# AGENDA

Butte County Association of Governments
Interagency Consultation Review Group Meeting

Tuesday, February 10, 2026
2:00 – 2:30 PM

Microsoft Teams Meeting
**Join the meeting now**
Meeting ID: 215 316 611 130 85
Passcode: 8hQ3gS9Q

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1. Introductions

2. Item #1 – Consultation on PM 2.5 Hot-Spot Conformity Assessment for the Eaton Road and SR 99 Southbound Ramps (Roundabout) Project in the City of Chico (CTIPS# 102-0000-0249)

BCAG
BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

326 Huss Drive, Suite 150
Chico, California 95928
(530) 809-4616 FAX (530) 879-2444

**MEMORANDUM**

DATE: February 10, 2026

TO: Interagency Consultation Review Group

FROM: Brian Lasagna, Regional Analyst

**SUBJECT: Consultation on PM 2.5 Hot-Spot Conformity Assessment for the Eaton Road and SR 99 Southbound Ramps (Roundabout) Project in the City of Chico (CTIPS# 102-0000-0249)**

**DISCUSSION:** The City of Chico is providing the following Project-level PM2.5 Conformity Analysis for the Eaton Road and SR 99 Southbound Ramps (Roundabout) Project.

**REQUESTED ACTION**

It is requested that the ICR concur that this project is not a "Project of Air Quality Concern" (POAQC). This is a Section 326 project; and as such, United States Environmental Protection Agency (EPA) and California Department of Transportation (Caltrans) concurrence with this determination is requested.

**Project Description**

The project aims to improve safety and reduce delays at the intersection of Eaton Road and SR 99 southbound on/off ramps. The City of Chico is proposing to convert the existing intersection of Eaton Road at the SR 99 southbound on/off ramps to a modern four-legged multilane roundabout. The project has been determined to best meet the safety needs for all modes of travel, while addressing future mobility needs.

**ADDITIONAL INFORMATION**

**Project Summary Form**

Included for the ICRs information is a technical memorandum and completed PM Conformity Hot Spot Analysis Project Summary form for the Eaton Road and SR 99 Southbound Ramps (Roundabout) project in the City of Chico (CTIPS# 102-0000-0249).

**STAFF REQUEST:** It is requested that the ICR concur that this project is not a "Project of Air Quality Concern" (POAQC). This is a Section 326 project; and as such, United States Environmental Protection Agency (EPA) and California Department of Transportation (Caltrans) concurrence with this determination is requested.

# Technical Memorandum

**December 9, 2025**

| | | | |
|---|---|---|---|
| **To** | Marta Martinez-Topete, Caltrans District 3 | | |
| **Copy to** | Tracy R. Bettencourt, Mike Cook & Jesse Hudson, City of Chico | | |
| **From** | Chryss Meier, GHD | | |
| **Project Name** | Eaton Road and SR 99 Southbound Ramps Project | **EA#** | 03-3J270 |
| **Subject** | Interagency Consultation for Project of Air Quality Concern (POAQC) Coordination | | |

## 1. Introduction

Caltrans District 3 Environmental has requested this memorandum in support of an Interagency Consultation (IAC) request for a Project of Air Quality Concern (POAQC) determination for the Eaton Road and State Route 99 Southbound Ramps Project (EA 03-3J270). The City requests that the Interagency Consultation Partners concur that the proposed project is not a POAQC.

## 2. Project Overview

### 2.1 Project Location

The project is in the northwest section of the City of Chico, Butte County, California. The project is located at the intersection of Eaton Road and the SR 99 southbound ramps at post mile R36.3. The site is in Section 9, Township 22 North, Range 1 East, of the Mount Diablo Base and Meridian, at approximately North Latitude 39.7760 and West Longitude -121.8721.

### 2.2 Environmental Setting

The project is situated within an urbanized/suburban area with surrounding residential and commercial properties. Regional access to the site is provided by SR 99, with local access from Eaton Road. SR 99 is a north-south highway that spans the Central Valley. Eaton Road is a two-lane east-west arterial extending from the western City limits to East Avenue/Wildwood Avenue, approximately 4.5 miles east of the project site. On the east side of the SR 99 interchange, the northbound on and off ramps are served by a recently constructed five-legged roundabout. The project is located within the Butte County PM2.5 Maintenance Area, meaning the area is designated as in attainment of the Federal PM2.5 ambient air quality standard, but with a maintenance plan in effect. The area is designated as attainment for the Federal PM10 ambient air quality standard.

