

Air Quality Conformity Determination For The SKATS FY 2024-2029 Transportation Improvement Program

Healthy Air

Following passage of the federal Clean Air Act Amendments in 1990, the Salem-Keizer area was designated as a non-attainment area for the carbon monoxide (CO) and 1-hour ozone (O3) national ambient air quality standards (NAAQS). However, monitoring data since that time has shown that pollutant levels are decreasing.

Carbon Monoxide Status

Previously, the CO monitor for the SKATS region was located at Market Street and Lancaster Drive. The CO monitor had been located there in the past to ensure that measurements were being made in the location of highest CO concentrations prior to a re-designation effort. No violations of the carbon monoxide standard were recorded between 1984 and 2003, and the last exceedance was in 1993⁹. Based on this history of clean air, the Oregon Department of Environmental Quality (DEQ) removed the CO monitor in 2006 and developed a Carbon Monoxide Limited Maintenance Plan for the SKATS region, which was submitted to the US Environmental Protection Agency (EPA) in 2007 and went into effect March 2, 2009¹⁰. As an area with a limited maintenance plan, SKATS is no longer required perform a regional emissions analysis for CO but still must demonstrate conformity as discussed below.

Ozone Status

Effective June 15, 2004, EPA formally designated the entire state of Oregon “unclassifiable/attainment” for the 8-hour ozone NAAQS.

Federal and State Regulations

The U.S. Congress approved amendments to the Clean Air Act (CAAA) on November 15, 1990. Shortly thereafter, urban air sheds were tested and classified on the basis of their attainment or non-attainment to national ambient air quality standards. The area encompassed by the SKATS boundary was designated as a non-attainment area for carbon monoxide (CO) and ozone (O3).

The U.S. Environmental Protection Agency (EPA) and the U.S. Department of Transportation (USDOT) issued the final rule for CAAA conformity on November 24, 1993 (40 CFR Parts 51 and 93), which included rules for regional emissions analyses of transportation improvement programs (TIPs) and transportation plans in the interim

⁹ An exceedance of the standard can happen on one day. A violation of the standard is based on multiple observations. An official violation is classified as three exceedances at a monitor.

¹⁰ Salem-Keizer Area Carbon Monoxide Limited Maintenance Plan, State Implementation Plan Volume 2 Section 4.57, June 4, 2007 Oregon Department of Environmental Quality. (EPA Approval is located at 73 FR 79655. See: <https://www.govinfo.gov/content/pkg/FR-2008-12-30/pdf/E8-30825.pdf#page=1>.)

period before approval of a revised State Implementation Plan (SIP)¹¹. The State of Oregon's Environmental Quality Commission adopted *Criteria and Procedures for Determining Conformity to State or Federal Implementation Plans of Transportation Plans, Programs, and Projects Funded or Approved Under Title 23 U.S.C. or the Federal Transit Act* (hereafter referred to as the Transportation Conformity), OAR 340-20-710 through 340-20-1080, in March 1995. The rule was last revised in 2010 under OAR 340-252-0010 to 340-252-0230, Transportation Conformity.

The transportation conformity rule requires that transportation plans, programs, and projects conform to state air quality implementation plans (SIPs) and establishes the criteria and procedures for determining whether or not they do conform. Conformity means that transportation activities will not produce new air quality violations, worsen existing violations, or delay timely attainment of the national ambient air quality standards.

Since 1993, EPA finalized several amendments to the transportation conformity rule. The first set of amendments was published on August 7, 1995 (60 FR 40098), a second set on November 14, 1995 (60 FR 57179), and a third set on August 15, 1997 (62 FR 43780). In particular, the third set of rules increased the flexibility of demonstrating conformity for areas not required to submit SIP, such as SKATS (see next section for details).

In 1997, EPA revised the primary ozone standard from the 1-hour to an 8-hour standard. On April 30, 2004, EPA finalized the rules (69 FR 23951) that revoked the 1-hour ozone standard one year after the effective date of 8-hour ozone nonattainment designations. In accordance with EPA's April 30, 2004 final rule, conformity for the 1-hour standard will no longer apply in existing 1-hour nonattainment and maintenance areas once the standard and corresponding designations are revoked.

On July 1, 2004, new transportation conformity amendments were finalized (69 FR 40004) that: include criteria and procedures for the new 8-hour ozone and fine particulate matter (PM_{2.5}) national ambient air quality standards (NAAQS); address conformity requirements for 1-hour non-attainment areas that are in attainment of the 8-hour ozone standards (such as SKATS); contain conformity rules that implement the March 2, 1999 court decision when conformity lapses occur; and include a few miscellaneous revisions to clarify the existing regulation and improve implementation.

