



U. S. DEPARTMENT OF TRANSPORTATION

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December 12, 2025

Reply To: HPR-ID

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

Dear Mr. Stokes:

Subject: 2025-2028 Idaho Statewide Transportation Improvement Program and TIP Air Quality Conformity Determination

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) reviewed the Idaho Transportation Department's (ITDs) 2025-2028 Statewide Transportation Improvement Program (STIP), submitted on November 14, 2024, 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 2025-2028 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 2025-2028 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 2025-2028 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. Please see the attached Federal Finding for recommended actions for continued improvement.

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

Sincerely,

Peter J. Hartman
Idaho Division Administrator
Federal Highway Administration

Susan Fletcher
Regional Administrator, Region 10
Federal Transit Administration

cc:
FHWA: Maureen Gresham
FTA: Ned Conroy
MPOs: BMPO, BTPO, COMPASS, KMPO, LCVMPPO, MVMPO

Attachment

2025 Idaho Federal Planning Finding on the Statewide and Metropolitan Planning Process

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 2024 Planning Finding as well as new or ongoing 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 2024 Corrective Actions and acknowledges that ITD has satisfactorily addressed these requirements.

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 for the recommendations identified below. This coordination will, at minimum, include an assessment of the public involvement activities conducted to support the STIP at key decision making points in the process, monitoring MPO coordination activities on a quarterly basis, and monitoring the functional classification update process on a monthly basis. This assistance may also 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 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 from the 2024 Federal Planning Finding

Below is an assessment of corrective actions included in the previous 2024 Federal Planning Finding to determine the level of completion toward full compliance with Federal planning regulations.

MPO Agreements – *Resolved*

A corrective action from the 2024 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). ITD has successfully updated each MPO Agreement.

Federal Land Management Agencies /Tribal Governments – *Resolved*

To address a corrective action from the 2024 Finding, ITD initiated further coordination to build on existing mechanisms to coordinate with Federal Land Management Agencies (FLMA) and Tribal Governments and documented that coordination in the 2025-2027 STIP to address 23 CFR 450.218 (d). FHWA/FTA expects continued engagement with these agencies and looks forward to reviewing the updated Public Involvement Program for engagement mechanisms with these entities, once completed.

Civil Rights/Americans with Disability Act (ADA) – *Resolved*

As part of the 2024 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 included provisions for the maintenance of accessible features into a draft ADA Transition Plan and submitted the plan for FHWA acceptance in compliance with 28 CFR 35.150 (d)

2025 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 the 2024 Finding to further expand on on-going improvements.

STIP Development and Content

The current process for STIP development allows for a 2-to-3-month delay in submitting the STIP to FHWA/FTA for approval. FHWA/FTA recommends ITD re-evaluate this process and schedule to better align with adoption of the Idaho Transportation Improvement Program (ITIP) and MPO TIPs. This will provide for a more transparent process to the public.

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 it 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.

Functional Classification

ITD should complete the functional classification update process, no later than December 2026 to ensure that time is available to address programmatic requirements associated with updates to the Highway Performance Management System (HPMS), 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 functional classification updates affect the April 15th and June 15th 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, adopted in 2019, is five years old. Although not a federal requirement, it is a state planning best practice to update these plans every five years. FHWA/FTA encourages ITD to begin preparing 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

FHWA/FTA notes that ITD has progressed with bicycle/pedestrian and complete street activities with the replacement of the required Statewide Bicycle and Pedestrian Coordinator and, as outlined in the SPR Work Program, intends to move forward with Complete Street activities with the adoption of a policy and inclusion of complete street activities in their Long Range Plan. FHWA/FTA encourages ITD to explore best practices in other states and is available to assist in that endeavor.