### 2.3 Project Description

The project aims to improve safety and reduce delays at the intersection of Eaton Road and the SR 99 southbound on/off ramps. The City of Chico is proposing to convert the existing intersection of Eaton Road at the SR 99 southbound on/off ramps to a modern four-legged multilane roundabout. The project has been determined to best meet the safety needs for all modes of travel, while addressing future mobility needs.

### 2.3.1 Alternative 1 - Programmable Project Alternative - Roundabout

This alternative will replace the existing intersection at Eaton Road and the SR-99 southbound on/off ramps with a roundabout designed to handle the Design Year traffic forecast volumes projected for 2045. This would ease traffic congestion by introducing a traffic-calming circulation pattern, and improve pedestrian and bicycle safety within and adjacent to the intersection. Local circulation and access will remain unchanged. This alternative includes the following street improvements:

- A yield-control roundabout with modified lane geometrics, curb, gutter, ramps, sidewalk, and streetlights.
- Widened and realigned intersection approaches for roundabout entrances and exits.
- A widened portion of Eaton Road near Constitution Drive to accommodate traffic lane reconfigurations, including the extension of an existing box culvert beneath Eaton Road.
- Removal and replacement of existing mainline hot mix asphalt (HMA) pavement within the roundabout limits.
- HMA overlay on the approaches to the roundabout and within the roundabout limits.
- Restriping of Eaton Road.
- Realignment and reconstruction of the southbound on-off ramps.
- Americans with Disabilities Act (ADA) compliant curb ramps and two-stage pedestrian crossings with pedestrian refuges.
- A buffered 10-foot wide pedestrian and bicycle shared use path through the new roundabout and along a maintenance path north of the roundabout.
- Two pre-cast pedestrian bridges, approximately 14 feet wide and approximately 30 to 50 feet long, clear spanning a Shasta Union Drainage Assessment District ditch.
- Adjusted utility vaults and manholes to match final pavement surface elevations along Eaton Road.
- Modified existing drainage facilities and storm water quality treatment facilities to ensure proper treatment and drainage.
- Minor frontage improvements to one adjacent parcel to construct a shared-use-path connecting to existing sidewalk and bike lanes along Eaton Road west of the intersection. This work would primarily be conducted through a Temporary Construction Easement, but may also require pedestrian and landscape easements to formalize City ownership and facilitate the expansion of pedestrian facilities. The project may also require re-designation of land owned by the City for an adjacent drainage channel for use as roadway right-of-way.

### 2.3.2 Alternative 1b - Traffic Signal Variant (Considered but Rejected)

Based on the Intersection Control Evaluation (ICE) completed for the project in 2022, a signalized alternative was determined to be cost prohibitive compared to the Roundabout Alternative, given that both alternatives adequately addressed the operational purpose and need for the project. The Signal Alternative included adding a westbound through lane and extending the left turn pocket to 400 feet, and widening the overcrossing to allow for these modifications. A westbound receiving lane was also added, along with Class II Bicycle lanes and 6-foot sidewalks on both sides of Eaton Road. With the high construction costs related to the structure widening and lower safety benefit compared to the Roundabout Alternative, the Signal Alternative had a Life Cycle Benefit/Cost Ratio of 0.6, indicating poor return on investment for the City. Therefore, it is not considered a feasible alternative and is not recommended.

### 2.3.3 Alternative 2 - No Build Alternative

The No Build Alternative would leave the existing lane geometrics and intersection controls in place, without a roundabout. Under existing conditions, the intersection of Eaton Road has a stop control on the State Route 99 southbound off ramp leg. The No Build Alternative does not meet the project purpose and need; therefore, it is not recommended.

# 3. Regulatory Setting

The Transportation Conformity requirement is based on Federal Clean Air Act Section 176(c), which prohibits the U.S. Department of Transportation (USDOT) and other federal agencies from funding, authorizing, or approving plans, programs, or projects that do not conform to the State Implementation Plan (SIP) for attaining the National Ambient Air Quality Standards (NAAQS).

Transportation Conformity applies to highway and transit projects and takes place on two levels: the regional (planning and programming level) and the project level. The proposed project must conform at both levels to be approved.