On December 22, 2006, the DC Court of Appeals struck down the 8-hour ozone standard, stating that EPA had violated the Clean Air Act in relaxing the limits. Later decision by the court clarified the ruling, and the State of Oregon is still designated as attainment for ozone.

In 2008, EPA modified federal rules to require states to adopt only parts of the conformity rules as state regulations. Passages that pertain to Oregon-specific conditions, such as those describing interagency consultation and any requirements that are more restrictive

¹¹ For more information see: <https://www.epa.gov/state-and-local-transportation/transportation-conformity-chronological-list-rulemakings>

than federal minimum standards were required to be retained as state rules. In response to the federal changes, in February 2010, the Oregon Environmental Quality Commission repealed state rules that simply duplicated federal measures, allowing the federal measures to govern. The changes to the state conformity rules were submitted to EPA and were approved in 2012 as a revision to the State Implementation Plan.

Transportation Conformity as it Applies to the SKATS Area

According to federal rules, while areas with approved limited maintenance plans are not required to perform a regional emission analysis, they are required to demonstrate conformity of the transportation plans as stated in 40 CFR part 93, subpart A. These requirements, and how SKATS is meeting them in regard to the SKATS FY 2024-2029 TIP, are presented below. A more detailed discussion is presented in **AQCD Appendix 1**.

- a) Transportation plans and projects provide for timely implementation of SIP transportation control measures (TCMs) in accordance with 40 CFR 93.113;
 - 1. There are no TCMs identified in the SIP for the SKATS area.
- b) Transportation plans and projects comply with the fiscal constraint element per 40 CFR 93.108;
 - 1. As required by federal regulations, the SKATS FY 2024-2029 TIP¹² is financially constrained, containing only those projects that funds are identified for or 'reasonably expected' to be available over the time frame of the plans.
 - 2. The financial constraint assumptions developed for the SKATS FY 2024-2029 TIP are shown in **Table 12** through **Table 16**: Summary of Total Revenue and Expenditures by Fund FY 2024-2027.
- c) The MPO's interagency consultation procedures meet applicable requirements of 40 CFR 93.105;
 - 1. The equivalent State Rule is OAR 340-252-0060.
 - 2. A draft of this document was circulated to ODOT, EPA, Oregon DEQ, FHWA, and FTA prior to adoption. The draft was sent to the group on January 17, 2023. In addition, a document explaining the reasons for updating the TIP was included.
 - 3. An interagency consultation was held on February 15, 2023, to discuss the TIP project list and the draft AQCD document. Questions about the projects were addressed and meeting notes are attached in **Appendix 2**. It was decided by all present (federal and state representatives) to consider the OR 22W project (Rickreall Rd to Doaks Ferry Rd KN 13188) as **non-exempt** based on what the project will be instead of the current phase. The list of projects included in the SKATS FY 2024-2029 TIP are attached as **Appendix 3**.

¹² The TIP is available at: <https://www.mwvcog.org/programs/transportation-planning/skats/planning-programs/transportation-improvement-program-tip/>

4. No additional comments were received during the public review period and public hearing.
- d) Conformity of transportation plans is determined no less frequently than every four years, and conformity of plan amendments and transportation projects is demonstrated in accordance with the timing requirements specified in 40 CFR 93.104;
 1. The previous conformity determination for the FY 2021-FY 2026 TIP was adopted on May 26, 2020, amended on August 24, 2021 and conformed by USDOT on October 28, 2021.
- e) The latest planning assumptions and emissions model are used as set forth in 40 CFR 93.110 and 40 CFR 93.111;
 1. As of March 2, 2009, SKATS is not required to perform regional emissions modeling as part of the conformity process. Thus, no emissions modeling was performed as part of this TIP Update.
- f) Projects do not cause or contribute to any new localized carbon monoxide or particulate matter violations, in accordance with procedures specified in 40 CFR 93.123; and
 1. Projects included in the SKATS FY 2021-2026 TIP that are required to perform hot spot analysis will have this conducted by the project sponsors during the appropriate phase of the project.
- g) Project sponsors and/or operators provide written commitments as specified in 40 CFR 93.125.
 1. Project sponsors and operators will conform to the CAA requirements.

