advertised, how traditionally underserved/underrepresented populations were engaged, and how was the local nonmetropolitan elected official process differed from the regular public involvement.

### **Performance Management**

ITD and MPOs have made progress toward addressing performance-based and planning program (PBPP) requirements per 23 CFR 450.306(d). However, improvements should continue to be made, including expanding the analysis and discussion of the anticipated effect of the STIP toward achieving the identified performance targets per 23 CFR 450.218 (q) and incorporating transit safety targets and greenhouse gas as part of the analysis. The STIP analysis should build on the performance-based planning goals, objectives, and targets established as part of the Statewide long-range transportation plan per 23 CFR 450.206 (c). Further, please note that State DOTs are now required to establish and report 4-year targets in the State Initial Greenhouse Gas (GHG) Report, due no later than February 1, 2024.

### **MPO Coordination**

FHWA/FTA acknowledges the improvements made to enhance MPO oversight and coordination activities. To further this effort, FHWA/FTA recommends that ITD develop and document procedures and protocols for continued support of MPOs. These procedures should address the process for review of air quality conformity determinations, coordination of UPWP review and approval, TIP/STIP coordination, and overall expanded oversight of MPO progress toward meeting federal planning requirements.

### **Urban Boundaries**

ITD should complete the urban boundary adjustment process, no later than December 2024 to ensure that time is available to address programmatic requirements associated with updates to the Highway Performance Management System (HPMS), functional classification, STIP

program funding related to population and/or functional classification, outdoor advertising requirements, and freight corridor designations. Each of those have their own approval timeframe requirements. Please note the urban boundaries affect the April 15<sup>th</sup> and June 15<sup>th</sup> HPMS data submissions for the following year and need to conform to the approved urban area boundary.

### **Long Range Transportation Plan (LRTP)**

FHWA/FTA notes that the current LRTP is four years old. It is a state planning best practice to up these plans every five years. FHWA/FTA encourages ITD to begin preparing to for a LRTP update process. Please note that FHWA/FTA is available to help organize workshops/peer exchanges on LRTP development as well as best practices on equity analysis, visualization techniques, and addressing security, resiliency, and other related planning factors/strategies.

### **Bicycle/Pedestrian Planning and Complete Streets**

As noted in a recent State Planning and Research (SPR) Work Program Amendment approval, ITD is not conducting sufficient bicycle and pedestrian planning activities or conducted the required Complete Street activities over the past year. FHWA/FTA encourages ITD to expediate the replacement of the required Statewide Bicycle and Pedestrian Coordinator to facilitate progress in these areas.