Conformity requirements apply only in nonattainment and maintenance (former nonattainment) areas for the NAAQS, and only for the specific NAAQS that are or were violated. The U.S. EPA regulations at 40 CFR 93 govern the conformity process. Conformity requirements do not apply in unclassifiable/attainment areas for NAAQS and do not apply at all for state standards regardless of the status of the area.

At the project level, transportation conformity determinations ensure that all federally supported transportation projects are consistent with an area's implementation plan to achieve or maintain NAAQSs. This project is in Butte County PM2.5 Maintenance Area.

## 3.1 Regional Conformity

The project is identified by the relevant transportation plans as an intersection channelization project. Under 40 CFR 93.127 Table 3, intersection channelization projects are exempt from the requirement for a regional emission analysis.

## 3.2 Project-Level Conformity (Hot-Spot)

The project is located in an area that is designated as a maintenance area for PM 2.5. According to the Environmental Protection Agency (EPA) Transportation Conformity Guidance, a PM 2.5 hot-spot analysis is required for Projects of Air Quality Concern (POAQC) in non-attainment and maintenance areas (40CFR 93.123 (b) (1)). Projects that are exempt from conformity per 40 CFR 93.126 Table 2 or not POAQC do not require hot-spot analysis.

# 4. Land Uses and Traffic Data

## 4.1 Land Uses

The project is situated within an urbanized/suburban area in the northwestern portion of the City of Chico, Butte County, California. Surrounding land uses include single-family residential homes, commercial and office land uses, and a theatre company. Two commercial land uses on the north side of Eaton Road are served by driveways located approximately 425 feet west of the existing SR 99 southbound ramp intersection.

The nearest location of sensitive receptors includes residences located approximately 50 feet west of the project environmental study area, west of the SR 99 SB exit ramp, approximately 130 feet west of the edge of travel lanes. However, the distance between sensitive receptors and the edge of travel lanes would not substantially change between the No Build Alternative and Build Alternative. Attached Figure 1 shows the environmental study area footprint of the project. Attached Figure 2 shows the proposed project geometry.

## 4.2 Traffic Data

This alternative will replace the existing intersection at Eaton Road and the SR-99 southbound on/off ramps with a roundabout designed to handle the Design Year traffic forecast volumes projected for 2045. This would ease traffic congestion by introducing a traffic-calming circulation pattern, and improve pedestrian and bicycle safety within and adjacent to the intersection.

The No Build and Build AADT and Truck AADT were forecasted using the methodology described in the Eaton and SR 99 Southbound Ramps Intersection Control Evaluation (ICE) prepared by GHD in 2022. The analysis was further updated in 2024 to present findings for a 2026 Opening Year and 2045 Design Year (GHD 2024, GHD 2022). The Truck percentage was 2% for all existing and future scenarios, so the Truck AADT is simply 2% of the intersection AADT. The detailed No Build and Build AADT and Truck AADT are provided in Table 1. As shown in the table, the Build Alternative will improve the Level of Service (LOS) compared to the No Build Alternative. The detailed AADT and Truck AADT for the intersection cross-streets are provided for a 2026 Opening Year and 2045 Design Year in Table 2 and Table 3, respectively.

*Table 1 Summary of Project AADT and Truck AADT at Opening Year 2026 and RTP Year 2045*

| Scenario | Time Unit | Opening Year | Horizon Year |
|---|---|---|---|
| | | 2026 | 2045 |
| **Level of Service** | | | |
| No Build Alternative | AM Peak Hour | F | F |
| | PM Peak Hour | F | F |
| Build Alternative | AM Peak Hour | A | B |
| | PM Peak Hour | A | B |
| Change in LOS under Build Alternative | AM Peak Hour | Improved | Improved |
| | PM Peak Hour | Improved | Improved |
| **AADT** | | | |
| No Build Alternative | Daily | 30,450 | 44,350 |
| Build Alternative | Daily | 30,450 | 44,350 |
| Change in AADT | Daily | 0 | 0 |
| **Fleet Mix (% Truck)** | | | |
| No Build Alternative | N/A | 2% | 2% |
| Build Alternative | N/A | 2% | 2% |
| Change in Fleet Mix | N/A | 0% | 0% |
| **Truck AADT** | | | |
| No Build Alternative | N/A | 609 | 887 |
| Build Alternative | N/A | 609 | 887 |
| Change in AADT | Daily | 0 | 0 |