AQCD Appendix 1: Supplemental Conformity Checklist

Response to the applicable conformity criteria and procedures as they apply to the amended SKATS FY 2021-2026 TIP, as per State of Oregon conformity rules (OAR 340-252-0010 et seq.), is made in the following text. This checklist is provided to assist in the state and federal review of this conformity determination and the consultation requirements of OAR 340-252-0060.

1. Conformity Requirements

40 CFR 93.014: Frequency of Conformity Determinations

A new transportation plan must be found to conform before the plan is approved by the MPO or accepted by USDOT. The conformity determination for the current SKATS plan (2019-2043 Regional Transportation Systems Plan) was adopted on May 28, 2019 and was approved/acknowledged by USDOT on March 2, 2020 (*see letter in Appendix 2*). The conformity determination marked the beginning of the four-year cycle of conformity for the RTSP.

A new TIP must be demonstrated to conform before the TIP is accepted by USDOT, and the TIP must be updated no less frequently than every four years. The current MTIP, FY 2021-2026, was adopted on May 26, 2020, amended on August 24, 2021, and conformed by USDOT on October 28, 2021 (*see letter in Appendix 2*). The conformity determination marked the beginning of the four-year cycle under federal rules.

OAR 340-252-0060 and 40 CFR 93.105: Consultation

Federal, state, and local interagency consultation are required before making conformity determinations. See the response to OAR 340-252-0060 and 40 CFR 93.112 below for details of the consultation carried out for this conformity determination.

The Salem-Keizer Area Transportation Study (SKATS) MPO is the lead agency responsible for making the conformity determination for the RTPs and TIPs, RTP amendments, TIP amendments, performing transportation modeling, regional emissions analyses, and preparing and distributing the draft and final documents. The MPO is the agency responsible for assuring the adequacy of the interagency consultation. The SKATS Technical Advisory Committee (TAC) is designated under this regulation as the standing committee for the purposes of consultation on air quality. Members of the SKATS TAC include representatives of the City of Salem, City of Keizer, City of Turner, Marion County, Polk County, Salem Area Mass Transit District, Salem-Keizer School District, Oregon Department of Land Conservation and Development, Oregon Department of Transportation, Oregon Department of Environmental Quality, and FHWA. This committee currently meets monthly. The meetings are open to the public.

As described in more detail in the response to OAR 340-252-0060 and 40 CFR 93.112 below, MPO staff conferred with TAC members, consulted other state and federal agencies on development of the conformity determinations, and provided public notices on the TIP

Update and conformity determination. This conformity determination is based on processes developed in 2007 during the conformity determination of the 2031 RTSP and FY 08-FY 11 TIP, and that had been used for all subsequent updates and amendments to the SKATS RTSP and TIP.

40 CFR 93.106: Content of Transportation Plans

The SKATS 2023-2050 RTSP describes the recommended and fiscally constrained transportation system up to the 2050 horizon year. Chapter 7 and Appendix A of the RTSP documents the employment and population projections and land use allocations by jurisdiction to 2050. The population forecasts are developed by the Population Research Center at Portland State University and are coordinated with the local jurisdictions through a Land Use Subcommittee of the TAC for use in the RTSP, TIP, and conformity determinations. The projections for the population and employment in the area were made for the new horizon year of 2050.

The highway and transit projects described within the MTP are divided into “Recommended” and “Illustrative” categories (*see Table 7-3 and Appendix I*). All projects are sufficiently identified by description and location to ensure adequate modeling of capacity, routes, and speeds. Transit operations described in Chapter 4 of the MTP reflect the system as of early 2023, which includes service on weekday evenings, Saturdays, and Sundays. As such, the Plan recommends continuation of this level of transit service where existing demand exists, and future service increases in service coverage, types, and frequencies including projects such as the bus replacement, and ITS applications.

See additional information in response to 40 CFR 93.110 below.

40 CFR 93.108: Fiscal Constraints for the Transportation Plans and TIPs

The financial constraint assumptions developed for the amended SKATS FY 2024-2029 TIP are documented in **Table 12** through **Table 16**: Summary of Total Revenue and Expenditures by Fund FY 2024-2027.

2. Criteria and Procedures for Determining Conformity

40 CFR 93.109: General

In order to demonstrate conformity of a transportation plan and/or TIP, specific criteria listed in OAR 340-252-0110 through 340-252-0200 (40 CFR 93.110 through 93.119) must be addressed. These criteria include using the latest planning assumptions and the latest emissions model and undertaking interagency consultation and public involvement. Responses to the criteria are listed below.

