



**U. S. DEPARTMENT OF TRANSPORTATION**

FEDERAL HIGHWAY ADMINISTRATION  
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**FEDERAL TRANSIT ADMINISTRATION**

915 SECOND AVENUE, SUITE 3142  
SEATTLE, WA 98174

Date: January 8, 2020

Reply To: HPR-ID/710.1

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

Dear Mr. Ness:

**Subject: 2020-2023 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 (ITD's) 2020 - 2023 Statewide Transportation Improvement Program (STIP), submitted on November 27, 2019 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 2020-2023 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 2020-2023 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 2020, 2021, 2022, and 2023;
- 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 which are not air quality exempt or neutral are subject to conformity determination requirements;
- only the projects listed for FY's 2020 through 2023 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 proposed 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 2020-2023 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 further explanation of this this approval, please contact Mr. Scott Frey, FHWA – Idaho at (208) 334-9180, extension 115 or Ned Conroy, FTA Region 10 at (206) 220-4318.

Sincerely yours,

**PETER J  
HARTMAN** Digitally signed by  
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Peter J. Hartman  
Division Administrator  
Federal Highway Administration

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Linda M. Gehrke  
Regional Administrator  
Federal Transit Administration

## ATTACHMENT A

### A Federal Planning Finding For The Idaho Transportation Department's 2020-2023 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 required 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 reflects both our assessment of progress made by the State on recommendations and correction actions from the previous Federal Planning Finding and our observations and experiences during FY-18 in the oversight and administration of Idaho's transportation program.

#### **Progress On 2019 Recommendations:**

The Planning Finding for the 2019 STIP did not identify any corrective actions; however, the following comments and recommendations for improvement were proposed:

1. Performance Management Implementation:  
The 2020 STIP and TIPs should provide further explanation of how these programs will support ITD's attainment of its statewide performance targets per 23 CFR 450.218 and 450.326. *ITD and the MPOs have coordinated to address the statewide performance targets. Continued work is still needed.*
2. Air Quality Conformity:  
The 2020 TIP Conformity Determinations by COMPASS and BTPO should reflect the EPA Region 10's comments on the 2019 Conformity Determinations for those two areas. *This recommendation was addressed and resolved.*

## **2020 Corrective Actions and Recommendations:**

The Planning Finding for the 2020 has identified the following two corrective actions and recommendation:

### **Corrective Actions**

1. KMPO's MTP Status:

The Metropolitan Transportation Plan (MTP) for the Kootenai Metropolitan Planning Organization (KMPO) exceeds the update cycle of at least every five years as specified per 23 CFR 450.324(d). A satisfactory update and adoption of the KMPO MTP will be considered a prerequisite to future Federal approval of STIP/TIP updates for the KMPO Planning Area beyond the 2020 STIP/TIP submittal.

2. TPM Coverage in the KMPO and BMPO TIPs:

The TIPs for the Kootenai Metropolitan Planning Organization and the Bonneville Metropolitan Planning Organization do not adequately address the Federal Transportation Performance Management (TPM) requirements and expectations of 23 CFR 450.326(d). Satisfactory coverage of this subject will be a requirement for Federal approval of STIP/TIP updates beyond the 2020 STIP/TIP submittal (See Attachment B).

### **Recommendation**

Oversight of the Statewide and Metropolitan Planning Programs:

Previous Federal Planning Findings have recommended that ITD more actively coordinate with FHWA/FTA and the Idaho MPOs in the administration and oversight of Statewide and Metropolitan Planning Programs. Progress has been made in some areas, such as TMA certification review support. However, ITD should continue to expand its role in monitoring and supporting MPO planning activities, including 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.