*Table 2 Summary of Project Cross-Street AADT and Truck AADT at Opening Year 2026*

| Scenario | Cross-Street Legs | | | |
|---|---|---|---|---|
| | SB Off Ramp (North Leg) | SB On Ramp (South Leg) | Eaton Road | |
| | | | East Leg | West Leg |
| **AADT** | | | | |
| No Build Alternative | 1,560 | 13,755 | 25,590 | 19,965 |
| Build Alternative | 1,560 | 13,755 | 25,590 | 19,965 |
| Change in AADT | No Change | No Change | No Change | No Change |
| **Fleet Mix (% Truck)** | | | | |
| No Build Alternative | 2% | 2% | 2% | 2% |
| Build Alternative | 2% | 2% | 2% | 2% |
| Percentage | No Change | No Change | No Change | No Change |

| Scenario | Cross-Street Legs | | | |
|---|---|---|---|---|
| | SB Off Ramp (North Leg) | SB On Ramp (South Leg) | Eaton Road | |
| | | | East Leg | West Leg |
| **Truck AADT** | | | | |
| No Build Alternative | 31 | 275 | 512 | 399 |
| Build Alternative | 31 | 275 | 512 | 399 |
| Change in AADT | No Change | No Change | No Change | No Change |

*Table 3 Summary of Project Cross-Street AADT and Truck AADT at RTP Year 2045*

| Scenario | Cross-Street Legs | | | |
|---|---|---|---|---|
| | SB Off Ramp (North Leg) | SB On Ramp (South Leg) | Eaton Road | |
| | | | East Leg | West Leg |
| **AADT** | | | | |
| No Build Alternative | 2,700 | 19,190 | 36,835 | 29,225 |
| Build Alternative | 2,700 | 19,190 | 36,835 | 29,225 |
| Change in AADT | No Change | No Change | No Change | No Change |
| **Fleet Mix (% Truck)** | | | | |
| No Build Alternative | 2% | 2% | 2% | 2% |
| Build Alternative | 2% | 2% | 2% | 2% |
| Change in Percentage | No Change | No Change | No Change | No Change |
| **Truck AADT** | | | | |
| No Build Alternative | 54 | 398 | 737 | 585 |
| Build Alternative | 54 | 398 | 737 | 585 |
| Change in AADT | No Change | No Change | No Change | No Change |

# 5. Findings

## 5.1 Transportation Conformity

### 5.1.1 Regional Conformity

Under 40 CFR 93.127 Table 3, intersection channelization projects are exempt from the requirement for a regional conformity analysis. The Butte County Association of Governments (BCAG) has identified the project as exempt from regional emissions analysis as follows:

**2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)**

- Eaton Road/SR 99 Southbound Roundabout. Convert the existing intersection of the State Route 99 southbound off- and on-ramps at Eaton Road into one four-leg, multi-lane roundabout.

**2024 RTP/SCS Appendix A, BCAG Exempt Project Listing – 2024 RTP & 2025 FTIP**

- SR 99 – In Butte County, SR 99 at Eaton southbound ramp intersection: Channelization Improvements.

**Transportation Conformity Rule – Exempt Reference:**

- Section 93.127, Table 3, Projects Exempt from Regional Emissions Analysis: Intersection signalization projects at individual intersections.

### 5.1.2 Project-Level Conformity (Hotspot)

The project meets the criteria for projects that are not of air quality concern, as well as EPA's guidance on PM2.5 hotspot analysis, which states:

> *The following are examples of projects that are not an air quality concern under 40 CFR 93.123(b)(1)(i) and (ii):*
>
> - *Intersection channelization projects, traffic circles or roundabouts, intersection signalization projects at individual intersections, and interchange reconfiguration projects that are designed to improve traffic flow and vehicle speeds, and do not involve any increases in idling. Thus, they would be expected to have a neutral or positive influence on PM2.5 or PM10 emissions. (EPA 2006)*

According to the project's ICE Report, the project is estimated to have a beneficial effect on traffic flow, which would improve intersection operations and reduce queuing (GHD 2022). At Year 2040, the project intersection would operate at LOS F under No Build conditions. However, the Year 2040 Build conditions would improve the project intersection operations to LOS A. The updated analysis shows that the intersection is projected to operate at LOS A in the AM and PM peak hours in 2026 (Updated Open Year). The intersection is projected to operate at LOS B in the AM and PM peak hours in 2045 (Updated Design Year).