As of June 15, 2005, the SKATS area is not required to show conformity for HC and NO_x, the precursors to ozone; and from March 2, 2009, is operating under a limited maintenance plan for Carbon Monoxide (CO), and thus not required to perform regional emissions modeling for CO.

40 CFR 93.110: Latest Planning Assumptions

This criteria states that the conformity determination must be based upon the most recent planning assumptions in force at the time of the conformity determination. Key assumptions include population and employment forecasts for the 454 transportation analysis zones (TAZs) over which the transportation network of the 2023-2050 MTP is defined. This conformity analysis uses the most current projections of 2022 to 2050 population and employment as prepared by SKATS and reviewed by the SKATS TAC (see response to 40 CFR 93.106). Allocations were made to transportation analysis zones in consultation with the individual jurisdictions and coordinated with the SKATS Land Use Subcommittee. Housing, population, and employment forecasts and allocations reflect local development, redevelopment, and infill plans for mixed-use nodes, known projects currently in the planning process, and the availability of vacant, buildable land by current plan designation.

Transit service is assumed to change during the life of the MTP. Current transit service is a mix of corridors with frequent service and connector-like service with less frequent service, with service on Saturdays and Sundays. There is a central transit center in downtown Salem where the majority of bus routes meet, and smaller transit stations in West Salem and Keizer, with a third in the planning stages for South Salem (construction is likely in the next two years). Longer term, an additional transit station is planned for East Salem at a location on the Chemeketa Community College campus. The Transit District reviews fares every two years and links them to an expected farebox rate of return but keeps the increases as small as possible and retain discounts for bus passes. In September 2022 fares for people under 18 years old were set to zero under a partnership with the cities of Keizer and Salem. It is hoped to keep this in place after the initial year trial period. A soon-to-be-implemented project will allow for eTickets and fare capping.

Salem Area Mass Transit District's website and staff provided historical and current ridership numbers. Cherriots ridership grew from 2.7 million trips in 1990 to over 4.3 million in 2000, increasing further to over 5 million riders for the first time in 2003 and peaked at 5.54 million in 2006. Ridership since 2006 have shown decreases every year, which can be partially attributable to service cuts (including removing Saturday service in 2009), fare increases, the regional/national economy (either the Great Recession in 2007-2010 or cheap fuel in 2014 onwards). Ridership in 2021 (the latest available from the National Transit Database) was approximately 1.8 million trips, which represents the impact of the COVID-19 pandemic and reduced service. The introduction of Sunday service in September 2021 had little impact on total ridership¹³.

There are no required TCMs for the SKATS area.

40 CFR 93.111: Latest Emissions Model

As of March 2, 2009, SKATS is not required to perform regional emissions modeling as part of the conformity process. Thus, no modeling was performed as part of this amendment.

¹³ In the fall of 2022, SAMTD introduced free fares for riders under the age of 18. This resulted in increasing ridership in the last three months of 2022 compared to 2021.

OAR 340-252-0060 and 40 CFR 93.112: Consultation

The SKATS MPO must make conformity determinations according to the interagency consultation procedures in OAR 340-252-0060 and according to the public involvement procedures established in OAR 340-252-0060 and 23 CFR Part 450.

Based on consultation conducted for the SKATS FY 04-FY 07 TIP amendment in December 2004, it was agreed that early consultation via e-mail was preferred by the MPO and state and federal agencies. This has been followed for all the subsequent consultations to date.

For this update, a draft copy of the AQCD and the project list was sent to air quality staff specialists at FHWA, FTA, EPA, ODOT and DEQ on January 17, 2023, for review. An interagency consultation with staff from the aforementioned agencies took place on February 15, 2023, focusing primarily on the project list. See **Appendix 3** for the meeting notes. The draft copy of the AQCD and appendices were available for public review and comment during the public review period of the SKATS FY 2024-2029 Transportation Improvement Program (TIP) which took place between March 28, 2023, and May 12, 2023. The public could download the draft AQCD from the Mid-Willamette Valley Council of Governments website or read a copy at the Salem Public Library or the Keizer Community Library. The availability of the document was discussed, and the contents briefly summarized at each of the public involvement events that took place (please see **Appendix D** of the SKATS FY 2024-2029 TIP for a complete list). Adoption of this document by the SKATS Policy Committee took place on May 23, 2023.