The roundabout is designed to improve traffic flow and vehicle speeds, and would not increase idling. The project is not capacity-enhancing, and the truck percentage would remain the same (2 percent of fleet mix) with and without the project at opening year and horizon year.

## 5.2 No Impact to Sensitive Receptors

The California Air Resources Board (CARB*) Air Quality and Land Use Handbook: A Community Health Perspective* (Land Use Handbook) provides CARB's recommendations regarding the siting of new sensitive land uses near facilities that are associated with health risks, particularly from air toxic emissions. The Land Use Handbook offers siting guidance for freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities. Although this guidance is for siting new locations of sensitive receptors, the facility distance and size guidance may be used as a screening level to identify when additional analysis is warranted during environmental review.

The Land Use Handbook advisory recommendation freeways and high traffic roads is as follows:

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

The maximum AADT through the intersection (Year 2040) is estimated to be 32,650 AADT, which is approximately 33% of the freeway screening level recommended by CARB's Land Use Handbook. Therefore, the project would not exceed the CARB's screening criteria for health risk impacts.

## 5.3 Non-Capacity Increasing

The project would not increase the vehicle capacity of the roadway. The roundabout is designed to accommodate future growth projected to occur in Year 2045. The two-lane entry was designed in accordance with the Caltrans HQ Roundabout Review Criteria. The exit ramp approach was designed in accordance with Chapter 500 of the Highway Design Manual. Pedestrian accommodations are provided for the roundabout alternative, through the implementation of a 10-foot wide shared-use path that runs along the southern side of the intersection.

## 5.4 Traffic Flow Improvements

The ICE Report and associated modeling demonstrate that traffic flow would be improved (less delay) under the Build Scenario as compared to the No Build Scenario (GHD 2020). There would be improved

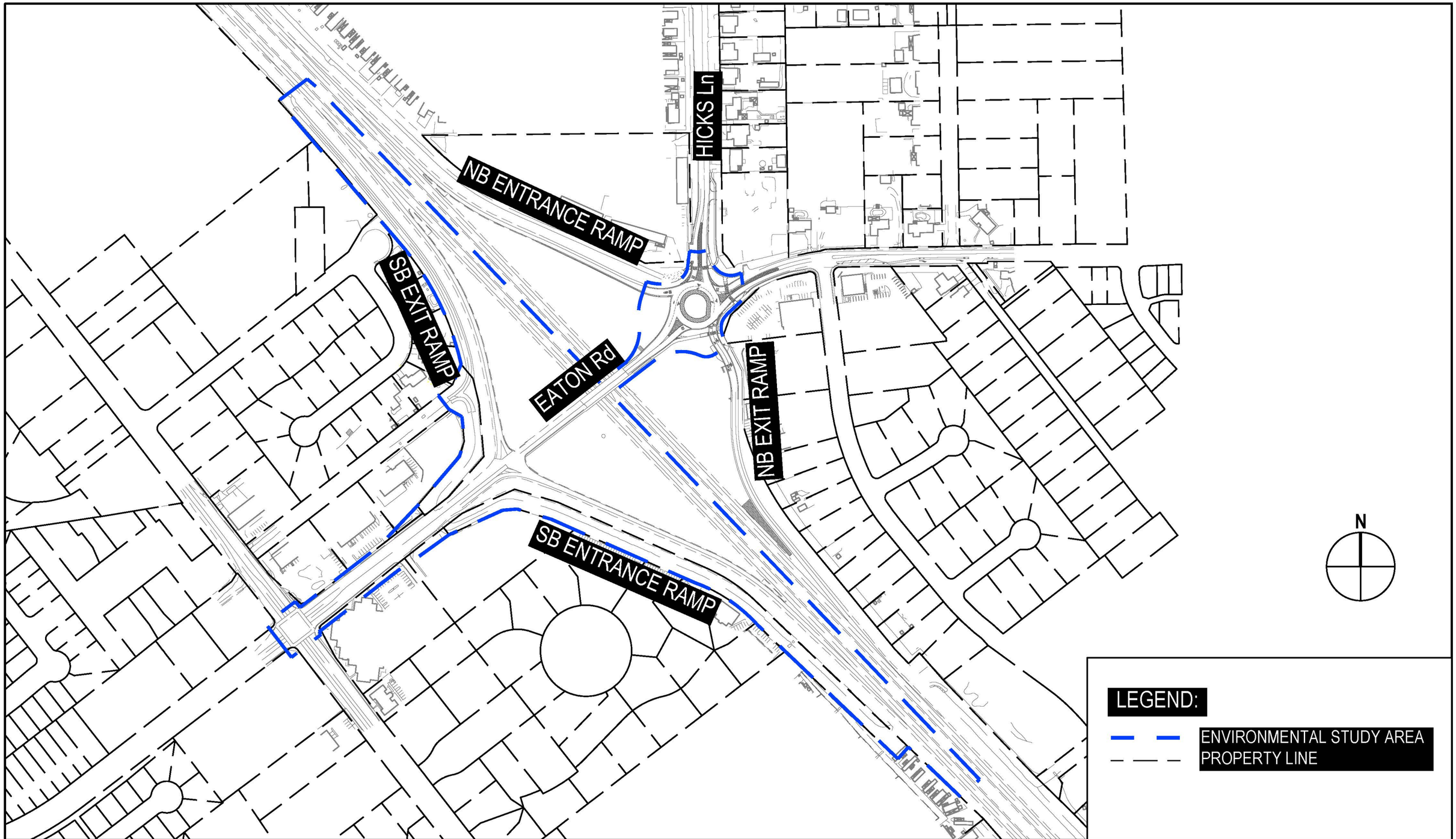
traffic flow through the intersection and an associated reduction in queuing and future idling during project operation.

# 6. References

EPA. 2006. Transportation Conformity Guidance for Qualitative Hot-spot Analyses in PM2.5 and PM10 Nonattainment and Maintenance Areas. EPA420-B-06-902. March.

GHD. 2022. Eaton and SR 99 Southbound Ramps Intersection Control Evaluation (ICE) Report. September 22.

GHD. 2024. Updated Eaton Road/SR 99 SB Ramps Roundabout Analysis Internal Memorandum. October 24.




PRELIMINARY,
SUBJECT TO CHANGE

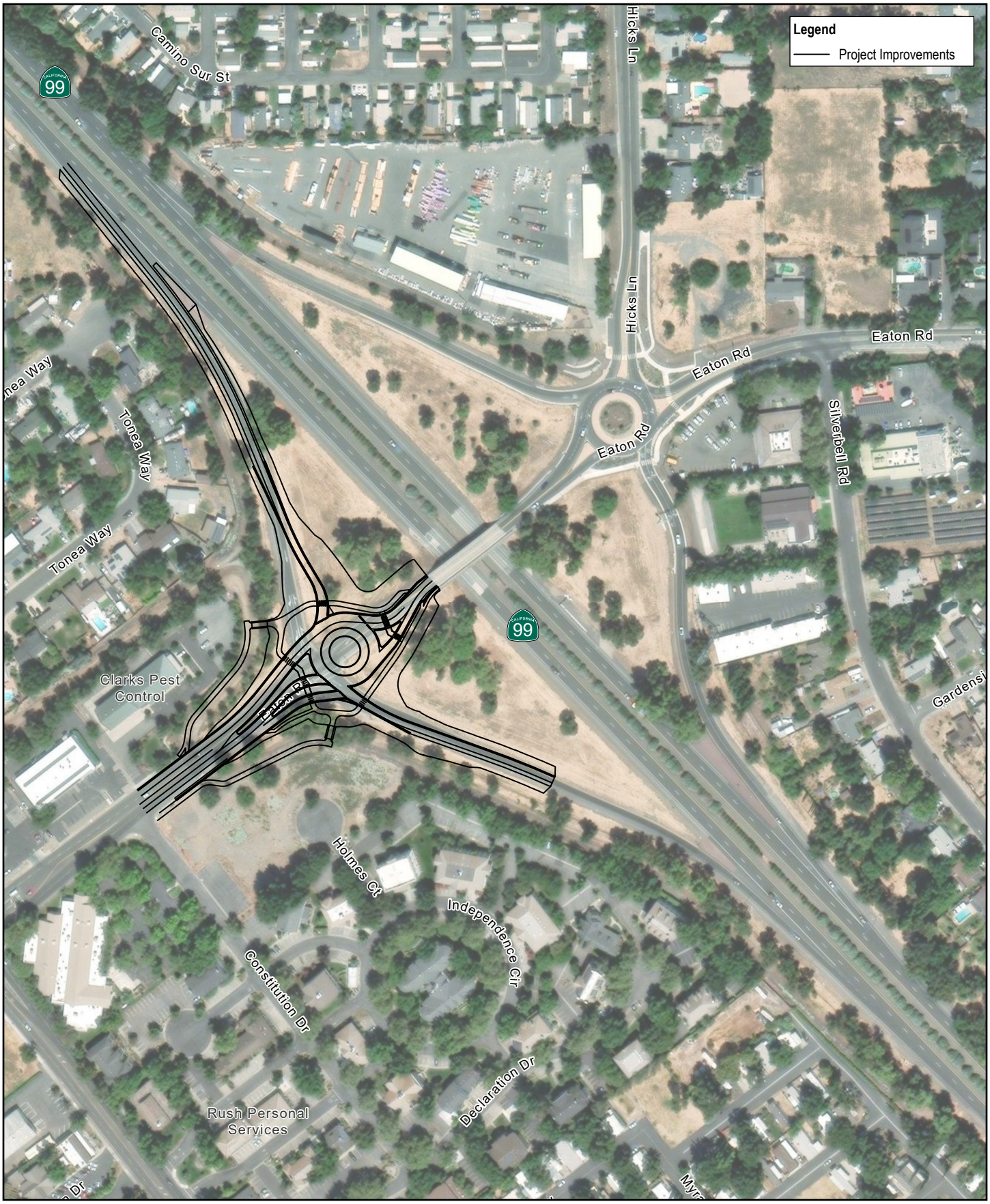
CITY of CHICO

# ROUTE 99 AT EATON ROAD SB RAMPS ROUNDABOUT
# ENVIRONMENTAL STUDY AREA

GHD
943 Reserve Drive
Roseville, CA 95678 USA
T 1 916 782 8888 W www.ghd.com

Project No.: 12620341
Date: December 2023
Scale: 1" = 300'

Filename: \\ghdnet\ghd\US\Roseville\Projects\561\12620341\Digital_Design\ACAD\Figures\12620341EX004.dwg
Plot Date: 12 December 2023 - 4:29 PM




Paper Size ANSI A

0 100 200 300

Feet

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983
Grid: NAD 1983 StatePlane California II FIPS 0402 Feet

N

GHD

**City of Chico**
**Eaton Road and SR 99**
**Southbound Ramps Project**

Project No. **12620341**
Revision No. **-**
Date **Sep 2025**

## Site Plan

# FIGURE 2

N:
\US\Azure\EastUS\12620341\GIS\Maps\Working\12620341_Chico_EatonRd_99_Ramp\12620341_Chico_EatonRd - 12620341_03_SitePlan Print date: 30 Sep 2025 - 15:51

Data source: World Imagery: Maxar, Microsoft; Reference - Full HWY Remove: . Created by: ethompson3

**CTIPS ID#** *(required)* 102-0000-0249

**ICR Consideration Date** *(requested timeframe)*

**Project Description** *(clearly describe project)*

The City of Chico proposes to transform the current intersection of Eaton Road and the State Route 99 southbound on/off ramps into a modern, four-legged multilane roundabout. The Project is designed to enhance safety for all travel modes and accommodate future mobility requirements.