40 CFR 93.113: Timely Implementation of TCMs

There are no TCM requirements in the SKATS non-attainment area.

40 CFR 93.114: Currently conforming transportation plan and TIP

The SKATS 2019-2043 RTSP was adopted on May 28, 2019 and conformed on March 2, 2020 (*see USDOT letter included in AQCD Appendix 2*). The FY 2021-2026 TIP was adopted on May 26, 2020, amended on August 24, 2021, and conformed by USDOT on October 28, 2021. The SKATS 2023-2050 RTSP and the associated AQCD is scheduled for adoption on the same day as the FY 2024-2029 TIP and this AQCD.

Only one conforming transportation plan or TIP may exist in an area at any time; conformity determinations of a previous transportation plan or TIP expire once the current plan or TIP is found to conform by DOT.

40 CFR 93.115: Projects from a Plan and TIP

Projects in the TIP are either drawn from the RTSP or are consistent with the policies and purpose of the plan and will not interfere with other projects specifically within the plan. Typically, TIP projects not in the RTSP are pavement rehabilitation/resurfacing projects.

AQCD Appendix 2

- a) Meeting notes from the Interagency Consultation that took place on February 15, 2023.

Virtual Meeting via Teams

Attendees – Federal State Agency Representatives

- LILJENWALL Natalie Natalie.LILJENWALL@odot.oregon.gov
- Ned.Conroy@dot.gov
- Jasmine Harris jasmine.harris@dot.gov Not present, but sent questions beforehand
- WILLIAMS Karen * DEQ Karen.WILLIAMS@deq.oregon.gov
- Vaupel, Claudia Vaupel.Claudia@epa.gov
- MAHER John D John.D.MAHER@odot.oregon.gov Only there to introduce Jessica
- Jessica Virrueta ODOT STIP
- Dan Fricke, ODOT Region 2 SKATS Liaison (outgoing)
- Brandon Williams, ODOT Region 2 SKATS Liaison (incoming)
- DERRICKSON Hope Hope.DERRICKSON@odot.oregon.gov
- thomas.w.parker@dot.gov FHWA Oregon environmental lead
- Daniel Burgin ? Listed in the TEAMS attendees, but I don't recall being present

Attendees – SKATS Staff

- Karen Odenthal: TIP Coordinator (outgoing)
- Steve Dobrinich: TIP Coordinator (incoming)
- Ray Jackson: MTP & AQCD Lead

Agenda

- Review the project lists for the SKATS 2023-2050 MTP and 2024-2029 TIP for the exempt/non-exempt category assigned by SKATS staff
- Clarification of whether projects are exempt/non-exempt
- Feedback on the draft AQCDs for the MTP and TIP
- Other Issues

The question sent by SKATS staff prior to the meeting:

One question for the IAC members is on the TIP projects, from Karen:

Here is the list of proposed SKATS FY 2024-2027 TIP projects, plus a couple that have illustrative years. I added a tab for exempt projects. It is unclear if KN 13188, OR22: Rickreall Rd to Doaks Ferry Rd NW is exempt or non-exempt. The description: "Evaluation of corridor safety improvements, undertake environmental investigations to reach NEPA classification, develop design to design acceptance package (DAP), conduct ROW and utility surveys, and purchase ROW." There is no construction phase funded at this time. I recommend asking the consultation group whether we should consider it exempt or non-exempt.

Notes:

There was discussion on Center Turn Lanes (CTL) and whether these add capacity to a road and why SKATS staff considers them non-exempt (Reasoning is, if AQ modeling was performed, the presence of a CTL results in the modification of the capacity for the link. This would need to be known to be included in the model). **The group agreed** to consider projects with CTLs as non-exempt.

Discussed the questions that Jasmine had sent before the meeting, clarified the descriptions for several of these projects (see below for details – answers were also emailed to the group prior to the meeting due to Jasmine’s absence).

OR22W Rickreall to Doaks Ferry – As shown above, SKATS staff had a question of whether a project or a phase should be used for purpose of exempt/non-exempt determination. The project has funding for PE/ROW but not Construction. **The group agreed** to consider this as non-exempt as it will eventually lead to a construction project, and this will not require a subsequent AQCD.

Natalie mentioned that she considers a project that is going to NEPA to be non-exempt. SKATS staff mentioned that they will encourage project submissions to include more information on the actual project, especially for the TIP. “Improvements” is too vague and does not adequately explain what is proposed to be built.