**Type of Project** *(use Table 1 on page 2)*

Intersection Channelization

| **County** | **Narrative Location/Route & Postmiles** Route 99, PM R36.486 / R36.128 |
|---|---|
| Butte | **Caltrans Projects – EA#** 03-3J270 |

**Lead Agency:** City of Chico

| **Contact Person** | **Phone#** | **Fax#** | **Email** |
|---|---|---|---|
| David Giongco | (530) 879-6902 | | david.giongco@chicoca.gov |

**Federal Action for which Project-Level PM Conformity is Needed** *(check appropriate box)*

| ☑ Categorical Exclusion (NEPA) | ☐ EA or Draft EIS | ☐ FONSI or Final EIS | ☐ PS&E or Construction | ☐ Other |
|---|---|---|---|---|

**Scheduled Date of Federal Action:** March 2026

**NEPA Delegation – Project Type** *(check appropriate box)*

| ☐ Exempt | ☑ Section 6004 – Categorical Exemption | ☐ Section 6005 – Non-Categorical Exemption |
|---|---|---|

**Current Programming Dates** *(as appropriate)*

| | PE/Environmental | ENG | ROW | CON |
|---|---|---|---|---|
| **Start** | Ongoing | Ongoing | April 2026 | 2026 |
| **End** | March 2026 | June 2026 | June 2026 | 2027 |

**Project Purpose and Need (Summary):** *(attach additional sheets as necessary)*

Purpose: The purpose of the project is to improve safety and traffic operations for all travel modes at the State Route 99 southbound ramps intersection with Eaton Road. The project improves operations, reduces delay, and enhances mobility for all users (vehicles, pedestrians, and bicyclists) traveling through the intersection.