No comments were received for the AQCD documents themselves. Ray asked the group to **review the draft AQCDs and provide any comments by March 28, 2023.**

At the end, the members of the IAC agreed to the designations of the TIP projects as provided, with the modification for the OR22W Rickreall to Doaks Ferry project to be considered as non-exempt. **Those voting in favor were: Ned (FTA), Thomas (FHWA), Claudia (EPA), Karen Williams (DEQ). Natalie concurred for ODOT.**

Questions prior to the SKATS AQCD IAC

Clarifications from Janelle (Marion County Public Works) ----

Hollywood Dr: Salem City Limits to Silverton Rd NE - M024 - Widen to collector standards and add new signal at Hollywood Dr at Silverton Rd. (combined with M032).

Construct bicycle and pedestrian improvements and add left turn refuge and signal at intersection with Silverton Road to increase safety. (Marion County PW)

Lone Oak Rd SE at Rees Hill Rd SE - S376 - Design and RoW acquisition for intersection modifications that include a lengthened left-turn lane and an acceleration lane on Rees Hill Rd SE.

Basically, this is a new intersection being built associated with development. Lone Oak is a collector street in Salem TSP. Development is required to build it. The actual intersection is in Marion County. Due to sight distance, Marion County is requiring an acceleration lane so cars turning off of Lone Oak onto Rees Hill eastbound have room to get up to speed since this is a 55 mph county road. City is participating because Marion County requirements require off-site acquisition to accommodate the length of the turn lane. (Salem PW)
Cordon Road at Center Street: Intersection Modifications – M091 - Modifications to the intersection including upgrading the signal. Assumes 50 percent developer funded. M046 has roadway modifications.

Modifications will be necessary to accommodate upgrading the signal and adding travel lanes. (Marion County PW)

Delaney Rd: Battle Creek SE to Turner - M022 - Widen road to county arterial standards

Widens the roadway from existing 22' width to meet AASHTO standards for pavement width (remains 2 travel lanes) and accommodate the large percentage of truck traffic, while also provide standard shoulder widths to increase safety for pedestrians, and bicycles. (Marion County PW)

Note: This project is outside of the SKATS Air Quality Boundary

Questions from Jasmine ---

Have any of the projects in the MTP or TIP list been determined exempt or nonexempt previously through the IAC process?

Maybe. The local projects in the TIP have not changed since the last update. There are new ODOT projects in the TIP. The Ex/NEx determination was made for (all/some of?) those in 20xx.

The MTP projects have never been reviewed by the IAC for Ex/NEx status – it was never a question/request before.

There are several projects listed as nonexempt, please confirm that the classifications is accurate for all of them. Some seem to fall under exempt, see examples below:

McGilchrist St SE: 12th St SE to 25th St SE; Final design and construction for McGilchrist Complete Street project to improve safety for all users and reduce flooding.

Project includes center turn lane which adds capacity. If we were performing AQ conformity modeling that would be non-exempt as it would be included in the model.

Center St.: Lancaster Dr. to 45th Pl. NE; Design the interim and long-term widening of Center St. east of Lancaster Dr. to 45th Pl NE, and construction of the interim improvements on the north side including center turn lane, bike lanes and sidewalks to increase safety. Update existing crossing located at Center St. & 45th Pl NE.

Project includes center turn lane which adds capacity. If we were performing AQ conformity modeling that would be non-exempt as it would be included in the model.

Delaney Rd: Battle Creek Bridge; Replace the existing bridge on Delaney Road over Battle Creek. Project includes various intersection and roadway improvements to improve traffic flow and safety. Didn't this project already go through the AQCD process already, and handled as a nonexempt project? Or is this a different project? Are the "various intersection and roadway improvements" at the immediate entrances to this bridge? Will this project increase traffic, or simply smooth traffic flow?

It is likely this project was reviewed as part of the previous update to the TIP.

Project is outside of the SKATS AQ boundary.

One project was flagged as "unknown," pending the IAC discussion seems like this project could be exempt. OR22: Rickreall Rd to Doaks Ferry Rd NW; Evaluation of corridor safety improvements, undertake environmental investigations to reach NEPA classification, develop design to design acceptance package (DAP), conduct ROW and utility surveys, and purchase ROW.

Discussion with the IAC was to address these projects in the TIP when only one phase is funded. Is the E/NE determination on the project or the phase?

AQCD Appendix 3

- a) List of projects in the SKATS FY 2024 – 2029 TIP (Excel format) (Not Included in this document – It is the same as **Table 11** in this document)