Need: With the recent completion of the northbound Eaton Road roundabout, additional congestion and potential safety issues have arisen at the existing southbound four-legged intersection with side-street stop control due to the inconsistent intersection control and close proximity between the two intersections. In addition, there are incomplete bicycle and pedestrian facilities throughout the interchange.

**Surrounding Land Use/Traffic Generators** *(especially effect on diesel traffic)*

The project is situated within an urbanized/suburban area in the northwestern portion of the City of Chico, Butte County, California. Surrounding land uses include single-family residential homes, commercial and office land uses, and a theater company. Two commercial land uses on the north side of Eaton Road are served by driveways located approximately 425 feet west of the existing SR 99 southbound ramp intersection.

**Opening Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility**

Opening Year Build: LOS A; AADT = 30,450; Truck AADT = 609 (2%)
Opening Year No Build: LOS F; AADT = 30,450; Truck AADT = 609 (2%)

**RTP Horizon Year / Design Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility**

Horizon Year Build: LOS B; AADT = 44,350; Truck AADT = 887 (2%)
Horizon Year No Build: LOS F; AADT = 44,350; Truck AADT = 887 (2%)

**Opening Year: If facility is an interchange(s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT**

Data presented as "AADT/Truck AADT (Truck Percentage)"
NL = North Leg; SL = South Leg; EL = East Leg; WL = West Leg

Opening Year Build: NL= 1,560/31 (2%); SL = 13,755/275 (2%); EL = 25,590/512 (2%); WL = 19,965/399 (2%)
Opening Year No Build: NL= 1,560/31 (2%); SL = 13,755/275 (2%); EL = 25,590/512 (2%); WL = 19,965/399 (2%)

**RTP Horizon Year / Design Year: If facility is an interchange (s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT**

Data presented as "AADT/Truck AADT (Truck Percentage)"
NL = North Leg; SL = South Leg; EL = East Leg; WL = West Leg
Horizon Year Build: NL= 2,700/54 (2%); SL = 19,910/398 (2%); EL = 36,835/737 (2%); WL = 29,225/585 (2%)
Horizon Year No Build: NL= 2,700/54 (2%); SL = 19,910/398 (2%); EL = 36,835/737 (2%); WL = 29,225/585 (2%)

**Describe potential traffic redistribution effects of congestion relief** *(impact on other facilities)*

The project is not anticipated to redistribute traffic and is not capacity-enhancing. The project's ICE Report and associated modeling demonstrate that traffic flow would be improved (less delay) under the 'with project' scenario (GHD 2022). There would be improved traffic flow through the intersection and an associated reduction in queuing and future idling during project operation. The percentage of trucks would remain the same (2 percent of fleet mix) with and without the project at opening year (Year 2026) and horizon year (Year 2045).The purpose of improving circulation in the study area includes reducing emissions, reducing collision frequency and severity, and reducing barriers to active transportation.

**Comments/Explanation/Details** *(attach additional sheets as necessary)*

The proposed project is not considered a project of air quality concern (POAQC) for the following reasons:

EPA's final rule defines the projects of air quality concern that require a PM2.5 or PM10 hot-spot analysis in 40 CFR 93.123(b)(1) as:

"(i) New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;
(ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;
(iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
(iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and
(v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM2.5 or PM10 applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

Further, the following is an example of projects that are not an air quality concern under 40 CFR 93.123(b)(1)(i) and (ii):

Intersection channelization projects, traffic circles or roundabouts, intersection signalization projects at individual intersections, and interchange reconfiguration projects that are designed to improve traffic flow and vehicle speeds, and do not involve any increases in idling. Thus, they would be expected to have a neutral or positive influence on PM2.5 or PM10 emissions.

The roundabout does not encompass any of EPA's rule definitions and is shown as an example of a project that is not an air quality concern.